

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

U.S. DISTRICT COURT  
DISTRICT OF MAINE  
PORTLAND  
RECEIVED & FILED

UNITED STATES OF AMERICA

v.

CHARLES ALLEN BARNES

No: 2:23-cr-97-JAW

2023 SEP -7 P 4:38

DEPUTY CLERK

**INDICTMENT**

The Grand Jury charges that:

**INTRODUCTION**

1. Defendant CHARLES ALLEN BARNES is a resident of Lewiston, Maine.
2. At the time of the offense alleged herein, K.T. was a neighbor of defendant, CHARLES ALLEN BARNES.
3. D.F. is a close friend of K.T. and an acquaintance of defendant CHARLES ALLEN BARNES.

**COUNT ONE**

(Interstate Communication of Threat to Injure)

4. On or about August 30, 2022, in Androscoggin County, within the District of Maine, the defendant,

**CHARLES ALLEN BARNES**

knowingly and willfully transmitted in interstate commerce a threat to injure the person of another. Specifically, defendant CHARLES ALLEN BARNES used an internet-based multimedia messaging service to transmit a recorded message to D.F., in which he stated: "I've been parked outside [K.T.'s] apartment since early this fucking morning, sis. Waiting for someone to step outside, and the first one who does is gonna

die. Just like that. I don't care if it's her kid, or her, or her boyfriend. I don't care, I don't care. I'm killing me a nigger."

In violation of Title 18, United States Code, Section 875(c).

**SPECIAL FINDING**

5. Defendant CHARLES ALLEN BARNES intentionally selected K.T. as the object of the offense described in Count One because of the actual and perceived race and color of K.T. and her son.

A TRUE BILL,

  
Assistant U.S. Attorney

**Signature Redacted – Original on file  
with the Clerk's Office**

Date: 9/7/23