UNITED STATES DISTRICT COURT EASTERN DISTRICT of TENNESSEE at CHATTANOOGA

FILED
2015 JUL - 7 P 12: 02

UNITED STATES OF AMERICA)	U.S. DISTRICT CO." EASTERN DIST. T.	
	ý	1:15-cr-	1 100
v.)		
)	Judge	
ROBERT R. DOGGART)	Magistrate Judg	e
IND	ICTMENT		

COUNT ONE

Solicitation to Commit a Civil Rights Violation

The Grand Jury charges that beginning in or about February, 2015, and continuing until in or about April, 2015, in the Eastern District of Tennessee and elsewhere, the defendant, ROBERT R. DOGGART, with the intent that another person or persons engage in conduct constituting a felony that has as an element the use, attempted use, and threatened use of physical force against the person and property of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did solicit, command, induce and endeavor to persuade such person or persons to engage in such conduct, that is, to damage and destroy religious property (a mosque), knowing the religious nature of the property, in the State of New York, in violation of Title 18, United States Code, Section 247, in violation of Title 18, United States Code, Section 373.

A TRUE BILL:

GRAND JURY FOREPERSON

WILLIAM C. KILLIAN United States Attorney

Perry H. Piper

Assistant United States Attorney

By: _

Saeed A. Mody Trial Attorney

Civil Rights Division