

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - :

CESAR ALTIERI SAYOC, :
a/k/a "Cesar Randazzo," :
a/k/a "Cesar Altieri," :
a/k/a "Cesar Altieri Randazzo," :

Defendant. :

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INDICTMENT
18 CRIM 820
18 Cr. 820

COUNT ONE
(Use of a Weapon of Mass Destruction)

The Grand Jury charges:

1. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in

furtherance of the offense, and (d) the offense, and the results of the offense, affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to George Soros in Katonah, New York.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT TWO
(Use of a Weapon of Mass Destruction)

The Grand Jury further charges:

2. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in

furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to Hillary Clinton in Chappaqua, New York.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT THREE
(Use of a Weapon of Mass Destruction)

The Grand Jury further charges:

3. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in

furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to John Brennan in Manhattan, New York.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT FOUR
(Use of a Weapon of Mass Destruction)

The Grand Jury further charges:

4. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use, a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in

furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to Robert De Niro in Manhattan, New York.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT FIVE
(Use of a Weapon of Mass Destruction)

The Grand Jury further charges:

5. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use, a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in

furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to James Clapper in Manhattan, New York.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT SIX
(Interstate Transportation and Receipt of Explosives)

The Grand Jury further charges:

6. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate an individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to George Soros in Katonah, New York.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT SEVEN

(Interstate Transportation and Receipt of Explosives)

The Grand Jury further charges:

7. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate an individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to Hillary Clinton in Chappaqua, New York.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT EIGHT

(Interstate Transportation and Receipt of Explosives)

The Grand Jury further charges:

8. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent

that it would be used to kill, injure, and intimidate an individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to John Brennan in Manhattan, New York.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT NINE

(Interstate Transportation and Receipt of Explosives)

The Grand Jury further charges:

9. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate any individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to Robert De Niro in Manhattan, New York.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT TEN

(Interstate Transportation and Receipt of Explosives)

The Grand Jury further charges:

10. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate any individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to James Clapper in Manhattan, New York.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT ELEVEN

(Threatening Interstate Communications)

The Grand Jury further charges:

11. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida

the improvised explosive device described in Counts One and Six of this Indictment to George Soros in Katonah, New York, which mailing also contained a print-out including the word "Soros" marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT TWELVE
(Threatening Interstate Communications)

The Grand Jury further charges:

12. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Two and Seven of this Indictment to Hillary Clinton in Chappaqua, New York, which mailing also contained a photograph of Clinton and members of her family marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT THIRTEEN
(Threatening Interstate Communications)

The Grand Jury further charges:

13. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a

"Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Three and Eight of this Indictment to John Brennan in Manhattan, New York, which mailing also contained a photograph of Brennan marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT FOURTEEN
(Threatening Interstate Communications)

The Grand Jury further charges:

14. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Four and Nine of this Indictment to Robert De Niro in Manhattan, New York, which mailing also contained a photograph of De Niro marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT FIFTEEN
(Threatening Interstate Communications)

The Grand Jury further charges:

15. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Five and Ten of this Indictment to James Clapper in Manhattan, New York, which mailing also contained a photograph of Clapper marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT SIXTEEN
(Illegal Mailing of Explosives)

The Grand Jury further charges:

16. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be delivered by the person to whom it was

addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another, and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts One, Six, and Eleven of this Indictment, which was addressed to George Soros in Katonah, New York.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT SEVENTEEN
(Illegal Mailing of Explosives)

The Grand Jury further charges:

17. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be delivered by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Two, Seven, and Twelve of this Indictment, which was addressed to Hillary Clinton in Chappaqua, New York.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT EIGHTEEN
(Illegal Mailing of Explosives)

The Grand Jury further charges:

18. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be delivered by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Three, Eight, and Thirteen of this Indictment, which was addressed to John Brennan in Manhattan, New York.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT NINETEEN
(Illegal Mailing of Explosives)

The Grand Jury further charges:

19. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri

Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be delivered by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Four, Nine, and Fourteen of this Indictment, which was addressed to Robert De Niro in Manhattan, New York.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT TWENTY
(Illegal Mailing of Explosives)

The Grand Jury further charges:

20. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be received by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit,

SAYOC mailed from Florida the improvised explosive device described in Counts Five, Ten, and Fifteen of this Indictment, which was addressed to James Clapper in Manhattan, New York.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT TWENTY-ONE
(Use of Explosives to Commit a Felony)

The Grand Jury further charges:

21. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly used an explosive -- to wit, the improvised explosive device that SAYOC mailed to George Soros in Katonah, New York -- to commit a felony which may be prosecuted in a court of the United States -- to wit, the offenses charged in Counts One, Six, Eleven, and Sixteen of this Indictment -- and knowingly carried such explosive during the commission of such felonies.

(Title 18, United States Code, Sections 844(h) and 2.)

COUNT TWENTY-TWO
(Use of Explosives to Commit a Felony)

The Grand Jury further charges:

22. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri

Randazzo," the defendant, knowingly used an explosive -- to wit, the improvised explosive device that SAYOC mailed to Hillary Clinton in Chappaqua, New York -- to commit a felony which may be prosecuted in a court of the United States -- to wit, the offenses charged in Counts Two, Seven, Twelve, and Seventeen of this Indictment -- and knowingly carried such explosive during the commission of such felonies.

(Title 18, United States Code, Sections 844(h) and 2.)

COUNT TWENTY-THREE
(Use of Explosives to Commit a Felony)

The Grand Jury further charges:

23. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly used an explosive -- to wit, the improvised explosive device that SAYOC mailed to John Brennan in Manhattan, New York -- to commit a felony which may be prosecuted in a court of the United States -- to wit, the offenses charged in Counts Three, Eight, Thirteen, and Eighteen of this Indictment -- and knowingly carried such explosive during the commission of such felonies.

(Title 18, United States Code, Sections 844(h) and 2.)

COUNT TWENTY-FOUR
(Use of Explosives to Commit a Felony)

The Grand Jury further charges:

24. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly used an explosive -- to wit, the improvised explosive device that SAYOC mailed to Robert De Niro in Manhattan, New York -- to commit a felony which may be prosecuted in a court of the United States -- to wit, the offenses charged in Counts Four, Nine, Fourteen, and Nineteen of this Indictment -- and knowingly carried such explosive during the commission of such felonies.

(Title 18, United States Code, Sections 844(h) and 2.)

COUNT TWENTY-FIVE
(Use of Explosives to Commit a Felony)

The Grand Jury further charges:

25. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly used an explosive -- to wit, the improvised explosive device that SAYOC mailed to James Clapper in Manhattan, New York -- to commit a felony which may be prosecuted in a court of the United States -- to wit, the

offenses charged in Counts Five, Ten, Fifteen, and Twenty of this Indictment, and knowingly carried such explosive during the commission of such felonies.

(Title 18, United States Code, Sections 844(h) and 2.)

COUNT TWENTY-SIX
**(Use of a Destructive Device During and in
Furtherance of a Crime of Violence)**

The Grand Jury further charges:

26. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the offenses charged in Counts One, Six, and Eleven of this Indictment, knowingly used and carried a destructive device, and, in furtherance of those crimes, knowingly possessed a destructive device, to wit, the improvised explosive device that SAYOC mailed to George Soros in Katonah, New York.

(Title 18, United States Code,
Sections 924(c)(1)(A), 924(c)(1)(B)(ii), and 2.)

COUNT TWENTY-SEVEN
**(Use of a Destructive Device During and in
Furtherance of a Crime of Violence)**

The Grand Jury further charges:

27. In or about October 2018, in the Southern

District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the offenses charged in Counts Two, Seven, and Twelve of this Indictment, knowingly used and carried a destructive device, and, in furtherance of those crimes, knowingly possessed a destructive device, to wit, the improvised explosive device that SAYOC mailed to Hillary Clinton in Chappaqua, New York.

(Title 18, United States Code,
Sections 924(c) (1) (A), 924(c) (1) (B) (ii), 924(c) (1) (C) (ii), and
2.)

COUNT TWENTY-EIGHT
**(Use of a Destructive Device During and in
Furtherance of a Crime of Violence)**

The Grand Jury further charges:

28. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the offenses charged in Counts Three, Eight, and Thirteen of this Indictment, knowingly used and carried a destructive device, and, in furtherance of those crimes,

knowingly possessed a destructive device, to wit, the improvised explosive device that SAYOC mailed to John Brennan in Manhattan, New York.

(Title 18, United States Code,
Sections 924(c)(1)(A), 924(c)(1)(B)(ii), 924(c)(1)(C)(ii), and
2.)

COUNT TWENTY-NINE
**(Use of a Destructive Device During and in
Furtherance of a Crime of Violence)**

The Grand Jury further charges:

29. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the offenses charged in Counts Four, Nine, and Fourteen of this Indictment, knowingly used and carried a destructive device, and, in furtherance of those crimes, knowingly possessed a destructive device, to wit, the improvised explosive device that SAYOC mailed to Robert De Niro in Manhattan, New York.

(Title 18, United States Code,
Sections 924(c)(1)(A), 924(c)(1)(B)(ii), 924(c)(1)(C)(ii), and
2.)

COUNT THIRTY
**(Use of a Destructive Device During and in
Furtherance of a Crime of Violence)**

The Grand Jury further charges:

30. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the offenses charged in Counts Five, Ten, and Fifteen of this Indictment, knowingly used and carried a destructive device, and, in furtherance of those crimes, knowingly possessed a destructive device, to wit, the improvised explosive device that SAYOC mailed to James Clapper in Manhattan, New York.

(Title 18, United States Code,
Sections 924(c)(1)(A), 924(c)(1)(B)(ii), 924(c)(1)(C)(ii), and
2.)

FORFEITURE ALLEGATION

31. As a result of committing the offenses alleged in Counts One through Ten and Counts Twenty-One through Twenty-Five of this Indictment, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28,

United States Code, Section 2461(c), any and all assets, foreign and domestic, of the defendant; any and all assets, foreign and domestic, affording the defendant a source of influence over any entity or organization engaged in planning or perpetrating said offense; any and all assets, foreign and domestic, acquired or maintained with the intent and for the purpose of supporting, planning, conducting or concealing said offense; any and all assets, foreign and domestic, derived from, involved in, or used or intended to be used to commit said offenses, including but not limited to a sum of money in United States currency representing the total amount of the defendant's assets.

32. As a result of committing the offenses alleged in Counts One through Five and Counts Eleven through Fifteen of this Indictment, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

33. As a result of committing the offenses alleged in

Counts Six through Ten and Counts Twenty-One through Twenty-Five of this Indictment, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 844(c) and 982(a)(2)(B), and Title 28, United States Code, Section 2461, (i) any and all explosive materials involved or used or intended to be used in said offenses, and (ii) any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said offenses, including but not limited to a sum of money in United States currency representing the amount of property involved in said offenses.


Substitute Assets Provision

34. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 844, 981 and 982; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

FOREPERSON 11-9-18



GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

CESAR ALTIERI SAYOC,
a/k/a "Cesar Randazzo,"
a/k/a "Cesar Altieri,"
a/k/a "Cesar Altieri Randazzo,"

Defendant.

INDICTMENT

18 Cr.

(18 U.S.C. §§ 844(d), 844(h), 875(c),
924(c), 1716(j)(2), 2332a(a)(2),
and 2.)

GEOFFREY S. BERMAN
United States Attorney.

A TRUE BILL

11-9-18