

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington  
**December 16, 2020**

WILLIAM M. McCOOL, Clerk

By  Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff

NO. CR20-222 RAJ

**INDICTMENT**

v.

JASON DESIMAS,  
JASON STANLEY,  
RANDY SMITH, and  
DANIEL DELBERT DORSON,  
Defendants.

The Grand Jury charges that:

**COUNT ONE**  
**(HATE CRIME)**

On or about December 8, 2018, in Snohomish County, within the Western District of Washington, JASON DESIMAS, JASON STANLEY, RANDY SMITH, and DANIEL DELBERT DORSON, each aiding and abetting one another, willfully caused bodily injury to T.S., a Black man, and did so because of T.S.'s actual and perceived race, by among other things, punching and kicking T.S. about the body and making racially derogatory comments about T.S.'s actual and perceived race.

1 All in violation of Title 18, United States Code, Sections 2 and 249(a)(1).

2 **COUNT TWO**

3 **(HATE CRIME)**

4 On or about December 8, 2018, in Snohomish County, within the Western District  
5 of Washington, JASON DESIMAS, JASON STANLEY, RANDY SMITH, and DANIEL  
6 DELBERT DORSON, each aiding and abetting one another, willfully caused bodily  
7 injury to J.B, by striking J.B., and did so because of T.S.'s actual and perceived race, as  
8 alleged above in Count One.

9 All in violation of Title 18, United States Code, Sections 2 and 249(a)(1).

10 **COUNT THREE**

11 **(HATE CRIME)**

12 On or about December 8, 2018, in Snohomish County, within the Western District  
13 of Washington, JASON DESIMAS, JASON STANLEY, RANDY SMITH, and DANIEL  
14 DELBERT DORSON, each aiding and abetting one another, willfully caused bodily  
15 injury to A.D, by striking A.D., and did so because of T.S.'s actual and perceived race, as  
16 alleged above in Count One.

17 All in violation of Title 18, United States Code, Sections 2 and 249(a)(1).

18 **COUNT FOUR**

19 **(FALSE STATEMENT)**

20 On or about December 5, 2019, within the Western District of Washington,  
21 JASON DESIMAS knowingly and willfully made materially false, fictitious, and  
22 fraudulent statements and representations in a matter, that is, a criminal investigation  
23 being conducted within the Western District of Washington, by and within the  
24 jurisdiction of the Federal Bureau of Investigation, an agency of the executive branch of  
25 the United States. Specifically, JASON DESIMAS falsely told a FBI Special Agent that  
26 during the assault of T.S. on December 8, 2018, neither he nor anyone else called T.S. a  
27 "n---er." In truth and in fact, as JASON DESIMAS then well knew, his statements to the  
28 FBI Special Agent were false, in that JASON DESIMAS and others called T.S. a "n---er"

1 before, during, and after the assault of T.S. on December 8, 2018, in Snohomish County,  
2 Washington.

3 All in violation of Title 18, United States Code, Section 1001.

4 **COUNT FIVE**

5 **(FALSE STATEMENT)**

6 On or about December 5, 2019, in the District of Idaho, JASON STANLEY  
7 knowingly and willfully made materially false, fictitious, and fraudulent statements and  
8 representations in a matter, that is, a criminal investigation being conducted within the  
9 Western District of Washington, by and within the jurisdiction of the Federal Bureau of  
10 Investigation, an agency of the executive branch of the United States. Specifically,  
11 JASON STANLEY falsely told a FBI Special Agent that he was not present in  
12 Washington State during the weekend of December 8, 2018. In truth and in fact, as  
13 JASON STANLEY then well knew, his statements to the FBI Special Agent were false,  
14 in that JASON STANLEY was in Washington State during the weekend of December 8,  
15 2018, when JASON STANLEY participated in the assault of T.S., J.B., and A.D. on  
16 December 8, 2018, in Snohomish County, Washington.

17 All in violation of Title 18, United States Code, Section 1001.

18 **COUNT SIX**

19 **(FALSE STATEMENT)**

20 On or about December 16, 2019, within the District of Oregon, RANDY SMITH  
21 knowingly and willfully made materially false, fictitious, and fraudulent statements and  
22 representations in a matter, that is, a criminal investigation being conducted within the  
23 Western District of Washington, by and within the jurisdiction of the Federal Bureau of  
24 Investigation, an agency of the executive branch of the United States. Specifically,  
25 RANDY SMITH falsely told a FBI Special Agent that he had bloodied his knuckles  
26 during his arrest by law enforcement on December 8, 2018. In truth and in fact, as  
27 RANDY SMITH then well knew, his statements to the FBI Special Agent were false, in  
28

1 that he had bloodied his knuckles prior to his arrest when he participated in the assault of  
2 T.S., J.B., and A.D. on December 8, 2018, in Snohomish County, Washington.

3 All in violation of Title 18, United States Code, Section 1001.

4 **COUNT SEVEN**  
5 **(FALSE STATEMENT)**

6 On or about December 5, 2019, within the District of Oregon, DANIEL  
7 DELBERT DORSON knowingly and willfully made materially false, fictitious, and  
8 fraudulent statements and representations in a matter, that is, a criminal investigation  
9 being conducted within the Western District of Washington, by and within the  
10 jurisdiction of the Federal Bureau of Investigation, an agency of the executive branch of  
11 the United States. Specifically, DANIEL DELBERT DORSON falsely told a FBI  
12 Special Agent that: (1) prior to his trip to Washington State on the weekend of December  
13 8, 2018, he believed the purpose of the trip was to attend a “punk show” and that he did  
14 not know about the annual “Martyr’s Day” memorial service for a white supremacist that  
15 was scheduled for that weekend, and (2) prior to the evening of December 7, 2018,  
16 DANIEL DELBERT DORSON did not have his own “flight jacket” (an article of  
17 clothing associated with membership in a white supremacist group) and instead was  
18 given someone’s else “flight jacket” to wear during the weekend of December 8, 2018.  
19 In truth and in fact, as DANIEL DELBERT DORSON then well knew, his statements to  
20 the FBI Special Agent were false, in that: (1) prior to his trip to Washington State on the  
21 weekend of December 8, 2018, DANIEL DELBERT DORSON was aware of and  
22 planned to attend the “Martyr’s Day” memorial service in Washington State, and (2)  
23 DANIEL DELBERT DORSON had already received and owned a “flight jacket” prior to  
24 traveling to Washington State in December 2018.


1 All in violation of Title 18, United States Code, Section 1001.

2 A TRUE BILL.

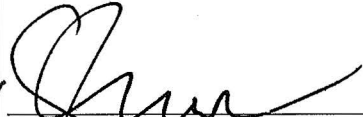
3 DATED: December 16, 2020


4 *Signature of Foreperson redacted*  
5 *pursuant to the policy of the Judicial*  
6 *Conference of the United States.*

7 FOREPERSON

8   
9 BRIAN T. MORAN  
10 United States Attorney

ERIC DREIBAND  
Assistant Attorney General

11   
12 TODD GREENBERG  
13 Assistant United States Attorney

14   
CHRISTINE M. SISCARETTI  
15 Trial Attorney  
16 Criminal Section  
17 Civil Rights Division

18   
YE-TING WOO  
19 Assistant United States Attorney