

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 21-CR-25
[18 U.S.C. § 1365(a)(1)]

STEVEN R. BRANDENBURG,

Defendant.

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

On or about December 24, 2020, in the State and Eastern District of Wisconsin,

STEVEN R. BRANDENBURG,

with reckless disregard for the risk that another person would be placed in danger of death and bodily injury, and under circumstances manifesting extreme indifference to such risk, attempted to tamper with certain vials of Moderna, Inc.'s COVID-19 vaccine, then located at 975 Port Washington Road in Grafton, Wisconsin, and such vaccine was a consumer product that affected interstate commerce.

In violation of Title 18, United States Code, Section 1365(a)(1).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about December 25, 2020, in the State and Eastern District of Wisconsin,

STEVEN R. BRANDENBURG,

with reckless disregard for the risk that another person would be placed in danger of death and bodily injury, and under circumstances manifesting extreme indifference to such risk, attempted to tamper with certain vials of Moderna, Inc.'s COVID-19 vaccine, then located at 975 Port Washington Road in Grafton, Wisconsin, and such vaccine was a consumer product that affected interstate commerce.

In violation of Title 18, United States Code, Section 1365(a)(1).

Dated: _____

1/21/2021



MATTHEW D. KRUEGER
United States Attorney