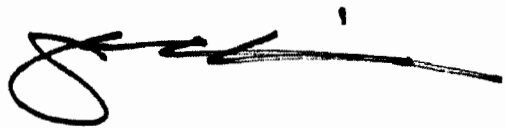


ORIGINAL



Approved:

EMIL J. BOVE III / JANE KIM
JASON A. RICHMAN / SAMUEL ADELSBERG
Assistant United States Attorneys

Before: HONORABLE KATHARINE H. PARKER
United States Magistrate Judge
Southern District of New York

18 MAG 9159

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: COMPLAINT

UNITED STATES OF AMERICA

- v. -

: Violations of 18 U.S.C.
§§ 1716, 879, 844(d), (e),
875, 111, and 2

CESAR ALTIERI SAYOC,

Defendant.

: COUNTY OF OFFENSE:
NEW YORK

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SOUTHERN DISTRICT OF NEW YORK, ss.:

DAVID BROWN, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and a member of the FBI's Joint Terrorism Task Force ("JTTF"), and charges as follows:

COUNT ONE

(Interstate Transportation of an Explosive)

1. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, the defendant, 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 individuals, and unlawfully to damage and destroy buildings, vehicles, and other real and personal property, to wit, SAYOC mailed approximately 13 packages containing improvised explosive devices ("IEDs") to certain current and former U.S. Government officials, politicians, and others, including mailings across state lines.

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

COUNT TWO

(Illegal Mailing of Explosives)

2. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, 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), to wit, the IEDs described in Count One, with intent to injure another and injure the mails and other property.

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

COUNT THREE

(Threats Against Former Presidents and Certain Other Persons)

3. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, the defendant, knowingly and willfully threatened to kill and inflict bodily harm upon a former President and a member of the immediate family of a former President, to wit, SAYOC mailed an IED to former First Lady Hillary Clinton, who resides with her husband, former President William Jefferson Clinton.

(Title 18, United States Code, Sections 879 and 2.)

COUNT FOUR

(Threatening Interstate Communications)

4. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed the IEDs described in Count One, including multiple mailings with photographs of the target-recipient marked with a red "X."

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

COUNT FIVE

(Assaulting Federal Officers)

5. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, the defendant, with the intent to commit another felony, to wit, the charges set out in Counts One through Four of this Complaint, forcibly assaulted and intimidated any person who formerly served as a person designated in Title 18, United States Code, Section 1114, to wit SAYOC mailed the IEDs described in Count One to two former Presidents, a former Vice President, former Members of the U.S. Congress, and former Executive Branch employees.

(Title 18, United States Code, Sections 111(a), 111(b), and 2.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

6. I am a Special Agent with the FBI and a member of the FBI's New York-based JTTF, and I have been personally involved in the investigation of this matter. This affidavit is based in part upon my conversations with law enforcement agents and other people, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview

7. During the course of October 2018, as further detailed below, CESAR ALTIERI SAYOC, the defendant, mailed approximately 13 IEDs through U.S. mail to certain current and former U.S. Government officials, politicians, and others, including mailings across state lines.

a. The intended targets of the defendant's IEDs included former President Barack Obama; former Vice President Joseph Biden; former Secretary of State, former Senator, former First Lady, and 2016 Presidential Candidate Hillary Clinton; former Attorney General Eric Holder; Congressperson Maxine Waters; Senator Cory Booker; former Director of the Central Intelligence Agency John Brennan; former Director of National Intelligence James Clapper; philanthropist and billionaire George Soros; and actor and director Robert De Niro.

b. Each of the 13 IEDs was largely similar in design and construction; they each consisted of approximately six inches of PVC pipe, a small clock, a battery, wiring, and energetic material.¹ Certain of the mailings included photographs of the target-recipients marked with a red "X."

c. Each of the 13 IEDs was packaged in a tan-colored manila envelope lined with bubble wrap. Each was stamped with approximately six self-adhesive postage stamps each bearing a picture of an American flag. Each envelope listed a return sender of "DEBBIE WASSERMAN SHULTZ" at a particular address in Florida ("Schultz Office-1"). Each envelope misspelled "Florida" in the Schultz Office-1 return address as "FLORIDS" rather than "FLORIDA." The return sender and the target-recipient listed on each envelope was typed in black ink on white paper.

8. As discussed below, based on initial analysis from the FBI laboratory in Quantico, Virginia (the "FBI Lab"), a latent fingerprint was detected on one of the envelopes containing an IED that was sent to Congressperson Waters and this fingerprint was identified to CESAR ALTIERI SAYOC, the defendant. In addition, there is a possible DNA association between a sample collected from a piece of the IED inside two of the envelopes containing IEDs and a sample previously collected from SAYOC.

SAYOC's Targets

9. Based on my review of publicly available information, I have learned the following, among other things:

a. Barack Obama served as President of the United States from 2009 to 2017. One of former President Obama's mailing addresses is a Post Office Box located in Washington, D.C. ("Obama Mailing Address-1").

b. Hillary Clinton served as the First Lady of the United States from 1993 to 2001, a United States Senator from approximately 2001 to 2009, United States Secretary of State from approximately 2009 to 2013, and as a nominee for President of the United States in the 2016 Presidential Election. Clinton resides

¹ Based on my conversations with other law enforcement officers and my training and experience, I understand energetic material to include explosives and material that gives off heat and energy through a rapid exothermic reaction when initiated by heat, shock, or friction.

at, among other locations, an address in Chappaqua, New York, with her husband, former President William Jefferson Clinton, who served as President of the United States from 1993 to 2001 ("Clinton Residence-1"). Certain staff members for the Clinton family operate out of a residence located in Chappaqua, New York ("Clinton Residence-2").

c. Joseph Biden served as Vice President of the United States from 2009 to 2017 under President Obama. From approximately 1973 to 2009, Vice President Biden was a member of the U.S. Senate. Former Vice President Biden resides at an address in Wilmington, Delaware ("Biden Residence-1").

d. Eric Holder served as the Attorney General of the United States from approximately 2009 to 2015 under President Obama. He is currently employed as a partner of a certain law firm, and is based out of the law firm's Washington, D.C. office ("Holder Office-1").

e. Maxine Waters serves as a member of the U.S. House of Representatives. She has served as a Congressperson since 1990. Congressperson Waters has two principal offices: one is located in Washington, D.C. ("Waters Office-1"), and one is located in Los Angeles, California ("Waters Office-2").

f. Cory Booker serves as a member of the U.S. Senate. He has served as a Senator since 2013. One of Senator Booker's offices is located in Camden, New Jersey ("Booker Office-1").

g. Kamala Harris serves as a member of the U.S. Senate. She has served as a Senator since 2017. One of Senator Harris's offices is located in Sacramento, California ("Harris Office-1").

h. John Brennan served as Director of the Central Intelligence Agency ("CIA") from approximately 2013 to 2017, under President Obama.

i. James Clapper served as Director of National Intelligence from approximately 2010 to 2017, under President Obama.

j. George Soros is a prominent U.S.-based philanthropist and billionaire. Soros resides at, among other locations, an address in Katonah, New York ("Soros Residence-1").

Soros's former spouse resides at a second address in Katonah, New York ("Soros Residence-2").

k. Robert De Niro is an American actor, producer, and director. De Niro is the co-founder of a film and television production company located at a particular address in New York, New York ("De Niro Address-1").

l. Debbie Wasserman Schultz serves as a member of the U.S. House of Representatives. She has served as a Congressperson since 2005. Congressperson Schultz has an office at a particular location in Florida ("Schultz Office-1").

SAYOC Mails 13 IEDs

The Soros Package

10. Based on my review of documents and records, my conversations with other law enforcement officers, and my involvement in this investigation, I have learned the following, among other things:

a. On or about October 22, 2018, a package containing an IED addressed to "GEORGE SOROS" was delivered via U.S. mail to Soros Residence-2 (the "Soros Package," and together with the other 12 packages described below, the "Packages").

b. The Soros Package consisted of a tan-colored manila envelope lined with bubble wrap. Approximately six self-adhesive postage stamps each bearing a picture of an American flag were stamped on the top right corner of the Soros Package. Each envelope listed a return sender of "DEBBIE WASSERMAN SHULTZ" at Schultz Office-1. Each envelope misspelled "Florida" in the Schultz Office-1 return address as "FLORIDS" rather than "FLORIDA." The return sender and the target-recipient listed on the Soros Package were typed in black ink on white paper. The return address for the Soros Package was Schultz Office-1.

c. The Soros Package was later received by personnel at Soros Residence-1. Personnel at Soros Residence-1 opened the package and, upon identifying what appeared to be an IED, called law enforcement authorities.

d. On or about October 22, 2018, the FBI identified what appeared to be an IED inside the Soros Package.

The FBI's Special Agent Bomb Technicians, along with the Westchester Hazardous Device Unit, rendered safe the contents of the Soros Package. An initial examination of the contents of the Soros Package revealed what appeared to be PVC pipe, a cap, clock, battery, wires, and energetic material. Included in the Soros Package was a photograph of George Soros marked with a red "X."

The Clinton Package

11. Based on my review of documents and records, my conversations with other law enforcement officers, and my involvement in this investigation, I have learned that on or about October 23, 2018, a package containing an IED was delivered to Clinton Residence-2 addressed to "HILARY [sic] CLINTON" (the "Clinton Package").

The Obama Package

12. Based on my review of documents and records, my conversations with other law enforcement officers, and my involvement in this investigation, I have learned that on or about October 23, 2018, a package containing an IED was delivered to Obama Mailing Address-1, and it was addressed to "BARRACK [sic] OBAMA" (the "Obama Package"). Included in the Obama Package was a photograph of President Obama marked with a red "X."

The Brennan Package

13. Based on my review of documents and records, my conversations with other law enforcement officers, and my involvement in this investigation, I have learned that on or about October 24, 2018, a package containing an IED was delivered to "TIME WARNER (CNN)" at a certain address in Manhattan, New York ("Manhattan Address-1"), and it was addressed to "JOHN BRENNAN" [sic] (the "Brennan Package"). Included in the Brennan Package was a photograph of John Brennan marked with a red "X."

The Holder Package

14. Based on my review of documents and records, my conversations with other law enforcement officers, and my involvement in this investigation, I have learned that on or about October 24, 2018, a package containing an IED addressed to "ERIC HIMPTON HOLDER" at Holder Office-1 was returned to sender (the "Holder Package").

The Waters Packages

15. Based on my review of documents and records, my conversations with other law enforcement officers, and my involvement in this investigation, I have learned the following, among other things:

a. On or about October 24, 2018, a package containing an IED was delivered to Waters Office-1, and it was addressed to "MAXIM [sic] WATERS" ("Waters Package-1").

b. On or about October 24, 2018, a package containing an IED was delivered to Waters Office-2 ("Waters Package-2," and together with "Waters Package-1," the "Waters Packages"). Waters Package-2 was addressed to "MAXIM [sic] WATERS" at Waters Office-2. Included in Waters Package-2 was a photograph of Congressperson Waters marked with a red "X."

The Biden Packages

16. Based on my review of documents and records, my conversations with other law enforcement officers, and my involvement in this investigation, I have learned the following, among other things:

a. On or about October 25, 2018, a package containing an IED addressed to "JOSEPH ROBINETTE BIDEN JR." at a certain assisted living facility was unsuccessfully delivered and recovered in Delaware ("Biden Package-1").

b. On or about October 25, 2018, a package containing an IED was unsuccessfully delivered to Biden Residence-1 ("Biden Package-2," and together with "Biden Package-1," the "Biden Packages"). Biden Package-2 was addressed to "JOSEPH BIDEN" at Biden Residence-1.

The De Niro Package

17. Based on my review of documents and records, my conversations with other law enforcement officers, and my involvement in this investigation, I have learned that on or about October 25, 2018, a package containing an IED addressed to "ROBERT DE NIRO" was delivered to De Niro Address-1 (the "De Niro Package").

The Booker Package

18. Based on my review of documents and records, my conversations with other law enforcement officers, and my involvement in this investigation, I have learned that on or about October 26, 2018, a package containing an IED addressed to "CORY BOOKER" was recovered in the U.S. Postal Service's Royal Palm Mail Processing Center in Opa-Locka, Florida (the "Booker Package").

The Clapper Package

19. Based on my review of documents and records, my conversations with other law enforcement officers, and my involvement in this investigation, I have learned that on or about October 26, 2018, a package addressed to "JAMES ROBERT CLAPPER" at Manhattan Address-1 was recovered in Manhattan (the "Clapper Package").

The Harris Package

20. Based on my review of documents and records, my conversations with other law enforcement officers, and my involvement in this investigation, I have learned that on or about October 26, 2018, a package addressed to "KAMALIA HARRIS" was recovered in Sacramento, California (the "Harris Package").

The 13 Packages Taken Together

21. The Packages--the Soros Package, the Clinton Package, the Obama Package, the Brennan Package, the Holder Package, Waters Package-1, Waters Package-2, Biden Package-1, Biden Package-2, the De Niro Package, the Booker Package, the Clapper Package, and the Harris Package--are largely identical with respect to size and shape. In addition, approximately six self-adhesive American flag postage stamps are located on the top right corner of each of the Packages, the return address for each of the Packages is the same, and the sender and target-recipient address labels on each of the Packages are substantially similar in terms of color, size, and font.

Latent Print and DNA Analysis

22. Based on communications with personnel from the FBI Lab, I know, among other things, that a latent fingerprint was detected on Waters Package-1 and this fingerprint was identified to CESAR ALTIERI SAYOC, the defendant. According to the FBI Lab,

the identification has been through the appropriate quality assurance measures.²

23. Based on communications with personnel from the FBI Lab, I know, among other things, that (a) there is a possible DNA association between a sample collected from a piece of the IED inside Waters Package-1 and a sample previously collected from CESAR ALTIERI SAYOC, the defendant, by the Florida Department of Law Enforcement, (b) there is a possible DNA association between a sample collected from a piece of the IED inside the Obama Package and a sample collected from SAYOC by the Florida Department of Law Enforcement, and (c) to this point, the FBI Lab has not identified any other possible matches on the evidence from the Packages that it has examined.

The Routing of the Packages

24. Based on conversations with employees of the U.S. Postal Service, I know, among other things, that:

a. Between on or about October 18, 2018 and on or about October 20, 2018, the Obama Package, the Clinton Package, the De Niro Package, Waters Package-1, and Biden Package-1 were routed through the U.S. Postal Service's Royal Palm Mail Processing Center in Opa-Locka, Florida (the "Opa-Locka Center").

b. The county in which CESAR ALTIERI SAYOC, the defendant, resides is serviced by the Opa-Locka Center.

SAYOC's Arrest

25. Based on my conversations with other law enforcement officers, I know that CESAR ALTIERI SAYOC, the defendant, was arrested on or about October 26, 2018, in Florida, in the vicinity of his white van. The windows of SAYOC's van were covered with images including images critical of CNN.

² Consistent with FBI policy, all latent fingerprint results are considered preliminary until an official FBI report is issued following technical and administrative review.

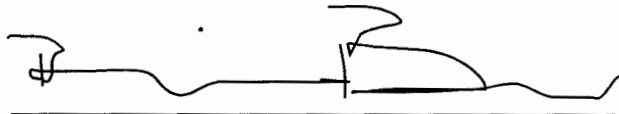
SAYOC's Social Media Posts

26. Based on my review of publicly available information on Twitter, I know that there is an account with username "Cesar Altieri"³ that contains the following, among other things:

a. Various posts with misspellings consistent with the Packages, including "Hilary" rather than "Hillary," "Shultz" rather than "Schultz"; and

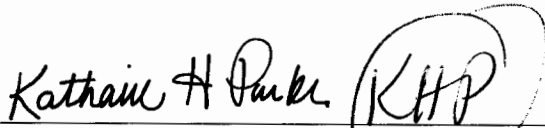
b. A post dated October 24, 2018--i.e., after the recovery of the Soros Package--that is critical of, among others, President Barack Obama and George Soros.

WHEREFORE deponent prays that CESAR ALTIERI SAYOC, the defendant, be imprisoned, or bailed, as the case may be.



Special Agent David Brown
Federal Bureau of Investigation
Joint Terrorism Task Force

Sworn to before me this
26th day of October 2018



HONORABLE KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

*Sworn to before me by reliable electronic means
(FaceTime).

³ Based on my training and experience, as well as my review of law enforcement databases, I believe that SAYOC is the user of the "Cesar Altieri" Twitter account because (i) Altieri is SAYOC's middle name, and (ii) the location of SAYOC's last known residence in Aventura, Florida is proximate to the two locations listed in the account information for the "Cesar Altieri" Twitter account (Sunny Isle Beach and Hollywood, Florida).