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EMIL J. BOVE III / JANE KIM
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Assistant United States Attorneys

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

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UNITED STATES OF AMERICA	:	_____
- v. -	:	Violations of 18 U.S.C.
CESAR ALTIERI SAYOC,	:	§§ 1716, 879, 844(d), (e),
	:	875, 111, and 2
Defendant.	:	COUNTY OF OFFENSE:
----- X	:	NEW YORK

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:

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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.)

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.)

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.)

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.)

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.

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.

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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

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

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

j.Á 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").

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.Á 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.Á 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.Á 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.Á 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.Á 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.Á 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.Á 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.Á 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

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

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