

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JEFFREY R. SMITH, JR.

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CR. No. *10-10193-JLT*
VIOLATIONS:
18 U.S.C. 844(e) - Making
Threats to Destroy
Property by Fire;
18 U.S.C. 876(c) -
Mailing Threatening
Communications

INDICTMENT

The Grand Jury charges that:

COUNT ONE: 18 U.S.C § 844(e) - Making a Threat to Destroy a
Building By Use of Fire and Maliciously Conveying
False Information

On or about September 17, 2009, in the District of
Massachusetts, the defendant

JEFFREY R. SMITH, JR.

through use of the mail, sent a letter addressed to the Saint
Paul AME Methodist Episcopal Church in Cambridge, MA,
purportedly authored by someone whom SMITH believed to be a
former supervisor at Novartis, containing the following threat:

I do not like African American or minorities in charge
as supervisors of my security department at Novartis,
nor I like them as president of the United States. For
that I am going to burn down your church just let you
know how I feel. What right does some black person has
the right to be in charge of me.

and thereby did willfully threaten to unlawfully damage and
destroy the building occupied by the Saint Paul American

Methodist Episcopal Church by means of fire, and did maliciously convey false information, knowing the same to be false, concerning an alleged attempt to be made, by means of fire, to damage and destroy said building.

All in violation of Title 18, United States Code, Section 844(e).

**COUNT TWO: 18 U.S.C § 844(e) - Making a Threat to Destroy a
Building By Use of Fire and Maliciously Conveying
False Information**

On or about September 17, 2009, in the District of
Massachusetts, the defendant

JEFFREY R. SMITH, JR.

through use of the mail, sent a letter addressed to the NAACP-
Boston Branch in Roxbury, MA, purportedly authored by someone
whom SMITH believed to be a former supervisor at Novartis,
containing the following threat:

I do not like African American or minorities
in charge as supervisors of my security
department at Novartis, nor I like them as
president of the United States. For that I
am going to burn down your offices just let
you know how I feel. What right does some
black person has the right to be in charge of
me.

and thereby did willfully threaten to unlawfully damage and
destroy the building occupied by the NAACP-Boston Branch by means
of fire, and did maliciously convey false information, knowing
the same to be false, concerning an alleged attempt to be made,
by means of fire, to damage and destroy said building.

All in violation of Title 18, United States Code, Section
844(e).

COUNT THREE: 18 U.S.C § 844(e) - Making a Threat to Destroy a Building By Use of Fire and Maliciously Conveying False Information

On or about September 22, 2009, in the District of Massachusetts, the defendant

JEFFREY R. SMITH, JR.

through use of the mail, sent a letter addressed to the Shiloh Baptist Church in Medford, MA, purportedly authored by a former supervisor of SMITH, containing the following threat:

I personally think Blacks and minorities must be treated like shit. At least I do that while am a branch manager working for Securitas Security. Since Barrack Obama was elected President and the fact that you people accused me of being drunk and getting me fired from my job I am going to take it out on you setting your church on fire and treating you like shit like I treat my employees at Securitas.

and thereby did willfully threaten to unlawfully damage and destroy the building occupied by the Shiloh Baptist Church by means of fire, and did maliciously convey false information, knowing the same to be false, concerning an alleged attempt to be made, by means of fire, to damage and destroy said building.

All in violation of Title 18, United States Code, Section 844(e).

COUNT FOUR: 18 U.S.C § 844(e) - Making a Threat to Destroy a Building By Use of Fire and Maliciously Conveying False Information

On or about September 24, 2009, in the District of Massachusetts and the Western District of North Carolina, the defendant

JEFFREY R. SMITH, JR.

through use of the mail, sent a letter addressed to the Macedonia Baptist Church in Charlotte, NC, purportedly authored by a former supervisor of SMITH, containing the following threat:

I personally think Blacks and minorities must be treated like shit. At least I do that while am an account manager working for Securitas Security. Since Barrack Obama was elected President, I am going to take it out on you setting your church on fire and treating you like shit like I treat my employees at Securitas.

and thereby did willfully threaten to unlawfully damage and destroy the building occupied by the Shiloh Baptist Church by means of fire, and did maliciously convey false information, knowing the same to be false, concerning an alleged attempt to be made, by means of fire, to damage and destroy said building.

All in violation of Title 18, United States Code, Section 844(e).

COUNT FIVE: 18 U.S.C § 844(e) - Making a Threat to Destroy a Building By Use of Fire and Maliciously Conveying False Information

On or about September 24, 2009, in the District of Massachusetts and the Western District of North Carolina, the defendant

JEFFREY R. SMITH, JR.

through use of the mail, sent a letter addressed to the Friendship Missionary Baptist Church in Charlotte, NC, purportedly authored by a former supervisor of SMITH, containing the following threat:

I personally think Blacks and minorities must be treated like shit. At least I do that while am an account manager working for Securitas Security. Since Barrack Obama was elected President, I am going to take it out on you setting your church on fire and treating you like shit like I treat my employees at Securitas.

and thereby did willfully threaten to unlawfully damage and destroy the building occupied by the Friendship Missionary Baptist Church by means of fire, and did maliciously convey false information, knowing the same to be false, concerning an alleged attempt to be made, by means of fire, to damage and destroy said building.

All in violation of Title 18, United States Code, Section 844(e).

COUNT SIX: 18 U.S.C § 844(e) - Making a Threat to Destroy a Building By Use of Fire and Maliciously Conveying False Information

On or about September 28, 2009, in the District of Massachusetts, the defendant

JEFFREY R. SMITH, JR.

through use of the mail, sent a letter addressed to the NAACP Merrimack Valley in Lawrence, MA, purportedly authored by a former supervisor of SMITH, containing the following threat:

I personally think Blacks and minorities must be treated like shit. At least I do that while am a branch manager working for Securitas Security. Since Barrack Obama was elected President and the fact that you people accused me of being drunk and getting me fired from my job I am going to take it out on you setting your offices on fire and treating you like shit like I treat my employees at Securitas.

and thereby did willfully threaten to unlawfully damage and destroy the building occupied by the NAACP Merrimack Valley Chapter by means of fire, and did maliciously convey false information, knowing the same to be false, concerning an alleged attempt to be made, by means of fire, to damage and destroy said building.

All in violation of Title 18, United States Code, Section 844(e).

COUNT SEVEN: 18 U.S.C § 844(e) - Making a Threat to Destroy a Building By Use of Fire and Maliciously Conveying False Information

On or about October 2, 2009, in the District of Massachusetts and in the Western District of North Carolina, the defendant

JEFFREY R. SMITH, JR.

through use of the mail, sent a letter addressed to the Charlotte Mecklenberg NAACP in Charlotte, NC, purportedly authored by a former supervisor of SMITH, containing the following threat:

I personally think Blacks and minorities must be treated like shit. At least I do that while am a account manager working for Securitas Security. Since Barrack Obama was elected President, I am going to take it out on you setting your offices on fire and treating you like shit like I treat my employees at Securitas.

and thereby did willfully threaten to unlawfully damage and destroy the building occupied by the Charlotte Mecklenberg NAACP Chapter by means of fire, and did maliciously convey false information, knowing the same to be false, concerning an alleged attempt to be made, by means of fire, to damage and destroy said building.

All in violation of Title 18, United States Code, Section 844(e).

COUNT EIGHT: 18 U.S.C § 844(e) - Making a Threat to Destroy a Building By Use of Fire and Maliciously Conveying False Information

On or about November 4, 2009, in the District of Massachusetts and the District of Rhode Island, the defendant

JEFFREY R. SMITH, JR.

through use of the mail, sent a letter addressed to the Condon Street Baptist Church in Providence, RI, purportedly authored by the father of a former supervisor of SMITH, containing the following threat:

I think minorities and blacks should be treated like shit. My son [J] also thinks so too, who was an account manager working for Securitas Security at the [DF], now working at [M] in Charlotte, North Carolina, as Securitas's branch manager. Since Barack Obama was elected President, we strongly that my family wants to burn you church, just to treat you like shit.

and thereby did willfully threaten to unlawfully damage and destroy the building occupied by the Condon Street Baptist Church by means of fire, and did maliciously convey false information, knowing the same to be false, concerning an alleged attempt to be made, by means of fire, to damage and destroy said building.

All in violation of Title 18, United States Code, Section 844(e).

COUNT NINE: 18 U.S.C § 844(e) - Making a Threat to Destroy a Building By Use of Fire and Maliciously Conveying False Information

On or about November 5, 2009, in the District of Massachusetts and the District of Rhode Island, the defendant

JEFFREY R. SMITH, JR.

through use of the mail, sent a letter addressed to the NAACP Providence Branch in Providence, RI, purportedly authored by the father of a former supervisor of SMITH, containing the following threat:

I think minorities and blacks should be treated like shit. My son [J] also thinks so too, who was an account manager working for Securitas Security at the [DF], now working at [M] in Charlotte, North Carolina, as Securitas's branch manager. Since Barack Obama was elected President, we strongly that my family wants to burn you offices, just to treat you like shit.

and thereby did willfully threaten to unlawfully damage and destroy the building occupied by the NAACP Providence Chapter by means of fire, and did maliciously convey false information, knowing the same to be false, concerning an alleged attempt to be made, by means of fire, to damage and destroy said building.

All in violation of Title 18, United States Code, Section 844(e).

COUNT TEN: 18 U.S.C § 844(e) - Making a Threat to Destroy a Building By Use of Fire and Maliciously Conveying False Information

On or about November 9, 2009, in the District of Massachusetts and the Western District of North Carolina, the defendant

JEFFREY R. SMITH, JR.

through use of the mail, sent a letter addressed to the Second Calvary Baptist Church in Charlotte, NC, purportedly authored by a former supervisor of SMITH, containing the following threat:

I think blacks and minorities should be treated like shit. I treat them like shit all the time like shit as at security manager at [CCS]. With the election of Barack Obama, I am going to treat you like shit by burning down your church.

and thereby did willfully threaten to unlawfully damage and destroy the building occupied by the Calvary Baptist Church by means of fire, and did maliciously convey false information, knowing the same to be false, concerning an alleged attempt to be made, by means of fire, to damage and destroy said building.

All in violation of Title 18, United States Code, Section 844(e).

COUNT ELEVEN: 18 U.S.C § 844(e) - Making a Threat to Destroy a Building By Use of Fire and Maliciously Conveying False Information

On or about November 9, 2009, in the District of Massachusetts and the Western District of North Carolina, the defendant

JEFFREY R. SMITH, JR.

through use of the mail, sent a letter addressed to the Thrift Baptist Church in Charlotte, NC, purportedly authored by a former supervisor of SMITH, containing the following threat:

I think blacks and minorities should be treated like shit. As an account manager working for Securitas Security working at the [DF], and now working at branch manager at [M] in Charlotte, North Carolina security account, I treat minorities and blacks should be treated like shit all the time. Since Barack Obama was elected President, I strongly want to burn you church, just to treat you like shit.

and thereby did willfully threaten to unlawfully damage and destroy the building occupied by the Thrift Baptist Church by means of fire, and did maliciously convey false information, knowing the same to be false, concerning an alleged attempt to be made, by means of fire, to damage and destroy said building.

All in violation of Title 18, United States Code, Section 844(e).

**COUNT TWELVE: 18 U.S.C § 876 - Mailing a Threatening
Communication**

On or about December 1, 2009, in the District of Massachusetts and the Western District of North Carolina, the defendant

JEFFREY R. SMITH, JR.

knowingly did deposit in an authorized depository for mail matter, caused to be delivered by the Postal Service, a written communication, addressed to [a person referred to herein as "J.C."] in Charlotte, NC, a former supervisor of SMITH known to the grand jury, containing the following threat to injure him:

If you are seen in the Boston and/or Providence Area, you will be shot on Site, especially where your family lives on [] St, Providence, Along with your family. We know where you honkeys live.

All in violation of Title 18, United States Code, Section 876(c).

**COUNT THIRTEEN: 18 U.S.C § 876 - Mailing a Threatening
Communication**

On or about December 1, 2009, in the District of
Massachusetts and the District of Rhode Island, the defendant

JEFFREY R. SMITH, JR.

knowingly did deposit in an authorized depository for mail
matter, to be sent and delivered by the Postal Service, a copy of
the written communication specified in Count Twelve, addressed to
[a person referred to herein as "G.C."], Providence, RI, the
father and family of a former supervisor of SMITH known to the
grand jury, containing the following threat to injure another:

If you are seen in the Boston and/or Providence Area,
you will be shot on Site, especially where your family
lives on [] St, Providence, Along with your family.
We know where you honkeys live.

All in violation of Title 18, United States Code, Section
876(c).

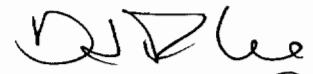
A TRUE BILL


FOREPERSON OF THE GRAND JURY


ASSISTANT U.S. ATTORNEY(S)

DISTRICT OF MASSACHUSETTS; June 15, 2010

Returned into the District Court by the Grand Jurors and
filed.


Donald LaRoche
6/15/10 2:45p.