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CLERK U.S. DISTRICT COURT
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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

TYLER RAI BARRISS,
aka "@SWAUTISTIC,"
aka "Robert Hayward,"
aka "Robert,"
aka "Alex Mendez,"
aka "Alex Mendez,"
aka "Alex,"
aka "Matthew,"
aka "Aaron,"
Defendant.

CR No. ~~18~~ **18CR00733-PSG**

I N F O R M A T I O N

[18 U.S.C. § 371: Conspiracy;
18 U.S.C. § 844(e): Conveying
False Information Concerning the
Use of An Explosive Device; 18
U.S.C. § 875(c): Threats to Injure
in Interstate Commerce; 18 U.S.C.
§ 1349: Conspiracy to Commit Bank
Fraud; 18 U.S.C. § 2: Aiding and
Abetting]

The United States Attorney charges:

INTRODUCTION

At all times relevant to this Information:

1. Twitter was an online social networking service on which users post and interact with messages known as tweets. Twitter users could also send Direct Messages to one another.

2. A Twitter "handle" was the name a user selected to use on Twitter.

1 3. Defendant TYLER RAI BARRISS, also known as ("aka")
2 "@SWAUTISTIC," aka "Robert Hayward," aka "Robert," aka "Alex Mendez,"
3 aka "Alex," aka "Matthew," aka "Aaron," resided in, and was located
4 in, Los Angeles County within the Central District of California.
5 Defendant BARRISS used the Twitter handle @SWAUTISTIC.

6 4. Unindicted Co-Conspirator No. 1 resided in, and was located
7 in, Des Plaines, Illinois. Unindicted Co-Conspirator No. 1 used the
8 Twitter handle @INTERNETLORD.

9 5. Unindicted Co-Conspirator No. 2 resided in, and was located
10 in, Gulf Breeze, Florida. Unindicted Co-Conspirator No. 2 used the
11 Twitter handle @TRAGIC.

12 6. Unindicted Co-Conspirator No. 3 resided in, and was located
13 in, Grand Rapids, Michigan. Unindicted Co-Conspirator No. 3 used the
14 Twitter handle @THROW.

15 7. Unindicted Co-Conspirator No. 4 resided in, and was located
16 in, Greenwood, Missouri. Unindicted Co-Conspirator No. 4 used the
17 Twitter handle @SPARED.

18 8. Waukesha State Bank was a financial institution insured by
19 the Federal Deposit Insurance Corporation.

20 9. "Swatting" was the action or practice of harassing a victim
21 by deceiving an emergency service into sending police and emergency
22 service response teams to the victim's address often by making a
23 false report of a serious law enforcement emergency - such as a
24 murder or hostage situation - at the victim's address to trigger the
25 deployment of the response team.

COUNT ONE

[18 U.S.C. § 844(e)]

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3 On or about September 24, 2015, in Los Angeles County, within
4 the Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Beaver Creek Police Department in Beaver Creek,
10 Ohio, concerning an alleged attempt being made, or to be made, to
11 kill, injure, and intimidate an individual and to damage and destroy
12 property by means of fire and an explosive, namely, and in substance
13 and effect, that bombs were planted at a high school in Beaver Creek
14 and that those bombs were set to explode.

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COUNT TWO

[18 U.S.C. § 844(e)]

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3 On or about September 29, 2015, in Los Angeles County, within
4 the Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Keene Police Department in Keene, New Hampshire,
10 concerning an alleged attempt being made, or to be made, to kill,
11 injure, and intimidate an individual and to damage and destroy
12 property by means of fire and an explosive, namely, and in substance
13 and effect, that bombs were planted at a high school in Keene and
14 that those bombs were set to explode.

COUNT THREE

[18 U.S.C. § 844(e)]

On or about late September 2015, in Los Angeles County, within the Central District of California, defendant TYLER RAI BARRISS, also known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert," aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a telephone and other instrument of commerce, willfully made a threat, and maliciously conveyed false information knowing the information to be false, to the Clark County School District Police Department in Henderson, Nevada, concerning an alleged attempt being made, or to be made, to kill, injure, and intimidate an individual and to damage and destroy property by means of fire and an explosive, namely, and in substance and effect, that bombs were planted at a school and that those bombs were set to explode.

COUNT FOUR

[18 U.S.C. § 875(c)]

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3 On or about October 1, 2015, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," with the
7 purpose of issuing a threat and with knowledge that the communication
8 would be viewed as a threat, knowingly transmitted in interstate
9 commerce to the Ipswich Police Department in Ipswich, Massachusetts,
10 a communication containing true threats to injure the person of
11 another, namely, and in substance and effect, that he had murdered
12 his girlfriend and intended to go to the Ipswich Police Department to
13 kill officers and himself.
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COUNT FIVE

[18 U.S.C. § 844(e)]

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3 On or about October 5, 2015, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the DuPage University Police Department in Glen Ellyn,
10 Illinois, concerning an alleged attempt being made, or to be made, to
11 kill, injure, and intimidate an individual and to damage and destroy
12 property by means of fire and an explosive, namely, and in substance
13 and effect, that bombs were planted at a college in Glen Ellyn and
14 that those bombs were set to explode.

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COUNT SIX

[18 U.S.C. § 844(e)]

On or about October 7, 2015, in Los Angeles County, within the Central District of California, defendant TYLER RAI BARRISS, also known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert," aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a telephone and other instrument of commerce, willfully made a threat, and maliciously conveyed false information knowing the information to be false, to the University of Illinois-Chicago Police Department in Chicago, Illinois, concerning an alleged attempt being made, or to be made, to kill, injure, and intimidate an individual and to damage and destroy property by means of fire and an explosive, namely, and in substance and effect, that bombs were planted in backpacks at a university in Chicago.

COUNT SEVEN

[18 U.S.C. § 844(e)]

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3 On or about October 8, 2015, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Northern Illinois University Police Department in
10 Dekalb, Illinois, concerning an alleged attempt being made, or to be
11 made, to kill, injure, and intimidate an individual and to damage and
12 destroy property by means of fire and an explosive, namely, and in
13 substance and effect, that bombs were planted at a university in
14 Dekalb and that those bombs were set to explode.

COUNT EIGHT

[18 U.S.C. § 875(c)]

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3 On or about September 26, 2017, in Los Angeles County, within
4 the Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," with the
7 purpose of issuing a threat and with knowledge that the communication
8 would be viewed as a threat, knowingly transmitted in interstate
9 commerce to the Washington Police Department in Washington, Illinois,
10 a communication containing true threats to injure the person of
11 another, namely, and in substance and effect, that he had just shot
12 two people at a residence on South Elm Street in Washington and that
13 he was armed with an assault rifle.

COUNT NINE

[18 U.S.C. § 844(e)]

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3 On or about September 26, 2017, in Los Angeles County, within
4 the Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Layton Police Department in Layton, Utah, concerning
10 an alleged attempt being made, or to be made, to kill, injure, and
11 intimidate an individual and to damage and destroy property by means
12 of fire and an explosive, namely, and in substance and effect, that
13 he had planted bombs at a shopping center in Layton and that those
14 bombs were set to explode.

COUNT TEN

[18 U.S.C. § 844(e)]

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3 On or about September 27, 2017, in Los Angeles County, within
4 the Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Peoria Police Department in Peoria, Illinois,
10 concerning an alleged attempt being made, or to be made, to kill,
11 injure, and intimidate an individual and to damage and destroy
12 property by means of fire and an explosive, namely, and in substance
13 and effect, that he had planted bombs in backpacks throughout a high
14 school, that those bombs were set to explode, and that he was at or
15 near the high school, armed with a gun, and intended to open fire.

COUNT ELEVEN

[18 U.S.C. § 844(e)]

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3 On or about September 28, 2017, in Los Angeles County, within
4 the Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Richmond Police Department in Richmond, Virginia,
10 concerning an alleged attempt being made, or to be made, to kill,
11 injure, and intimidate an individual and to damage and destroy
12 property by means of fire and an explosive, namely, and in substance
13 and effect, that he had planted bombs in a building on West Broad
14 Street in Richmond.

COUNT TWELVE

[18 U.S.C. § 844(e)]

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3 On or about September 28, 2017, in Los Angeles County, within
4 the Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Arlington Police Department in Arlington, Virginia,
10 concerning an alleged attempt being made, or to be made, to kill,
11 injure, and intimidate an individual and to damage and destroy
12 property by means of fire and an explosive, namely, and in substance
13 and effect, that he had planted a bomb in a building on Wilson
14 Boulevard in Arlington.

COUNT THIRTEEN

[18 U.S.C. § 844(e)]

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3 On or about September 28, 2017, in Los Angeles County, within
4 the Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the West University Place Police Department in West
10 University Place, Texas, concerning an alleged attempt being made, or
11 to be made, to kill, injure, and intimidate an individual and to
12 damage and destroy property by means of fire and an explosive,
13 namely, and in substance and effect, that bombs were planted in a
14 building on Bissonnet Street in Houston and that those bombs were set
15 to explode.

COUNT FOURTEEN

[18 U.S.C. § 844(e)]

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3 On or about September 29, 2017, in Los Angeles County, within
4 the Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to a television station in Phoenix, Arizona, concerning an
10 alleged attempt being made, or to be made, to kill, injure, and
11 intimidate an individual and to damage and destroy property by means
12 of fire and an explosive, namely, and in substance and effect, that
13 he had planted a bomb inside a public works building on North 23rd
14 Avenue in Phoenix and that the bomb was set to explode.

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COUNT FIFTEEN

[18 U.S.C. § 844(e)]

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3 On or about September 29, 2017, in Los Angeles County, within
4 the Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Allen Police Department in Allen, Texas, concerning
10 an alleged attempt being made, or to be made, to kill, injure, and
11 intimidate an individual and to damage and destroy property by means
12 of fire and an explosive, namely, and in substance and effect, that
13 he had planted bombs throughout a high school in Allen and that those
14 bombs were set to explode.

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COUNT SIXTEEN

[18 U.S.C. § 844(e)]

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3 On or about September 29, 2017, in Los Angeles County, within
4 the Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Harvard University Police Department in Cambridge,
10 Massachusetts, concerning an alleged attempt being made, or to be
11 made, to kill, injure, and intimidate an individual and to damage and
12 destroy property by means of fire and an explosive, namely, and in
13 substance and effect, that he had planted bombs on a university
14 campus and that the bombs were set to explode.

COUNT SEVENTEEN

[18 U.S.C. § 844(e)]

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3 On or about September 30, 2017, in Los Angeles County, within
4 the Central District of California, defendant TYLER RAI BARRISS
5 ("BARRISS"), also known as ("aka") "@SWAUTISTIC," aka "Robert
6 Hayward," aka "Robert," aka "Alex Mendez," aka "Alex," aka "Matthew,"
7 aka "Aaron," by a telephone and other instrument of commerce,
8 willfully made a threat, and maliciously conveyed false information
9 knowing the information to be false, to a television station in
10 Phoenix, Arizona, concerning an alleged attempt being made, or to be
11 made, to kill, injure, and intimidate an individual and to damage and
12 destroy property by means of fire and an explosive, namely, and in
13 substance and effect, that he had planted bombs throughout a building
14 located on West Adams Street in Phoenix and that those bombs were set
15 to explode.

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COUNT EIGHTEEN

[18 U.S.C. § 844(e)]

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3 On or about September 30, 2017, in Los Angeles County, within
4 the Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Alexandria Police Department in Alexandria,
10 Virginia, concerning an alleged attempt being made, or to be made, to
11 kill, injure, and intimidate an individual and to damage and destroy
12 property by means of fire and an explosive, namely, and in substance
13 and effect, that he had planted bombs in a movie theater in
14 Alexandria and that he was outside that theater armed with an assault
15 rifle.

COUNT NINETEEN

[18 U.S.C. § 875(c)]

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3 On or about September 30, 2017, in Los Angeles County, within
4 the Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," with the
7 purpose of issuing a threat and with knowledge that the communication
8 would be viewed as a threat, knowingly transmitted in interstate
9 commerce to Marion County Emergency Services in Marion County,
10 Missouri, a communication containing true threats to injure the
11 person of another, namely, and in substance and effect, that he had
12 just shot two people and planned to burn down a residence on Whitaker
13 Lane in New London, Missouri.

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COUNT TWENTY

[18 U.S.C. § 875(c)]

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3 On or about September 30, 2017, in Los Angeles County, within
4 the Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," with the
7 purpose of issuing a threat and with knowledge that the communication
8 would be viewed as a threat, knowingly transmitted in interstate
9 commerce to Marion County Emergency Services in Marion County,
10 Missouri, a communication containing true threats to injure the
11 person of another, namely, and in substance and effect, that he had
12 just shot two people at a residence on Walnut Street in Hannibal,
13 Missouri.

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COUNT TWENTY-ONE

[18 U.S.C. § 844(e)]

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3 On or about October 2, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS
5 ("BARRISS"), also known as ("aka") "@SWAUTISTIC," aka "Robert
6 Hayward," aka "Robert," aka "Alex Mendez," aka "Alex," aka "Matthew,"
7 aka "Aaron," by a telephone and other instrument of commerce,
8 willfully made a threat, and maliciously conveyed false information
9 knowing the information to be false, to Marion County Emergency
10 Services in Marion County, Missouri, concerning an alleged attempt
11 being made, or to be made, to kill, injure, and intimidate an
12 individual and to damage and destroy property by means of fire and an
13 explosive, namely, and in substance and effect, that he had planted
14 bombs at a high school in Center, Missouri.

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COUNT TWENTY-TWO

[18 U.S.C. § 875(c)]

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3 On or about October 2, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," with the
7 purpose of issuing a threat and with knowledge that the communication
8 would be viewed as a threat, knowingly transmitted in interstate
9 commerce to the Las Vegas Police Department in Las Vegas, Nevada, a
10 communication containing true threats to injure the person of
11 another, namely, and in substance and effect, that he had shot his
12 wife at a Las Vegas hotel and intended to shoot other hotel guests.

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COUNT TWENTY-THREE

[18 U.S.C. § 875(c)]

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3 On or about October 2, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," with the
7 purpose of issuing a threat and with knowledge that the communication
8 would be viewed as a threat, knowingly transmitted in interstate
9 commerce to the Washington Police Department in Washington, Illinois,
10 a communication containing true threats to injure the person of
11 another, namely, and in substance and effect, that he had just killed
12 two people at a residence on South Wood Street in Washington, that he
13 had an assault rifle, and that he would kill any law enforcement
14 officer that approached the residence.
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COUNT TWENTY-FOUR

[18 U.S.C. § 844(e)]

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3 On or about October 4, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS
5 ("BARRISS"), also known as ("aka") "@SWAUTISTIC," aka "Robert
6 Hayward," aka "Robert," aka "Alex Mendez," aka "Alex," aka "Matthew,"
7 aka "Aaron," by a telephone and other instrument of commerce,
8 willfully made a threat, and maliciously conveyed false information
9 knowing the information to be false, to emergency services in Ralls
10 County, Missouri, concerning an alleged attempt being made, or to be
11 made, to kill, injure, and intimidate an individual and to damage and
12 destroy property by means of fire and an explosive, namely, and in
13 substance and effect, that bombs were planted at a high school in
14 Center, Missouri.

COUNT TWENTY-FIVE

[18 U.S.C. § 844(e)]

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3 On or about November 2, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the West Virginia University Police Department in
10 Morgantown, West Virginia, concerning an alleged attempt being made,
11 or to be made, to kill, injure, and intimidate an individual and to
12 damage and destroy property by means of fire and an explosive,
13 namely, and in substance and effect, that he had planted bombs on a
14 university campus, that he had an assault rifle, and that he intended
15 to open fire on students.
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COUNT TWENTY-SIX

[18 U.S.C. § 844(e)]

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3 On or about November 9, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Portland Police Department in Portland, Maine,
10 concerning an alleged attempt being made, or to be made, to kill,
11 injure, and intimidate an individual and to damage and destroy
12 property by means of fire and an explosive, namely, and in substance
13 and effect, that he had placed bombs around a television station in
14 Portland.

COUNT TWENTY-SEVEN

[18 U.S.C. § 844(e)]

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3 On or about November 10, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Dedham Police Department in Dedham, Massachusetts,
10 concerning an alleged attempt being made, or to be made, to kill,
11 injure, and intimidate an individual and to damage and destroy
12 property by means of fire and an explosive, namely, and in substance
13 and effect, that he worked with the designated terrorist organization
14 known as the Islamic State of Iraq and the Levant, also known as
15 ISIS, that he had planted bombs on and around a television station
16 located on Fox Drive in Dedham, and that the bombs were set to
17 explode.

COUNT TWENTY-EIGHT

[18 U.S.C. § 844(e)]

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3 On or about November 10, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Chicago Police Department in Chicago, Illinois,
10 concerning an alleged attempt being made, or to be made, to kill,
11 injure, and intimidate an individual and to damage and destroy
12 property by means of fire and an explosive, namely, and in substance
13 and effect, that he was an agent of the designated foreign terrorist
14 organization known as the Islamic State of Iraq and the Levant,
15 otherwise known as ISIS, and that he had planted a bomb in a building
16 on North State Street in Chicago.

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COUNT TWENTY-NINE

[18 U.S.C. § 844(e)]

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3 On or about November 11, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Philadelphia Police Department in Philadelphia,
10 Pennsylvania, concerning an alleged attempt being made, or to be
11 made, to kill, injure, and intimidate an individual and to damage and
12 destroy property by means of fire and an explosive, namely, and in
13 substance and effect, that bombs were planted at a museum in
14 Philadelphia.

COUNT THIRTY

[18 U.S.C. § 844(e)]

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3 On or about November 19, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Austin Police Department in Austin, Texas,
10 concerning an alleged attempt being made, or to be made, to kill,
11 injure, and intimidate an individual and to damage and destroy
12 property by means of fire and an explosive, namely, and in substance
13 and effect, that he had left backpacks containing dynamite at an
14 apartment complex on Farm to Market Road in Austin and that the
15 dynamite was set to explode.

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COUNT THIRTY-ONE

[18 U.S.C. § 844(e)]

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3 On or about November 24, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Bernalillo Police Department in Bernalillo, New
10 Mexico, concerning an alleged attempt being made, or to be made, to
11 kill, injure, and intimidate an individual and to damage and destroy
12 property by means of fire and an explosive, namely, and in substance
13 and effect, there were bombs planted at a shopping center in
14 Bernalillo.

COUNT THIRTY-TWO

[18 U.S.C. § 875(c)]

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3 On or about November 24, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," with the
7 purpose of issuing a threat and with knowledge that the communication
8 would be viewed as a threat, knowingly transmitted in interstate
9 commerce to the Dallas Police Department in Dallas, Texas, a
10 communication containing true threats to injure the person of
11 another, namely, and in substance and effect, that he intended to
12 engage in violent acts toward persons at a shopping center in Dallas.

COUNT THIRTY-THREE

[18 U.S.C. § 844(e)]

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3 On or about November 24, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Nassau County Police Department in Nassau County,
10 New York, concerning an alleged attempt being made, or to be made, to
11 kill, injure, and intimidate an individual and to damage and destroy
12 property by means of fire and an explosive, namely, and in substance
13 and effect, that there were bombs at shopping center in Valley
14 Stream, New York.

COUNT THIRTY-FOUR

[18 U.S.C. § 844(e)]

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3 On or about November 24, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Michigan City Police Department in Michigan City,
10 Indiana, concerning an alleged attempt being made, or to be made, to
11 kill, injure, and intimidate an individual and to damage and destroy
12 property by means of fire and an explosive, namely, and in substance
13 and effect, that there were bombs at a Michigan City shopping center.
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COUNT THIRTY-FIVE

[18 U.S.C. § 844(e)]

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3 On or about November 28, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Panama City Beach Police Department in Panama City
10 Beach, Florida, concerning an alleged attempt being made, or to be
11 made, to kill, injure, and intimidate an individual and to damage and
12 destroy property by means of fire and an explosive, namely, and in
13 substance and effect, that he had planted bombs at a high school in
14 Panama City Beach, that the bombs were set to explode, and that he
15 and another person were at the school, armed with guns.

COUNT THIRTY-SIX

[18 U.S.C. § 844(e)]

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3 On or about November 28, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Durand Area Schools in Durand, Michigan, concerning
10 an alleged attempt being made, or to be made, to kill, injure, and
11 intimidate an individual and to damage and destroy property by means
12 of fire and an explosive, namely, and in substance and effect, that
13 he had planted bombs at a high school and that those bombs were set
14 to explode.

1 COUNT THIRTY-SEVEN

2 [18 U.S.C. § 1349]

3 A. THE OBJECT OF THE CONSPIRACY

4 1. Beginning on a date unknown to the Grand Jury, but no later
5 than November 27, 2017, and continuing through on or about
6 December 5, 2017, in Los Angeles County, within the Central District
7 of California, and elsewhere, defendant TYLER RAI BARRISS
8 ("BARRISS"), also known as ("aka") "@SWAUTISTIC," aka "Robert
9 Hayward," aka "Robert," aka "Alex Mendez," aka "Alex," aka "Matthew,"
10 aka "Aaron," and Unindicted Co-Conspirator No. 1, together with
11 others known and unknown to the Grand Jury, knowingly combined,
12 conspired, and agreed to commit bank fraud, in violation of Title 18,
13 United States Code, Section 1344(2).

14 B. THE MANNER AND MEANS OF THE CONSPIRACY

15 2. The object of the conspiracy was to be carried out, and was
16 carried out, in substance as follows:

17 a. Unindicted Co-Conspirator No. 1 would obtain credit
18 and debit card account numbers that he knew belonged to real persons;

19 b. Unindicted Co-Conspirator No. 1 would use those
20 unauthorized debit and credit card account numbers to purchase
21 clothing and other items online for, and at the request of, defendant
22 BARRISS;

23 c. In purchasing those items, Unindicted Co-Conspirator
24 No. 1 would falsely represent to online retailers that he was
25 authorized to use those credit and debit card account numbers to make
26 purchases, when, in fact, he was not authorized to do so.

1 C. OVERT ACTS

2 3. On or about the following dates, in furtherance of the
3 conspiracy and to accomplish its objects, defendant BARRISS and
4 Unindicted Co-Conspirator No. 1, together with other co-conspirators
5 known and unknown to the Grand Jury, committed and caused others to
6 commit various overt acts within the Central District of California
7 and elsewhere, including the following:

8 Overt Act No. 1: On or before November 27, 2017, Unindicted
9 Co-Conspirator No. 1 opened an account with a virtual private network
10 service provider (the "VPN Service").

11 Overt Act No. 2: On December 1, 2017, Unindicted Co-
12 Conspirator No. 1 attempted to purchase a 1-month subscription to the
13 VPN Service with a credit card number that he knew belonged to a real
14 person and that he was not authorized to use.

15 Overt Act No. 3: On or about December 2, 2017, in Twitter
16 Direct Messages, defendant BARRISS asked Unindicted Co-Conspirator
17 No. 1 to purchase a cap bearing a NASA logo (the "NASA cap") for
18 defendant BARRISS.

19 Overt Act No. 4: On or about December 3, 2017, in Twitter
20 Direct Messages, defendant BARRISS again asked Unindicted Co-
21 Conspirator No. 1 to purchase the NASA cap for him. Unindicted Co-
22 Conspirator No. 1 agreed to make the purchase after obtaining credit
23 and debit card account numbers belonging to others that he knew he
24 was not authorized to use.

25 Overt Act No. 5: On December 3, 2017, and again on
26 December 4, 2017, in Twitter Direct Messages, defendant BARRISS
27 repeatedly insisted that Unindicted Co-Conspirator No. 1 purchase the
28

1 NASA cap for him and provided Unindicted Co-Conspirator No. 1 with
2 defendant BARRISS's mailing address in Los Angeles.

3 Overt Act No. 6: On or before December 4, 2017, Unindicted
4 Co-Conspirator No. 1 obtained a debit card account number (the
5 "Account Number"), which he knew belonged to Victim J.B., which was
6 linked to her checking account at Waukesha State Bank.

7 Overt Act No. 7: On or about December 4, 2017, Unindicted Co-
8 Conspirator No. 1 purchased the NASA cap from an online retailer,
9 using the unauthorized Account Number. Unindicted Co-Conspirator
10 No. 1 represented to the online retailer that he was authorized to
11 use the Account Number to make the purchase when, in fact, he was
12 not. Unindicted Co-Conspirator No. 1 provided the online retailer
13 with defendant BARRISS's name and address in Los Angeles for shipping
14 purposes.

15 Overt Act No. 8: On or about December 4, 2017, defendant
16 BARRISS told Unindicted Co-Conspirator No. 1 that he wanted him to
17 purchase shoes for him.

18 Overt Act No. 9: On or about December 4, 2017, Unindicted Co-
19 Conspirator No. 1 purchased a 1-month subscription to the VPN
20 Service, using the Account Number, knowing that he was not authorized
21 to use that Account Number.

22 Overt Act No. 10: On or about December 5, 2017, in Twitter
23 Direct Messages, defendant BARRISS told Unindicted Co-Conspirator
24 No. 1 that he had received the NASA cap and was thankful for it.

25 Overt Act No. 11: On or about December 6, 2017, in Twitter
26 Direct Messages, defendant BARRISS told Unindicted Co-Conspirator
27 No. 1 that he wanted him to purchase shoes and a belt for him. He
28 then directed Unindicted Co-Conspirator No. 1 to a website and asked

1 him, "Can you card it[?]," which was coded language indicating his
2 intent that Unindicted Co-Conspirator No. 1 use an unauthorized debit
3 or card account number to make the purchase. Unindicted Co-
4 Conspirator No. 1 responded, "yessir."

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1 COUNT THIRTY-EIGHT

2 [18 U.S.C. § 371]

3 A. THE OBJECT OF THE CONSPIRACY

4 1. Beginning on a date unknown to the Grand Jury, but no later
5 than December 4, 2017, and continuing through on or about December 6,
6 2017, in Los Angeles, within the Central District of California, and
7 elsewhere, TYLER RAI BARRISS ("BARRISS"), also known as ("aka")
8 "@SWAUTISTIC," aka "Robert Hayward," aka "Robert," aka "Alex Mendez,"
9 aka "Alex," aka "Matthew," aka "Aaron," and Unindicted Co-Conspirator
10 No. 2, knowingly combined, conspired, confederated, and agreed to, by
11 a telephone and instrument of commerce, willfully make a threat, and
12 maliciously convey false information knowing the information to be
13 false, concerning an alleged attempt being made, or to be made, to
14 kill, injure, and intimidate an individual and to damage and destroy
15 property by means of fire and an explosive, in violation of Title 18,
16 United States Code, Section 844(e).

17 B. THE MANNER AND MEANS OF THE CONSPIRACY

18 2. The object of the conspiracy was to be carried out, and was
19 carried out, in substance as follows:

20 a. Unidentified Co-Conspirator No. 2 would identify a
21 school building that he wanted to evacuate while school was in
22 session.

23 b. Unidentified Co-Conspirator No. 2 would share
24 information concerning that school with defendant BARRISS, to include
25 its address.

26 c. Defendant BARRISS would call the school and willfully
27 and maliciously convey the false information that he had planted
28 bombs at the school, knowing that information to be false.

1 d. Defendant BARRISS would call law enforcement and
2 willfully and maliciously convey that he had planted bombs at the
3 school, knowing that information to be false.

4 C. OVERT ACTS

5 3. On or about the following dates, in furtherance of the
6 conspiracy and to accomplish its object, defendant BARRISS, together
7 with Unindicted Co-Conspirator No. 2 and other co-conspirators known
8 and unknown to the Grand Jury, committed and caused others to commit
9 various overt acts within the Central District of California and
10 elsewhere, including the following:

11 Overt Act No. 1: On or about December 4, 2017, Unindicted Co-
12 Conspirator No. 2, in Twitter Direct Messages, asked defendant
13 BARRISS to cause the evacuation of a high school in Gurnee, Illinois
14 (the "Gurnee High School"), and defendant BARRISS agreed.

15 Overt Act No. 2: On or about December 5, 2017, defendant
16 BARRISS and Unindicted Co-Conspirator No. 2 investigated the address
17 and telephone number of the Gurnee High School, including by looking
18 up that information online.

19 Overt Act No. 3: On or about December 5, 2017, defendant
20 BARRISS and Unindicted Co-Conspirator No. 2 investigated the address
21 and telephone number for the Gurnee Police Department, including by
22 looking up that information online.

23 Overt Act No. 4: On or about December 5, 2017, defendant
24 BARRISS called the Gurnee High School and told a secretary there, in
25 substance and effect, that he left a backpack containing dynamite in
26 the Gurnee High School and that it was set to explode.

27 Overt Act No. 5: On or about December 5, 2017, defendant
28 BARRISS called the Gurnee Police Department and told a communications

1 center operator that he had planted a bomb at the Gurnee High School
2 and that the bomb was set to explode.

3 Overt Act No. 6: On or about December 5, 2017, defendant
4 BARRISS, in Twitter Direct Messages, told Unindicted Co-Conspirator
5 No. 2 that he had taken steps to cause an evacuation of the Gurnee
6 High School.

7 Overt Act No. 7: On or about December 6, 2017, in Twitter
8 Direct Messages, Unindicted Co-Conspirator No. 2 and defendant
9 BARRISS agreed to try again to cause an evacuation of the Gurnee High
10 School.

11 Overt Act No. 8: On or about December 6, 2017, defendant
12 BARRISS called the Gurnee High School and left a voicemail on a
13 school line in which he said that he had planted a bomb at the
14 school.

15 Overt Act No. 9: On or about December 6, 2017, defendant
16 BARRISS called the Gurnee Police Department and told a communications
17 center operator that he left a backpack containing explosives in a
18 classroom at the Gurnee High School, that the explosives were set to
19 explode, that he was high on crystal methamphetamine, that he was
20 carrying a pistol, and that he was considering opening fire on
21 students and teachers.

1 COUNT THIRTY-NINE

2 [18 U.S.C. § 371]

3 A. THE OBJECT OF THE CONSPIRACY

4 1. Beginning on a date unknown to the Grand Jury, but no later
5 than December 7, 2017, and continuing through on or about
6 December 10, 2017, in Los Angeles, within the Central District of
7 California, and elsewhere, TYLER RAI BARRISS ("BARRISS"), also known
8 as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert," aka
9 "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," and Unindicted
10 Co-Conspirator No. 1, knowingly combined, conspired, confederated,
11 and agreed to, by a telephone and instrument of commerce, willfully
12 make a threat, and maliciously convey false information knowing the
13 information to be false, concerning an alleged attempt being made, or
14 to be made, to kill, injure, and intimidate an individual and to
15 damage and destroy property by means of fire and an explosive, in
16 violation of Title 18, United States Code, Section 844(e).

17 B. THE MANNER AND MEANS OF THE CONSPIRACY

18 2. The object of the conspiracy was to be carried out, and was
19 carried out, in substance as follows:

20 a. Unidentified Co-Conspirator No. 1 and defendant
21 BARRISS would identify a person or persons that they wanted to
22 harass, intimidate, disrupt, and annoy either by swatting them or by
23 causing them to be evacuated from their locations.

24 b. Unidentified Co-Conspirator No. 1 and defendant
25 BARRISS would investigate their intended victims, to include
26 identifying their victims' addresses and telephone numbers and the
27 addresses and telephone numbers of law enforcement local to those
28 victims.

1 c. Defendant BARRISS would call law enforcement and
2 maliciously convey false information, knowing that information to be
3 false, and willfully make a threat, about explosives being present at
4 the victim's address to cause a law enforcement response.

5 d. Defendant BARRISS would call the location where he
6 believed the victim was then located and maliciously convey false
7 information, knowing that information to be false, and willfully make
8 a threat, about explosives being present at that location to cause
9 its evacuation.

10 C. OVERT ACTS

11 3. On or about the following dates, in furtherance of the
12 conspiracy and to accomplish its object, defendant BARRISS, together
13 with Unindicted Co-Conspirator No. 1 and other co-conspirators known
14 and unknown to the Grand Jury, committed and caused others to commit
15 various overt acts, among others, within the Central District of
16 California, and elsewhere, including, but not limited to, the
17 following:

18 Overt Act No. 1: On or about December 7, 2017, in Twitter
19 direct messages, Unindicted Co-Conspirator No. 1 asked defendant
20 BARRISS to swat Victim R.S., and defendant BARRISS agreed.

21 Overt Act No. 2: On or about December 7, 2017, in Twitter
22 direct messages, Unindicted Co-Conspirator No. 1 provided defendant
23 BARRISS with what he believed to be personal identification
24 information for Victim R.S., including Victim R.S.'s home address.

25 Overt Act No. 3: On or about December 7, 2017, defendant
26 BARRISS called the Milford Police Department in Milford, Connecticut,
27 identified himself as Victim R.S., and provided what he believed to
28 be the home address of Victim R.S. He also maliciously conveyed the

1 false information, knowing that information to be false, and
2 willfully made the threat, that he had shot his parents, that he had
3 tied up his siblings and intended to kill them, and that he planned
4 to burn down his house.

5 Overt Act No. 4: On or about December 7, 2017, in Twitter
6 direct messages, defendant BARRISS told Unindicted Co-Conspirator
7 No. 1 that he had swatted Victim R.S.

8 Overt Act No. 5: On or about December 8, 2017, in Twitter
9 direct messages, Unindicted Co-Conspirator No. 1 provided defendant
10 BARRISS with what he believed to be the address for a convention
11 center in Dallas, Texas (the "Convention Center"), where a video game
12 tournament was then occurring.

13 Overt Act No. 6: On or about December 8, 2017, in Twitter
14 Direct Messages, Unindicted Co-Conspirator No. 1 agreed to create,
15 and did in fact create, an account with a voice-over-internet
16 services provider for defendant BARRISS to use in making hoax phone
17 calls to and concerning the Convention Center.

18 Overt Act No. 7: On or about December 8, 2017, defendant
19 BARRISS called both the Convention Center's administrative line and a
20 Crime Stoppers tip line and maliciously conveyed the false
21 information, and willfully made the threat, that he left backpacks
22 containing explosives in the Convention Center and that they were set
23 to explode.

24 Overt Act No. 8: On or about December 8, 2017, in Twitter
25 direct messages, Unindicted Co-Conspirator No. 1 provided defendant
26 BARRISS with information about the evacuation of the Convention
27 Center in response to defendant BARRISS's knowingly false reports
28 that he planted bombs there.

1 Overt Act No. 9: On or about December 10, 2017, defendant
2 BARRISS called the Dallas Police Department and said that he and a
3 friend had left backpacks containing explosives inside the Convention
4 Center and that they were set to explode.

5 Overt Act No. 10: On or about December 10, 2017, defendant
6 BARRISS called the Convention Center's administrative line and
7 maliciously conveyed the false information that he had planted a bomb
8 there. That day, the Convention Center was again evacuated.

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COUNT FORTY

[18 U.S.C. § 844(e)]

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3 On or about December 11, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Suffolk County Police Department in Smithtown, New
10 York, concerning an alleged attempt being made, or to be made, to
11 kill, injure, and intimidate an individual and to damage and destroy
12 property by means of fire and an explosive, namely, and in substance
13 and effect, that he and a friend had planted bombs at a mall in Lake
14 Grove, New York, that those bombs were set to explode, and that he
15 and others were armed with assault weapons and planned to open fire
16 at the mall.

COUNT FORTY-ONE

[18 U.S.C. § 844(e)]

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3 On or about December 14, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the George Mason University Police Department in Fairfax
10 County, Virginia, concerning an alleged attempt being made, or to be
11 made, to kill, injure, and intimidate an individual and to damage and
12 destroy property by means of fire and an explosive, namely, and in
13 substance and effect, that he had planted dynamite at a secondary
14 school in Burke, Virginia, and that the dynamite was set to explode.

COUNT FORTY-TWO

[18 U.S.C. § 844(e)]

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3 On or about December 17, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to a mall in Lake Grove, New York, concerning an alleged
10 attempt being made, or to be made, to kill, injure, and intimidate an
11 individual and to damage and destroy property by means of fire and an
12 explosive, namely, and in substance and effect, that he and a friend
13 had planted bombs at the mall and that those bombs were set to
14 explode.

1 COUNT FORTY-THREE

2 [18 U.S.C. § 371]

3 A. THE OBJECT OF THE CONSPIRACY

4 1. Beginning on a date unknown to the Grand Jury, but no later
5 than December 16, 2017, and continuing through on or about
6 December 17, 2017, within the Central District of California, and
7 elsewhere, TYLER RAI BARRISS ("BARRISS"), also known as ("aka")
8 "@SWAUTISTIC," aka "Robert Hayward," aka "Robert," aka "Alex Mendez,"
9 aka "Alex," aka "Matthew," aka "Aaron," Unindicted Co-Conspirator No.
10 3, and Unindicted Co-Conspirator No. 4 knowingly combined, conspired,
11 confederated, and agreed to:

12 a. By a telephone and other instrument of commerce,
13 willfully make a threat, and maliciously convey false information
14 knowing the information to be false, concerning an alleged attempt
15 being made, or to be made, to kill, injure, and intimidate an
16 individual and to damage and destroy property by means of fire and an
17 explosive, in violation of Title 18, United States Code, Section
18 844(e).

19 b. With the purpose of issuing a threat and with
20 knowledge that the communication would be viewed as a threat,
21 knowingly transmit in interstate commerce a communication containing
22 true threats to injure the person of another, in violation of
23 Title 18, United States Code, Section 875(c).

24 B. THE MANNER AND MEANS OF THE CONSPIRACY

25 2. The object of the conspiracy was to be carried out, and was
26 carried out, in substance as follows:
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1 a. Unindicted Co-Conspirator No. 3 and Unindicted Co-
2 Conspirator No. 4 would identify victims that either or both of them
3 wanted to harass, intimidate, disrupt, and annoy by swatting them.

4 b. Unindicted Co-Conspirator No. 3 and Unindicted Co-
5 Conspirator No. 4 would provide information about their victims, such
6 as what they believed to be their victims' home addresses, to
7 defendant BARRISS.

8 c. Using an online payment processor, Unindicted Co-
9 Conspirator No. 4 would pay defendant BARRISS to swat the victims.

10 d. Defendant BARRISS would willfully and maliciously call
11 law enforcement and make a false report, knowing that information to
12 be false, of a serious law enforcement emergency in order to trigger
13 a law enforcement and emergency services response at what he believed
14 to be the victim's home address.

15 C. OVERT ACTS

16 3. On or about the following dates, in furtherance of the
17 conspiracy and to accomplish its object, defendant BARRISS, together
18 with Unindicted Co-Conspirator No. 3 and Unindicted Co-Conspirator
19 No. 4 and other co-conspirators known and unknown to the Grand Jury,
20 committed and caused others to commit various overt acts within the
21 Central District of California and elsewhere, including the
22 following:

23 Overt Act No. 1: On or about December 16, 2017, Unindicted
24 Co-Conspirator No. 3 asked defendant BARRISS, in Twitter Direct
25 Messages, whether he would "do some naughty tasks 4me" in exchange
26 for payment, to include Bitcoin, which is a peer-to-peer crypto-
27 currency, and a Microsoft Xbox, which is a video game system.

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1 Overt Act No. 2: On or about December 17, 2017, Unindicted
2 Co-Conspirator No. 3 told Unindicted Co-Conspirator No. 4, in Twitter
3 Direct Messages, "@SWAutistic knows a thing or 2 on naughty
4 stuff!!hint: look at his name!!" Unindicted Co-Conspirator No. 3
5 also told Unindicted Co-Conspirator No. 4 that defendant BARRISS
6 charged \$10 to conduct a swat.

7 Overt Act No. 3: On or about December 17, 2017, in Twitter
8 Direct Messages with Unindicted Co-Conspirator No. 3, defendant
9 BARRISS agreed to swat Victim P.E.

10 Overt Act No. 4: On or about December 17, 2017, Unindicted
11 Co-Conspirator No. 3 sought, for his own amusement, to record Victim
12 P.E.'s reaction to the swat on a multi-party voice-over-internet
13 communication.

14 Overt Act No. 5: On or about December 17, 2017, defendant
15 BARRISS, with the purpose of issuing a threat and with knowledge that
16 the communication would be viewed as a threat, called the
17 Indianapolis Metropolitan Police Department in Indianapolis, Indiana,
18 and falsely reported, knowing the information to be false, that he
19 had shot his father at what defendant BARRISS believed to be Victim
20 P.E.'s home address on Caval Cade Court in Avon, Indiana.

21 Overt Act No. 6: On or after December 17, 2017, Unindicted
22 Co-Conspirator No. 4 told defendant BARRISS, in Twitter Direct
23 Messages, in substance and effect, that he had paid defendant BARRISS
24 to swat Victim P.E. and that Unindicted Co-Conspirator No. 3 was the
25 "middle man."

26 Overt Act No. 7: On or about December 17, 2017, Unindicted
27 Co-Conspirator No. 4 and defendant BARRISS agreed that defendant
28 BARRISS would swat Victim C.V., and Unindicted Co-Conspirator No. 4

1 provided defendant BARRISS with what he believed to be Victim C.V.'s
2 home address on Wittekind Terrace in Cincinnati, Ohio.

3 Overt Act No. 8: On or about December 17, 2017, using an
4 online payment processor, Unindicted Co-Conspirator No. 4 sent three
5 payments of \$10.00 each to defendant BARRISS to pay him for
6 conducting the swats of Victim P.E. and Victim C.V.

7 Overt Act No. 9: On December 18, 2017, by a telephone and
8 other instrument of commerce, defendant BARRISS willfully make a
9 threat, and maliciously conveyed false information knowing the
10 information to be false, to the Hamilton County Sheriff's Office
11 Communications Center in Hamilton County, Ohio, concerning an alleged
12 attempt being made, or to be made, to kill, injure, and intimidate an
13 individual and to damage and destroy property by means of fire and an
14 explosive, specifically, in substance and effect, that he had shot
15 his father at a residence on Wittekind Terrace in Cincinnati, Ohio,
16 that he was holding his mother and sister hostage, and that he
17 planned to set the residence on fire.

COUNT FORTY-FOUR

[18 U.S.C. § 844(e)]

1
2
3 On or about December 19, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," by a
7 telephone and other instrument of commerce, willfully made a threat,
8 and maliciously conveyed false information knowing the information to
9 be false, to the Lee's Summit Police Department in Lee's Summit,
10 Missouri, concerning an alleged attempt being made, or to be made, to
11 kill, injure, and intimidate an individual and to damage and destroy
12 property by means of fire and an explosive, namely, and in substance
13 and effect, that he had planted a bomb at a high school and that the
14 bomb was set to explode.

COUNT FORTY-FIVE

[18 U.S.C. § 875(c)]

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3 On or about December 22, 2017, in Los Angeles County, within the
4 Central District of California, defendant TYLER RAI BARRISS, also
5 known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert,"
6 aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," with the
7 purpose of issuing a threat and with knowledge that the communication
8 would be viewed as a threat, knowingly transmitted in interstate
9 commerce to Calgary emergency services in Calgary, Canada, a
10 communication containing true threats to injure the person of
11 another, namely, and in substance and effect, that he had shot a
12 person and was holding two others as hostages.

COUNT FORTY-SIX

[18 U.S.C. § 875(c)]

On or about December 26, 2017, in Los Angeles County, within the Central District of California, defendant TYLER RAI BARRISS, also known as ("aka") "@SWAUTISTIC," aka "Robert Hayward," aka "Robert," aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," with the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, knowingly transmitted in interstate commerce to the San Antonio Police Department in San Antonio, Texas, a communication containing true threats to injure the person of another, namely, and in substance and effect, that he had shot his mother and intended to harm others.

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