

COUNT 2

(Conspiracy to Use a Destructive Device During and In Relation to a Crime of Violence,
in violation of 18 U.S.C. § 924(o))

The Grand Jury further charges:

2. From in or around April 2018 to December 10, 2018, in the Northern District of Ohio, Western Division, and elsewhere, Defendants ELIZABETH R. LECRON and VINCENT S. ARMSTRONG did conspire, combine, confederate, and agree, to use and carry a destructive device, during and in relation to any crime of violence, as set forth in Title 18, United States Code, Section 924(c), to wit: Transportation or Receipt of Explosive with Intent to Kill, Injure, or Intimidate Any Individual, in violation of Title 18, United States Code, Section 844(d), and Maliciously Damage or Destroy Property by Fire or Explosive, in violation of Title 18, United States Code, Section 844(i), all in violation of Title 18, United States Code, Section 924(o).

COUNT 3

(Conspiracy to Use Firearms During and In Relation to a Crime of Violence,
in violation of 18 U.S.C. § 924(o))

The Grand Jury further charges:

3. From in or around April 2018 to December 10, 2018, in the Northern District of Ohio, Western Division, and elsewhere, Defendants ELIZABETH R. LECRON and VINCENT S. ARMSTRONG did conspire, combine, confederate, and agree, to use and carry firearms, during and in relation to any crime of violence, as set forth in Title 18, United States Code, Section 924(c), to wit: Transportation or Receipt of Explosive with Intent to Kill, Injure, or Intimidate Any Individual, in violation of Title 18, United States Code, Section 844(d), and Maliciously Damage or Destroy Property by Fire or Explosive, in violation of Title 18, United States Code, Section 844(i), all in violation of Title 18, United States Code, Section 924(o).

COUNT 4

(Possession of a Firearm in Furtherance of a Crime of Violence,
in violation of 18 U.S.C. § 924(c)(1)(A)(i))

The Grand Jury further charges:

4. From in or around April 2018 to December 10, 2018, in the Northern District of Ohio, Western Division, Defendant ELIZABETH R. LECRON did knowingly possess a firearm in furtherance of a crime of violence for which she may be prosecuted in a court of the United States, to wit: Conspiracy to Transport or Receive Explosive with Intent to Kill, Injure, or Intimidate Any Individual, in violation of Title 18, United States Code, Section 844(d) and 844(n), and Conspiracy to Maliciously Damage or Destroy Property by Fire or Explosive, in violation of Title 18, United States Code, Section 844(i) and 844(n), all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 5

(Possession of Firearms in Furtherance of a Crime of Violence,
in violation of 18 U.S.C. § 924(c)(1)(A)(i))

The Grand Jury further charges:

5. From in or around April 2018 to December 10, 2018, in the Northern District of Ohio, Western Division, Defendant VINCENT S. ARMSTRONG did knowingly possess firearms in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, to wit: Conspiracy to Transport or Receive Explosive with Intent to Kill, Injure, or Intimidate Any Individual, in violation of Title 18, United States Code, Section 844(d) and 844(n), and Conspiracy to Maliciously Damage or Destroy Property by Fire or Explosive, in violation of Title 18, United States Code, Section 844(i) and 844(n), all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 6

(Making False Statements, in violation of 18 U.S.C. § 1001(a)(2))

The Grand Jury further charges:

6. On or about December 10, 2018, in the Northern District of Ohio, Western Division, Defendant VINCENT S. ARMSTRONG knowingly and willfully made the following materially false, fictitious and fraudulent statements to a Special Agent of the FBI in a matter within the jurisdiction of the executive branch of the government of the United States, those are:

a.) When asked by agents, “Have you or did Elizabeth ever purchase pipes, caps, black powder, fuses, screws, or other bomb components for the purpose of making a bomb?” ARMSTRONG replied, “No, ah I don’t know about her because I didn’t know ...(unintelligible) ... ah but for me no.” Agents asked again whether he had purchased bomb parts and ARMSTRONG reaffirmed he had not.

b.) When asked by agents, “Has Elizabeth ever discussed with you any plans to commit an attack that would involve the loss of life, bodily injury, or property damage?” ARMSTRONG replied, “Um, besides like a in a role-playing aspect, no.”

c.) A short time later, agents asked again, “Have you and Elizabeth ever discussed a plan or strategy on how or where to commit an attack involving the loss of life, bodily injury, or property damage? ARMSTRONG replied, “No, not, not anywhere real or I don’t think anywhere fictional.”

When in truth and fact, as Defendant then well knew, those statements to the FBI Special Agent were false, all in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 7

(Transporting Explosives in Interstate Commerce, in violation of 18 U.S.C. § 844(d))

The Grand Jury further charges:

7. On or about December 8, 2018, in the Northern District of Ohio, Western Division, Defendant ELIZABETH R. LECRON did transport and receive, and attempted to transport and receive, in interstate commerce explosive materials, to wit: Hodgdon Triple Seven Muzzleloading Propellant, with the knowledge and intent that the explosive materials would be used to kill, injure, and intimidate any individual and unlawfully to damage and destroy any building, vehicle, and other real or personal property, in violation of Title 18, United States Code, Section 844(d).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.