

FILED
Sep 05, 2024
CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SEALED

1 PHILLIP A. TALBERT
United States Attorney
2 ANGELA L. SCOTT
Assistant United States Attorney

3 United States Attorney's Office
4 501 I Street, Suite 10-100
Sacramento, CA. 95814
5 Telephone: (916) 554-2700

6 KRISTEN CLARKE
Assistant Attorney General, Civil Rights Division
7 CHRISTOPHER J. PERRAS
Special Litigation Counsel

8 U.S. Department of Justice
9 950 Pennsylvania Avenue NW
Washington, DC 20530
10 Telephone: (202) 514-3847

11 MATTHEW G. OLSEN
Assistant Attorney General, National Security Division
12 JACOB WARREN
Trial Attorney

13 U.S. Department of Justice
14 950 Pennsylvania Avenue NW
Washington, DC 20530
15 Telephone: (202) 514-2007

16 Attorneys for Plaintiff
United States of America

17 IN THE UNITED STATES DISTRICT COURT
18 EASTERN DISTRICT OF CALIFORNIA

19
20 UNITED STATES OF AMERICA,
21 Plaintiff,

22 v.

23 DALLAS ERIN HUMBER, and
24 MATTHEW ROBERT ALLISON,
25 Defendants.

CASE NO. 2:24-cr-0257 DJC

18 U.S.C. § 371 – Conspiracy; 18 U.S.C. § 373 –
Solicitation of Hate Crimes (4 Counts); 18 U.S.C. §
373 – Solicitation of the Murder of Federal Officials
(3 Counts); 18 U.S.C. § 119 – Doxing Federal
Officials (3 Counts); 18 U.S.C. § 875(c) –
Interstate Threatening Communications; 18 U.S.C. §
842(p) – Distribution of Information Relating to
Explosives and Destructive Devices (2 Counts); 18
U.S.C. § 2339A – Conspiracy to Provide Material
Support to Terrorists; and 18 U.S.C. §§ 981(a)(1)(C),
981(a)(1)(G), and 28 U.S.C. § 2461(c) – Criminal
Forfeiture

26
27
28 INDICTMENT

GENERAL ALLEGATIONS

The Grand Jury charges, T H A T:

At all times relevant to the indictment:

The Terrorgram Collective

1. Telegram Messenger (“Telegram”) is a digital communications platform that allows users from around the world to send encrypted one-on-one messages, participate in group chats, share files, and operate and subscribe to “channels” that broadcast messages and content.

2. “The Terrorgram Collective,” commonly referred to as “Terrorgram”—a combination of the words “terrorism” and “Telegram”—is a network of channels, group chats, and users on Telegram that promote white supremacist accelerationism: an ideology centered on the belief that the white race is superior; that society is irreparably corrupt and cannot be saved by political action; and that violence and terrorism is necessary to ignite a race war and “accelerate” the collapse of the government and the rise of a white ethnostate.

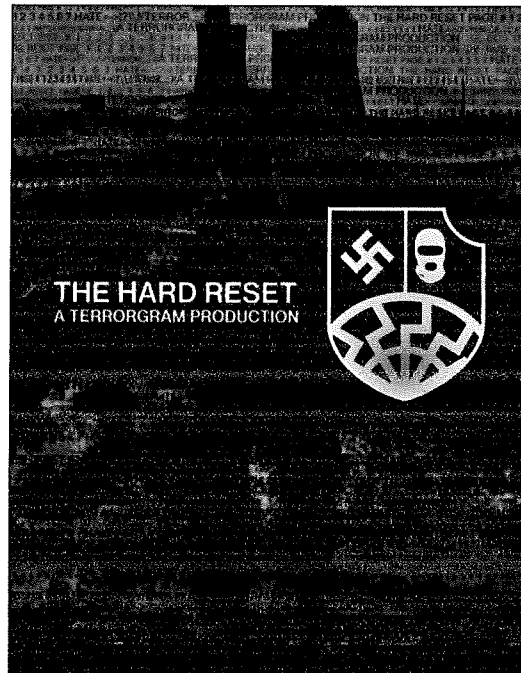
3. To achieve its vision of white revolution and domination, Terrorgram solicited terrorist attacks, including, but not limited to:

- a. Bias-motivated attacks against groups deemed by Terrorgram to be enemies of the white race;
- b. Attacks on government infrastructure, such as government buildings and energy facilities, which Terrorgram believes will ignite a race war and help accelerate the collapse of government and society; and
- c. Attacks on “high-value targets”—like politicians and government officials—whom Terrorgram sees as perpetuating an irredeemable society and whose murders Terrorgram believes would sow chaos and further accelerate the government’s downfall.

4. Defendants MATTHEW ROBERT ALLISON (“ALLISON”) and DALLAS ERIN HUMBER (“HUMBER”) joined Terrorgram in 2019, and became leaders of the group in the summer of 2022, after one previous leader was arrested and charged with terrorism offenses and another became aware that he was the subject of a terrorism related investigation. As leaders of the Terrorgram Collective, ALLISON and HUMBER ran Terrorgram channels and group chats; contributed to and disseminated

1 Terrorgram videos and publications, such as The Hard Reset, White Terror, and The List; solicited
2 Terrorgram users to commit bias-motivated attacks against racial enemies and terrorist attacks on critical
3 infrastructure; provided guidance and instructions to equip Terrorgram users to carry out those attacks;
4 and inspired Terrorgram users to become “Saints” by committing an attack in furtherance of white
5 supremacist accelerationism.

6 The Hard Reset



18 5. “The Hard Reset” is a digital publication explaining and justifying Terrorgram ideology;
19 providing detailed instructions and tactical advice for carrying out bias-motivated violence and
20 committing terrorist attacks on critical infrastructure; providing instructions for making bombs and
21 explosives, including Napalm, thermite, chlorine gas, pipe bombs, and dirty bombs; identifying targets
22 to attack; instructing readers how to effectively run a terror cell; celebrating terrorist attacks and violent
23 extremism; and inciting readers to terrorist action in support of Terrorgram’s cause.

24 6. ALLISON and HUMBER, working together and in collaboration with persons known
25 and unknown to the Grand Jury, helped create, edit, and disseminate The Hard Reset.

26 7. HUMBER narrated “The Hard Reset” and disseminated it in audiobook form.

27 //

28 //

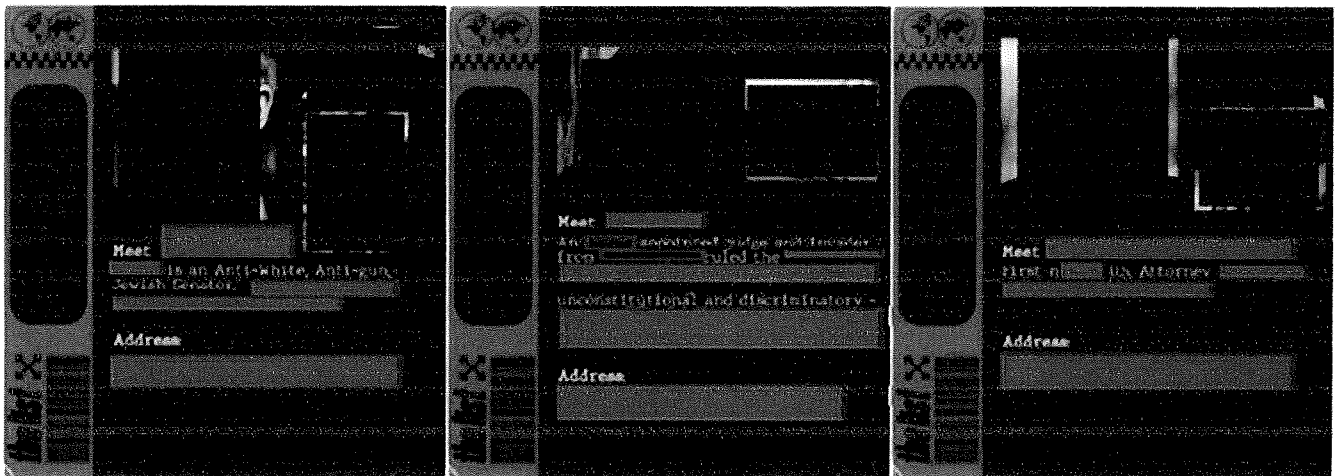
White Terror

1
2 8. "White Terror" is a 24-minute documentary, jointly produced and disseminated by
3 HUMBER and ALLISON, chronicling and celebrating 105 white supremacist attacks perpetrated between
4 1968 and 2021. HUMBER narrated the documentary, which includes graphic videos and photographs of
5 the attacks. The documentary opens with the message: "Between 1968 and 2021, 105 white men and
6 women of action have taken it upon themselves to wage war against the system and our racial enemies.
7 Our Saints are the best of our brothers, and this is our legacy of white terror." After chronicling each of
8 the attacks, the documentary concludes with the message: "To the Saints of tomorrow watching this today,
9 know that when you succeed you will be celebrated with reverence and your sacrifice will not be in vain.
10 Hail the Saints and hail our glorious and bloody legacy of white terror."

The List

11
12 9. "The List" is a hit list of "high-value targets" for assassination. The List includes a "List
13 card" for each target that displays the target's name, home address, and photograph; and a photograph of
14 the target's residence, if available.

15 10. Individuals named in The List, many of whom were targeted because of race, religion,
16 national origin, sexual orientation, and/or gender identity, include federal officials—such as a United
17 States Senator (Federal Official 1), a United States District Court Judge (Federal Official 2), and a
18 former United States Attorney (Federal Official 3); state officials; municipal officials; and leaders of
19 private companies and non-governmental organizations. The following are redacted versions of the List
20 cards for Federal Officials 1-3:



1 11. Each List card includes reasons why Terrorgram considered the target an enemy of the
2 cause of white supremacist accelerationism. For example, The List describes Federal Official 1 as “an
3 Anti-White, Anti-gun, Jewish Senator”; The List calls Federal Official 2 “an invader” from a foreign
4 country and highlighted the judge’s ruling on an immigration issue; and The List refers to Federal
5 Official 3 as the “[f]irst [racial slur] U.S. Attorney” in Federal Official 3’s jurisdiction.

6 12. ALLISON operated The List channels and archives, and collaborated on The List with
7 others known and unknown to the Grand Jury, including HUMBER.

8 13. ALLISON and HUMBER disseminated versions of The List on Terrorgram by posting
9 links and List cards in their chats and channels and by sending links and List cards to Terrorgram users
10 via direct message.

11 14. When disseminating The List, ALLISON included comments encouraging users to take
12 action, including, but not limited to, the following:

- 13 a. “Take Action Now”
14 b. “Do your part”
15 c. “Remember change starts with you. No one is coming to save us.”
16 d. A short story that concludes, “The List would do for killing what the printing press had
17 done for literacy.”

18 15. ALLISON and HUMBER provided guidance to Terrorgram users seeking to attack List
19 targets. For example, on or about April 26, 2022, a Terrorgram user posted in HUMBER’s group chat: “I
20 saw your ‘THE LIST’ channel” and “do you have any targets near cascadia?” In response, an
21 administrator of THE LIST channel posted a List card for a target residing in Seattle, Washington, and
22 HUMBER tagged the user who had asked the question. The user replied, “we already have this one” but
23 “make sure to [tag] me for any more in that location.” HUMBER replied, “will do.” On or about May
24 3, 2022, HUMBER posted the List card for another target residing in Seattle, Washington, and again
25 tagged the user. The user replied, “Very good i’ll check with my guys now.”

26 **Solicitation of Bias-Motivated Attacks**

27 16. ALLISON and HUMBER used Terrorgram channels, chats, and direct messages to solicit
28 Terrorgram users to commit bias-motivated attacks targeting victims because of their race, religion,

1 national origin, sexual orientation, and gender identity. Examples include, but are not limited to, the
2 following:

- 3 a. On or about July 4, 2023—during protests in France following the fatal police shooting
4 of Nahel Merzouk—HUMBER posted a photograph of a sniper aiming a rifle, with the
5 caption: “A MESSAGE TO ARMED AND POTENTIALLY LETHAL FRENCH BROS:
6 Don’t cower in your rooms, waiting for the nigger riots to stop. Instead, load your
7 magazines and get cozy. You know what to do - what MUST be done. Every fiber of
8 your being knows. Don’t second-guess your Racial Duty. Don’t breathe a word of what
9 you’re planning to anyone, and make every shot count.”
- 10 b. On or about June 22, 2023, HUMBER posted (and ALLISON re-posted): “Just this week
11 in fact the Justice Department announced it had arrested a man alleged to have been
12 threatening violent disruption of Nashville’s upcoming Pride celebration — with
13 ‘shrapnel pressure cooker bombs’ or ‘a mass shooting.’ ACTION > THREATS. If you’re
14 terrorpilled enough to KNOW WHAT MUST BE DONE keep your fucking mouth shut
15 and 🤝MAKE🤝IT🤝HAPPEN🤝 Fag month isn’t over yet there’s still time... 🤔
16 HAIL HOLY TERROR”
- 17 c. On or about June 1, 2023, HUMBER posted: “Well lads, it’s officially fag month. ZOG’s
18 fag agenda and their sick, systematic abuse of White children isn’t slowing down. It won’t
19 stop until YOU stop it. While conservatards might be satisfied fighting back economically,
20 let’s be real - there are MUCH better ways to fight back. Mass shootings, arson, bombings,
21 vehicular attacks, the list goes on and the opportunities provided to you this month will be
22 plentiful. Don’t let them go to waste. What’s more impactful - boycotting Target, or getting
23 dozens of targets in your sights and taking them out permanently? Actions speak louder
24 than words. DIRECT, LETHAL ACTION speaks louder than any boycott. This ‘pride
25 month,’ give us what we truly need - a new Saint to be proud of, and a glorious new attack
26 to celebrate. You’ve got the means and the opportunity, all you need is the Will. Don’t
27 breathe a word of what you’re planning to anyone, and MAKE IT COUNT. ‘IF [attacker]
28 CAN KILL FIFTY, IMAGINE WHAT YOU CAN DO.’ - The Hard Reset (p. 193) HAIL

1 HOLY TERROR.” Along with the message, HUMBER posted Pages 192 and 193 of The
2 Hard Reset, which include a photograph from a nightclub massacre in the United States, on
3 June 12, 2016, in which an attacker killed 49 people.

4 d. On or about December 23, 2022, HUMBER posted (and ALLISON re-posted) the
5 following message about the murder of three Kurdish immigrants in Paris, France:
6 “Allow me to ‘Terrorgram Life Coach’ you lads for a moment. Today’s mass shooting in
7 Paris is SO much more than a few dead invaders, an early Christmas present, and a nice
8 way to end an already great year. The making of our newest Saint is a truly inspirational
9 story. It’s a story about redemption, resilience, and never giving up. First it was a knife in
10 2016. Then it was a sword in 2021. Finally it was a gun on this glorious day, 2022. It
11 would’ve been easy to conclude, ‘Maybe I’m past my prime, maybe terrorism isn’t for
12 me,’ and give up... but Saint [attacker] didn’t give up. Instead he persisted, and today his
13 tireless efforts paid off. If a 69 year old man living under France’s tyrannical gun control
14 laws can carry out a mass shooting, IMAGINE WHAT YOU COULD DO. Believe in
15 yourselves, lads, and never give up. On your path to Victory, to fulfilling your Destiny, to
16 answering your Higher Calling, may nothing impede you. Have no doubt. YOU. GOT.
17 THIS.”

18 **Solicitation of Terrorist Attacks on Critical Infrastructure**

19 17. In addition to soliciting bias-motivated attacks, HUMBER and ALLISON also solicited
20 attacks on critical government infrastructure, including federal buildings and energy facilities, and
21 provided instructions for carrying out those attacks. As HUMBER explained, in a post on or about
22 December 9, 2022 (which ALLISON re-posted): “Both strategies—mass casualty attacks AND sabotage
23 attacks on critical infrastructure—are effective and indeed necessary to achieve our goals. They’re
24 completely different means, but they work towards the same end. And, most importantly, they work
25 better together. After all, the best time to strike is when the power’s out and emergency services are
26 disabled. Every attack is unique, but they’re ALL worth celebrating. Every target is a legitimate target.
27 Every method of attack—sabotage, shootings, bombings, arson, stabbings, vehicular attacks, and
28

1 more—are viable and justified.” Examples of posts soliciting terrorist attacks on critical infrastructure
2 include, but are not limited to, the following:

- 3 a. On or about December 9, 2022, ALLISON posted: “**Preparing an Attack/Sabotage:**
4 **When sabotaging it is worth mentioning all the demotivating things an individual is**
5 **going to face** when executing an attack. Like having second thoughts, thinking it's not
6 going to work out, and the fear of getting caught... BUT DO NOT LET THIS BIG
7 MISTAKE HAPPEN TO YOU! Remember, having a plan, knowing the area you are
8 sabotaging, being masked up, having throwaway clothes, having the right tools, not
9 bringing technology, and keeping your mouth shut **is the key towards a successful**
10 **attack**. Try to not lose your motivation as it is the only thing that keeps you going. When
11 you feel like you do never forget why you started. Never forget about the brothers
12 waiting to celebrate your attack... and never forget what has the industrial society has
13 done to you, your people, and your tribe. **☛ Do not let those technophiles have a day of**
14 **rest! Learn more about where power grids are located near you.**” The post ended
15 with a link to a detailed map of the worldwide electrical grid.
- 16 b. On or about December 7, 2022, HUMBER posted (and ALLISON re-posted): “At any
17 given time, there are determined soldiers of this struggle out there in the night, getting
18 ready for their attack. Planning, assessing targets, scoping them out, and everything that
19 goes into a well-planned and precision strike. Next time your power is out, you should
20 wonder if it will ever come back on any time soon. Maybe one of these cool and
21 calculating Aryan soldiers put a .308 into the side of every transformer at a few carefully
22 chosen substations. You’ll never know because they kept their mouth shut. They’re not in
23 it for fame or glory, their only drive is bringing this System to its knees. And who
24 knows? Maybe that person could be YOU, lining up your sights on these metal
25 behemoths from the tree line, squeezing the trigger, and retreating from the area with a
26 shit eating grin on your face knowing the chaos you’ve just unleashed. Never to boast
27 about it, never to be caught. Perhaps even to rinse and repeat.”
28

- 1 c. On or about December 26, 2022, HUMBER posted (and on or about December 28, 2022,
2 ALLISON re-posted) four images detailing component parts of electrical substation
3 transformers, along with the message: “For educational purposes only of course ☹️
4 Don’t get any ideas HAIL HOLY TERROR.”
- 5 d. On or about January 4, 2023, HUMBER posted (and ALLISON re-posted) a photo of a
6 Seattle Times news article entitled, “Pierce County Christmas Day substation attacks,”
7 with the message: “If two petty criminal tweakers can take out 4 substations in a day,
8 imagine what an ambitious, fully radicalized Hard Reset and Make it Count reader like
9 YOU can do! Just PLEASE remember to **LEAVE. YOUR. PHONE. AT. HOME.**”
- 10 e. On or about January 20, 2023, HUMBER posted a link to an article titled, “Multiple
11 bullets leave hundreds of thousands of dollars in damage at Thomasville substation,
12 EnergyUnited says,” along with the following message: “Everyone, please take a moment
13 to congratulate yourselves. It seems as though this avenue of attack, an incredibly
14 effective one at that, has really caught on. I like to think that all our hard work in
15 detailing its effectiveness and showing our community how easy it is not only to do, but
16 to get away with, has helped encourage this. Death to the grid. Death to the System.”

17 **Dissemination of Bombmaking and Explosives Instructions**

18 18. ALLISON and HUMBER operated Terrorgram channels that serve as archives for
19 instructional manuals and videos on how to create bombs, chemical weapons, and weapons of mass
20 destruction. Through their Terrorgram channels, chats, and private messages, ALLISON and HUMBER
21 disseminated instructional manuals and videos to Terrorgram users in order to equip them to carry out
22 attacks. Examples include, but are not limited to, the following:

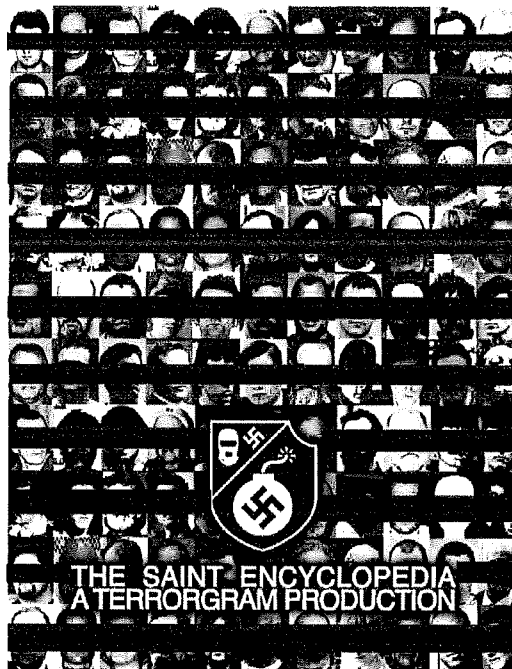
- 23 a. On or about July 28, 2022, HUMBER posted (and on or about August 1, 2022,
24 ALLISON re-posted) Pages 142-43 of The Hard Reset, which provide instructions and
25 encouragement to make and detonate a “dirty bomb”—a bomb comprised of explosives
26 and radioactive material—to “fumigate the cities” by targeting and killing groups of
27 people because of their race, religion, national origin, sexual orientation, and gender
28 identity, describing those groups with slurs known to the Grand Jury.

1 b. On various dates, HUMBER and ALLISON posted a five-step instructional video titled,
2 “How To Make a Letter Bomb.” The video explained how to obtain ingredients for the
3 explosive mixture and the fuse; how to mix the ingredients to create the explosive; how
4 to synthesize the fuse paste; how to rig a padded envelope; how to find the location of a
5 “federal building” that would be “a suitable target”; and how to commit the crime without
6 being caught.

7 **The Saint Encyclopedia**

8 19. ALLISON and HUMBER, working together and in collaboration with persons known
9 and unknown to the Grand Jury, were in the process of creating “The Saint Encyclopedia,” a Terrorgram
10 publication that celebrates white supremacist attackers as heroes of the white race—“Saints”—and urges
11 Terrorgram users to follow their path to “Sainthood” by committing an attack in the name of
12 Terrorgram.

13 20. The proposed cover of The Saint Encyclopedia is comprised of mugshots of white
14 supremacist mass murderers whom Terrorgram celebrates as heroes and Saints (redacted image below):

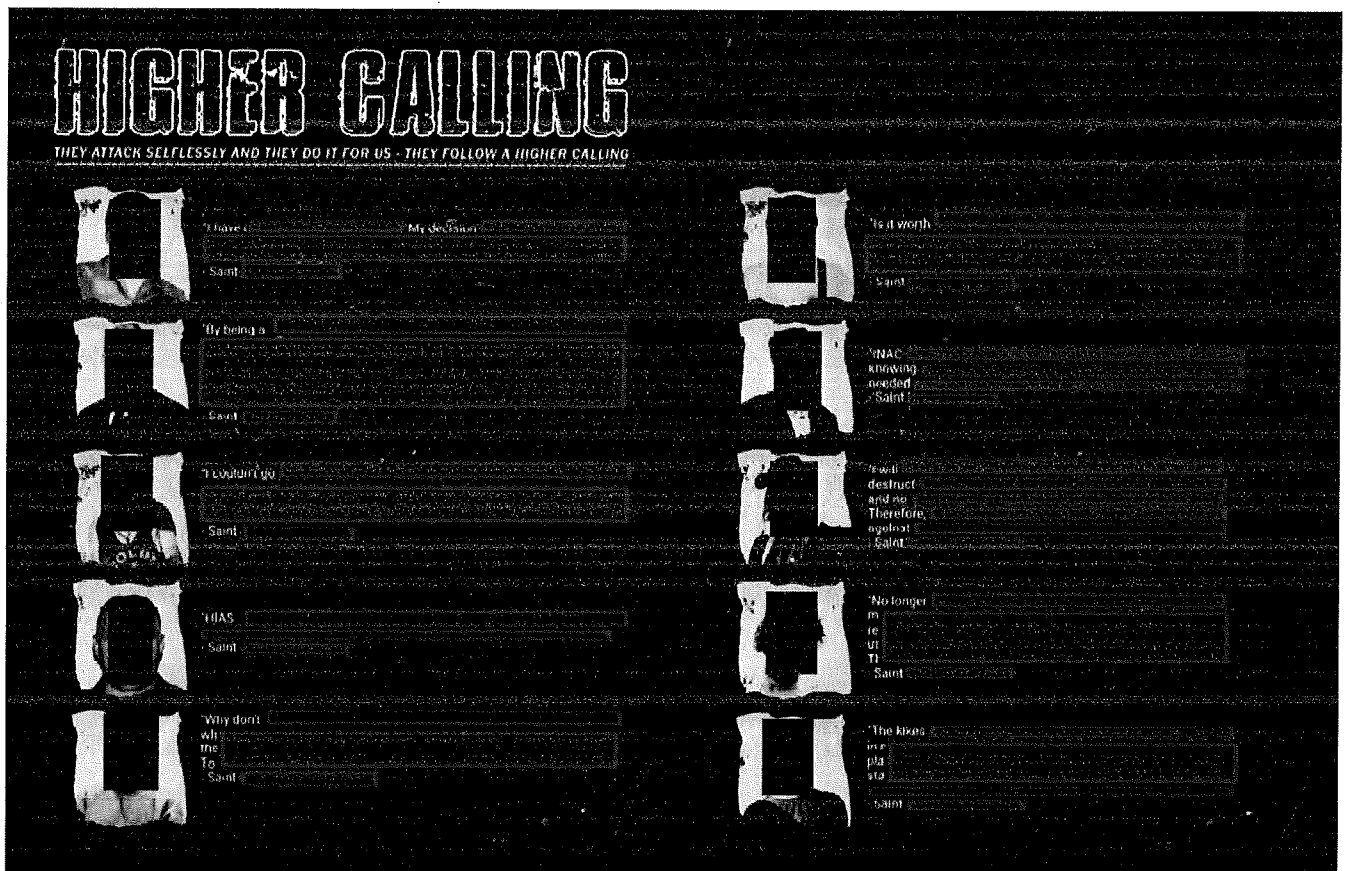


27 //

28 //

1 21. The dedication of The Saint Encyclopedia, which sits between two still shots from the
2 live-streamed massacre of 51 Muslim worshippers in Christchurch, New Zealand, in 2019, reads: “This
3 book is dedicated to our ever-expanding Pantheon of Saints; to the White Men and Women of Action
4 who made this book possible; and to the Saints of tomorrow reading this today. May our words and
5 praise, and the glorious deeds of your predecessors, strengthen your resolve and guide you on your path
6 to Victory.”

7 22. The Saint Encyclopedia includes information on each “Saint” and the murders the Saint
8 committed to further the cause of white supremacist accelerationism, as well as quotes from manifestos of
9 “inner-circle Saints,” ten white supremacist mass murderers, to inspire the “Saints of tomorrow” (redacted
10 image below):



//

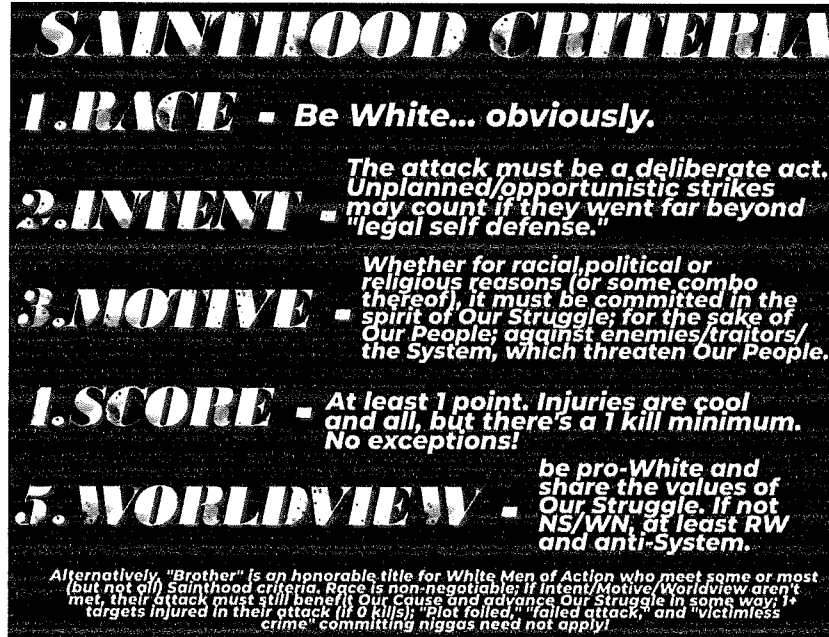
//

Terrorgram's Saint Culture

23. The Saint Encyclopedia is an expression of Terrorgram's broader "Saint" culture, nurtured and weaponized by ALLISON and HUMBER to inspire Terrorgram users to commit acts of violence.

24. As HUMBER explained in a post on or about May 24, 2022 (which ALLISON re-posted on or about May 26, 2022): "The canonization of mass shooters and amplification of their messages creates an environment where aspiring attackers are increasingly willing to perpetrate violence as a way to honor previous 'saints,' attain sainthood themselves, and inspire future attacks."

25. On or about July 8, 2022, HUMBER posted the below graphic setting forth Terrorgram's "Sainthood Criteria":

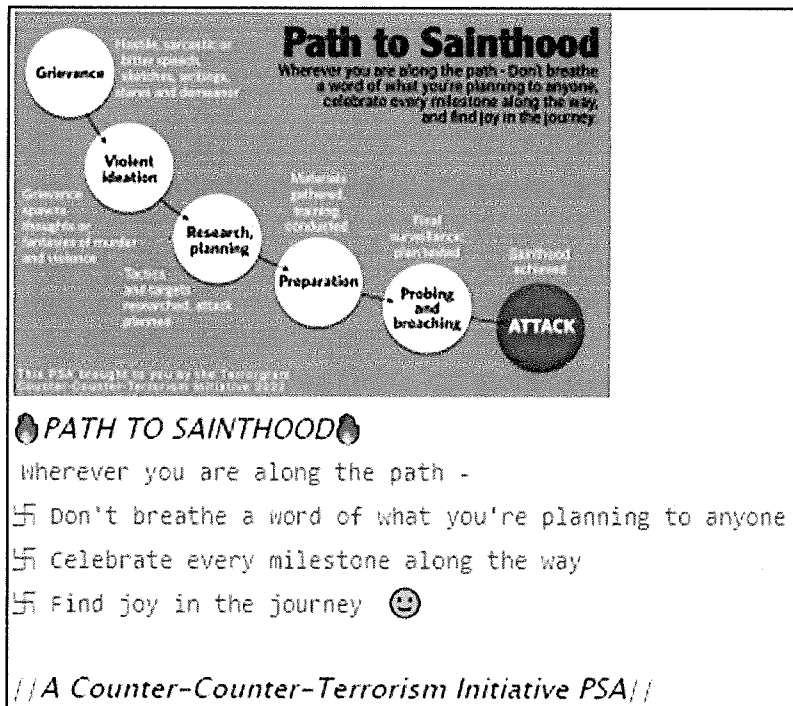


[Remainder of page intentionally left blank]

1 26. On or about November 2, 2022, HUMBER posted (and ALLISON re-posted) the below
2 graphic displaying the "Path to Sainthood":

3 27. To persuade Terrorgram users to follow the "Path to Sainthood," HUMBER and
4 ALLISON posted messages celebrating past Saints and encouraging Terrorgram users to "join the
5 Pantheon" (i.e., become a Saint by committing a white supremacist attack). Examples include, but are
6 not limited to, the following:

- 7 a. On or about August 28, 2023, HUMBER posted: "There's no love like the love we feel
8 for every Accelerationist mass shooter. Have no doubt, after your Big Day you will be
9 celebrated, admired, honored and defended until the end of time. Keep your head up, be
10 strong and do your best. We believe in you and we can't wait to see what you're capable
11 of! 🤖❤️"
- 12 b. On or about January 1, 2023, HUMBER posted (and the next day, ALLISON re-posted),



13
14
15
16
17
18
19
20
21 "Terrorgram's next Saints are out there somewhere, and I hope they're reading this. If
22 you're planning on MAKING 2023 YOUR YEAR, this post is for you. So you've made
23 your decision - this year you're finally gonna do it. We can't wait to see—and celebrate
24 —what you're capable of. Don't breathe a word of what you're planning to anyone in the
25
26
27
28

1 meantime. Stack ‘em high, King. Make them pay. After you initiate, your only regret will
2 be not striking sooner. You. Got. This. HAIL HOLY TERROR.”

- 3 c. On or about August 4, 2022, HUMBER posted (and the next day, ALLISON re-posted),
4 Page 247 of The Hard Reset, titled, “A Letter to the Next Disciples,” which encourages
5 future Saints to plan and follow through with an attack, and advises future Saints about
6 how to write a manifesto, successfully carry out an attack, and get away with it.
- 7 d. On or about June 8, 2022, HUMBER posted, “More Saints, more attack methods, more
8 targets. That’s my vision and hope for the future. Broaden our horizons in terms of methods
9 and target selection but don’t abandon conventional terrorism. It works for a reason.”
- 10 e. On or about March 15, 2022, HUMBER posted, “Saints aren’t Gods but they’ve ascended
11 beyond ordinary men. They were all ordinary men, then took extraordinary action for the
12 sake of Our People. They are in fact the only soldiers in this war against the White Race.
13 No military is fighting for us. No govt is protecting our people and defending our interests.
14 The ONLY people fighting for us are lone wolves who, as [one of the ten mass murderers
15 referenced in Paragraph 22, above] said, ‘couldn’t go another day watching these things
16 happen to my people and doing nothing about it.’ They answered a higher calling and they
17 made the ultimate sacrifice for us.”
- 18 f. On or about March 15, 2022, HUMBER stated in ALLISON’s group chat that she posted
19 the above quote for a specific Terrorgram user she was targeting for radicalization.
20 HUMBER wrote: “He’s like 18yo and seems very impressionable, I’m trying to
21 radicalize him.”

22 **The Final Push**

23 28. HUMBER and ALLISON gave Terrorgram users advice and encouragement to follow
24 through with planned attacks. Examples include, but are not limited to, the following:

- 25 a. On or about June 29, 2024, HUMBER posted: “MENTAL PREPARATION – ADVICE
26 FOR THE NEXT DISCIPLES. It pained us all to see what happened in Australia the
27 other day – would-be Saint [attacker] uploaded his manifesto, started his livestream, but
28 didn’t go through with the mass stabbing he had planned. We can only speculate what

1 was going through his mind at that moment, but that brings us to the topic of this post:
2 MENTAL PREPARATION. With so much focus on physical preparation, it's easy to
3 overlook the mental component, but hesitating or losing your nerve can derail your plans
4 as quickly as poor planning. By choosing the path of Holy Terror, you are making the
5 ultimate sacrifice – whether you are captured or killed, life as you know it is over. But
6 you stand to gain so much more – immortality, Sainthood, your place in history, the list
7 goes on. After you initiate – make your announcement, post your manifesto, start your
8 livestream, or simply brandish your weapon at your target location – THERE IS NO
9 TURNING BACK. There is no 'going back to your old life,' there are only 2 options
10 ahead of you – immortalize yourself in the Pantheon, or fail and be forgotten. Within you
11 lies the Blood of Heroes – your Will to Act is proof of that. Don't sell your life cheaply,
12 or give it away for nothing. You've come too far to give up at the last second. MAKE.
13 IT. COUNT. And if you're out there, the next Disciples planning your Big Day and
14 patiently awaiting your time to strike, we encourage you to learn from [attacker's]
15 mistakes. Let this be a moment of self-reflection, not a 'bad omen' that makes you
16 second guess your correct course. If your first thought is, 'Second guess myself? Never,'
17 then you're on the right track and you've absolutely got what it takes. YOU. GOT.
18 THIS.”

- 19 b. On about December 29, 2023, a Terrorgram user made a series of posts in ALLISON's
20 group chat signaling his plans to commit a mass-shooting, including: “2024 there shall be
21 saints”; “highscore shall be defeated”; “there is no surrender only death”; “when my @
22 says last seen a week ago remove me from everything”; and “you have not seen the wrath
23 of the Aryan that has no purpose left.” HUMBER responded to the posts by writing, “stay
24 safe brother ily.” ALLISON responded to the posts by posting a picture of two warriors
25 hugging and wrote: “love ya bro. you're a fuckin OG. wish you the best in everything
26 homie.”
- 27 c. On or about August 9, 2023, a Terrorgram user posted in HUMBER's group chat, “Talk
28 me down from committing a failed domestic terror act.” HUMBER responded, “If you

1 weren't destined to succeed, you wouldn't have made it this far. 🤝 HAVE. NO
2 DOUBT. YOU. GOT. THIS. 🤝 ." Humber then posted Page 93 of Terrorgram
3 publication Militant Accelerationism, titled "Your Big Day," which encourages "lone wolf
4 . . . white warriors" to carry out attacks.

- 5 d. On various dates, HUMBER posted (and ALLISON re-posted): 🤝 LOOSE TALK RUINS
6 PLANS 🤝 SHHH... SURPRISE US WE NEED TERROR SHOOTINGS 🚩 ARSON 🚩
7 BOMBINGS 🚩 STABBINGS DEAD TARGETS NOT FOILED PLOTS STOP
8 TALKING START KILLING."

9 **Terrorgram Users Incited to Action**

10 29. Guided by Terrorgram posts, publications, videos, and instruction manuals and inspired
11 by Terrorgram's Saint culture, several Terrorgram users have carried out attacks in order to become
12 "Saints," or were planning to do so when they were arrested or otherwise disrupted by law enforcement.
13 Examples include, but are not limited to, the following:

14 30. **Attacker 1.** On or about October 12, 2022, a 19-year-old from Slovakia known to the
15 Grand Jury (hereinafter, "Attacker 1") shot three people, killing two, at an LGBT bar in Bratislava,
16 Slovakia; sent his manifesto to ALLISON; then killed himself.

- 17 a. In Attacker 1's manifesto, "A Call To Arms," which HUMBER later narrated and turned
18 into an audiobook, Attacker 1 thanked Terrorgram for inspiring and guiding him:
- 19 i. In a section titled, "Recommended Reading," Attacker 1 listed "Militant
20 Accelerationism and The Hard Reset by Terrorgram Collective," commenting: "If
21 the other books give a theoretical and fictional base for our resistance, these two
22 provide the practical means for it."
- 23 ii. In a section titled, "Special Thanks," Attacker 1 thanked a former Terrorgram
24 leader who was convicted of terrorism offenses, as well as the "Terrorgram
25 Collective," adding, "You know who you are. Thank you for your incredible
26 writing and art, for your political texts; for your practical guides. Building the
27 future of the White revolution, one publication at a time."
- 28

1 iii. The final sentence of Attacker 1’s manifesto is “Make it Count!”, which is a
2 commonly used phrase on Terrorgram meaning to kill as many people as possible
3 during an attack.

4 b. In the year leading up to Attacker 1’s attack, Attacker 1 was active on Terrorgram and
5 had frequent conversations with ALLISON, HUMBER, and other members of the
6 Terrorgram Collective, including, but not limited to, the following conversations:

7 i. On or about July 15, 2022, HUMBER told other members of her group chat,
8 including Attacker 1, “If you became a Saint I’d narrate your book. That’s the
9 cost of admission, so to speak.” HUMBER later clarified: “Dead targets or I
10 don’t care.”

11 ii. In the same group chat, Attacker 1 posted, “Finished reading The Hard Reset. It’s
12 excellent - on par with Mil[itant] Accel[erationism]” (a previous Terrorgram
13 publication). Attacker 1 identified “a letter to the disciples”—a page from The
14 Hard Reset that HUMBER and ALLISON disseminated, as detailed in Paragraph
15 27c of this Indictment—as one of the “best parts” of The Hard Reset. HUMBER
16 replied, “I hope the next Saints out there read those passages and feel inspired.”

17 c. After Attacker 1’s attack, HUMBER and ALLISON took credit, on behalf of Terrorgram,
18 for inspiring and guiding Attacker 1 and celebrated him as “Terrorgram’s first Saint”:

19 i. On or about October 13, 2022, HUMBER posted a “New Saint Announcement,”
20 which ALLISON re-posted, that reads: “October 12, 2022 – a new Saint arose in
21 Bratislava, Slovakia. The absolute madlad, [Attacker 1], became Saint [attacker’s]
22 6th Disciple, and Terrorgram’s very first Saint. He released his manifesto online
23 before shooting up an LGBT coffee shop, killing 2 fags and injuring a waitress,
24 before escaping. While evading police, he actively posted on his Pol thread and
25 trolled fag sympathizers on Twitter. He had many more targets on his to-do list,
26 but ran out of ammo before he could reach them. Unable to continue, he took his
27 own life. We encourage all of you to read his FIRE AF manifesto, ‘A Call
28 To Arms.’ Saint [Attacker 1]’s place in the Pantheon is undisputed, as is our

1 enthusiastic support for his work. We thank him from the bottom of our hearts
2 and we will never forget his sacrifice. His Saint card is coming very soon, but
3 this exciting announcement couldn't wait. FUCKING HAIL, BROTHER!!!



- 5 ii. On October 19, 2022, ALLISON and HUMBER posted the audiobook of
6 Attacker 1's manifesto, which HUMBER narrated.
- 7 iii. Between January 1, 2023, and October 12, 2023, HUMBER and ALLISON
8 posted messages and images celebrating Attacker 1's attack, including the
9 following fake newspaper cover:



1 31. **Attacker 2**. On or about July 10, 2024, an 18-year-old from the United States known to
2 the Grand Jury (hereinafter, “Attacker 2”) was arrested for plotting an attack on an energy facility in
3 New Jersey.

- 4 a. Before his arrest, Attacker 2 was active in Terrorgram group chats, where he consumed
5 and spread Terrorgram material, including White Terror and The Hard Reset.
- 6 b. In January 2024, in a Terrorgram group chat with HUMBER, Attacker 2 asked for
7 “recommended documentaries about our guys, made by our guys,” elaborating that he
8 was looking for something “like White Terror.” HUMBER posted the audiobook of a
9 Saint manifesto she narrated titled, “A White Boy Summer To Remember.”
- 10 c. On or about April 14, 2024, in a Terrorgram group chat with ALLISON and HUMBER,
11 the chat administrator posted “The BTC Movie Trilogy,” which is a compilation of hours
12 of accelerationist propaganda videos created by ALLISON. In response, a group chat
13 participant asked the administrator to post “Crimepilled” videos, additional videos
14 created and/or disseminated by ALLISON that provide guidance for committing attacks.
15 The chat administrator posted several “Crimepilled” videos, including instructions for
16 making homemade explosives, instructions for using Mylar balloons to commit an attack
17 on an energy facility, and a “lone wolf” guide for committing a mass-casualty attack.
18 Attacker 2 thanked the chat administrator for posting the videos, and asked the chat
19 administrator to send him more videos via direct message.
- 20 d. On two occasions in June and July 2024, at Attacker 2’s direction, Attacker 2 and another
21 individual (who, unbeknownst to Attacker 2, was a Federal Bureau of Investigation
22 undercover special agent (hereinafter, “UC”)), drove to two different electrical
23 substations in North Brunswick and New Brunswick, New Jersey. During these visits,
24 Attacker 2 solicited the UC to conduct an electrical substation attack and advised the UC
25 how to do so. Attacker 2 told the UC to use Mylar balloons to short-circuit a
26 transformer—the same method recommended in ALLISON’s Crimepilled video.
27 Attacker 2 sent a copy of The Hard Reset to the UC, and told the UC that The Hard Reset
28 “is really the only thing you need It has ideology, it has how to guides, it has ideas

1 for funny things, it goes into how you should plan it, it goes into the thought process.”

2 32. **Attacker 3.** On or about August 12, 2024, an 18-year-old from Turkey known to the
3 Grand Jury (hereinafter, “Attacker 3”)—wearing a Siege mask, helmet, and tactical vest attired with a
4 Sonnenrad and Totenkopf—livestreamed himself stabbing five people outside of a mosque in Eskişehir,
5 Turkey.

- 6 a. On the morning of the attack, Attacker 3 posted in a Telegram group chat the message,
7 “Come see how much humans I can cleanse”. The post included links to a livestream and
8 images and PDF files.
- 9 b. An individual describing himself as a friend of the attacker later broadcasted the
10 livestreamed attack over X (formerly known as Twitter), using the account
11 @HolyTerrorist1 (display name Total Human Death). The tweet included a link to the
12 livestream, the attacker’s manifesto, and PDFs the attacker wished to share.
- 13 c. The PDFs shared by Attacker 3 included several Terrorgram publications—The Hard
14 Reset, Do It For The Gram, Militant Accelerationism—that Attacker 3 explained, in his
15 manifesto, have information that is useful to planning and committing an attack. The
16 PDFs shared by Attacker 3 included manifestos of several Terrorgram Saints, including
17 Attacker 1. In his manifesto, Attacker 3 expressed a desire to be recognized as a Saint
18 and encouraged others to livestream their attacks to inspire future Saints.
- 19 d. After the attack, members of HUMBER and ALLISON’s Terrorgram group chat discussed
20 the mass-stabbing and its connections to Terrorgram. HUMBER posted: “He included the
21 Terrorgram books and other Saint manifestos in his file dump, gives shoutouts to the other
22 Saints in his manifesto and references several Hard Reset passages, he was 100% our guy.
23 But he’s not White so I can’t give him an honorary title. We still celebrating his attack tho,
24 he did it for Terrorgram.” HUMBER also posted: “We can hail him anyway, we just can’t
25 add him to the Pantheon. But yeah it’s a great development regardless, inspiring more
26 attacks is the goal and anyone claiming to be an accelerationist should support them.”

27 //

28 //

1 COUNT ONE: [18 U.S.C. § 371 – Conspiracy]

2 The Grand Jury charges: T H A T

3 DALLAS ERIN HUMBER and
4 MATTHEW ROBERT ALLISON,

5 defendants herein, as follows:

6 1. The General Allegations of this Indictment are realleged and incorporated herein.

7 2. Beginning in or about January 2022, and continuing through in or about September 2024,
8 in the State and Eastern District of California, and elsewhere, knowingly and intentionally conspired and
9 agreed with one another and with persons known and unknown to the Grand Jury to commit the
10 following offenses against the United States:

11 a. to solicit, command, induce, or otherwise endeavor to persuade another person to
12 engage in conduct constituting a felony that has as an element the use, attempted use, or threatened use
13 of physical force against the person of another in violation of the laws of the United States—
14 specifically, the hate crimes charged in Counts 2, 3, 4 and 5 of this Indictment—under circumstances
15 strongly corroborative of that intent, in violation of 18 U.S.C. § 373.

16 b. to solicit, command, induce, or otherwise endeavor to persuade another person to
17 engage in conduct constituting a felony that has as an element the use, attempted use, or threatened use
18 of physical force against the person of another in violation of the laws of the United States—
19 specifically, the murders of federal officials charged in Counts 6, 7, and 8 of this Indictment—under
20 circumstances strongly corroborative of that intent, in violation of 18 U.S.C. § 373.

21 c. to knowingly make publicly available restricted personal information about
22 federal officers or employees with the intent to threaten, intimidate, or incite crimes of violence against
23 them—as charged in Counts 9, 10, and 11 of this Indictment—in violation of 18 U.S.C. § 119(a)(1).

24 d. to knowingly transmit in interstate or foreign commerce a communication
25 containing a threat to injure the person of another—as charged in Count 12 of this Indictment—in
26 violation of 18 U.S.C. § 875(c).

27 e. to distribute, by any means, information pertaining to, in whole or in part, the
28 manufacture or use of an explosive or destructive device, with the intent that the information be used for,

1 or in furtherance of, an activity that constitutes a federal crime of violence—as charged in Counts 13 and
2 14 of this Indictment—in violation of 18 U.S.C. § 842(p).

3 Manner and Means of the Conspiracy

4 3. ALLISON and HUMBER conspired together to recruit, radicalize, equip, advise, inspire,
5 and solicit others to commit attacks in furtherance of Terrorgram’s mission:

6 a. Recruit: ALLISON and HUMBER conspired to recruit future Saints by
7 monitoring Telegram channels in search of individuals who may be susceptible to radicalization; and by
8 inviting those individuals to join Terrorgram channels and chats.

9 b. Radicalize: ALLISON and HUMBER conspired to radicalize future Saints by
10 creating and disseminating propaganda—including digital publications; coordinated messages and
11 media content broadcast over Terrorgram chats and channels; and audio and video productions that
12 glorify white supremacist terrorist attackers—with the goal of, as ALLISON explained, “mov[ing]
13 people further down the path” of radicalization until, as HUMBER put it, “they finish their
14 radicalization journey and [we] mold them into White Warriors.”

15 c. Equip: ALLISON and HUMBER conspired to equip future Saints to carry out
16 attacks by providing instructions for how to make homemade bombs, firearms, detonators, chemical
17 weapons, and weapons of mass destruction; how to plan, prepare for, and carry out an attack; and how to
18 evade detection by law enforcement.

19 d. Advise: ALLISON and HUMBER conspired to advise future Saints by providing
20 guidance and encouragement in channels, chats, and in one-on-one communications.

21 e. Inspire: ALLISON and HUMBER conspired to inspire future Saints to commit
22 attacks by promising that “Men and Women of action” will be immortalized as “Saints” of Terrorgram and
23 heroes of the white race; and by demonstrating the rewards of following the “Path to Sainthood” by
24 glorifying Saints who committed white supremacist terrorist attacks.

25 f. Solicit: ALLISON and HUMBER conspired to solicit future Saints to carry out
26 bias-motivated attacks against racial enemies and terrorist attacks on critical infrastructure.

27 Overt Acts Committed in Furtherance of the Conspiracy

28 4. In furtherance of the conspiracy and to effect the objects thereof, HUMBER and

1 ALLISON, within the Eastern District of California and elsewhere, committed overt acts within the
2 dates of the charged conspiracy, including the following:

3 *The Hard Reset*

4 a. HUMBER and ALLISON worked together, and with other persons known and unknown
5 to the Grand Jury, to create The Hard Reset, a Terrorgram publication described in Paragraph 5 of the
6 General Allegations.

7 b. HUMBER posted messages on Telegram promoting the release of The Hard Reset, with
8 each posting constituting an independent overt act.

9 c. ALLISON posted messages on Telegram promoting the release of The Hard Reset, with
10 each posting constituting an independent overt act.

11 d. HUMBER disseminated The Hard Reset on Telegram, with each dissemination
12 constituting an independent overt act.

13 e. ALLISON disseminated The Hard Reset on Telegram, with each dissemination
14 constituting an independent overt act.

15 f. HUMBER posted individual pages from The Hard Reset to amplify their message, with
16 each posting constituting an independent overt act.

17 g. ALLISON posted individual pages from The Hard Reset to amplify their message, with
18 each posting constituting an independent overt act.

19 h. HUMBER narrated The Hard Reset, and disseminated the audiobook version on
20 Telegram.

21 *White Terror*

22 i. HUMBER and ALLISON worked together to create White Terror, the documentary
23 described in Paragraph 8 of the General Allegations.

24 j. HUMBER disseminated White Terror on Telegram, with each dissemination constituting
25 an independent overt act.

26 k. ALLISON disseminated White Terror on Telegram, with each dissemination constituting
27 an independent overt act.

28 *The List*

1 instructional manuals and videos on how to create bombs, chemical weapons, and weapons of mass
2 destruction.

3 v. HUMBER, through her Terrorgram channels, chats, and private messages, disseminated
4 instructional manuals and videos to Terrorgram users in order to equip them to carry out attacks,
5 including but not limited to the posts set forth in Paragraph 18 of the General Allegations, with each
6 dissemination constituting an independent overt act.

7 w. ALLISON, through his Terrorgram channels, chats, and private messages, disseminated
8 instructional manuals and videos to Terrorgram users in order to equip them to carry out attacks,
9 including but not limited to the posts set forth in Paragraph 18 of the General Allegations, with each
10 dissemination constituting an independent overt act.

11 *The Saint Encyclopedia and Saint Culture*

12 x. HUMBER and ALLISON worked together, and with other persons known and unknown
13 to the Grand Jury, to create “The Saint Encyclopedia,” a Terrorgram publication described in Paragraphs
14 19-22 of the General Allegations.

15 y. HUMBER and ALLISON worked together to nurture and weaponize Terrorgram’s Saint
16 culture by posting the images and messages set forth in Paragraphs 24-27 of the General Allegations,
17 with each post constituting an independent overt act.

18 z. HUMBER gave Terrorgram users advice and encouragement to follow through with
19 planned attacks, including by posting the images and messages set forth in Paragraphs 28 and 30(b) and
20 (c) of the General Allegations, with each post constituting an independent overt act.

21 aa. ALLISON gave Terrorgram users advice and encouragement to follow through with
22 planned attacks, including by posting the images and messages set forth in Paragraphs 28 and 30(b) and
23 (c) of the General Allegations, with each post constituting an independent overt act.

24 All in violation of Title 18, United States Code, Section 371.

25 //

26 //

27

28

1 COUNT TWO: [18 U.S.C. § 373 – Solicitation of a Hate Crime]

2 The Grand Jury further charges: T H A T

3 DALLAS ERIN HUMBER and
4 MATTHEW ROBERT ALLISON

5 defendants herein, between in or about January 2022 and in or about September 2024, in the State and
6 Eastern District of California, and elsewhere, aiding and abetting one another, with the intent that
7 another person engage in conduct constituting a felony that has as an element the use, attempted use, and
8 threatened use of physical force against the person of another in violation of the laws of the United
9 States, and under circumstances strongly corroborative of that intent, did solicit, command, induce, and
10 otherwise endeavor to persuade another person to engage in such conduct: that is, to willfully cause
11 bodily injury to any person because of the actual or perceived race or color of any person, in an attempt
12 to kill, in violation of Title 18, United States Code, Sections 249(a)(1) and 249(a)(1)(B)(ii). Specifically,
13 as detailed in the General Allegations of this Indictment, which are realleged and incorporated herein,
14 Humber and Allison solicited, commanded, induced, and otherwise endeavored to persuade other people
15 to commit bias-motivated attacks targeting Black people and white people who associate with Black
16 people, whom they deem “race traitors.”

17 All in violation of Title 18, United States Code, Sections 373 and 2.

18 COUNT THREE: [18 U.S.C. § 373 – Solicitation of a Hate Crime]

19 The Grand Jury further charges: T H A T

20 DALLAS ERIN HUMBER and
21 MATTHEW ROBERT ALLISON,

22 defendants herein, between in or about January 2022 and in or about September 2024, in the State and
23 Eastern District of California, and elsewhere, aiding and abetting one another, with the intent that another
24 person engage in conduct constituting a felony that has as an element the use, attempted use, and
25 threatened use of physical force against the person of another in violation of the laws of the United States,
26 and under circumstances strongly corroborative of that intent, did solicit, command, induce and otherwise
27 endeavor to persuade another person to engage in such conduct: that is, to willfully cause bodily injury to
28 any person because of the actual or perceived race, color, or religion of any person, in an attempt to kill, in

1 violation of Title 18, United States Code, Sections 249(a)(1), and 249(a)(1)(B)(ii). Specifically, as
2 detailed in the General Allegations of this Indictment, which are realleged and incorporated herein,
3 Humber and Allison solicited, commanded, induced, and otherwise endeavored to persuade other people
4 to commit bias-motivated attacks targeting Jewish people.

5 All in violation of Title 18, United States Code, Sections 373 and 2.

6 COUNT FOUR: [18 U.S.C. § 373 – Solicitation of a Hate Crime]

7 The Grand Jury further charges: T H A T

8 DALLAS ERIN HUMBER and
9 MATTHEW ROBERT ALLISON

10 defendants herein, between in or about January 2022 and in or about September 2024, in the State and
11 Eastern District of California, and elsewhere, aiding and abetting one another, with the intent that another
12 person engage in conduct constituting a felony that has as an element the use, attempted use, and
13 threatened use of physical force against the person of another in violation of the laws of the United States,
14 and under circumstances strongly corroborative of that intent, did solicit, command, induce and otherwise
15 endeavor to persuade another person to engage in such conduct: that is, to willfully cause bodily injury to
16 any person because of the actual or perceived national origin of any person, in an attempt to kill, in
17 violation of Title 18, United States Code, Section 249(a)(1), and 249(a)(1)(B)(ii). Specifically, as detailed
18 in the General Allegations of this Indictment, which are realleged and incorporated herein, Humber and
19 Allison solicited, commanded, induced, and otherwise endeavored to persuade other people to commit
20 bias-motivated attacks targeting non-white immigrants.

21 All in violation of Title 18, United States Code, Sections 373 and 2.

22 COUNT FIVE: [18 U.S.C. § 373 – Solicitation of a Hate Crime]

23 The Grand Jury further charges: T H A T

24 DALLAS ERIN HUMBER and
25 MATTHEW ROBERT ALLISON,

26 defendants herein, between in or about January 2022 and in or about September 2024, in the State and
27 Eastern District of California, and elsewhere, aiding and abetting one another, with the intent that another
28 person engage in conduct constituting a felony that has as an element the use, attempted use, and

1 threatened use of physical force against the person of another in violation of the laws of the United States,
2 and under circumstances strongly corroborative of that intent, did solicit, command, induce and otherwise
3 endeavor to persuade another person to engage in such conduct: that is, to willfully cause bodily injury to
4 any person because of the actual or perceived sexual orientation or gender identity of any person, in an
5 attempt to kill, in violation of Title 18, United States Code, Sections 249(a)(2)(A) and 249(a)(2)(A)(ii)(II),
6 under circumstances that, if carried out, would affect commerce in a manner set forth in section
7 249(a)(2)(B) of Title 18 of the United States Code. Specifically, as detailed in the General Allegations of
8 this Indictment, which are realleged and incorporated herein, Humber and Allison solicited, commanded,
9 induced, and otherwise endeavored to persuade other people to commit bias-motivated attacks targeting
10 lesbian, gay, bisexual, and transgender people.

11 All in violation of Title 18, United States Code, Sections 373 and 2.

12 COUNT SIX: [18 U.S.C. § 373 – Solicitation of the Murder of a Federal Official]

13 The Grand Jury further charges: . T H A T

14 DALLAS ERIN HUMBER and
15 MATTHEW ROBERT ALLISON,

16 defendants herein, between on or about November 17, 2021, and on or about September 5, 2024, in the
17 State and Eastern District of California, and elsewhere, aiding and abetting one another, with the intent
18 that another person engage in conduct constituting a felony that has as an element the use, attempted
19 use, and threatened use of physical force against the person of another in violation of the laws of the
20 United States, and under circumstances strongly corroborative of that intent, did solicit, command,
21 induce, and otherwise endeavor to persuade another person to engage in such conduct: that is, with
22 premeditation and malice aforethought, to kill Federal Official 1, a United States Senator known to the
23 Grand Jury, an officer and employee of the United States, while Federal Official 1 was engaged in and
24 on account of the performance of Federal Official 1's official duties, as detailed in the General
25 Allegations of this Indictment, which are realleged and incorporated herein, in violation of Title 18,
26 United States Code, Section 1114(a)(1).

27 All in violation of Title 18, United States Code, Sections 373 and 2.

28 //

1 COUNT SEVEN: [18 U.S.C. § 373 – Solicitation of the Murder of a Federal Official]

2 The Grand Jury further charges: T H A T

3 DALLAS ERIN HUMBER and
4 MATTHEW ROBERT ALLISON,

5 defendants herein, between on or about November 17, 2021, and on or about September 5, 2024, in the
6 State and Eastern District of California, and elsewhere, aiding and abetting one another, with the intent
7 that another person engage in conduct constituting a felony that has as an element the use, attempted
8 use, and threatened use of physical force against the person of another in violation of the laws of the
9 United States, and under circumstances strongly corroborative of that intent, did solicit, command,
10 induce, and otherwise endeavor to persuade another person to engage in such conduct: that is, with
11 premeditation and malice aforethought, to kill Federal Official 2, a United States District Court Judge
12 known to the Grand Jury, an officer and employee of the United States, while Federal Official 2 was
13 engaged in and on account of the performance of Federal Official 2's official duties, as detailed in the
14 General Allegations of this Indictment, which are realleged and incorporated herein, in violation of Title
15 18, United States Code, Section 1114(a)(1).

16 All in violation of Title 18, United States Code, Sections 373 and 2.

17 COUNT EIGHT: [18 U.S.C. § 373 – Solicitation of the Murder of a Federal Official]

18 The Grand Jury further charges: T H A T

19 DALLAS ERIN HUMBER and
20 MATTHEW ROBERT ALLISON,

21 defendants herein, between on or about November 17, 2021, and on or about September 5, 2024, in the
22 State and Eastern District of California, and elsewhere, aiding and abetting one another, with the intent
23 that another person engage in conduct constituting a felony that has as an element the use, attempted
24 use, and threatened use of physical force against the person of another in violation of the laws of the
25 United States, and under circumstances strongly corroborative of that intent, did solicit, command,
26 induce, and otherwise endeavor to persuade another person to engage in such conduct: that is, with
27 premeditation and malice aforethought, to kill Federal Official 3, a United States Attorney known to the
28 Grand Jury, an officer and employee of the United States, while Federal Official 3 was engaged in and

1 on account of the performance of Federal Official 3's official duties, as detailed in the General
2 Allegations of this Indictment, which are realleged and incorporated herein, in violation of Title 18,
3 United States Code, Section 1114(a)(1).

4 All in violation of Title 18, United States Code, Sections 373 and 2.

5 COUNT NINE: [18 U.S.C. § 119(a)(1) – Doxing Federal Official]

6 The Grand Jury further charges: T H A T

7 DALLAS ERIN HUMBER and
8 MATTHEW ROBERT ALLISON,

9 defendants herein, between on or about November 17, 2021, and on or about September 5, 2024, in the
10 State and Eastern District of California, and elsewhere, aiding and abetting one another, knowingly
11 made publicly available restricted personal information about Federal Official 1, a United States Senator
12 known to the Grand Jury, with the intent to threaten, intimidate, and incite a crime of violence—
13 specifically, the crime of violence the defendants are charged with soliciting in Count 6 of this
14 Indictment—against Federal Official 1.

15 All in violation of Title 18, United States Code, Sections 119(a)(1) and 2.

16 COUNT TEN: [18 U.S.C. § 119(a)(1) – Doxing Federal Official]

17 The Grand Jury further charges: T H A T

18 DALLAS ERIN HUMBER and
19 MATTHEW ROBERT ALLISON,

20 defendants herein, between on or about November 17, 2021, and on or about September 5, 2024, in the
21 State and Eastern District of California, and elsewhere, aiding and abetting one another, knowingly
22 made publicly available restricted personal information about Federal Official 2, a United States District
23 Court Judge known to the Grand Jury, with the intent to threaten, intimidate, and incite a crime of
24 violence—specifically, the crime of violence the defendants are charged with soliciting in Count 7 of
25 this Indictment—against Federal Official 2.

26 All in violation of Title 18, United States Code, Sections 119(a)(1) and 2.

27 //

28 //

1 COUNT ELEVEN: [18 U.S.C. § 119(a)(1) – Doxing Federal Official]

2 The Grand Jury further charges: T H A T

3 DALLAS ERIN HUMBER and
4 MATTHEW ROBERT ALLISON,

5 defendants herein, between on or about November 17, 2021, and on or about September 5, 2024, in the
6 State and Eastern District of California, and elsewhere, aiding and abetting one another, knowingly made
7 publicly available restricted personal information about Federal Official 3, a United States Attorney known
8 to the Grand Jury, with the intent to threaten, intimidate, and incite a crime of violence—specifically, the
9 crime of violence the defendants are charged with soliciting in Count 8 of this Indictment—against Federal
10 Official 3.

11 All in violation of Title 18, United States Code, Sections 119(a)(1) and 2.

12 COUNT TWELVE: [18 U.S.C. § 875(c) – Interstate Threatening Communication]

13 The Grand Jury further charges: T H A T

14 DALLAS ERIN HUMBER and
15 MATTHEW ROBERT ALLISON,

16 defendants herein, between on or about November 17, 2021, and on or about September 5, 2024, in the
17 State and Eastern District of California, and elsewhere, aiding and abetting one another, knowingly
18 transmitted in interstate and foreign commerce a communication containing a threat to injure the person
19 of another. Specifically, defendants transmitted threatening communications such as those detailed in
20 Paragraphs 9 through 18 and 23 through 28 of the General Allegations of this Indictment, which are
21 realleged and incorporated herein.

22 All in violation of Title 18, United States Code, Sections 875(c) and 2.

23 COUNT THIRTEEN: [18 U.S.C. § 842(p) – Distribution of Information Relating to Explosives and
24 Destructive Devices in Furtherance of Assault and Murder of Federal Officials]

25 The Grand Jury further charges: T H A T

26 DALLAS ERIN HUMBER and
27 MATTHEW ROBERT ALLISON,

28 defendants herein, between on or about November 7, 2022, and on or about September 5, 2024, in the

1 State and Eastern District of California, and elsewhere, aiding and abetting one another, distributed by
2 any means information pertaining to, in whole and in part, the manufacture and use of an explosive and
3 destructive device, with the intent that the information be used for, and in furtherance of, an activity that
4 constitutes a federal crime of violence—specifically, with premeditation and malice aforethought, to
5 unlawfully kill an officer or employee of the United States or of any agency in any branch of the United
6 States Government (including any member of the uniformed services) while such officer or employee is
7 engaged in or on account of the performance of official duties, or any person assisting such an officer or
8 employee in the performance of such duties or on account of that assistance, in violation of Title 18,
9 United States Code, Section 1114(a)(1); and to intentionally and forcibly assault, intimidate, or interfere
10 with any officer or employee of the United States or of any agency in any branch of the United States
11 Government who was engaged in official duties, with a dangerous weapon, in violation of Title 18,
12 United States Code, Section 111(b)—as detailed in the General Allegations of this Indictment, which are
13 realleged and incorporated herein.

14 All in violation of Title 18, United States Code, Section 842(p)(2)(A) and 2.

15 COUNT FOURTEEN: [18 U.S.C. § 842(p) – Distribution of Information Relating to Explosives and
16 Destructive Devices in Furtherance of Hate Crimes]

17 The Grand Jury further charges: T H A T

18 DALLAS ERIN HUMBER and
19 MATTHEW ROBERT ALLISON,

20 defendants herein, between on or about July 14, 2022, and on or about September 5, 2024, in the State
21 and Eastern District of California, and elsewhere, aiding and abetting one another, distributed by any
22 means information pertaining to, in whole and in part, the manufacture and use of an explosive and
23 destructive device, with the intent that the information be used for, and in furtherance of, an activity that
24 constitutes a federal crime of violence—specifically, to willfully cause bodily injury to any person
25 because of the actual or perceived race, color, religion, or national origin of any person, in an attempt to
26 kill, in violation of Title 18, United States Code, Sections 249(a)(1) and 249(a)(1)(B)(ii); and to willfully
27 cause bodily injury to any person because of the actual or perceived sexual orientation or gender identity
28 of any person, in an attempt to kill, in violation of Title 18, United States Code, Sections 249(a)(2)(A)

1 and 249(a)(2)(A)(ii)(II), under circumstances that, if carried out, would affect commerce in a manner set
2 forth in § 249(a)(2)(B)—as detailed in the General Allegations of this Indictment, which are realleged
3 and incorporated herein.

4 All in violation of Title 18, United States Code, Section 842(p)(2)(A) and 2.

5 COUNT FIFTEEN: [18 U.S.C. § 2339A – Conspiracy to Provide Material Support to Terrorists]

6 The Grand Jury further charges: T H A T

7 DALLAS ERIN HUMBER and
8 MATTHEW ROBERT ALLISON,

9 defendants herein, beginning in or about January 2022, and continuing through in or about September
10 2024, in the State and Eastern District of California, and elsewhere, together with persons known and
11 unknown to the Grand Jury, knowingly and intentionally conspired to provide “material support or
12 resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), namely, services,
13 property, personnel, training, and expert advice or assistance, knowing and intending that they were to
14 be used in preparation for, and in carrying out, a violation of Title 18, United States Code, Sections
15 844(f)(1)(2) (arson or bombing of federal property), 844(i) (arson or bombing of property used in
16 interstate or foreign commerce), 1114 (killing or attempted killing of a federal official), and 1366
17 (destruction or damage of an energy facility), as detailed in the General Allegations of this Indictment,
18 which are realleged and incorporated herein.

19 All in violation of Title 18, United States Code, Section 2339A.

20 FORFEITURE ALLEGATION: [18 U.S.C. §§ 981(a)(1)(C), 981(a)(1)(G), and 28 U.S.C. § 2461(c)
21 – Criminal Forfeiture]

22 1. Upon conviction of one or more of the offenses alleged in Counts One and Twelve
23 through Fifteen of this Indictment, defendants DALLAS ERIN HUMBER and MATTHEW ROBERT
24 ALLISON shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C), (G) and 28 U.S.C.
25 § 2461(c), all property, real and personal, which constitutes or is derived from proceeds traceable to
26 such violations, including but not limited to a sum of money equal to the total amount of proceeds
27 traceable to such offenses, for which defendants are convicted.

28 2. If any property subject to forfeiture, as a result of the offenses alleged in Counts One and

1 Twelve through Fifteen of this Indictment, for which defendants are convicted:


- 2 a. cannot be located upon the exercise of due diligence;
- 3 b. has been transferred or sold to, or deposited with, a third party;
- 4 c. has been placed beyond the jurisdiction of the court;
- 5 d. has been substantially diminished in value; or
- 6 e. has been commingled with other property which cannot be divided without
7 difficulty;

8 it is the intent of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to
9 seek forfeiture of any other property of defendants, up to the value of the property subject to forfeiture.

10
11 A TRUE BILL.

12 **/s/ Signature on file w/AUSA**

13 _____
14 FOREPERSON

15 
16 PHILLIP A. TALBERT
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

No Bail Warrant Pending Hearing

HUMBER, Dallas Erin, and

ALLISON, Matthew Robert

No Bail Warrant Pending Hearing

INDICTMENT

VIOLATION(S): 18 U.S.C. § 371; 18 U.S.C. § 373 (4 counts); 18 U.S.C. § 373 (3 counts);
18 U.S.C. § 119 (3 counts); 18 U.S.C. § 875(c); 18 U.S.C. § 842(p) (2 counts);
18 U.S.C. § 2339A; 18 U.S.C. §§ 981(a)(1)(C), 981(a)(1)(G), and 28 U.S.C. § 2461(c)

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this _____ 5th day

of September _____, A.D. 20 24

/s/ R. Alvarez
Clerk.

No Bail Warrant Pending Hearing

Bail, \$ _____

Carol H. Delaney

United States v. Dallas Erin Humber, et al.
Penalties for Indictment

Defendants

DALLAS ERIN HUMBER
MATTHEW ROBERT ALLISON

COUNT 1: **DALLAS ERIN HUMBER**
 MATTHEW ROBERT ALLISON

VIOLATION: 18 U.S.C. § 371 – Conspiracy

PENALTIES: Maximum five-year term of imprisonment
 Maximum \$250,000 fine or both fine and imprisonment
 Three-year term of supervised release

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNTS 2-5: **DALLAS ERIN HUMBER**
 MATTHEW ROBERT ALLISON

VIOLATION: 18 U.S.C. § 373 – Solicitation of a Hate Crime

PENALTIES: Maximum twenty-year term of imprisonment
 Maximum \$250,000 fine or both fine and imprisonment
 Five-year term of supervised release

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNTS 6-8: **DALLAS ERIN HUMBER**
 MATTHEW ROBERT ALLISON

VIOLATION: 18 U.S.C. § 373 – Solicitation of Murder of a Federal Official

PENALTIES: Maximum twenty-year term of imprisonment
 Maximum \$250,000 fine or both fine and imprisonment
 Five-year term of supervised release

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNTS 9-11: **DALLAS ERIN HUMBER**
 MATTHEW ROBERT ALLISON

VIOLATION: 18 U.S.C. § 119 – Doxing Federal Officials

1 PENALTIES: Maximum five-year term of imprisonment
2 Maximum \$250,000 fine or both fine and imprisonment
3 Three-year term of supervised release

4 SPECIAL ASSESSMENT: \$100 (mandatory)

5 **COUNT 12:** **DALLAS ERIN HUMBER**
MATTHEW ROBERT ALLISON

6 VIOLATION: 18 U.S.C. § 875(c) – Interstate Threatening Communications

7 PENALTIES: Maximum five-year term of imprisonment
8 Maximum \$250,000 fine or both fine and imprisonment
9 Three-year term of supervised release

10 SPECIAL ASSESSMENT: \$100 (mandatory)

11
12 **COUNTS 13-14:** **DALLAS ERIN HUMBER**
MATTHEW ROBERT ALLISON

13 VIOLATION: 18 U.S.C. § 842(p) – Distribution of Information Relating to Explosives and
14 Destructive Devices

15 PENALTIES: Maximum twenty-year term of imprisonment
16 Maximum \$250,000 fine or both fine and imprisonment
17 Three-year term of supervised release

18 SPECIAL ASSESSMENT: \$100 (mandatory)

19 **COUNT 15:** **DALLAS ERIN HUMBER**
MATTHEW ROBERT ALLISON

20 VIOLATION: 18 U.S.C. § 2339A – Conspiracy to Provide Material Support to Terrorists

21 PENALTIES: Maximum fifteen-year term of imprisonment
22 Maximum \$250,000 fine or both fine and imprisonment
23 Three-year term of supervised release

24 SPECIAL ASSESSMENT: \$100 (mandatory)

25 **FORFEITURE ALLEGATION:**

26 VIOLATION: 18 U.S.C. §§ 981(a)(1)(C), 981(a)(1)(G), and 28 U.S.C. § 2461(c) – Criminal
27 Forfeiture

28 PENALTIES: As stated in the charging document