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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2020 Grand Jury

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
CARL DE VERA BENNINGTON,  
  
Defendant.

CR No.  
  
I N D I C T M E N T  
  
[18 U.S.C. §§ 2261A(2),  
2261(b)(5): Stalking; 18 U.S.C.  
§ 875(c): Threats to Injure in  
Interstate Commerce]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 2261A(2), 2261(b)(5)]

1. Beginning in or about January 2013 and continuing to on or about November 26, 2019, in Los Angeles County, within the Central District of California, and elsewhere, defendant CARL DE VERA BENNINGTON ("BENNINGTON"), with the intent to harass and intimidate Victim 1, who was a 15-year-old female high school student at the time the conduct started, used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely, interstate wires and the Internet, to engage in a

1 course of conduct, described in paragraph 2 below, that placed Victim  
2 1 in reasonable fear of death and serious bodily injury, and caused,  
3 attempted to cause, and would reasonably be expected to cause  
4 substantial emotional distress to Victim 1.

5 2. Defendant BENNINGTON's course of conduct included, among  
6 other things, the following:

7 a. Between in or about January 2013 and on or about March  
8 1, 2019, defendant BENNINGTON repeatedly sent Victim 1 unsolicited  
9 online messages. When Victim 1 would block defendant BENNINGTON from  
10 contacting her from a particular account, defendant BENNINGTON would  
11 create a new online account and continue sending Victim 1 messages.

12 b. On or about March 1, 2019, after Victim 1 sent  
13 defendant BENNINGTON online messages accusing him of stalking her  
14 online for several years and asking him to identify himself,  
15 defendant BENNINGTON sent Victim 1 a series of online messages in  
16 which he refused to provide his true name, accused her of "disrespect  
17 and ignorance," told her she made him "so fucking angry," and warned  
18 her, "Don't Fuckin test me."

19 c. On or about March 11, 2019, defendant BENNINGTON sent  
20 Victim 1 an online message stating that "talking to me that way is a  
21 no no."

22 d. Between on or about June 24, 2019 and on or about July  
23 15, 2019, defendant BENNINGTON sent Victim 1 several unsolicited and  
24 graphic online messages in which he insulted Victim 1 and demanded  
25 that Victim 1 participate in a sexual relationship with him.

26 e. On or about July 16, 2019, after Victim 1 demanded  
27 that defendant BENNINGTON "cease and desist all communication with me  
28

1 forever," defendant BENNINGTON sent Victim 1 the following online  
2 messages:

3 i. "Your friends [and] family are gonna be murdered  
4 if you stop. Only you can prevent it.

5 ii. "Do you want everyone you love in your [life]  
6 murder[ed] and killed. You need to show yourself if you. You won't  
7 be safe either."

8 iii. "You don't have a choice."

9 iv. "Show yourself or everyone and you will be gone  
10 from this earth."

11 v. "You need to save them."

12 vi. "Some[one] is gonna show up to your place right  
13 now . . . it's not gonna be. You have to do what they say."

14 vii. [VICTIM 1]!!!!!! GOOO!!!!!"

15 viii. "GET YOURE [SIC] WHORE AS[S] OVER HERE NOW."

16 ix. "HURRY."

17 x. "Or you're going to get killed."

18 xi. "It's not safe."

19 xii. "I'll kill everyone you love if you don't come."

20 xiii. "And leave you in the dust."

21 xiv. "Is that how your [sic] gonna treat your  
22 boyfriend."

23 xv. "Fucking kill you if you don't come out here and  
24 Strangle your ass If you don't do it."

25 xvi. "Fine just wait . . ."

26 xvii. "I'm gonna get rid of this car and phone . . .  
27 . soo [sic] I be off the radar . . . watch yourself payback is a  
28 bitch . . . if I decide to do it."

1 f. Later on or about July 16, 2019, after Victim 1 again  
2 demanded that defendant BENNINGTON stop contacting her, defendant  
3 BENNINGTON wrote several insulting and graphic online messages to  
4 Victim 1 demanding that Victim 1 perform sexual acts.

5 g. Between on or about July 16, 2019 and on or about  
6 August 23, 2019, defendant BENNINGTON wrote numerous, graphic online  
7 messages to Victim 1 demanding that Victim 1 participate in a sexual  
8 relationship with him and insulting her when she did not response to  
9 his demands.

10 h. On or about August 23, 2019, after Victim 1 did not  
11 respond to defendant BENNINGTON's demands, defendant BENNINGTON sent  
12 the following online messages to Victim 1:

- 13 i. "Get your little slutty ass over here."
- 14 ii. "Or go away."
- 15 iii. "Dog."
- 16 iv. "Where the fuck is your collar at . . ."
- 17 v. "I need to go buy a leash so you don't escape!!!  
18 Fucking hoe. "
- 19 vi. "I wanna pound you doggy and Pull your fucking  
20 hair."
- 21 vii. "Then I[']m gonna burry [sic] Your body into a  
22 gra[v]e."
- 23 viii. "And no one is come [sic] to look for you."
- 24 ix. "You Better obey you a slut."
- 25 x. "No one wants you around."
- 26 xi. "I own you."
- 27 xii. "Fuck you . . . no."
- 28 xiii. "I'm gonna rape you."

1 xiv. "And you better fucking tell anyone."

2 xv. "I'll be fucking watching you. I owe you,"

3 accompanied by a picture of a man choking a woman while pointing a  
4 gun at her

5 xvi. "Shut the fuck up and don't talk. Where the fuck  
6 is your collar. We are not gonna have a baby . . . I need you around  
7 for a while. I want you fucking sore all over body. I wanna slap  
8 you around. You belong to no one else but me," accompanied by a  
9 picture of a leather dominatrix whip being pressed against the back  
10 of a woman.

11 xvii. "Where the fuck is you[r] collar."

12 xviii. "We are not gonna have a baby . . ."

13 xix. "I need you around for a while."

14 xx. "I want you fucking sore all over [your] body."

15 xxi. "I wanna slap you around."

16 xxii. "You belong to no one else but me."

17 xxiii. "Put on your fucking collar," accompanied by  
18 a picture of an electronic dog collar.

19 xxiv. "Dog . . . bark for me dog."

20 xxv. "LOUDER YOU LITTLE (yanks the chain)!!!"

21 xxvi. "I can't fucking hear you."

22 xxvii. "Get on your knees and fucking tie my shoe."

23 xxviii. "You're married to my ass."

24 xxix. "Now."

25 xxx. "Now. . ."

26 xxxi. "Yanks collar."

27 xxxii. "I'm gonna pull your hair and bite and kiss  
28 your neck and fuck toss you on the floor."

1 xxxiii. "I'm replacing you lol."

2 xxxiv. "You better not be fucking cheating on my  
3 ass . . . I'll replace your ass in an instant."

4 xxxv. "Fucking whore."

5 xxxvi. "Where the fuck you at anyways."

6 xxxvii. "Fuck I'm starting to become possessive."

7 i. On or about the morning of August 24, 2019, defendant  
8 BENNINGTON sent numerous graphic online messages to Victim 1 in which  
9 he insulted Victim 1 and demanded that Victim 1 participate in a  
10 sexual relationship with him.

11 j. Between on or about September 1, 2019 and on or about  
12 November 26, 2019, defendant BENNINGTON wrote numerous graphic online  
13 messages to Victim 1 demanding that Victim 1 participate in a sexual  
14 relationship with him and insulting her when she did not response to  
15 his demands.

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COUNT TWO

[18 U.S.C. §§ 2261A(2), 2261(b)(5)]

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3 3. Beginning on or about April 30, 2016, and continuing to on  
4 or about March 30, 2020, in Los Angeles County, within the Central  
5 District of California, and elsewhere, defendant CARL DE VERA  
6 BENNINGTON ("BENNINGTON"), with the intent to harass and intimidate  
7 Victim 2, who was a 26-year-old woman at the time the conduct  
8 started, used an interactive computer service, electronic  
9 communication service, electronic communication system of interstate  
10 commerce, and other facilities of interstate and foreign commerce,  
11 namely, interstate wires and the Internet, to engage in a course of  
12 conduct, described in paragraph 4 below, that placed Victim 2 in  
13 reasonable fear of death and serious bodily injury, and caused,  
14 attempted to cause, and would reasonably be expected to cause  
15 substantial emotional distress to Victim 2.

16 4. Defendant BENNINGTON's course of conduct included, among  
17 other things, the following:

18 a. Beginning on or about February 13, 2016, and  
19 continuing through on or about August 30, 2017, defendant BENNINGTON  
20 sent Victim 2 a series of online messages in which he repeatedly  
21 solicited Victim 2 to engage in a sexual relationship with him,  
22 causing Victim 2 to deactivate her social media accounts to prevent  
23 defendant BENNINGTON from continuing to message her.

24 b. On August 25, 2019, shortly after Victim 2 reactivated  
25 her social media accounts, defendant BENNINGTON sent the following  
26 online messages to Victim 2 demanding that she engage in a sexual  
27 relationship with him and threatening to commit violence against her  
28 after she did not respond to his demands:

1           i.     "What's up you little skank . . . I've been  
2 looking all over for you."

3           ii.    "You ain't going no where now . . . I own you,"  
4 accompanied by a picture of a man grabbing a woman's neck from  
5 behind.

6           iii.   "Where the fuck have you been . . . I never said  
7 you could fuck[i]ng leave . . . You little slut . . . I'm gonna make  
8 sure you [don't] fucking leave again."

9           iv.    "I'm gonna whip you back since I'm WOMEN'S  
10 CHAMPION."

11          v.     "Slut . . . Doggg . . . You don't fucking belong  
12 to anyone else but me."

13          vi.    "Your [sic] gonna marry my ass too as well . . .  
14 Cause I said so."

15          vii.   "I wanna pin you against the wall and kiss and  
16 bite your neck then pull your hair and pound doggy until your [sic]  
17 fucking sore."

18          viii.    "This is what you get for leaving me  
19 fatass," accompanied by a picture of a young girl standing in the  
20 corner of a room, as though being punished.

21          ix.    "Your ass better not fuck[i]ng leave . . . if you  
22 know what's good for you . . . This dick bitch!!!!"

23          x.     "We will name our child Gotham soo [Victim 2] is  
24 like Gotham needs you Batman then I'll ride on my car . . . Slut.  
25 Dog . . . can you bark for me dog."

26          xi.    "Go wash my clothes you ugly little slut. I'm  
27 making you with me . . . you have no choice."

28



1                   xii. "Fine . . . you get body chopped up and dumped  
2 you little hoe," accompanied by a picture of a body dumped into a  
3 trash can in the woods with its leg slashed open.

4                   xiii. "I'm piss on you . . . I own you now . . .  
5 you be[long] to nobody but me," accompanied by a picture of a man  
6 urinating on a tree.

7                   xiv. "50 shades darker now . . . Marry me. Fuck I  
8 hate being in love, slut . . . You better decide what your [sic]  
9 fucking gonna do. Your biological clock is about to wear out."

10                  xv. "I was thinking about marry[ing] this stripper  
11 named [Victim 2]. What do you have to offer me slut."

12                  xvi. "Fuck . . . I don't know why I have so much love  
13 for this girl . . . you rock my dick on!!! Fuck . . . you make me  
14 horny and want my kids . . . When do I get a free sample. You better  
15 not being cheating on me you little slut . . . I own you."

16                  xvii. "I'm outside your window watching you. . .  
17 you better be on the look out . . . if you know what['s] good for you  
18 . . . only god can save you . . . slut . . . dog . . . whore . . .  
19 Bark for me you little slut."

20                  xviii. "Don't make me slap you around. . . if you  
21 know what's good for you. . . no one is gonna hear you cry when I'm  
22 fuckjng [sic] done with you. . . your [sic] my victim. . . you little  
23 whore."

24                  xix. "I know where you live. . . Don't scream . . . or  
25 I'll cut your Adam's apple . . . You're not really a dude are you,"  
26 accompanied by a picture of a man holding a knife to a woman's  
27 throat.

1           xx. "Your [sic] gonna have my baby . . . You abort it  
2 . . . I'll kill you . . . don't fucking move," accompanied by  
3 pictures of a baby's crib and a man in a ski mask holding a knife to  
4 a woman's throat.

5           xxi. "Don't fucking squirm . . . or you'll get slapped  
6 around. I own you now . . . and your [sic] gonna [do] as I say.  
7 Cause I'm FUCKING GOD," accompanied by a picture of a woman's hands  
8 tied or restrained.

9           xxii. "Your [sic] not fucking going anywhere . . .  
10 you're cuming [sic] with me . . . You little sluuu [sic]."

11           xxiii. "Your ass ain't running away again . . . you  
12 little bitch . . . I'm very possessive of my property . . . I AM YOUR  
13 ONE. NOBODY ELSE!!"

14           xxiv. "You got that!!!!!! You little whore,"  
15 accompanied by a picture of a man in a ski mask holding a knife to a  
16 woman's throat.

17           xxv. "You better no[t] fucking cheat on me . . . I  
18 blow them out of the water . . . cause THE SHIT!" accompanied by a  
19 picture of a man pointing a gun at a person's face.

20           xxvi. "You're mine forever," accompanied by a  
21 picture of a woman with a knife held to her throat.

22           xxvii. "You got that . . . you little fuckin hooker  
23 . . . now give me some free vagina. Your [sic] gonna marry my ass.  
24 You don't have a fucking choice. Slut . . . I'm leaving you,"  
25 accompanied by a picture of a man choking a woman while pointing a  
26 gun at her.

27           c. On or about August 26, 2019, defendant BENNINGTON sent  
28 the following online messages to Victim 2 demanding that she engage

1 in a sexual relationship with him and threatening to commit violence  
2 against her after she did not respond to his demands:

3 i. "Come to California. I've fall[e]n and I can't  
4 let you go . . . I'm selfish as fuck. Let's start a family . . .  
5 I've already told everyone you[']re taken by me . . . I know you feel  
6 the same. This unplugging left me as a horn dog all day . . . wtf.  
7 You were all just jealous my career . . . fuck."

8 ii. "You wanna go out for a drink girl . . . You  
9 might get very sleepy. You better not fucking reject . . . Or you'll  
10 be getting this in your drink," accompanied by a picture of a bottle  
11 of medicine.

12 iii. "Bark for me you little slut," accompanied by a  
13 picture of a woman on her hands and knees.

14 iv. "My love. Better not be fucking cheating on me,"  
15 accompanied by a picture of a woman in lingerie on a chair.

16 v. "Your ass better not be fucking anyone but me. I  
17 own you. Your [sic] exclusive with me, but I'm not exclusive with  
18 anyone . . . you got that!!!! You little slut . . . Fuck . . . I'm  
19 not good with this shit . . . I'm the master of all functions now . .  
20 . crazy shit . . . I love being perfect."

21 vi. "I'm #1 and you get silver cause your dumbass is  
22 2 . . . your ass can't complain either . . . Come to California . . .  
23 or I'll replace your ass!!!!" accompanied by a picture of a silver  
24 wedding ring.

25 vii. "Hi I'm ted bundy . . . do you remember me at the  
26 park . . . I thought soo [sic]. You look familiar. I think tied you  
27 up in the back of a tree. Shhh don't scream . . . If you wanna live.  
28

1 No one[']s ever lived though. . . ." accompanied by a picture of  
2 serial killer Ted Bundy.

3 d. On September 21, 2019, defendant BENNINGTON sent  
4 Victim 2 an online message stating, "dead over alive your [sic]  
5 coming with me -robocop . . . are you really crying."

6 e. On March 30, 2020, defendant BENNINGTON posted a  
7 public comment on one of Victim 2's social media accounts stating, "I  
8 liked [Victim 2] before she went nuts."  
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COUNT THREE

[18 U.S.C. § 875(c)]

On or about July 16, 2019, defendant Carl De Vera Bennington ("BENNINGTON"), for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, knowingly transmitted in interstate commerce to victim A.T. an electronic communication containing true threats to injure the person of another, namely, and in substance an effect, that he intended to kill victim A.T. and victim A.T.'s friends and family.

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COUNT FOUR

[18 U.S.C. § 875(c)]

On or about August 23, 2019, defendant Carl De Vera Bennington ("BENNINGTON"), for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, knowingly transmitted in interstate commerce to victim A.T. an electronic communication containing true threats to injure the person of another, namely, and in substance an effect, that he intended to rape and kill victim A.T.

COUNT FIVE

[18 U.S.C. § 875(c)]

On or about August 25, 2019, defendant Carl De Vera Bennington ("BENNINGTON"), for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, knowingly transmitted in interstate commerce to victim A.B. an electronic communication containing true threats to injure the person of another, namely, and in substance an effect, that he intended to assault and kill victim A.B.

A TRUE BILL

15/  
Foreperson

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