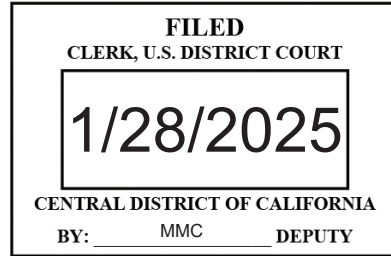


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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2024 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID WILLIAM PLATEK,

Defendant.

CR No. 2:25-CR-00061-HDV

I N D I C T M E N T

[18 U.S.C. § 875(c): Threats by
Interstate Communication]

The Grand Jury charges:

[18 U.S.C. § 875(c)]

I. INTRODUCTORY ALLEGATIONS

At times relevant to this indictment:

1. Defendant DAVID WILLIAM PLATEK was a resident of Springfield, Missouri.
2. Victim 1 was a resident and elected official of San Luis Obispo County, within the Central District of California.
3. On or about December 9, 2024, defendant PLATEK texted Person A the following messages, which, as defendant PLATEK knew and intended, contained true threats to injure the person of another, namely, Victim 1, who was located in San Luis Obispo County:

1 a. "I'll do [sic] out surrounded by the bodies of the
2 [Victim 1]'s family on a Christmas day, or something more heinous,
3 since people have already judged me";

4 b. "I've got the ammo, I just need to rent a uhaul and
5 drive to CA. He took everything I made from me, and I want to take
6 it from him";

7 c. "I suddenly understand the mind of the worst people:
8 they go into those schools because they know it will leave a
9 permanent hole in people. It's making way to [sic] much sense to me.
10 It would be more fitting to leave [Victim 1] and those responsible
11 alive in an aftermath to explain what happened"; and

12 d. Defendant PLATEK threatened to host a website
13 "kill[Victim 1].com" and "killing[Victim 1].se (where the feds can't
14 touch)."

15 4. On or about December 11, 2024, as described further below,
16 defendant PLATEK changed the profile picture of one of his social
17 media accounts to a Luigi character, a reference to an alleged
18 murderer, and reposted a prior post that had been made by Victim 1.
19 Defendant PLATEK later told Person A in reference to these actions
20 that defendant PLATEK wondered if "[Victim 1's] heart will skip a
21 beat when he sees this," and that "no one is ever going to see this
22 except [Victim 1]. I have no followers. And I hope [Victim 1] is
23 left believing I have no other options either." Defendant PLATEK
24 described his profile change and re-post as "the most subtle inside-
25 baseball death threat one could ever hope to craft. . . . [T]his is a
26 message meant to be received by only one person."
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1 5. On or about December 16, 2024, defendant PLATEK texted
2 Person A again the following messages threatening to kill Victim 1
3 and other residents of San Luis Obispo County where Victim 1 worked:

4 a. "I'd rather be remembered as a killer";

5 b. "I have one months rent left and that's enough to get
6 me to [San Luis Obispo] in a rented van. There's a small farm a block
7 from my apartment and I've been eyeing the pallet of potassium
8 nitrate they've had sitting on the back half of the farm.";

9 c. "I'd let [Victim 1's] children live. I'd wait for a
10 sick day, let them live with the guilt of watching their classmates
11 die because their father is corrupts [sic]";

12 d. "My revenge will scar history books";

13 e. "I wouldn't even kill myself. I'd want the trial. 'I
14 am the monster [Victim 1] and the broken justice system made me. You
15 let it all happen, you all paid the price.' Bullets are cheap and
16 children are plentiful";

17 f. "[San Luis Obispo] wants to destroy my life, I'll blow
18 up one of their schools";

19 g. "You want a safe future for your kids? Don't create
20 monsters on [sic] the present";

21 h. "The second political assassination of 2024, David
22 Platek assassinated [Victim 1] two days before his second act, a
23 large explosion killing 400, mostly children in San Luis Obispo";

24 i. "I hear dead kids upset parents a lot";

25 j. "I'll buy a van. I'll get a job that gives me access
26 to fertilizer";

27 k. "On January 1, I will shift all of my focus to killing
28 as many people as possible in my lifetime"; and

1 1. "I'll take that truck driver job, and I'll exist as a
2 ghost committing atrocities across the nation."

3 II. THREATS BY INTERSTATE COMMUNICATION

4 6. On or about December 11, 2024, in San Luis Obispo County,
5 within the Central District of California, and elsewhere, defendant
6 PLATEK, with intent to issue a threat, and with knowledge that it
7 would be viewed as a threat, knowingly transmitted in interstate
8 commerce an electronic communication that contained a true threat to
9 injure the person of another, namely, Victim 1, who received the
10 threat in San Luis Obispo County, in that defendant PLATEK threatened
11 Victim 1 using a social media account defendant PLATEK controlled and
12 depicting defendant PLATEK's name, by changing defendant PLATEK's

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1 profile photo to a Luigi character, a reference to an alleged
2 murderer, and reposting a prior post by Victim 1.

3
4 A TRUE BILL

5
6 /s/
7 Foreperson

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