

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Criminal Case No. **24-cr-130-RMR**

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. DANIEL LARSON

Defendant.

INDICTMENT

The Grand Jury charges:

COUNT 1

On or about July 3, 2023, in the State and District of Colorado, the defendant, DANIEL LARSON, through the use of an instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, unlawfully to damage and destroy a building and other real and personal property by means of an explosive, namely a particular county courthouse in Colorado.

All in violation of Title 18, United States Code, Section 844(e).

COUNT 2

On or about August 7, 2023, in the State and District of Colorado, the defendant, DANIEL LARSON, through the use of an instrument of interstate commerce, and in and

affecting interstate commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, to unlawfully to damage and destroy a building and other real and personal property by means of an explosive, namely a particular nonprofit center in Lakewood, Colorado.

All in violation of Title 18, United States Code, Section 844(e).

COUNT 3

On or about August 29, 2023, in the State and District of Colorado, the defendant, DANIEL LARSON, through the use of an instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, unlawfully to damage and destroy a building and other real and personal property by means of an explosive, namely the White House.

All in violation of Title 18, United States Code, Section 844(e).

COUNT 4

On or about September 26, 2023, in the State and District of Colorado, the defendant, DANIEL LARSON, through the use of an instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, unlawfully to damage and destroy a

building and other real and personal property by means of an explosive, namely a state government building in Colorado.

All in violation of Title 18, United States Code, Section 844(e).

COUNT 5

On or about September 26, 2023, in the State and District of Colorado, the defendant, DANIEL LARSON, through the use of an instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, unlawfully to damage and destroy a building and other real and personal property by means of an explosive, namely a particular college campus in Colorado.

All in violation of Title 18, United States Code, Section 844(e).

COUNT 6

On or about December 25, 2023, in the State and District of Colorado, the defendant, DANIEL LARSON, did knowingly transmit in interstate and foreign commerce a communication, containing a threat to injure the person of another, namely a particular Federal Bureau of Investigation special agent.

All in violation of Title 18, United States Code, Section 875(c).

COUNT 7

On or about March 23, 2024, in the State and District of Colorado, the defendant, DANIEL LARSON, through the use of an instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat, and maliciously conveyed false

information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, unlawfully to damage and destroy a building and other real and personal property by means of an explosive, namely the Federal Bureau of Investigation headquarters.

All in violation of Title 18, United States Code, Section 844(e).

A TRUE BILL:

Ink signature on file in Clerk's Office
FOREPERSON

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United States Attorney

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