UNITED STATES DISTRICT COURT

District of Kansas (Wichita Docket)

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASE NO. 24-CR-10044-JWB

LORI A. DAVIS, a/k/a "Lori A. Glock", a/k/a "Lori A. Bergman", a/k/a "MeritSumMercy1776", a/k/a " Lori Love",

Defendant.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

THREATS AGAINST A FORMER PRESIDENT OF THE UNITED STATES [18 U.S.C. § 879]

On or about September 23, 2021, in the District of Kansas,

LORI A. DAVIS, a/k/a "Lori A. Glock", a/k/a "Lori A. Bergman", a/k/a "MeritSumMercy1776", a/k/a "Lori Love",

the defendant herein, knowingly and willfully threatened to kill and inflict bodily harm

on William (Bill) J. Clinton, a former President of the United States, by calling the Clinton Foundation in New York, New York, and leaving a message wherein Lori A. Davis said, "...but you can bet your fucking ass that we got those sites right in the center of Clinton's fucking eyes and every one of you God damn Democrats trying to push Nazis right on through to the front of the line, guess what, you're fucked, we're gonna hang every one of you Democrat demon fucks and I can't fucking wait."

In violation of Title 18, United States Code, Section 879.

COUNT 2

THREATS AGAINST THE PRESIDENT
OF THE UNITED STATES
[18 U.S.C. § 871]

On or about January 12, 2024, in the District of Kansas,

LORI A. DAVIS, a/k/a "Lori A. Glock", a/k/a "Lori A. Bergman", a/k/a "MeritSumMercy1776", a/k/a "Lori Love"

the defendant herein, knowingly and willfully threatened to kill and inflict bodily harm on Joseph R. Biden, the President of the United States, by posting on her X (formerly known as Twitter) account, starting at approximately 6:06 a.m. (CST) and continuing to approximately 12:25 p.m. (CST), a series of threats, further described as:

X Account Name	Time of Post (All Central Standard Time)	Threat
MeritSumMercy1776	6:06 a.m.	"This is how I imagine it's going down when I face Joe Biden." With an image of a woman holding a firearm.

X Account Name	Time of Post (All Central Standard Time)	Threat
MeritSumMercy1776	6:17 a.m.	"You know what is more popular than thet (sic) your flat line. And it's incoming"
MeritSumMercy1776	6:38 a.m.	"I'm going to be the b**** that takes out Joe Biden!"
MeritSumMercy1776	6:59 a.m.	"And we can take Biden out with a sniper! By golly!"
MeritSumMercy1776	7:02 a.m.	"Red bead on Joe's forehead and pull!"
MeritSumMercy1776	7:07 a.m.	"And maybe someone should tell Biden to stop being a pedophile s*** bag terrible president. I pick me. But I let my red beads on foreheads do the talking."
MeritSumMercy1776	9:09 a.m.	"And then we're going to do what we should have done the first time." Followed by bomb and explosion emojis.
MeritSumMercy1776	12:00 p.m.	"do you think we need money to get your ass? You can't get me! #JoeBiden nana nana boo boo punk ass little b**** I'd smoke you!"
MeritSumMercy1776	12:25 p.m.	"@POTUS I'll bet if a gun were held to your head you still wouldn't admit to molesting your own daughter. Even if she was in the room reading aloud from her diary. Well maybe but you would only to save yourself. Trigger still getting pulled though."

All in violation of Title 18, United States Code, Section 871.

A TRUE BILL.

April 16, 2024	s/Foreperson
DATE	FOREPERSON OF THE GRAND JURY

KATE E. BRUBACHER UNITED STATES ATTORNEY

By: /s/ Lanny D. Welch

LANNY D. WELCH
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Ks. S. Ct. No. 13267

IT IS REQUESTED THAT THE TRIAL BE HELD IN WICHITA, KANSAS

PENALTIES

Counts 1-2: 18 U.S.C. § 879 and § 871. [Threats Against a Former President and Against the President]

- Punishable by a term of imprisonment of not more than five (5) years. 18 U.S.C. § 871 and § 879.
- A term of supervised release of not more than three (3) years. 18 U.S.C. § 3583(b)(2).
- A fine not to exceed \$250,000. 18 U.S.C. § 3571(b)(3).
- A mandatory special assessment of \$100.00. 18 U.S.C. § 3013(a)(2)(A).