

FILED

FEB 04 2026

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHANNON MATHRE,

Defendant.

) I N D I C T M E N T

3:26 CR 52

JUDGE HELMICK

MAGISTRATE JUDGE CLAY

) CASE NO.

Title 18, United States Code,
Sections 871(a) and 2252(a)(2)

COUNT 1

(Threats against President and successors to Presidency, 18 U.S.C. § 871(a))

The Grand Jury charges:

1. On or about January 21, 2026, in the Northern District of Ohio, Western Division, and elsewhere, Defendant SHANNON MATHRE did knowingly and willfully make a threat to take the life of and to inflict bodily harm upon the Vice President of the United States, specifically, MATHRE stated: "I am going to find out where he (Vice President) is going to be and use my M14 automatic gun and kill him", in violation of Title 18, United States Code, Section 871(a).

COUNT 2

(Receipt and Distribution of Child Pornography, 18 U.S.C. § 2252(a)(2))

The Grand Jury further charges:

2. From on or about December 31, 2025, through on or about January 21, 2026, in the Northern District of Ohio, Western Division, and elsewhere, Defendant SHANNON MATHRE did knowingly receive and distribute any visual depiction using any means or facility of interstate commerce, the production of the visual depiction involved the use of a minor

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engaged in sexually explicit conduct, and such visual depiction was of such conduct, in violation of Title 18, United States Code, Section 2252(a)(2).

FORFEITURE SPECIFICATION

The Grand Jury further charges:

3. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253, the allegation of Count 2 is hereby re-alleged and incorporated herein by reference. As a result of the foregoing offense, Defendant SHANNON MATHRE shall forfeit to the United States: (i) all visual depictions described in Title 18, United States Code, Section 2252, and all books, magazines, periodicals, films, videotapes, and other matter which contain any such visual depictions, which were produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110; (ii) all property, real and personal, constituting or traceable to gross profits or other proceeds obtained from the offense charged in Count 2; and (iii) all property, real and personal, used or intended to be used to commit or to promote the commission of the offense charged in Count 2 and all property traceable to such property; including, but not limited to, the following:

- a) Samsung Model: Galaxy A16 5G serial number: R5CY54BVRWY, seized on January 21, 2026.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.