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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

BRIAN KEITH MCKENZIE

CRIMINAL NO. 3:25-CR-029-H

INDICTMENT

The Grand Jury charges:

At all times material to this Indictment:

General Allegations

1. On or about January 20, 2021, Joseph R. Biden Jr. assumed the office of President of the United States and Kamala D. Harris assumed the office of Vice President of the United States.
2. On or about January 20, 2021, Donald J. Trump became the former President of the United States.
3. On or about March 19, 2021, a United States District Judge for the Northern District of Texas, whose name is known to the Grand Jury, sentenced the defendant, **Brian Keith McKenzie**, to the custody of the United States Bureau of Prisons for a period of 60 months to be followed by three years of supervised release.
4. On or about November 15, 2022, former President Donald J. Trump announced his candidacy for President of the United States for the 2024 general election.
5. On or about September 1, 2023, a United States Magistrate Judge in the Northern District of Texas issued a written Findings, Conclusion, and Recommendation recommending that defendant **Brian Keith McKenzie's** term of supervised release

should be revoked, and that **McKenzie** should be sentenced to an additional term of imprisonment of 18 months.

6. On or about October 4, 2024, a United States District Judge for the Northern District of Texas issued an order adopting the Findings, Conclusions, and Recommendation of the United States Magistrate Judge, and sentenced the defendant, **Brian Keith McKenzie**, to an additional term of 18 months' imprisonment.

7. On or about November 5, 2024, the general election was held to determine the electors of President and Vice President, in accordance with 3 U.S.C. §§ 1 and 2, and Donald J. Trump became the President-elect of the United States.

8. On or about January 20, 2025, Donald J. Trump assumed the office of President of the United States, and J.D. Vance assumed the office of Vice President of the United States.

9. On or about January 20, 2025, Joseph R. Biden Jr. became the former President of the United States.

Count One

Threats Against the Presidency and Successors to the Presidency
[Violation of 18 U.S.C. § 871(a)]

10. Paragraphs 1 through 9 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

11. On or about October 18, 2024, in the Northern District of Texas and elsewhere, the defendant, **Brian Keith McKenzie**, did knowingly and willfully deposit for conveyance in the mail and for a delivery from a post office and by a letter carrier a letter, paper, writing, print, missive, and document containing a threat to take the life of, to kidnap, and to inflict bodily harm upon the then President of the United States, Joseph R. Biden Jr. and the then Vice President of the United States Kamala D. Harris. Specifically, in a letter postmarked October 18, 2024, **McKenzie** wrote “I am going to have a couple of my friends make a try at Biden, Trump, or Harris . . . I have a few friends who are trying to make my bond now so I can take care of this myself I don’t have any choice its out of my hands I have to do as they say.”

All in violation of 18 U.S.C. § 871(a).

Count Two

Threats Against Former Presidents and Other Secret Service Protectees
[Violation of 18 U.S.C. § 879(a)(1)]

12. Paragraphs 1 through 9 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

13. On or about October 18, 2024, in the Northern District of Texas and elsewhere, the defendant, **Brian Keith McKenzie**, knowingly and willfully threatened to kill and to kidnap and to inflict bodily harm upon the then former President of the United States, Donald J. Trump. Specifically, in a letter postmarked October 18, 2024, **McKenzie** wrote “I am going to have a couple of my friends make a try at Biden, Trump, or Harris . . . I have a few friends who are trying to make my bond now so I can take care of this myself I don’t have any choice its out of my hands I have to do as they say.”

All in violation of 18 U.S.C. § 879(a)(1).

Count Three

Threats Against the Presidency and Successors to the Presidency
[Violation of 18 U.S.C. § 871(a)]

14. Paragraphs 1 through 9 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

15. On or about December 17, 2024, , in the Northern District of Texas and elsewhere, the defendant, **Brian Keith McKenzie**, did knowingly and willfully deposit for conveyance in the mail and for a delivery from a post office and by a letter carrier a letter, paper, writing, print, missive, and document containing a threat to take the life of, to kidnap, and to inflict bodily harm upon the President-elect of the United States, Donald J. Trump. Specifically, in a letter postmarked December 17, 2024, **McKenzie** wrote “Judge [whose name is name known to the Grand Jury] and President Trump, you both worked together to send me to Prison the voices are never wrong I will get you both I will get you both I will.”

All in violation of 18 U.S.C. § 871(a).

Count Four

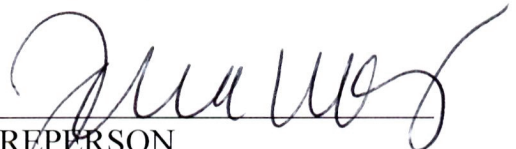
Influencing, Impeding, and Retaliating Against a Federal Official by Threat
[Violation of 18 U.S.C. § 115(a)(1)(B)]

16. Paragraphs 1 through 9 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

17. On or about December 17, 2024, in the Northern District of Texas and elsewhere, the defendant, **Brian Keith McKenzie**, did threaten to murder a United States District Judge and did so with intent to impede, intimidate, and interfere with the United States District Judge while the United States District Judge was engaged in the performance of the United States District Judge's official duties, and to retaliate against the United States District Judge on account of the performance of the United States District Judge's official duties. Specifically, in a letter postmarked December 17, 2024, **McKenzie** wrote "Judge [whose name is known to the Grand Jury] and President Trump, you both worked together to send me to Prison the voices are never wrong I will get you both I will get you both I will."


All in violation of 18 U.S.C. § 115(a)(1)(B).

A TRUE BILL



FOREPERSON

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DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

BRIAN KEITH MCKENZIE

INDICTMENT

18 U.S.C. § 871(a)

Threats Against the Presidency and Successors to the Presidency
(Count 1)

18 U.S.C. § 879(a)(1)

Threats Against Former Presidents and Other Secret Service Protectees
(Count 2)

18 U.S.C. § 871(a)

Threats Against the Presidency and Successors to the Presidency
(Count 3)

18 U.S.C. § 115(a)(1)(B)

Influencing, Impeding, and Retaliating Against a Federal Official by Threat
(Count 4)

4 Counts

A true bill rendered

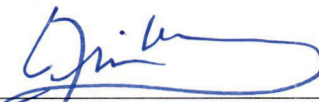


DALLAS

FOREPERSON

Filed in open court this 28 day of January, 2025.

Warrant to be Issued



UNITED STATES MAGISTRATE JUDGE
No Criminal Matter Pending