FILED
2018 NOV -1 PM 2:55
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

February 2018 Grand Jury

UNITED STATES OF AMERICA, Plaintiff, v. ROBERT RUNDO, ROBERT BOMAN, AARON EASON, and TYLER LAUBE, Defendants.	CR No. 18- 19CR00759-CJC I N D I C T M E N T [18 U.S.C. § 371: Conspiracy; 18 U.S.C. § 2101: Riots; 18 U.S.C. § 2(a): Aiding and Abetting]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

1. Beginning in or around February 2017, defendants ROBERT RUNDO ("RUNDO"), ROBERT BOMAN ("BOMAN"), AARON EASON ("EASON"), TYLER LAUBE ("LAUBE"), and others known and unknown to the Grand Jury participated in a white supremacist organization known as the "Rise Above Movement," or "RAM."

2. RAM represented itself publicly as a combat-ready, militant group of a new nationalist white supremacy and identity movement.

3. RAM and its members used the Internet to post videos and pictures of RAM members conducting training in hand-to-hand combat,

often interspersed with pictures and video clips of RAM members assaulting people at political events, accompanied by messages in support of RAM's white supremacist ideology.

COUNT ONE

[18 U.S.C. § 371]

A. OBJECT OF THE CONSPIRACY

4. The allegations set forth in paragraphs 1 through 3 are incorporated by reference as if fully set forth herein.

5. Beginning on a date unknown but not later than in or around December 2016, and continuing until on or about October 2, 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendants ROBERT RUNDO ("RUNDO"), ROBERT BOMAN ("BOMAN"), AARON EASON ("EASON"), and TYLER LAUBE ("LAUBE"), and others known and unknown to the Grand Jury, conspired and agreed with each other to commit an offense against the United States, namely, rioting, in violation of Title 18, United States Code, Section 2101.

B. THE MANNER AND MEANS OF THE CONSPIRACY

6. The object of the conspiracy was to be accomplished, in substance, as follows:

a. Defendants RUNDO, BOMAN, EASON, and other co-conspirators known and unknown to the Grand Jury would recruit members to join RAM;

b. Defendants RUNDO, BOMAN, EASON, and other co-conspirators known and unknown to the Grand Jury would coordinate hand-to-hand and other combat training among RAM members and associates to prepare to engage in violence at political rallies;

c. Defendants RUNDO, BOMAN, EASON, LAUBE, and other co-conspirators known and unknown to the Grand Jury would engage in hand-to-hand and other combat training to prepare to engage in violence at political rallies;

d. Defendants RUNDO, BOMAN, EASON, LAUBE, and other co-conspirators known and unknown to the Grand Jury would travel to political rallies where they attacked attendees, protestors, and other persons;

e. Defendants RUNDO, BOMAN, and other co-conspirators known and unknown to the Grand Jury would share videos and photographs of themselves committing acts of violence at political rallies in order to recruit members for future events.

C. OVERT ACTS

7. On or about the following dates, in furtherance of the conspiracy and to accomplish its object, defendants RUNDO, BOMAN, EASON, and LAUBE, and others known and unknown to the Grand Jury, committed the following overt acts within the Central District of California, and elsewhere:

March 25, 2017: Huntington Beach, California

Overt Act No. 1: On or about December 28, 2016, a RAM co-founder ("Co-Conspirator #1") used the Internet to lead a group conference call in which he shared RAM's strategic plan to attend rallies in 2017 in order to provide "security," and instructed listeners to wear specific clothing, such as polo-style shirts and khakis, to get military-style haircuts, and to maintain an organized presence at the events.

Overt Act No. 2: On or about March 15, 2017, defendants RUNDO, LAUBE, BOMAN, Co-Conspirator #1, and other RAM members engaged in combat training in San Clemente, California, to prepare to engage in violence at political events.

Overt Act No. 3: On or about March 25, 2017, defendants RUNDO, BOMAN, LAUBE, and EASON, Co-Conspirator #1, and other RAM

members attended a political rally in Huntington Beach, California (the "Huntington Beach Rally").

Overt Act No. 4: On or about March 25, 2017, defendant RUNDO assaulted persons at the Huntington Beach Rally.

Overt Act No. 5: On or about March 25, 2017, defendant BOMAN assaulted persons at the Huntington Beach Rally.

Overt Act No. 6: On or about March 25, 2017, defendant LAUBE assaulted journalists at the Huntington Beach Rally.

Overt Act No. 7: On or about March 26, 2017, defendant BOMAN posted on his Facebook account a link to an article on The Daily Stormer titled "Trumpenkriegers Physically Remove Antifa Homos in Huntington Beach," along with the comment, "We did it fam."

Overt Act No. 8: On or about March 26, 2017, defendant BOMAN posted a photograph on his Facebook account showing himself, defendant RUNDO, defendant LAUBE, and other RAM members at the Huntington Beach Rally, along with the comment, "Hail victory and the alt-reich."

April 15, 2017: Berkeley, California

Overt Act No. 9: On or about March 27, 2017, defendant EASON sent a text message to a new RAM member ("Co-Conspirator #2") to invite the new member to attend and provide "security" at a political event in Berkeley, California, on April 15, 2017 (the "Berkeley Rally") and to attend "hand to hand and formation fighting training" prior to the Berkeley Rally.

Overt Act No. 10: On or about March 30, 2017, defendant EASON sent a text message to ask Co-Conspirator #2 to recruit additional people to attend the Berkeley Rally, stating, "I want us to have a

group of at least 25 so we can form up and take down anything that comes at us."

Overt Act No. 11: On or about April 1, 2017, defendant EASON sent text messages to confirm Co-Conspirator #2's attendance at a combat training session in advance of the Berkeley Rally, and stated, "We'll probably have equipment for shield and stick training and our formation tactics ready."

Overt Act No. 12: On or about April 14, 2017, defendant EASON used a Visa credit card with account number ending in 0807 to rent a 12-15 passenger van from Airport Van Rental, and used the van to transport RUNDO, BOMAN, Co-Conspirator #2, and other RAM members from Southern California to the Berkeley Rally

Overt Act No. 13: On or about April 15, 2017, defendants RUNDO, BOMAN, and EASON, Co-Conspirator #1, Co-Conspirator #2, and other RAM members attended the Berkeley Rally.

Overt Act No. 14: On or about April 15, 2017, defendants RUNDO, BOMAN, and EASON, Co-Conspirator #1, Co-Conspirator #2, and other RAM members prepared to commit acts of violence at the Berkeley Rally by wrapping their hands with athletic tape and wearing matching grey shirts and black masks with white skeleton designs around their faces.

Overt Act No. 15: On or about April 15, 2017, defendant RUNDO assaulted multiple persons, including a Berkeley Police Department police officer, at the Berkeley Rally.

Overt Act No. 16: On or about April 15, 2017, defendant BOMAN assaulted persons at the Berkeley Rally.

Overt Act No. 17: On or about April 15, 2017, defendant EASON assaulted persons at the Berkeley Rally.

Overt Act No. 18: On or about April 16, 2017, defendant BOMAN posted a photograph on his Facebook page showing him punching persons at the Berkeley Rally along with the caption, "Oooooi vey!!! Dagoyiiiiim knooooow."

Overt Act No. 19: On or about April 16, 2017, defendant BOMAN posted a photograph on his Facebook account containing a Twitter post in which a journalist identified defendants BOMAN and RUNDO at the Berkeley Rally and accused them of shoving him. Defendant BOMAN wrote, "You come face to face with the enemy, what do you expect. . . [.]"

Overt Act No. 20: On or about April 16, 2017, Co-Conspirator #2 sent a text message to an associate describing his actions at the Berkeley Rally, and stating, "I was about to jump into that but our guys were just wrecking them, like not even any room to get a hit in. I was like alrite, u guys got it handled then lol." The associate responded, "I've been looking at videos. There's a grey-shirted storm trooper at the fucking front every, single, time. You guys were lions." Co-Conspirator #2 replied, "Total Aryan victory."

Overt Act No. 21: On or about April 19, 2017, defendant RUNDO sent a text message to Co-Conspirator #2 to thank Co-Conspirator #2 for attending the Berkeley Rally, and then invited Co-Conspirator #2 to combat training and offered to buy lunch for all who attend.

Overt Act No. 22: On or about April 21, 2017, Co-Conspirator #2 sent a text message to defendant EASON stating that Co-Conspirator #2 and RUNDO had both broken their hands at the Berkeley Rally. Defendant EASON replied, "class is cancelled this weekend. It's on for next weekend though. Maybe we should work on palm strikes and elbows."

Overt Act No. 23: On or about April 21, 2017, defendant EASON sent a text message to Co-Conspirator #2 to invite Co-Conspirator #2 to a political rally in Berkeley, California on April 27, 2017, stating that he was "driving up to deny antifa a face-saving victory," and intended to "leave in the morning, drive fast, get up there early so we can stretch out and power up, hit it hard and skip town."

Overt Act No. 24: On or about April 26, 2017, Co-Conspirator #2 sent a text message to Co-Conspirator #1 stating that he was not available for combat training on Thursdays. Co-Conspirator #1 replied that he would inform defendant RUNDO and "consider when setting up a regular time."

June 10, 2017: San Bernardino, California

Overt Act No. 25: On or about June 1, 2017, Co-Conspirator #1 sent a Facebook message to an associate stating that he and 30 other RAM members were planning to "take over" a march and sharing photographs of signs that RAM members planned to carry at the march.

Overt Act No. 26: On or about June 10, 2017, RUNDO, Co-Conspirator #1, Co-Conspirator #2, and other RAM members attended a political rally in San Bernardino, California (the "San Bernardino Rally") carrying several of the signs Co-Conspirator #1 had shared via Facebook on June 1, 2017.

Overt Act No. 27: On or about June 10, 2017, defendant RUNDO, Co-Conspirator #1, Co-Conspirator #2, and other RAM members confronted and pursued persons at the San Bernardino Rally.

Overt Act No. 28: On or about June 10, 2017, RAM members smashed the windows of cars belonging to persons at the San Bernardino Rally.

Overt Act No. 29: On or about June 13, 2017, Co-Conspirator #1 sent a text message to an associate, stating, "We smashed some antifa as they were leaving." The associate responded, "If it wasn't for the White Nationalists nothing would ever get done." Co-Conspirator #1 replied, "This is true would've been no victory in Huntington or Berkeley."

August 11-12, 2017: Charlottesville, Virginia

Overt Act No. 30: On or about June 18, 2017, Co-Conspirator #1 and Co-Conspirator #2 exchanged text messages regarding booking flights to the Unite The Right rally in Charlottesville, Virginia on August 11-2, 2017 (the "Charlottesville Rally").

Overt Act No. 31: On or about July 23, 2017, defendant RUNDO used the Internet to post a RAM promotional video showing RAM members assaulting counter-protestors at the Huntington Beach Rally and the Berkeley Rally.

Overt Act No. 32: On or about July 23, 2017, Co-Conspirator #1 and Co-Conspirator #2 exchanged text messages about finding housing to attend the Charlottesville Rally.

Overt Act No. 33: On or about July 24, 2017, defendant RUNDO sent a text message instructing Co-Conspirator #2 to contact Co-Conspirator #1 because "I may have a place for you guys to stay in Charlottesville."

Overt Act No. 34: On or about August 10, 2017, defendant BOMAN posted a photograph on his Facebook page showing himself punching a person at the Berkeley Rally.

Overt Act No. 35: On or about August 11, 2017, defendant RUNDO sent a text message to Co-Conspirator #2 stating, "Take a lot of pics."

Overt Act No. 36: On or about August 10-11, 2017, Co-Conspirator #1, Co-Conspirator #2, and other RAM members traveled from Los Angeles, California, to Charlottesville, Virginia to attend the Charlottesville Rally.

Overt Act No. 37: On or about August 12, 2017, Co-Conspirator #1, Co-Conspirator #2, and other RAM members attended the Charlottesville Rally, where they assaulted counter-protestors.

August 2017-May 2018: RAM Members Celebrate Their Assaults and Train For Future Events

Overt Act No. 38: On or about September 14, 2017, defendant RUNDO posted a Twitter message containing a photograph of RAM members assaulting counter-protestors at the Berkeley Rally, with the accompanying text: "#antiantifa, #goodnightleftsisde, #riseabovemovement."

Overt Act No. 39: On or about September 25, 2017, defendant EASON sent a text message to Co-Conspirator #2 stating that he was "back in a position to go hard with activism" after having been "sidetracked after Berkeley."

Overt Act No. 40: On or about December 17, 2017, defendant RUNDO used the Internet to post a promotional video showing defendants RUNDO, BOMAN, LAUBE, and other RAM members assaulting persons at the Huntington Beach Rally and the Berkeley Rally, combined with videos and pictures of RAM members engaging in combat training.

Overt Act No. 41: On or about January 10, 2018, defendant RUNDO posted a Twitter message from the RAM Twitter account, stating, "What's up with giving a shoutout to the only alt right crew that actually beats antifa senseless and wins rallies."

Overt Act No. 42: On or about January 17, 2018, defendant RUNDO posted a Twitter message from the RAM Twitter account, stating, "From the guys that [won] very rally they ever attended and always chased out antifa."

Overt Act No. 43: On or about February 5, 2018, defendant RUNDO posted a Twitter message from the RAM Twitter account containing a photograph of RAM members including defendant RUNDO, covering their faces with books, stating, "When the squads not out smashing commies . . . #nationalist #lifestyle."

Overt Act No. 44: On or about February 15, 2018, defendant RUNDO posted a Twitter message from the RAM Twitter account containing a photograph of RAM members, including defendant RUNDO, defendant BOMAN, and Co-Conspirator #1, at the Huntington Beach Rally, standing behind a large banner with the accompanying text, "Shortly after this pic antifa was [blown the fuck out] in Huntington Beach."

Overt Act No. 45: On or about March 24, 2018, Co-Conspirator #2 sent a text message to an associate stating, "my friends and I practice fighting every weekend," and explaining that they train in both boxing and mixed martial arts, and "[w]e usually train kicks too, just for practicality."

Overt Act No. 46: On or about April 18, 2018, defendant RUNDO, Co-Conspirator #1, Co-Conspirator #2, and another RAM member traveled to Germany, Ukraine, and Italy, where they engaged in combat training with members of European white supremacist organizations.

Overt Act No. 47: On or about May 15, 2018, defendant RUNDO sent a Twitter message from the RAM Twitter account to another Twitter user who had proposed interviewing RAM leaders on a podcast,

and stated, "Maybe if there [is] enough time could mention [Berkeley] how we were the first guys to jump over the barrier and engage and how that had a huge impact."

COUNT TWO

[18 U.S.C. §§ 2101, 2(a)]

8. The allegations set forth in paragraphs 1 through 3 are incorporated by reference as if fully set forth herein.

9. Beginning on or about March 27, 2017, and continuing until on or about April 15, 2017, in Los Angeles County, within the Central District of California, defendants ROBERT RUNDO ("RUNDO"), ROBERT BOMAN ("BOMAN"), and AARON EASON ("EASON"), each aiding and abetting the other, used facilities of interstate commerce, including but not limited to the Internet, telephone, and a Visa credit card with account number ending in 0807, with intent to incite, organize, promote, encourage, participate in, and carry on a riot, and to commit an act of violence in furtherance of a riot, and to aid or abet any person in inciting and participating in and carrying on a riot and committing any act of violence in furtherance of a riot.

10. During the course of such use of a facility of interstate commerce and thereafter, defendants RUNDO, BOMAN, and EASON committed one or more overt acts for one or more of the purposes specified

//

//

above, including traveling together on or about April 14, 2017, to Berkeley, California, to engage in a riot.

A TRUE BILL

/s/

Foreperson

NICOLA T. HANNA
United States Attorney

PATRICK R. FITZGERALD
Assistant United States Attorney
Chief, National Security Division

CHRISTOPHER D. GRIGG
Assistant United States Attorney
Chief, Terrorism and Export Crimes Section

DAVID T. RYAN
Assistant United States Attorney
Terrorism and Export Crimes Section