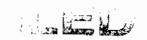
McGREGOR W. SCOTT
United States Attorney
R. STEVEN LAPHAM
ELLEN V. ENDRIZZI
Assistant U.S. Attorneys
501 I Street, Suite 10-100
Sacramento, California 95814
Telephone: (916) 554-2724



MAY 3 3 2006

C. G.S. DISTRICT COURT CASTRICT OF CALIFORN

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

NO. Cr. S-06-035 MCE

VIOLATION: 18 U.S.C. § 371 - Conspiracy

LAUREN WEINER,

Defendant.

<u>SUPERSEDING INFORMATION</u>

The United States Attorney charges: T H A T

LAUREN WEINER

defendant herein, from in or about August 2005 through on or about January 13, 2006, in Placer County, in the State and Eastern District of California, and elsewhere, did knowingly and intentionally agree, combine and conspire with others known and unknown to the Grand Jury, to maliciously damage and destroy, and attempt to do so, by means of fire and an explosive, (1) a building, and personal and real property of the United States Forest Service, United States Department of Agriculture; (2) a building, and personal and real property of an institution and organization receiving financial assistance from the United States Bureau of Reclamation, United States Department of the Interior;

and (3) personal and real property used in interstate commerce and in an activity affecting interstate commerce, specifically, cellular telephone towers and electric power stations, in violation of 18 U.S.C. §§ 844(f) and (i);

In furtherance of the conspiracy and to effect the objectives thereof, the defendant and others performed the following overt acts:

- a. During the weekend of November 18-20, 2005, the defendant met with others at a residence in Foresthill, California and conducted a planning meeting and identified targets to be destroyed by fire and an explosive;
- b. Between approximately November 18, 2005 and December 8, 2005, the defendant ordered the book, Poor Man's James Bond, which contains instructions for creating explosive devices;
- c. On January 10, 2006, the defendant and others visited the Nimbus Dam and Nimbus Fish Hatchery and, later that day, visited the United States Forest Service Institute of Forest Genetics to perform reconnaissance on those prospective targets for destruction and damage by fire and an explosive.
- d. On January 11, 2006, the defendant and others traveled to a store in Sacramento to purchase ingredients necessary for the creation of an explosive device, including, but not limited to, three bottles of bleach, a hot-plate, glassware, a gasoline can, a car battery, and three jars of petroleum jelly.
- e. On January 12, 2006, the defendants WEINER and a coconspirator measured and heated bleach on a hot-plate at a rented

residence in Dutch Flat, California, in order to create crystals necessary for an explosive device.

All in violation of Title 18, United States Code, Section 371.

DATED: 30 MAY 2006

McGREGOR W. SCOTT United States Attorney

Ėν:

ELLEN V. ENDRIZZI

Assistant U.S. Attorneys