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FILED

MAY 29 2006

U.S. DISTRICT COURT
DISTRICT OF CALIFORNIA

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

9 UNITED STATES OF AMERICA,) NO. Cr. S-06-035 MCE
)
10 Plaintiff,) VIOLATION: 18 U.S.C.
) § 371 - Conspiracy
11 v.)
)
12 LAUREN WEINER,)
)
13 Defendant.)
14

15 S U P E R S E D I N G I N F O R M A T I O N

16 The United States Attorney charges: T H A T

17 LAUREN WEINER

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

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

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

8 a. During the weekend of November 18-20, 2005, the
9 defendant met with others at a residence in Foresthill, California
10 and conducted a planning meeting and identified targets to be
11 destroyed by fire and an explosive;

12 b. Between approximately November 18, 2005 and December
13 8, 2005, the defendant ordered the book, Poor Man's James Bond,
14 which contains instructions for creating explosive devices;

15 c. On January 10, 2006, the defendant and others
16 visited the Nimbus Dam and Nimbus Fish Hatchery and, later that
17 day, visited the United States Forest Service Institute of Forest
18 Genetics to perform reconnaissance on those prospective targets
19 for destruction and damage by fire and an explosive.

20 d. On January 11, 2006, the defendant and others
21 traveled to a store in Sacramento to purchase ingredients
22 necessary for the creation of an explosive device, including, but
23 not limited to, three bottles of bleach, a hot-plate, glassware, a
24 gasoline can, a car battery, and three jars of petroleum jelly.

25 e. On January 12, 2006, the defendants WEINER and a co-
26 conspirator measured and heated bleach on a hot-plate at a rented

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

3 All in violation of Title 18, United States Code, Section
4 371.

5 DATED: 30 MAY 2006

6 MCGREGOR W. SCOTT
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8 By: 
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