

DMP:EHS/ADR
F. #2023R00792

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

MICHAIL CHKHIKVISHVILI,
also known as "Mishka,"
"Michael,"
"Commander Butcher" and
"Butcher,"

Defendant.

----- X

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Solicit Violent Felonies)

1. In or about and between July 2022 and July 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MICHAIL CHKHIKVISHVILI, also known as "Mishka," "Michael," "Commander Butcher" and "Butcher," together with others, did knowingly and willfully conspire to solicit, command, induce and otherwise endeavor to persuade another person to engage in conduct constituting one or more felonies, each of which has as an element the use and attempted use of physical force against the person of another, in violation of the laws of the United States, to wit: hate crime acts, in violation of Title 18, United States Code, Section 249(a)(1)(B), and transporting an explosive with intent to kill or injure, in violation of Title 18, United States Code, Section

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
* JULY 15, 2024 *
BROOKLYN OFFICE

I N D I C T M E N T

Cr. No. 24-CR-286
(T. 18, U.S.C., §§ 371, 373, 842(p)(2)(A),
844(a)(2), 844(c)(1), 875(c), 981(a)(1)(C),
982(a)(2)(B), 982(b)(1), 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28, U.S.C.,
§ 2461(c))

Judge Carol Bagley Amon
Magistrate Judge Vera M. Scanlon

844(d), with the intent that such other person engage in such conduct and under circumstances strongly corroborative of that intent, contrary to Title 18, United States Code, Section 373.

2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant MICHAIL CHKHIKVISHVILI, also known as “Mishka,” “Michael,” “Commander Butcher” and “Butcher,” together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about July 3, 2022, CHKHIKVISHVILI messaged an individual (“Co-Conspirator-1”) using an Internet-based electronic communication service (“ECS-1”).¹ The messages stated, “Is there anyway to get unmarked guns here [i.e., in the United States]?” and “Besides killing we should rob victims too.”

(b) On or about July 19, 2022, CHKHIKVISHVILI messaged Co-Conspirator-1 on ECS-1, “Mky is only group so far that done so many kills.” In this and other communications, CHKHIKVISHVILI used “MKY” and “MMC” to refer to Maniac Murder Cult, an international racially or ethnically motivated violent extremist group for which CHKHIKVISHVILI claimed to be a “recruiter,” “curator” and “leader.”

(c) On or about August 26, 2022, CHKHIKVISHVILI messaged Co-Conspirator-1 on ECS-1, “Mky members preparing actions soon.”

(d) On or about March 20, 2023, Co-Conspirator-1 messaged CHKHIKVISHVILI on ECS-1 and asked him questions on behalf of an individual seeking to join MKY.

¹ The identities of each of the individuals and entities anonymized in this Indictment are known to the Grand Jury.

(e) On or about March 20, 2023, CHKHIKVISHVILI responded to Co-Conspirator-1 on ECS-1, “Just explain to them what membership in mky means and what actions should be recorded in good quality Beating, Arson, Killing // Beating brutal one not regular.”

(f) On or about March 20, 2023, CHKHIKVISHVILI messaged Co-Conspirator-1 on ECS-1, “You remove metadata from video first // Or from any file committing such crime as murder which will be investigated.”

(g) On or about September 8, 2023, CHKHIKVISHVILI messaged an undercover law enforcement employee (“UC-1”) on ECS-1 about recruiting “maniacs” to join MKY. CHKHIKVISHVILI stated, “I see USA as big potential because accessibility to firearms and other resources.”

(h) On or about September 8, 2023, CHKHIKVISHVILI messaged UC-1 on ECS-1 that in order to join MKY, “we ask people for brutal beating, arson/explosion or murder vids on camera.” CHKHIKVISHVILI advised UC-1 that the victims of these acts should be “low race targets.”

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(j) On or about September 29, 2023, CHKHIKVISHVILI sent UC-1 on ECS-1 files titled “MMC – COLD WEAPON” and “MMC – MANHUNT INSTRUCTION” and stated, “I want you to read those.” The “Cold Weapon” document described how to attack and kill victims using knives, hammers, screwdrivers and other weapons. The “Manhunt

Instruction” document described how to avoid detection by law enforcement after attacking and killing victims, for example by changing clothes and hiding weapons.

(k) On or about September 29, 2023, CHKHIVISHVILI sent UC-1 on ECS-1 a file called “Detonator,” which was a Russian-language bombmaking manual. The document provided a step-by-step guide on creating the various components of an explosive device, including the types and amounts of chemicals needed and how to mix them.

(l) On or about September 29, 2023, CHKHIVISHVILI messaged UC-1 on ECS-1, “murdering anyone in USA supports mky tbh [to be honest] // Big opportunity.”

(m) On or about September 29, 2023, CHKHIVISHVILI sent UC-1 on ECS-1 a Russian-language document containing detailed instructions for committing acts of arson and stated, “This is very good arson guide it’s on Russian // Just translate pdf.”

(n) On or about September 29, 2023, CHKHIVISHVILI messaged UC-1 on ECS-1, “When you finish reading all pdf-s we will on targets // You can even arson with no trace even nyc.” CHKHIVISHVILI suggested targeting “homeless people” because the government would not care “[e]ven if they die.”

(o) On or about September 29, 2023, CHKHIVISHVILI messaged UC-1 on ECS-1, “For simple Molotov you just need 1/3 car engine oil 2/3 petrol,” “There’s also one recipe worth of trying // With fertilizer and petrol,” and “You must mix fertilizer and petrol and let it stay on sun for 12 hours, after that it’s ready // Its like flammable bomb.”

(p) On or about October 17, 2023, CHKHIVISHVILI messaged UC-1 on ECS-1, “Just gotta make sure many people gonna die really by our hands.” CHKHIVISHVILI instructed UC-1 to “[t]ry to record video” or else it would be a “lost action.”

(q) On or about October 30, 2023, CHKHIKVISHVILI sent UC-1 a PDF copy of the “Hater’s Handbook” on ECS-1. The document advocated committing violent acts on behalf of MKY.

(r) On or about November 2, 2023, CHKHIKVISHVILI messaged UC-1 on a second Internet-based electronic communications service (“ECS-2”) that UC-1 could “do bigger action than Breivik without getting caught.”

(s) On or about November 2, 2023, CHKHIKVISHVILI sent a series of messages to UC-1 on ECS-2 in which he detailed a plan for UC-1 to murder racial minorities and others in New York City on New Year’s Eve by dressing up as Santa Claus and handing out candy laced with poison. CHKHIKVISHVILI relayed step-by-step instructions on how UC-1 could successfully execute the scheme without getting caught.

(t) On or about November 2, 2023, CHKHIKVISHVILI sent UC-1 on ECS-2 a document titled “The Mujahideen Poisons Handbook” and instructed him that “ricin would be most simple.” The document contained detailed instructions on creating and mixing lethal poisons and gases to further the cause of “Islamic jihad.”

(u) On or about November 2, 2023, CHKHIKVISHVILI sent UC-1 a series of messages on ECS-2 in which he instructed UC-1 on the methods of making ricin-based poison in powder and liquid form, including by extracting ricin from castor beans.

(v) On or about November 2, 2023, CHKHIKVISHVILI stated to UC-1, “Once you do poison attack, I’ll do message against US government.”

(w) On or about December 19, 2023, CHKHIKVISHVILI messaged UC-1 on ECS-1 about how UC-1 wanted to be credited in the “mky video” CHKHIKVISHVILI planned to post after a successful attack.

(x) On or about January 9, 2024, CHKHIKVISHVILI messaged UC-1 on ECS-1 and indicated that they should execute the attack where there would be the “most people operating,” stated that “Jews are literally everywhere” in Brooklyn, and suggested executing the attack on “some Jewish holiday” and at “Jewish schools full of kids.”

(y) On or about January 12, 2024, CHKHIKVISHVILI messaged UC-1 on ECS-1 that he was “very pleased to hear” that UC-1 was scouting locations for an attack in New York City, and advised UC-1 on how to evade detection by law enforcement since “NYC is full of CCTV.”

(z) On or about January 18, 2024, CHKHIKVISHVILI messaged UC-1 on ECS-1, “When should I expect news?”

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO
(Solicitation of Violent Felonies)

3. In or about and between July 2022 and July 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MICHAIL CHKHIKVISHVILI, also known as “Mishka,” “Michael,” “Commander Butcher” and “Butcher,” together with others, did knowingly and intentionally solicit, command, induce and otherwise endeavor to persuade another person to engage in conduct constituting one or more felonies, each of which has as an element the use and attempted use of physical force against the person of another, in violation of the laws of the United States, to wit: hate crime acts, in violation of Title 18, United States Code, Section 249(a)(1)(B), and transporting an explosive with intent to kill or injure, in violation of Title 18, United States Code, Section

844(d), with the intent that such other person engage in such conduct and under circumstances strongly corroborative of that intent.

(Title 18, United States Code, Sections 373, 2 and 3551 et seq.)

COUNT THREE

(Distribution of Information Pertaining to the Making and Use of an Explosive Device)

4. In or about and between July 2022 and July 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MICHAEL CHKHIKVISHVILI, also known as “Mishka,” “Michael,” “Commander Butcher” and “Butcher,” together with others, did knowingly and intentionally teach and demonstrate the making and use of an explosive, destructive device and weapon of mass destruction, and distribute information pertaining to, in whole and in part, the manufacture and use of an explosive, destructive device and weapon of mass destruction, with the intent that such teaching, demonstration, and information be used for, and in furtherance of, an activity that constitutes a federal crime of violence, to wit: hate crime acts, in violation of Title 18, United States Code, Section 249(a)(1)(B), and transporting an explosive with intent to kill or injure, in violation of Title 18, United States Code, Section 844(d).

(Title 18, United States Code, Sections 842(p)(2)(A), 844(a)(2), 2 and 3551 et seq.)

COUNT FOUR

(Transmission of Threatening Communications)

5. In or about and between July 2022 and July 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MICHAEL CHKHIKVISHVILI, also known as “Mishka,” “Michael,” “Commander Butcher” and “Butcher,” together with others, did knowingly and willfully transmit in interstate and

foreign commerce, using Internet-based electronic communications services, one or more electronic communications, to wit: messages on ECS-1 and ECS-2, containing threats to injure the person of another.

(Title 18, United States Code, Sections 875(c), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT THREE

6. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Three, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 844(c)(1), which requires any person convicted of such offense to forfeit any explosive materials involved or used or intended to be used in any violation of Title 18, United States Code, Section 844; (b) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense; and (c) Title 18, United States Code, Section 982(a)(2)(B), which requires any person convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such offense.

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 844(c)(1), 981(a)(1)(C), 982(a)(2)(B) and 982(b)(1); Title 21, United States Code, Section 853(p), Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT FOUR

8. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Four, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

9. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

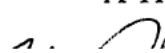
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



/s/

FOREPERSON

Breon Peace

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

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U.S. DISTRICT COURT E.D.N.Y.
* JULY 15, 2024 *
BROOKLYN OFFICE

INFORMATION SHEET

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

24-CR-286
Judge Carol Bagley Amon
Magistrate Judge Vera M. Scanlon

1. Title of Case: United States v. Michail Chkhikvishvili, also known as "Mishka," "Michael," "Commander Butcher" and "Butcher"
2. Related Magistrate Docket Number(s): 24-MJ-306
3. Arrest Date: 7/6/2024
4. Nature of offense(s): Felony
 Misdemeanor
5. Related Cases - Title and Docket No(s). (Pursuant to Rule 50.3.2 of the Local E.D.N.Y. Division of Business Rules): N/A
6. Projected Length of Trial: Less than 6 weeks
 More than 6 weeks
7. County in which crime was allegedly committed: Kings
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)
8. Was any aspect of the investigation, inquiry and prosecution giving rise to the case pending or initiated before March 10, 2012.¹ Yes No
9. Has this indictment/information been ordered sealed? Yes No
10. Have arrest warrants been ordered? Yes No
11. Is there a capital count included in the indictment? Yes No

BREON PEACE
UNITED STATES ATTORNEY

By: /s/ Andrew D. Reich
Ellen H. Sise
Andrew D. Reich
Assistant U.S. Attorneys
718-254-7000

¹ Judge Brodie will not accept cases that were initiated before March 10, 2012.

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Judge Carol Bagley Amon
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THE GRAND JURY CHARGES:

COUNT ONE
(Conspiracy to Solicit Violent Felonies)

1. In or about and between July 2022 and July 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MICHAIL CHKHIKVISHVILI, also known as "Mishka," "Michael," "Commander Butcher" and "Butcher," together with others, did knowingly and willfully conspire to solicit, command, induce and otherwise endeavor to persuade another person to engage in conduct constituting one or more felonies, each of which has as an element the use and attempted use of physical force against the person of another, in violation of the laws of the United States, to wit: hate crime acts, in violation of Title 18, United States Code, Section 249(a)(1)(B), and transporting an explosive with intent to kill or injure, in violation of Title 18, United States Code, Section

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OVERT ACTS

(a) On or about July 3, 2022, CHKHIKVISHVILI messaged an individual (“Co-Conspirator-1”) using an Internet-based electronic communication service (“ECS-1”).¹ The messages stated, “Is there anyway to get unmarked guns here [i.e., in the United States]?” and “Besides killing we should rob victims too.”

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(z) On or about January 18, 2024, CHKHIKVISHVILI messaged UC-1 on ECS-1, “When should I expect news?”

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO
(Solicitation of Violent Felonies)

3. In or about and between July 2022 and July 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MICHAEL CHKHIKVISHVILI, also known as “Mishka,” “Michael,” “Commander Butcher” and “Butcher,” together with others, did knowingly and intentionally solicit, command, induce and otherwise endeavor to persuade another person to engage in conduct constituting one or more felonies, each of which has as an element the use and attempted use of physical force against the person of another, in violation of the laws of the United States, to wit: hate crime acts, in violation of Title 18, United States Code, Section 249(a)(1)(B), and transporting an explosive with intent to kill or injure, in violation of Title 18, United States Code, Section

844(d), with the intent that such other person engage in such conduct and under circumstances strongly corroborative of that intent.

(Title 18, United States Code, Sections 373, 2 and 3551 et seq.)

COUNT THREE

(Distribution of Information Pertaining to the Making and Use of an Explosive Device)

4. In or about and between July 2022 and July 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MICHAEL CHKHIKVISHVILI, also known as “Mishka,” “Michael,” “Commander Butcher” and “Butcher,” together with others, did knowingly and intentionally teach and demonstrate the making and use of an explosive, destructive device and weapon of mass destruction, and distribute information pertaining to, in whole and in part, the manufacture and use of an explosive, destructive device and weapon of mass destruction, with the intent that such teaching, demonstration, and information be used for, and in furtherance of, an activity that constitutes a federal crime of violence, to wit: hate crime acts, in violation of Title 18, United States Code, Section 249(a)(1)(B), and transporting an explosive with intent to kill or injure, in violation of Title 18, United States Code, Section 844(d).

(Title 18, United States Code, Sections 842(p)(2)(A), 844(a)(2), 2 and 3551 et seq.)

COUNT FOUR

(Transmission of Threatening Communications)

5. In or about and between July 2022 and July 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MICHAEL CHKHIKVISHVILI, also known as “Mishka,” “Michael,” “Commander Butcher” and “Butcher,” together with others, did knowingly and willfully transmit in interstate and

foreign commerce, using Internet-based electronic communications services, one or more electronic communications, to wit: messages on ECS-1 and ECS-2, containing threats to injure the person of another.

(Title 18, United States Code, Sections 875(c), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT THREE

6. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Three, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 844(c)(1), which requires any person convicted of such offense to forfeit any explosive materials involved or used or intended to be used in any violation of Title 18, United States Code, Section 844; (b) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense; and (c) Title 18, United States Code, Section 982(a)(2)(B), which requires any person convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such offense.

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 844(c)(1), 981(a)(1)(C), 982(a)(2)(B) and 982(b)(1); Title 21, United States Code, Section 853(p), Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT FOUR

8. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Four, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

9. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



FOREPERSON

Breon Peace

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK