

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term
Grand Jury Sworn in on August 1, 2024

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	VIOLATIONS:
	:	
THOMASZ SZABO,	:	COUNT 1:
a/k/a "Plank," "Jonah," and "Cypher"	:	18 U.S.C. § 371
	:	(Conspiracy)
NEMANJA RADOVANOVIC,	:	
a/k/a "XBD31," "Thuggin," and "XDR"	:	COUNTS 2 - 30:
	:	18 U.S.C. §§ 844(e), 2
Defendants.	:	(Threats and False Information
	:	Regarding Explosives, Aiding and
	:	Abetting)
	:	
	:	Counts 31 - 34:
	:	18 U.S.C. §§ 875(c), 2
	:	(Transmitting Threats in Interstate and
	:	Foreign Commerce, Aiding and
	:	Abetting)

INDICTMENT

The Grand Jury charges that:

COUNT ONE
(18 U.S.C. § 371 — Conspiracy)

1. From no later than in or around December of 2020 through in or around January of 2024, in the District of Columbia and elsewhere, the defendants,

THOMASZ SZABO
and
NEMANJA RADOVANOVIC,

did knowingly combine, conspire, confederate, and agree with each other and with others known and unknown to commit offenses against the United States, namely:

- a. To, through the use of the telephone and other instruments of interstate and foreign commerce, willfully make threats, and maliciously convey false information knowing the same to be false, concerning attempts to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings by means of fire and explosives, in violation of Title 18, United States Code, Section 844(e).
- b. To knowingly and willfully transmit in interstate and foreign commerce communications containing threats to injure the person of another, in violation of Title 18, United States Code, Section 875(c).
- c. To, with the intent to injure, harass, and intimidate another person, use facilities of interstate and foreign commerce, including interactive computer services and electronic communication services, to engage in a course of conduct that would reasonably be expected to cause substantial emotional distress to the person and to the person's immediate family members, in violation of Title 18, United States Code, Section 2261A(2)(B).

Manner and Means of the Conspiracy

2. SZABO and RADOVANOVIC, with others known and unknown, carried out the conspiracy through the following manner and means, among others:
 - a. SZABO, RADOVANOVIC, and others obtained personal identifying information, including home addresses, for victims they wished to harass and endanger.
 - b. SZABO, RADOVANOVIC, and others carried out "swatting" attacks against their victims by falsely reporting ongoing threats of violence at the victims' home addresses for the purpose of provoking a police response (such as the deployment of a SWAT team) at those locations.

- c. SZABO, RADOVANOVIC, and others made false bomb threats against government entities, houses of worship, and businesses.
- d. SZABO, RADOVANOVIC, and others sought to conceal their identities through the use of virtual private networks, text-to-speech apps, and internet-based phone services.
- e. SZABO, RADOVANOVIC, and others communicated in online chat groups organized and moderated by SZABO.
- f. SZABO, RADOVANOVIC, and others used monikers (that is, online usernames or nicknames) to communicate with one another. SZABO's monikers included but were not limited to "Jonah," "Jonah Goldberg," "Plank," "Rambler," "War Lord," "Shovel," "Cypher," "Kollectivist," "Mortenberg Shekelstorms," and "NotThuggin2." RADOVANOVIC's monikers included but were not limited to "XBD31," "XDR," "Angus," "Thuggin," "Thug Hunter," "NotThuggin," "DCL," and "AOD."
- g. SZABO, RADOVANOVIC, and others promoted their criminal activity by, for example, live-streaming their "swatting" attacks in online chat groups made up of like-minded individuals.

Acts in Furtherance of the Conspiracy

3. On or about December 30, 2020, SZABO made a phone call to a crisis intervention hotline conveying threats to commit a mass shooting at multiple unspecified synagogues in New York City.

4. On or about January 17, 2021, SZABO made a phone call to crisis intervention hotline conveying threats to detonate explosives at the United States Capitol and kill the President-elect.

5. On or about October 30, 2021, SZABO made a phone call to a government agency in the United States conveying a false report that explosives had been placed at Victim University 1.

6. On or about January 6, 2022, SZABO posted a message to a public internet forum in which he threatened to commit mass murder and detonate explosives at the United States Capitol.

7. On or about February 9, 2022, SZABO falsely reported a homicide and imminent suicide at the home of Private Victim 1 and shared the results in a chat group.

8. On or about February 9, 2022, SZABO falsely reported a homicide and imminent suicide at the home of Private Victim 2 and shared the results in a chat group.

9. On or about April 23, 2022, SZABO shared with a chat group the results of a swatting of Private Victim 3.

10. On or about December 12, 2023, via text message to a crisis intervention hotline, RADOVANOVIC falsely reported a homicide at the home of Private Victim 4, whom SZABO had selected as a swatting target.

11. On or about December 16, 2023, via text message to a crisis intervention hotline, RADOVANOVIC falsely reported an imminent suicide at the home of Private Victim 5, whom SZABO had selected as a swatting target.

12. On or about December 16, 2023, via text message to a crisis intervention hotline, RADOVANOVIC falsely reported an imminent suicide at the home of Private Victim 6, whom SZABO had selected as a swatting target.

13. On or about December 19, via text message to a crisis intervention hotline, RADOVANOVIC falsely reported an imminent suicide at the home of Private Victim 7, whom

SZABO had selected as a swatting target. RADOVANOVIC falsely claimed to have a child hostage at the residence; he threatened to kill the child as well as any police officers who responded.

14. On or about December 22, 2023, via text message to a crisis intervention hotline, RADOVANOVIC falsely reported a violent crime in progress at the home of Private Victim 4, whom SZABO had previously selected as a swatting target and whom RADOVANOVIC had already swatted.

15. On or about December 23, 2023, via text message to a crisis intervention hotline, RADOVANOVIC falsely reported a homicide at the home of the parents of Private Victim 8, whom SZABO had selected as a swatting target.

16. On or about December 23, 2023, upon learning that RADOVANOVIC had swatted Private Victim 8's parents, SZABO congratulated RADOVANOVIC. RADOVANOVIC asked whether he should swat Private Victim 8's spouse, and SZABO replied that he should do so the next day.

17. On or about December 23, 2023, SZABO explained to RADOVANOVIC that they should direct their swatting activity against victims from both U.S. political parties because "we are not on any side."

18. On or about December 24, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported that he had placed explosives at Victim Religious Institution 1 and threatened to detonate them, resulting in the evacuation of Victim Religious Institution 1 during services.

19. On or about December 24, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Private Victim 8,

whom SZABO had selected as a swatting target and whose parents RADOVANOVIC had previously swatted.

20. On or about December 24, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported that he had placed explosives at Victim Religious Institution 2.

21. On or about December 24, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Private Victim 9. RADOVANOVIC threatened to kill the fictitious hostage if he was not paid a ransom.

22. On or about December 25, 2023, in a phone call to a crisis intervention hotline, RADOVANOVIC falsely reported a homicide and imminent suicide at the home of Official Victim 1, a member of the U.S. House of Representatives.

23. On or about December 25, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported that he had placed explosives at Victim Religious Institution 3, resulting in the interruption of services at Victim Religious Institution 3.

24. On or about December 25, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and imminent suicide at the home of Official Victim 2, a former state legislator.

25. On or about December 25, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a mass shooting at Victim Religious Institution 4.

26. On or about December 25, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and imminent suicide at the home of Official Victim 3, a member of the U.S. House of Representatives.

27. On or about December 25, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at a neighboring residence to the home of Official Victim 4, a member of the U.S. Senate. RADOVANOVIC threatened to kill the fictitious hostage if he was not paid a ransom.

28. On or about December 25, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Private Victim 10, whom SZABO had selected as a swatting target.

29. On or about December 25, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 5, an elected state official. RADOVANOVIC threatened to kill the fictitious hostage if he was not paid a ransom.

30. On or about December 25, 2023, in a phone call to a government agency in the United States, RADOVANOVIC again falsely reported a homicide and kidnapping at the home of the parents of Private Victim 8. RADOVANOVIC threatened to kill the fictitious hostage if he was not paid a ransom.

31. On or about December 25, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 6, a member of the U.S. Senate. RADOVANOVIC threatened to kill the fictitious hostage if he was not paid a ransom.

32. On or about December 25, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 7, a state legislator. RADOVANOVIC threatened to kill the fictitious hostage if he was not paid a ransom.

33. On or about December 25, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Private Victim 11. RADOVANOVIC threatened to kill the fictitious hostage if he was not paid a ransom.

34. On or about December 26, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Official Victim 8, a state executive branch official.

35. On or about December 26, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at a home owned by Official Victim 9, a state legislator. RADOVANOVIC threatened to kill the fictitious hostage if he was not paid a ransom.

36. On or about December 26, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 10, a state legislator. RADOVANOVIC threatened to kill the fictitious hostage if he was not paid a ransom.

37. On or about December 26, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Private Victim 12, a family member of Official Victim 10, whom RADOVANOVIC had just swatted. RADOVANOVIC threatened to kill the fictitious hostage if he was not paid a ransom.

38. On or about December 26, 2023, in a phone call to a government agency in the United States, RADOVANOVIC again falsely reported a homicide, kidnapping, and the presence of explosives at the home of Official Victim 7, whom RADOVANOVIC had previously swatted. RADOVANOVIC threatened to detonate the fictitious explosives if he was not paid a ransom.

39. On or about December 26, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 11, a state legislator. RADOVANOVIC threatened to kill the fictitious hostage if he was not paid a ransom.

40. On or about December 26, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 12, a state legislator. RADOVANOVIC threatened to kill the fictitious hostage if he was not paid a ransom.

41. On or about December 26, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 13, a former state legislator.

42. On or about December 26, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide, kidnapping, and the presence of explosives at the home of Official Victim 14, a senior U.S. executive branch official. RADOVANOVIC threatened to detonate the fictitious explosives, kill the fictitious hostage, and rape and kill three fictitious children at the home if he was not paid a ransom.

43. On or about December 26, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide, kidnapping, and the presence of

explosives at the home of Official Victim 15, a senior official of a federal law enforcement agency. RADOVANOVIC threatened to detonate the fictitious explosives if he was not paid a ransom.

44. On or about December 26, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide, kidnapping, and the presence of explosives at the home of Official Victim 16, the head of a federal law enforcement agency. RADOVANOVIC threatened to detonate the fictitious explosives if he was not paid a ransom.

45. On or about December 26, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide, kidnapping, and the presence of explosives at the home of Official Victim 17, a state legislator. RADOVANOVIC threatened to detonate the fictitious explosives if he was not provided with a getaway vehicle.

46. On or about December 26, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the former home of Private Victim 13.

47. On or about December 26, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 18, a member of the U.S. House of Representatives. RADOVANOVIC threatened to kill the fictitious hostage if he was not paid a ransom.

48. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide, kidnapping, and the presence of explosives at the home of Private Victim 14. RADOVANOVIC threatened to detonate the fictitious explosives if he was not paid a ransom.

49. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide, kidnapping, and the presence of

explosives at the home of Official Victim 19, a state executive branch official. RADOVANOVIC threatened to detonate the fictitious explosives if he was not paid a ransom.

50. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide, kidnapping, and the presence of explosives at the home of Official Victim 20, a former senior official of a federal law enforcement agency. RADOVANOVIC threatened to kill the fictitious hostage and detonate the fictitious explosives if he was not paid a ransom.

51. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 21, the head of a federal law enforcement agency.

52. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 22, an official of a state law enforcement agency. RADOVANOVIC threatened to detonate the fictitious explosives if he was not paid a ransom.

53. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 23, a former senior official of a federal law enforcement agency. RADOVANOVIC threatened to kill the fictitious hostage if he was not paid a ransom. During the police response to RADOVANOVIC's false threat, a car accident occurred that resulted in serious bodily injuries.

54. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of

Official Victim 24, the head of a county law enforcement agency. RADOVANOVIC threatened to “blow the house up” if he was not paid a ransom.

55. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide, kidnapping, and the presence of explosives at the home of Official Victim 11, a state legislator whom he had previously swatted. RADOVANOVIC threatened to detonate the fictitious explosives if he was not paid a ransom.

56. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide, kidnapping, and the presence of explosives at the home of Official Victim 25, a cabinet-level U.S. executive branch official. RADOVANOVIC threatened to kill the fictitious hostage and detonate the fictitious explosives if he was not paid a ransom.

57. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide, kidnapping, and the presence of explosives at the home of Private Victim 15. RADOVANOVIC threatened to detonate the fictitious explosives if he was not paid a ransom.

58. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide, kidnapping, and the presence of explosives at a neighboring residence to the former home of Official Victim 26, a member of the U.S. House of Representatives. RADOVANOVIC threatened to kill the fictitious hostages and detonate the fictitious explosives if he was not paid a ransom.

59. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide, kidnapping, and the presence of explosives at the home of Private Victim 16, who is a family member of Official Victim 27, an

official of a federal law enforcement agency. RADOVANOVIC threatened to detonate the fictitious explosives if he was not paid a ransom, and further threatened to shoot any officers who responded.

60. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide, kidnapping, and the presence of explosives at the home of Official Victim 27, whose family member RADOVANOVIC had just swatted. RADOVANOVIC threatened to detonate the fictitious explosives and shoot any responding officers if he was not paid a ransom.

61. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 28, a member of the U.S. Senate. RADOVANOVIC threatened to kill the fictitious hostage if he was not paid a ransom.

62. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at a home owned by Official Victim 29, a member of the U.S. Senate.

63. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide, kidnapping, and the presence of explosives at the home of Official Victim 30, a member of the U.S. Senate. RADOVANOVIC threatened to “blow the house up” if he was not paid a ransom.

64. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide, kidnapping, and the presence of explosives at the home of Official Victim 31, a member of the U.S. Senate. RADOVANOVIC threatened to detonate the fictitious explosives and if he was not paid a ransom.

65. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide, kidnapping, and the presence of explosives at the home of Official Victim 32, a member of the U.S. Senate. RADOVANOVIC threatened to kill the fictitious hostage if he was not provided with an escape vehicle.

66. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 33, a member of the U.S. Senate. RADOVANOVIC threatened to kill the fictitious hostage if he was not paid a ransom.

67. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 34, a member of the U.S. Senate.

68. On or about December 27, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported having placed explosives at the premises of Victim Business 1, which is owned by Official Victim 19, a state executive branch official whom RADOVANOVIC had previously swatted. RADOVANOVIC threatened that the fictitious explosives were timed to explode in forty-five minutes.

69. On or about December 28, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported the presence of explosives at Government Facility 1, a federal law enforcement facility. RADOVNOVIC threatened that the fictitious explosives were timed to explode in one hour.

70. On or about December 28, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 35, a U.S. District Judge.

71. On or about December 28, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Private Victim 17.

72. On or about December 28, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported having placed explosives at the premises of Victim Business 2. RADOVANOVIC threatened that the fictitious explosives were timed to explode in 45 minutes.

73. On or about December 28, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Private Victim 18, who is a family member of Official Victim 1, a member of the U.S. House of Representatives whom RADOVANOVIC had previously swatted.

74. On or about December 28, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Private Victim 19, a second family member of Official Victim 1.

75. On or about December 28, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Private Victim 20.

76. On or about December 28, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 36, a member of the U.S. House of Representatives.

77. On or about December 28, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of

Official Victim 37, a member of the U.S. House of Representatives. RADOVANOVIC threatened to kill multiple children whom he falsely claimed to have captive at the home.

78. On or about December 28, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Private Victim 21, a family member of Official Victim 37. RADOVANOVIC threatened to kill the fictitious hostages, including several children whom he falsely claimed to have tied up at the home.

79. On or about December 29, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 38, a state legislator.

80. On or about December 29, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Private Victim 22. RADOVANOVIC threatened to kill multiple children whom he falsely claimed to have captive at the home.

81. On or about December 29, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 39, a state executive branch official.

82. On or about December 29, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Private Victim 23.

83. On or about December 29, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Private Victim 24.

84. On or about December 29, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide, kidnapping, and the presence of explosives at the home of Private Victim 25. RADOVANOVIC threatened to kill the fictitious hostage if he was not provided with an escape vehicle.

85. On or about December 29, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 40, a state executive branch official. RADOVANOVIC threatened to kill the fictitious hostages if he was not provided with an escape vehicle.

86. On or about December 29, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and imminent suicide at the home of Official Victim 41, the head of a state law enforcement agency.

87. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Official Victim 42, a local law enforcement officer who had made a statement to the media about the harms of swatting after RADOVANOVIC's swatting of Private Victim 15, alleged above.

88. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported having placed explosives at the premises of Victim Business 3. RADOVANOVIC threatened that the fictitious explosives were timed to explode in 40 minutes.

89. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Official Victim 43, a municipal public safety official.

90. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at a home owned by Private Victim 26 and Private Victim 27, who are family members of Official Victim 44, a member of the U.S. House of Representatives.

91. On or about December 30, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and imminent suicide at the home of Official Victim 45, a former state governor.

92. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Private Victim 28, a second family member of Official Victim 37. This false report caused police to close down the street where Private Victim 28 lived.

93. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Private Victim 29, a third family member of Official Victim 37. RADOVANOVIC threatened to kill any police who responded. This false report caused police to shut down the street where Private Victim 29 lived.

94. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Private Victim 30.

95. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Official Victim 46, a senior official of a state law enforcement agency.

96. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 47, the head of a state law enforcement agency.

97. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Official Victim 48, a cabinet-level U.S. executive branch official.

98. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and imminent suicide at the home of Official Victim 49, a senior U.S. executive branch official.

99. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and imminent suicide at the home of Official Victim 50, a senior U.S. executive branch official.

100. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and imminent suicide at the home of the family of Official Victim 51, a senior official of a federal law enforcement agency.

101. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and imminent suicide at the home of Official Victim 52, a senior official of a federal law enforcement agency.

102. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Private Victim 31 and Private Victim 32.

103. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of

Official Victim 53, a member of the U.S. House of Representatives. This false report caused a tactical police response that included the deployment of an armored vehicle.

104. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 54, a member of the U.S. House of Representatives. RADOVANOVIC threatened to kill multiple children whom he falsely claimed to have captive at the home.

105. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and kidnapping at the home of Official Victim 55, a former senior official of a federal law enforcement agency. RADOVANOVIC threatened to kill multiple children whom he falsely claimed to have captive at the home.

106. On or about December 30, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Official Victim 56, a federal law enforcement agent.

107. On or about December 31, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Private Victim 33.

108. On or about December 31, 2023, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and threatened to kill fictitious children at the home of Private Victim 34.

109. On or about January 2, 2024, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Private Victim 35.

110. On or about January 2, 2024, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the former home of Private Victim 36.

111. On or about January 2, 2024, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the current home of Private Victim 36, whose former home he had just swatted.

112. On or about January 3, 2024, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Private Victim 37.

113. On or about January 3, 2024, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Private Victim 38.

114. On or about January 3, 2024, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported the presence of explosive at Government Facility 2, a state law enforcement facility.

115. On or about January 3, 2024, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Official Victim 57, a state executive branch official.

116. On or about January 3, 2024, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Private Victim 39, who is a family member of Official Victim 58, a member of the U.S. Senate. RADOVANOVIC threatened to use gas to “blow up the house” and played simulated gunshot sounds on the call. This false report caused a tactical police response.

117. On or about January 9, 2024, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Private Victim 40. RADOVANOVIC threatened that he was going to “turn the gas on and blow this house up” with children inside.

118. On or about January 9, 2024, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Official Victim 59, a state executive branch official.

119. On or about January 9, 2024, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Official Victim 20, whom he had previously swatted.

120. On or about January 9, 2024, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide and threatened to cause an explosion at the home of Official Victim 60, a former elected official of the executive branch of the United States.

121. On or about January 9, 2024, in a phone call to a government agency in the United States, RADOVANOVIC falsely reported a homicide at the home of Official Victim 61, a state governor.

(In violation of Title 18, United States Code, Section 371)

COUNTS TWO through THIRTY

(18 U.S.C. §§ 844(e), 2 — Threats and False Information Regarding Explosives, Aiding and Abetting)

122. On or about each of the below-specified dates, begun and committed outside the jurisdiction of any particular state or district of the United States and, therefore, pursuant to Title 18, United States Code, Section 3238, within the venue of the United States District Court for the District of Columbia, the defendants,

**THOMASZ SZABO
and
NEMANJA RADOVANOVIC,**

through the use of the telephone and other instruments of interstate and foreign commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt being made and to be made unlawfully to damage and destroy each of the below-specified buildings by means of fire and explosive, as alleged in each of the corresponding paragraphs above that are incorporated herein by reference:

Count	Date	Building	Corresponding paragraph above
2	December 24, 2023	Victim Religious Institution 1	18
3	December 24, 2023	Victim Religious Institution 2	20
4	December 25, 2023	Victim Religious Institution 3	23
5	December 26, 2023	Home of Official Victim 7	38
6	December 26, 2023	Home of Official Victim 14	42
7	December 26, 2023	Home of Official Victim 15	43
8	December 26, 2023	Home of Official Victim 16	44
9	December 26, 2023	Home of Official Victim 17	45
10	December 27, 2023	Home of Private Victim 14	48
11	December 27, 2023	Home of Official Victim 19	49
12	December 27, 2023	Home of Official Victim 20	50

13	December 27, 2023	Home of Official Victim 22	52
14	December 27, 2023	Home of Official Victim 24	54
15	December 27, 2023	Home of Official Victim 11	55
16	December 27, 2023	Home of Official Victim 25	56
17	December 27, 2023	Home of Private Victim 15	57
18	December 27, 2023	Home of Official Victim 26	58
19	December 27, 2023	Home of Private Victim 16	59
20	December 27, 2023	Home of Official Victim 27	60
21	December 27, 2023	Home of Official Victim 30	63
22	December 27, 2023	Home of Official Victim 31	64
23	December 28, 2023	Victim Business 1	68
24	December 28, 2023	Government Facility 1	69
25	December 28, 2023	Victim Business 2	72
26	December 30, 2023	Victim Business 3	88
27	January 3, 2024	Government Facility 2	114
28	January 3, 2024	Home of Private Victim 39	116
29	January 9, 2024	Home of Private Victim 40	117
30	January 9, 2024	Home of Private Victim 41	120

(Each in violation of Title 18, United States Code, Sections 844(e) and 2)

COUNTS THIRTY-ONE through THIRTY-FOUR

**(18 U.S.C. §§ 875(c), 2 — Transmitting Threats in Interstate and Foreign Commerce,
Aiding and Abetting)**

123. On or about each of the below-specified dates, begun and committed outside the jurisdiction of any particular state or district of the United States and, therefore, pursuant to Title 18, United States Code, Section 3238, within the venue of the United States District Court for the District of Columbia, the defendants,

**THOMASZ SZABO
and
NEMANJA RADOVANOVIC,**

knowingly and willfully did transmit in interstate and foreign commerce a communication containing a threat to injure each of the below-specified persons, as alleged in each of the corresponding paragraphs above that are incorporated herein by reference:

Count	Date	Victim(s) of threatened injury	Corresponding paragraph above
31	December 19, 2023	Responding officers	13
32	December 27, 2023	Responding officers	59
33	December 27, 2023	Responding officers	60
34	December 30, 2023	Responding officers	93

(Each in violation of Title 18, United States Code, Sections 875(c) and 2)

NOTICE OF FORFEITURE
18 U.S.C. § 371

The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), upon conviction of a conspiracy to violate 18 U.S.C. §§ 844(e), 1038, 875(c) and 2261A(2)(B), in violation of Title 18, United States Code, Section 371, the defendants,

THOMASZ SZABO
and
NEMANJA RADOVANOVIC,

shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to said violations.

NOTICE OF FORFEITURE
18 U.S.C. § 875

The allegations contained in Counts Two through Thirty of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses in violation of Title 18, United States Code, Section 875 set forth in Counts Two through Thirty of this Indictment, the defendants,

THOMASZ SZABO
and
NEMANJA RADOVANOVIC,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses.

MONEY JUDGMENT

In the event of conviction, the United States intends to seek a money judgment.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendants:

- 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON



MATTHEW M. GRAVES
U.S. ATTORNEY FOR THE UNITED STATES
IN AND FOR THE DISTRICT OF COLUMBIA