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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
February 2003 Grand Jury

UNITED STATES OF AMERICA, ) CR No. 04-  
)  
Plaintiff, ) I N D I C T M E N T  
)  
v. ) [18 U.S.C. § 844(n): Conspiracy  
) to Commit Arson; 18 U.S.C.  
) § 844(i): Arson; 18 U.S.C. § 2:  
) Aiding and Abetting; 18 U.S.C.  
WILLIAM JENSEN COTTRELL, ) § 924(c)(1)(A)(i) and (B)(ii):  
) Use or Carrying of Destructive  
Defendant. ) Device During Crime of  
) Violence]  
)  
\_\_\_\_\_ )

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 844(n)]

I. OBJECT OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury and continuing to on or about September 17, 2003, in Los Angeles County, within the Central District of California, and elsewhere, defendant WILLIAM JENSEN COTTRELL and others known and unknown to the Grand Jury, willfully and knowingly conspired and agreed to commit the

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1 following offense against the United States:

2 To maliciously damage or destroy, or attempt to damage  
3 or destroy, by means of fire or an explosive, any  
4 building, vehicle or other real or personal property  
5 used in interstate or foreign commerce or in any  
6 activity affecting interstate or foreign commerce, in  
7 violation of Title 18, United States Code, Section  
8 844(i).

9 II. MEANS OF THE CONSPIRACY

10 \_\_\_\_\_The foregoing object of the conspiracy was to be  
11 accomplished in the following manner:

12 1. Defendant WILLIAM JENSEN COTTRELL would search the  
13 Internet for Sport Utility Vehicle (SUV) dealerships in the  
14 Pasadena, California area.

15 2. Defendant WILLIAM JENSEN COTTRELL would print maps  
16 from the Internet showing the locations of SUV dealerships in the  
17 Pasadena, California area;

18 3. Defendant WILLIAM JENSEN COTTRELL and other known and  
19 unknown co-conspirators would drive to a gas station in the  
20 Pasadena, California area to fill up detergent bottles with  
21 gasoline for use in setting fire to SUVs.

22 4. Defendant WILLIAM JENSEN COTTRELL and other known and  
23 unknown co-conspirators would drive to the arson locations in  
24 COTTRELL's maroon car.

25 5. Defendant WILLIAM JENSEN COTTRELL and other known and  
26 unknown co-conspirators would set SUVs on fire by throwing  
27 Molotov cocktails into the SUVs.

1           6. Defendant WILLIAM JENSEN COTTRELL and other known and  
2 unknown co-conspirators would vandalize SUVs by spray painting  
3 statements such as "ELF", "TERRORIST", "I ♡ POLLUTION", "SUV =  
4 TERRORISM", and "KILLER" on them.

5           7. Defendant WILLIAM JENSEN COTTRELL and other known and  
6 unknown co-conspirators would write " $e^i + 1 = 0$ " on an SUV  
7 located at Duarte Mitsubishi, 1125 Central Avenue, Duarte,  
8 California.

9 III. OVERT ACTS

10 \_\_\_\_\_In order to carry out the object of the conspiracy,  
11 defendant WILLIAM JENSEN COTTRELL, and his other known and  
12 unknown co-conspirators, committed various overt acts within the  
13 Central District of California and elsewhere, including but not  
14 limited to the following:

15           1. On or about August 22, 2003, defendant WILLIAM JENSEN  
16 COTTRELL accessed the Internet to identify Sport Utility Vehicle  
17 (SUV) dealerships in the Pasadena, California area and printed  
18 out maps showing the locations of these dealerships.

19           2. On or about August 22, 2003, defendant WILLIAM JENSEN  
20 COTTRELL and other known and unknown co-conspirators drove to a  
21 gas station in Pasadena, California, and filled detergent bottles  
22 with gasoline for use in setting fire to SUVs.

23           3. On or about August 22, 2003, defendant WILLIAM JENSEN  
24 COTTRELL and other known and unknown co-conspirators drove to  
25 Rusnak Mercedes, 55 West Huntington Boulevard, Arcadia,  
26 California, and vandalized approximately eight SUVs by spray  
27 painting statements such as "ELF", "TERRORIST", "I ♡ POLLUTION",  
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1 "SUV = TERRORISM", and "KILLER" on them.

2 4. On or about August 22, 2003, defendant WILLIAM JENSEN  
3 COTTRELL and other known and unknown co-conspirators drove to 513  
4 West Lime Street, Monrovia, California, and vandalized a 2002  
5 Toyota Tundra by breaking a window and spray painting a blue "C"  
6 on another window.

7 5. On or about August 22, 2003, defendant WILLIAM JENSEN  
8 COTTRELL and other known and unknown co-conspirators drove to  
9 private residences in the area of 1408 South Magnolia Avenue,  
10 Monrovia, California, and vandalized a 1996 Honda Passport by  
11 spray painting the words, among others, "POLLUTER" and "ELF" on  
12 it.

13 6. On or about August 22, 2003, defendant WILLIAM JENSEN  
14 COTTRELL and other known and unknown co-conspirators drove to  
15 private residences in the area of 1408 South Magnolia Avenue,  
16 Monrovia, California, and vandalized a 1999 Chevrolet Suburban by  
17 spray painting the words "GAS GUZZLER" and "ELF" on it.

18 7. On or about August 22, 2003, defendant WILLIAM JENSEN  
19 COTTRELL and other known and unknown co-conspirators drove to  
20 private residences in the area of 1408 South Magnolia Avenue,  
21 Monrovia, California, and vandalized a 1998 Ford Expedition by  
22 spray painting the words "POLLUTER," "ELF," and the symbol "☺"  
23 on it.

24 8. On or about August 22, 2003, defendant WILLIAM JENSEN  
25 COTTRELL and other known and unknown co-conspirators drove to  
26 private residences in the area of 1408 South Magnolia Avenue,  
27 Monrovia, California, and threw a Molotov cocktail into the  
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1 window of the 1998 Ford Expedition in order to determine how well  
2 the SUV would burn.

3 9. On or about August 22, 2003, defendant WILLIAM JENSEN  
4 COTTRELL and other known and unknown co-conspirators drove to  
5 Advantage Ford, 1031 Central Avenue, Duarte, California, and  
6 vandalized twenty-one SUVs by spray painting the words and  
7 symbols, among others, "POLLUTER", "☺", "I ♡ POLLUTION", "ELF",  
8 "DESTROYER", "SUV'S SUCK", "SUV'S SUCK HI", "CLEAN", "AIR",  
9 "KILLER", "SMOG MACHINE", "GAS GUZZLER, ELF", and "POLLUTER ELF"  
10 on the SUVs.

11 10. On or about August 22, 2003, defendant WILLIAM JENSEN  
12 COTTRELL and other known and unknown co-conspirators entered the  
13 parking lot of Duarte Mitsubishi, 1125 Central Avenue, Duarte,  
14 California, and vandalized twenty-six SUVs by spray painting the  
15 words and symbols, among others, "SUV = TERRORISM", "☺", "I ♡  
16 POLLUTION", "ELF", "POLLUTION ELF", "NO!", "HI", "POLLUTER",  
17 "POLLUTION", "KILLER", and "GAS GUZZLER" on the SUVs.

18 11. On or about August 22, 2003 defendant WILLIAM JENSEN  
19 COTTRELL and other known and unknown co-conspirators spray  
20 painted the equation " $e^i + 1 = 0$ ", on an SUV located at Duarte  
21 Mitsubishi, 1125 Central Avenue, Duarte, California.

22 12. On or about August 22, 2003, defendant WILLIAM JENSEN  
23 COTTRELL and other known and unknown co-conspirators drove to  
24 Clippinger Hummer, 1900 East Garvey Street, West Covina,  
25 California, and threw Molotov cocktails into the windows of  
26 approximately eight SUVs, burning approximately fourteen SUVs and  
27 a commercial building.

1           13. On or about August 22, 2003, defendant WILLIAM JENSEN  
2 COTTRELL and other known and unknown co-conspirators drove to  
3 Clippinger Hummer, 1900 East Garvey Avenue, West Covina,  
4 California, and vandalized approximately fifty-two SUVs by spray  
5 painting the words, among others, "SUV = TERRORISM", "I ♡  
6 POLLUTION", "ELF", "I ♡ POLLUTION E.L.F.", "elf", "NO", "MORE",  
7 "FAT, LAZY, AMERICANS", "KILLER OF THE EARTH ELF", "GREEDY LITTLE  
8 PIG", "EARTH MURDER", "BIGGEST ASHAME", "AMERICAN WASTEFULLNESS",  
9 "DESTROYER", "NO RESPECT TO EARTH ELF", and "SHAME" on the SUVs.

10           14. On or about September 15, 2003, defendant WILLIAM  
11 JENSEN COTTRELL, using a fictitious electronic mail ("e-mail")  
12 address, sent an e-mail message to the Los Angeles Times claiming  
13 responsibility for the arsons, and explaining that he had written  
14 the equation " $e^{in} + 1 = 0$ " to identify himself and his co-  
15 conspirators as the vandals and arsonists.

16           15. On or about September 17, 2003, defendant WILLIAM  
17 JENSEN COTTRELL, using a fictitious e-mail address, sent an e-  
18 mail message to the Los Angeles Times providing emissions and  
19 fuel efficiency statistics for SUVs, hoping that the statistics  
20 would be placed in a Los Angeles Times article about the arsons.

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COUNT TWO

[18 U.S.C. §§ 844(i), 2]

On or about August 22, 2003, in Los Angeles County, within the Central District of California, defendant WILLIAM JENSEN COTTRELL willfully caused and aided, abetted, counseled, commanded, induced, and procured the malicious damaging and destroying, by means of fire and an explosive, of a Sport Utility Vehicle and a building used in interstate commerce and used in activities affecting interstate commerce, namely, a 2003 red H2 Hummer, vehicle identification number 5GRGN23UX3H143441, and an adjacent building housing SUV parts and records, located at Clippinger Hummer, 1900 East Garvey Avenue, West Covina, California.

COUNT THREE

[18 U.S.C. §§ 844(i), 2]

On or about August 22, 2003, in Los Angeles County, within the Central District of California, defendant WILLIAM JENSEN COTTRELL willfully caused and aided, abetted, counseled, commanded, induced, and procured the malicious damaging and destroying, by means of fire and an explosive, of a Sport Utility Vehicle used in interstate commerce and used in activities affecting interstate commerce, namely, a 2003 yellow H2 Hummer, vehicle identification number 5GRGN23U63H146630, located at Clippinger Hummer, 1900 East Garvey Avenue, West Covina, California.

COUNT FOUR

[18 U.S.C. §§ 844(i), 2]

On or about August 22, 2003, in Los Angeles County, within the Central District of California, defendant WILLIAM JENSEN COTTRELL willfully caused and aided, abetted, counseled, commanded, induced, and procured the malicious damaging and destroying, by means of fire and an explosive, of a Sport Utility Vehicle used in interstate commerce and used in activities affecting interstate commerce, namely, a 2003 yellow H2 Hummer, vehicle identification number 5GRGN23U53H148692, located at Clippinger Hummer, 1900 East Garvey Avenue, West Covina, California.

COUNT FIVE

[18 U.S.C. §§ 844(i), 2]

On or about August 22, 2003, in Los Angeles County, within the Central District of California, defendant WILLIAM JENSEN COTTRELL willfully caused and aided, abetted, counseled, commanded, induced, and procured the malicious damaging and destroying, by means of fire and an explosive, of a Sport Utility Vehicle used in interstate commerce and used in activities affecting interstate commerce, namely, a 2003 white H2 Hummer, vehicle identification number 5GRGN23U43H147243, located at Clippinger Hummer, 1900 East Garvey Avenue, West Covina, California.

COUNT SIX

[18 U.S.C. §§ 844(i), 2]

On or about August 22, 2003, in Los Angeles County, within the Central District of California, defendant WILLIAM JENSEN COTTRELL willfully caused and aided, abetted, counseled, commanded, induced, and procured the malicious damaging and destroying, by means of fire and an explosive, of a Sport Utility Vehicle used in interstate commerce and used in activities affecting interstate commerce, namely, a 2003 white H2 Hummer, vehicle identification number 5GRGN23U43H133443, located at Clippinger Hummer, 1900 East Garvey Avenue, West Covina, California.

COUNT SEVEN

[18 U.S.C. §§ 844(i), 2]

On or about August 22, 2003, in Los Angeles County, within the Central District of California, defendant WILLIAM JENSEN COTTRELL willfully caused and aided, abetted, counseled, commanded, induced, and procured the malicious damaging and destroying, by means of fire and an explosive, of a Sport Utility Vehicle used in interstate commerce and used in activities affecting interstate commerce, namely, a 2003 white H2 Hummer, vehicle identification number 5GRGN23U13H149208, located at Clippinger Hummer, 1900 East Garvey Avenue, West Covina, California.

COUNT EIGHT

[18 U.S.C. §§ 844(i), 2]

On or about August 22, 2003, in Los Angeles County, within the Central District of California, defendant WILLIAM JENSEN COTTRELL willfully caused and aided, abetted, counseled, commanded, induced, and procured the malicious damaging and destroying, by means of fire and an explosive, of a Sport Utility Vehicle used in interstate commerce and used in activities affecting interstate commerce, namely, a 2003 black H2 Hummer, vehicle identification number 5GRGN23U53H144447, located at Clippinger Hummer, 1900 East Garvey Avenue, West Covina, California.

COUNT NINE

[18 U.S.C. § 924(c) (1) (A) (i) and (B) (ii)]

On or about August 22, 2003, in Los Angeles County, within the Central District of California, defendant WILLIAM JENSEN COTTRELL, knowingly used and carried a destructive device, namely, a Molotov cocktail incendiary device, during and in relation to a crime of violence, namely, conspiracy to commit arson, and possessed such destructive device in furtherance of such crime, all in violation of 18 U.S.C. § 844(n), as charged in Count One of this Indictment, specifically, the Molotov cocktail thrown into the window of the 1998 Ford Expedition in order to determine how well the SUV would burn.

A TRUE BILL

\_\_\_\_\_  
Foreperson

DEBRA W. YANG  
United States Attorney

SALLY L. MELOCH  
Assistant United States Attorney  
Acting Chief, Criminal Division

BEVERLY REID O'CONNELL  
JASON DE BRETTEVILLE  
Assistant United States Attorneys  
Terrorism & Organized Crime Section