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CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
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FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RANDOLPH LINN,

Defendant.

) INDICTMENT

))
) CASE NO. **3:12 CR 495**

) JUDGE **JUDGE ZOUHARY**
) **MAG. JUDGE ARMSTRONG**

) Title 18, United States Code, Sections
) 247(a)(1), 247(d)(3), and 844(h)(1)

)

GENERAL ALLEGATIONS

1. At all times relevant to this Indictment, The Islamic Center of Greater Toledo (“The Islamic Center”), located in Perrysburg, Ohio, was an Islamic Mosque, which was a religious place of worship for practitioners of the Islamic faith. The Islamic Center had a patterned carpet in the prayer room where congregational prayers take place.

2. At all times relevant to this Indictment, RANDOLPH LINN was a resident of the State of Indiana.

COUNT 1

The Grand Jury charges:

1. Paragraphs 1-2 of the General Allegations are incorporated by reference in this count.
2. On or about September 30, 2012, in the Northern District of Ohio, Western Division, defendant RANDOLPH LINN intentionally defaced, damaged, and destroyed any religious real property, because of the religious character of that property, and attempted to do so, and the offense was in and affecting interstate and foreign commerce, to wit: RANDOLPH LINN drove a motor vehicle from Indiana to The Islamic Center in Perrysburg, Ohio, and, after unlawfully entering The Islamic Center, used gasoline to set a fire in the center of The Islamic Center's prayer room.

All in violation of Title 18, United States Code, Sections 247(a)(1) and 247(d)(3).

COUNT 2

The Grand Jury further charges:

1. Paragraphs 1-2 of the General Allegations are incorporated by reference in this count.
2. On or about September 30, 2012, in the Northern District of Ohio, Western Division, defendant RANDOLPH LINN did knowingly and willfully use fire to commit an offense prosecutable as a felony in a court of the United States; to wit: the felony of Damage to

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Religious Property charged in Count One of this Indictment.

All in violation of Title 18, United States Code, Section 844(h)(1).

A TRUE BILL.

Original document -- Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

UNITED STATES OF AMERICA,

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RANDOLPH LINN,

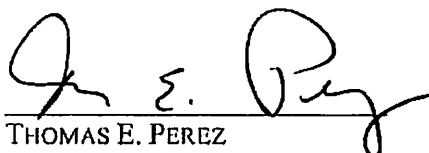
Defendant.

CERTIFICATE OF THE ASSISTANT ATTORNEY GENERAL

I, Thomas E. Perez, hereby certify that in my judgment, prosecution of RANDOLPH LINN by the United States under Title 18, United States Code, § 247, for defacing and damaging The Islamic Center of Greater Toledo in Perrysburg, Ohio, on or about September 30, 2012, is in the public interest and necessary to secure substantial justice.

This certification is made pursuant to Title 18, United States Code, Section 247(c).

Signed this 3rd day of October, 2012.



THOMAS E. PEREZ
ASSISTANT ATTORNEY GENERAL
CIVIL RIGHTS DIVISION