

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

GLENDON SCOTT CRAWFORD,

Defendant.

Case No. 14-CR-30 (GLS)

INDICTMENT

Violations: 18 U.S.C. §§ 2332h, 2332a,
and 842

(Three Felony Counts; Forfeiture
Allegation)

(Counties of Offenses: Albany, Rensselaer,
Saratoga, and Schenectady)

THE GRAND JURY CHARGES:

COUNT ONE

(Attempt to Produce and Use a Radiological Dispersal Device)

From at least in or about April 2012, to on or about June 18, 2013, in Albany, Rensselaer, Saratoga, and Schenectady Counties in the Northern District of New York, and elsewhere, in an offense occurring in and affecting interstate and foreign commerce, defendant GLENDON SCOTT CRAWFORD, without lawful authority, did knowingly attempt to produce, construct, acquire, transfer, receive, possess, and use a device capable of and designed and intended to endanger human life through the release of radiation and radioactivity, specifically an industrial-grade x-ray system that the defendant planned to modify so that it could be activated from a remote location, all for the purpose of causing serious injury and death to human beings, in violation of Title 18, United States Code, Section 2332h(a) & (c)(1).

COUNT TWO
(Conspiracy to Use a Weapon of Mass Destruction)

From in or about the summer of 2012, to on or about June 18, 2013, in Albany, Rensselaer, Saratoga, and Schenectady Counties in the Northern District of New York, and elsewhere, defendant GLENDON SCOTT CRAWFORD and others, without lawful authority, conspired to use a weapon of mass destruction, specifically a modified industrial-grade x-ray system designed to release radiation at a level dangerous to human life, against persons and property within the United States, and traveled in interstate commerce in furtherance of such offense, in violation of Title 18, United States Code, Section 2332a(a)(2)(C).

COUNT THREE
(Distribution of Information Relating to Weapons of Mass Destruction)

Beginning in or about April of 2012, and continuing through June 18, 2013, in Albany, Saratoga, and Schenectady Counties in the Northern District of New York, and elsewhere, defendant GLENDON SCOTT CRAWFORD did knowingly teach and demonstrate the making and use of a weapon of mass destruction, and did knowingly distribute information pertaining to, in whole or in part, the manufacture and use of a weapon of mass destruction, with the intent that the teaching, demonstration, and information be used for, and in furtherance of, an activity that constitutes a Federal crime of violence, including a violation of Title 18, United States Code, Section 2332a (use of weapons of mass destruction), all in violation of Title 18, United States Code, Section 842(p)(2)(A).

FORFEITURE ALLEGATION

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

Upon conviction of an offense in violation of Title 18, United States Code, Sections 2332h, 2332a, and 842(p)(2)(A), as set forth in Counts One, Two, and Three of this Indictment, the defendant,

GLENDON SCOTT CRAWFORD,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and (G) and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense. The property to be forfeited includes, but is not limited to, the following:

- A. Any drawings, schematics or diagrams relating to the use, possession, construction, production, or acquisition of a weapon of mass destruction;
- B. “-----“ brand, model “—70” point-to-point wireless radio devices;
- C. Any maps, photographs, documents, or papers relating to the use, possession, construction, production, or acquisition of a weapon of mass destruction;
- D. AT&T model no. Z331 cellular telephone bearing serial no. 322912840028; and

- E. LG model no. LG500G cellular telephone bearing serial no. 110CQPY968264.

3. If any of the property described above, 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,

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).

All pursuant to 18 U.S.C. Section 981(a)(1)(C) and (G) and 28 U.S.C. Section 2461(c).

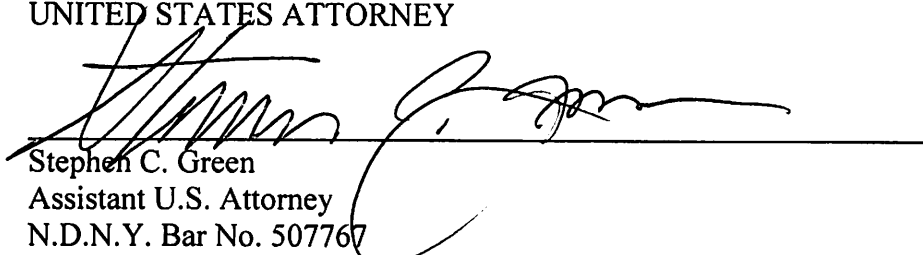
Date: January 16, 2014

A TRUE BILL


FOREPERSON

RICHARD S. HARTUNIAN
UNITED STATES ATTORNEY

BY:


Stephen C. Green
Assistant U.S. Attorney
N.D.N.Y. Bar No. 507767