

SEALED

UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

<input checked="" type="checkbox"/> FILED	<input type="checkbox"/> LODGED
<input type="checkbox"/> RECEIVED	<input type="checkbox"/> COPY
JUN 16 2009	
CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
BY _____	DEPUTY

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

United States of America  
 Plaintiff,  
 v.  
 1. Dennis Mahon  
 (Counts 1,2,3)  
 2. Daniel Mahon  
 (Count 1)  
 Defendants.

NO.

INDICTMENT

**CR 090712 PHX DGC ECV**

VIO: 18 U.S.C. §§ 844(n), 844(i)  
 (Conspiracy to Damage Buildings  
 and Property by Means of  
 Explosive)  
 Count 1

18 U.S.C. § 844(i)  
 (Malicious Damage of Building by  
 Means of Explosive)  
 Count 2

18 U.S.C. § 842(p)(2)(A)  
 (Distribution of Information  
 Related to Explosives)  
 Count 3

THE GRAND JURY CHARGES:

COUNT 1

From on or about September 26, 2003 to on or about January 5, 2009, in the District of Arizona and elsewhere, defendants DENNIS MAHON and DANIEL MAHON and others known and unknown to the grand jury did knowingly and unlawfully combine, conspire, confederate and agree together to maliciously damage and destroy by means of fire and explosives, buildings and other real property used in interstate and foreign commerce and in activities affecting interstate and foreign commerce.

//

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

### **OBJECT OF THE CONSPIRACY**

The object of the conspiracy was to promote racial discord on behalf of the "White Aryan Resistance"(WAR) by damaging and destroying buildings, facilities and real property of both the government and businesses whose activities defendants believed conflicted with their goals. Defendants also conspired to teach the tactics of terrorism with the intent that others commit violent acts on behalf of WAR.

### **MANNER AND MEANS OF THE CONSPIRACY**

1) It was part of the conspiracy that one or more of the conspirators build and deliver an explosive device to the City of Scottsdale Office of Diversity and Dialogue.

2) It was further part of the conspiracy that one or more of the conspirators teach an individual how to build a package containing a pipe bomb.

3) It was further part of the conspiracy that one or more of the conspirators send to others training materials on the production of and use of explosives, techniques to avoid detection by law enforcement, and methods to commit domestic terrorism.

### **OVERT ACTS OF THE CONSPIRACY**

In furtherance of the conspiracy, and to effect the illegal objects thereof, one or more of the conspirators knowingly performed one or more overt acts, in the District of Arizona and elsewhere within the United States, including but not limited to the following:

1) On or about September 26, 2003, DENNIS MAHON, using the telephone of DANIEL MAHON, called the City of Scottsdale Office of Diversity and Dialogue office, and left a voice message stating that "the White Aryan Resistance is growing in Scottsdale. There's a few white people who are standing up."

2) On or about February 21, 2004, DENNIS MAHON participated in the construction of a bomb, disguised in a cardboard box made to appear as a parcel package, that was delivered to the City of Scottsdale Civic Center Library. The label on the box was addressed to Donald Logan, Office of Diversity & Dialogue. The bomb did in fact explode on February 26, 2004

1 when Donald Logan opened the box. Donald Logan and Renita Linyard suffered personal  
2 injuries as result of the explosion.

3 3) On or about January 29, 2005, DANIEL MAHON discussed with an individual how  
4 to plan for criminal activity, how to dress to avoid detection by law enforcement, and how to  
5 blow-up a vehicle by releasing a phosphorus compound into its gas tank.

6 4) On or about February 1, 2005, DENNIS MAHON taught an individual how to blow-  
7 up a house using simple tools and a propane tank. As part of this instruction, DENNIS MAHON  
8 told this person to avoid detection by always wearing gloves when building or placing a bomb.

9 5) On or about February 2, 2005, DENNIS MAHON taught another individual how to  
10 construct a package pipe bomb that would use a 9-volt battery, black powder, an electric match  
11 and other components. DENNIS MAHON instructed the individual that a victim might survive  
12 a package bomb containing only black powder but that a "pipe bomb will kill him."

13 6) On or about February 4, 2005, DENNIS MAHON and DANIEL MAHON planned  
14 a trip to a gun show in Catoosa, Oklahoma for the purpose of purchasing periodicals and  
15 components related to bomb-making, including books, gun powder, an electric match, and a  
16 fuse.

17 7) On or about February 5, 2005, DENNIS MAHON and DANIEL MAHON traveled  
18 to a gun show for the purpose of acquiring bomb-related materials. DENNIS MAHON and  
19 DANIEL MAHON discussed measures to avoid detection by law enforcement at the gun show,  
20 including the necessity to travel separately to the gun show, to wear hats and sunglasses and to  
21 split up at the show.

22 8) On or about February 5, 2005, DENNIS MAHON demonstrated to an individual the  
23 assembly of a bomb using a cardboard box, wires, and other components of a pipe bomb.  
24 DENNIS MAHON told the individual that the bomb would either kill the victim or injure the  
25 victim's fingers and face.

26 9) On or about April 15, 2005, DENNIS MAHON mailed to an individual in Wickenburg,  
27 Arizona, a book titled Forgive? Forget it! Creative Revenge at its Best. In this book, DENNIS  
28

1 MAHON enclosed an index card with the words "padded envelope," "9x12," and "6x9." The  
2 card was enclosed at the chapter of the book explaining how to build "a poor man's mail bomb."

3 10) On or about May 3, 2005, DENNIS MAHON mailed to an individual in Wickenburg,  
4 Arizona, a book titled Poor Man James Bond 2. The book contains numerous chapters  
5 explaining the manufacture and use of improvised explosive devices.

6 11) On or about October 11, 2006, DENNIS MAHON mailed to an individual in  
7 Wickenburg, Arizona, a book titled A Manual of Urban Guerilla Warfare, Fighting in the  
8 Streets. This book contains several chapters explaining the manufacture and use of improvised  
9 explosive devices.

10 12) On or about October 20, 2007, DENNIS MAHON directed an individual to travel  
11 to Missouri for the purpose of learning how to make improvised explosive devices and learn  
12 techniques to avoid law enforcement detection.

13 13) On or about February 13, 2008, DENNIS MAHON directed an individual to conduct  
14 violent action on behalf of the movement and show the results to DENNIS MAHON by mailing  
15 copies of newspaper articles that would report the violent acts.

16 14) On or about January 5, 2009, DENNIS MAHON directed an individual to take  
17 action against the power grid in Arizona or Texas in the event that leaders of the white  
18 resistance, such as himself, were arrested by law enforcement.

19 All in violation of Title 18 United States Code, Sections 844(n) and 844(i).

20 **NOTICE OF SPECIAL FINDING**

21 The allegations of Count 1 of this Indictment are hereby re-alleged as if fully set forth  
22 herein and incorporated by reference. With regard to Count 1 of this Indictment, the Grand Jury  
23 makes the special finding that Donald Logan and Renita Linyard suffered personal injury as a  
24 result of prohibited conduct by defendants.

25 **COUNT 2**

26 On or about February 26, 2004, in the District of Arizona, defendant DENNIS MAHON  
27 did maliciously damage by means of an explosive, a building and real property used in activity  
28 affecting interstate and foreign commerce and used in interstate and foreign commerce, namely

1 the City of Scottsdale Office, Office of Diversity and Dialogue located in Scottsdale, Arizona;  
2 that prohibited conduct resulted in personal injury to Donald Logan and Renita Linyard.

3 In violation of Title 18, United States Code, Sections 844(i) and 2.

4 **COUNT 3**

5 From on or about January 29, 2005 up to and including on or about May 15, 2005, in the  
6 District of Arizona and elsewhere, defendant DENNIS MAHON taught and demonstrated the  
7 making and use of an explosive and destructive device, and distributed information pertaining  
8 to in whole and in part the manufacture and use of an explosive and destructive device, in that  
9 DENNIS MAHON taught an individual how to blow up a house using simple tools and a  
10 propane tank, taught that individual how to construct a package pipe bomb, mailed to that  
11 individual in Wickenburg, Arizona, a book titled Forgive? Forget it! Creative Revenge at its  
12 Best, and a book titled Poor Man James Bond 2, with the intent that the teaching, demonstration,  
13 and information be used for and in furtherance of an activity that constitutes a Federal crime of  
14 violence, that is, a violation of Title 18, United States Code, Section 844(d), transportation and  
15 attempted transportation in interstate commerce of an explosive for the purpose of killing,  
16 injuring, or intimidating an individual and unlawfully damaging and destroying any building,  
17 vehicle, or real and personal property.

18 All in violation of Title 18, United States Code, Sections 842(p)(2)(A).

19 A TRUE BILL

20  
21 s/  
22 FOREPERSON OF THE GRAND JURY  
Date: June 16, 2009

23 DIANE J. HUMETEWA  
24 United States Attorney  
District of Arizona

25  
26 s/  
27 JOHN BOYLE  
MICHAEL T. MORRISSEY  
Assistant U.S. Attorneys

28