



United States Attorney

District of Columbia

Judiciary Center 555 Fourth St. N.W. Washington, DC 20001

May 11, 1988

PRESS RELEASE

Jay B. Stephens
United States Attorney
for the
District of Columbia

United States Attorney Jay B. Stephens today announced that a federal grand jury has returned an indictment charging seven individuals with acts of violence against the United States, including bombing the United States Capitol on November 7, 1983 and several other government buildings here in Washington, D.C.

In announcing the indictments Mr. Stephens stated, "Let this be a warning to those who seek to influence the policies of the United States Government through violence and terrorism that we will seek unrelentingly to bring them to justice. Those who attack our sacred institutions of government and seek to destroy the symbols of our democratic system ultimately will have to pay the price."

The grand jury returned a five-count indictment charging seven individuals -- Laura Whitehorn, Linda Evans, Marilyn Buck, Susan Rosenberg, Timothy Blunk, Alan Berkman and Elizabeth Duke -- with participation in a far-reaching conspiracy to bomb various government and private buildings and with involvement in the bombings of the United States Capitol and three Washington area military facilities -- the National War College at Fort McNair, the Computer Center at the Washington Navy Yard, and the Washington Navy Yard Officer's Club.

The indictment charges that the defendants and their co-conspirators were part of a secret organization which described itself as a "communist politico/military organization" and which operated under the names Revolutionary Fighting Group (RFG), Armed Resistance Unit (ARU) and the Red Guerrilla Resistance (RGR).

The indictment charges that as part of their program of "armed propaganda" the defendants and their co-conspirators also placed and detonated explosives at four locations in New York City -- the FBI's office in the Federal Building on Staten Island, the Israeli Aircraft Industries Building, the South African Consulate, and the Patrolmen's Benevolent Association. They also allegedly surveilled other bombing targets, including the Old Executive Office Building in Washington and the United States Naval Academy in Annapolis.

According to the indictment, the defendants and their coconspirators made extensive use of aliases and false identification to evade surveillance and detection by law enforcement authorities. The indictment charges that to support their efforts, the defendants obtained rifles, shotguns, handguns, bullet proof armor, and combined time-delay firing mechanisms and explosives into operable bombs. In addition, the indictment charges that the defendants funded their operations, in part, through theft and armed robbery.

Mr. Stephens praised the cooperative efforts of the District of Columbia Metropolitan Police Department, the Bureau of Alcohol, Tobacco and Firearms, and the Federal Bureau of Investigation, who in December, 1983 formed the Metropolitan Area Terrorist Task Force to investigate the series of bombings in the District of Columbia. The Task Force has coordinated its efforts with the Joint Terrorist Task Force in New York City, and the FBI and ATF offices in Philadelphia and Baltimore. The case is being handled by Assistant United States Attorneys Rhonda C. Fields and Margaret Ellen.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn In On June 3, 1987

UNITED STATES OF AMERICA

Criminal No.

v. .

GRAND JURY ORIGINAL

LAURA WHITEHORN
LINDA EVANS
MARILYN BUCK
SUSAN ROSENBERG
TIMOTHY BLUNK
ALAN BERKMAN and
ELIZABETH DUKE

18 USC § 371 (Conspiracy)
18 USC § 844(f) (Malicious
Damage of U.S. Property
by Means of Fire and
Explosives)

18 USC \$2(a) & (b) (Aiding & Abetting and Causing an

Act to Be Done)

I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE

A. From at least as early as on or about July 1982 and continuing thereafter up to and including on or about May 23, 1985, the exact dates being unknown to the grand jury, within the District of Columbia and elsewhere, the defendants

LAURA WHITEHORN LINDA EVANS and MARILYN BUCK

did willfully and knowingly combine, conspire, confederate, and agree together and with others known and unknown to the grand jury, including defendants SUSAN ROSENBERG, TIMOTHY BLUNK, ALAN BERKMAN, and ELIZABETH DUKE co-conspirators herein but not indicted in Count One, to commit offenses against the United States, that is, the defendants and co-conspirators did conspire:

- to maliciously damage and destroy and attempt to damage and destroy, by means of fire and explosive, buildings and other personal and real property owned, possessed and used by the United States, and departments and agencies thereof, in violation of 18 U.S.C. § 844(f), and
- 2. to maliciously damage and destroy and attempt to damage and destroy, by means of fire and explosive, buildings, vehicles, and other real and personal property used in interstate and foreign commerce and in activities affecting interstate and foreign commerce, in violation of 18 U.S.C. § 844(i).

GOAL OF THE CONSPIRACY

B. It was a goal of the conspiracy, among others, that the defendants and co-conspirators would seek to influence, change and protest policies and practices of the United States government concerning various international and domestic matters through the use of violent and illegal means.

MANNERS AND MEANS

C. In order to further the objects and goals of said conspiracy, the defendants and co-conspirators would and did use the following manners and means, among others:

Preparation for and carrying out of actions:

- 1. The defendants and co-conspirators would form a clandestine organization which, on various occasions, operated under the names Revolutionary Fighting Group (RFG), Armed Resistance Unit (ARU) and the Red Guerrilla Resistance (RGR).
- 2. The defendants and co-conspirators would plan and carry out acts of violence, which they called "armed propaganda", including the bombing of various government and private buildings and property.
- 3. The defendants and co-conspirators would plan, learn to conduct and would conduct studies and surveillances of various locations which were potential bombing targets, including the Old Executive Office Building, the office of the American Israel Public Affairs Committee (AIPAC), the law offices of Smathers, Symington and Herlong, and the offices of the Cuban American National Foundation (CANF) in Washington, D.C., Summit Aviation in Delaware, the United States Naval Academy at Annapolis, and the United States Army Aberdeen Proving Ground in Maryland.
- 4. The defendants and co-conspirators would obtain and receive explosives and explosive components including chemicals, dynamite, water gel explosives, blasting agents, blasting caps and detonating cord.
- 5. The defendants and co-conspirators would store explosives and explosive components in New Jersey and Pennsylvania.

- 6. The defendants and co-conspirators would obtain instructions for the construction of and would construct time-delay bomb firing mechanisms.
- 7. The defendants and co-conspirators would combine the time-delay firing mechanisms and explosives into operable bombs.
- 8. The defendants and co-conspirators, using the organizational names indicated below, would place and explode bombs at various locations, including:
 - a. The Federal Building, Staten Island, New York on January 28, 1983-RFG
 - b. The National War College, Fort McNair, Washington, D.C. on April 26, 1983-ARU
 - c. The Washington Navy Yard Computer Center (NARDAC), Washington, D.C. on August 18, 1983-ARU
 - d. The United States Capitol, Washington, D.C. or November 7, 1983-ARU
 - e. The Israeli Aircraft Industries Building, New York on April 5, 1984-RGR
 - f. The Washington Navy Yard Officer's Club, Washington, D.C. on April 20, 1984-RGR
 - g. The South African Consulate, New York on September 26, 1984-RGR, and
 - h. The Patrolmen's Benevolent Association, New York on February 23, 1985-RGR.
- 9. The defendants and co-conspirators, to publicize their acts, would make and issue communiques claiming credit for the bombings using the names Revolutionary Fighting Group (RFG), Armed Resistance Unit (ARU) and Red Guerrilla Resistance (RGR).

Manufacture and use of false identification:

- 10. The defendants and co-conspirators would obtain and compile for use as aliases vital statistics about babies who had been born and died in the late 1940's and early 1950's.
- II. The defendants and co-conspirators would obtain and compile for use as aliases names, addresses, license numbers and other identification information of living persons.
- 12. The defendants and co-conspirators would manufacture false identification documents including, but not limited to, birth certificates, drivers licenses, social security cards, business cards of law enforcement agents, business cards and identification cards bearing the names of real and/or fictitious companies and entities.
- 13. The defendants and co-conspirators, in order to facilitate the manufacture of false identification documents, would obtain photographic equipment, develop embossing techniques and seek access to printing and reproduction equipment.
- 14. The defendants and co-conspirators would use the aliases and false identification documents to obtain fraudulently, among other things, drivers licenses, passports, and firearms; to secure employment; to rent hotel rooms, apartments, garages and storage spaces; to rent and register vehicles; to impersonate law enforcement agents; and to evade detection by law enforcement authorities.

15. The defendants and co-conspirators listed below would possess and use identification in the following aliases, among others:

TIMOTHY BLUNK - William Bassler, William Hammond

SUSAN ROSENBERG - Barbara Grodin, Susan Knoll

MARILYN BUCK - Ann Erickson, Louise Harmon, Eve Marie Mancuso, Sarah Hoffman, Ruth Landau, Denise Andrea Jefferson

LINDA EVANS - Christine Johnson, Katherine Orloff, Rebecca Morgan, Louise Robinett, Martha Ann Carter, Kate Thompson, Christine Porter, Carolyn Lee Campbell, Christine Baldwin

LAURA WHITEHORN - Sharon Lee Scott, Milagros Matese, Jo Ann Roth, Jane Bortner, Leslie Harris, Patsy McCarthy

ELIZABETH DUKE - Karen Baker, Janice Adams, Frances Marshall, Loretta Polo, Louise Marcella Cox, Linda Gail Bourgea, Janice Stevens, Carolyn Jones, Lorraine Jackson, Mary Ann Johnson, Janice Walker, Carol Ann Mason, Ann Carson, Mary Alice Hamilton

ALAN BERKMAN - Kenneth Abrams, William Lunderman, David Levy, David Morris, John Morris, Steve Levine.

Support and Countermeasure Activities:

16. The defendants and co-conspirators would obtain and possess ammunition, bulletproof body armor, firearm accessories, and firearms, including UZI rifles, shotguns, handguns and silencers.

17. The defendants and co-conpirators would obtain instructions on reloading ammunition and the maintenance and use of firearms.

- 18. The defendants and co-conspirators would plot to support their operations, in part, through theft and armed robbery.
- 19. The defendants and co-conspirators would conduct studies and surveillances at banks, stores, and other areas which were potential robbery targets.
- 20. The defendants and co-conspirators would manufacture a fraudulent search warrant directed at a Stop and Shop store in Cromwell, Connecticut.
- 21. The defendants and co-conspirators, using the fraudulent search warrant and impersonating law enforcement agents, would carry out an armed robbery at the Stop and Shop store in Cromwell, Connecticut.
- 22. The defendants and co-conspirators would obtain and develop plans and methods to evade surveillance and detection by law enforcement agencies.
- 23. The defendants and co-conspirators would engage in oral and written evaluations and descriptions of their plans and activities, sometimes called "self-criticism", in order to assess the strengths and weaknesses of previous activities and thus improve performance of future actions.
- 24. The defendants and co-conspirators, following arrest, would prepare and forward to unarrested co-conspirators descriptions and evaluations of the circumstances of their apprehensions, and descriptions of evidentiary "traces" which

might have been revealed to law enforcement authorities, in order to help the unarrested co-conspirators evade apprehension and destroy and sever themselves from possible leads.

25. The defendants and co-conspirators would communicate both orally and in writing with each other and with sympathizers and potential sympathizers in order to obtain money, support and advice, and otherwise enlist aid and assistance.

OVERT ACTS

- D. In furtherance of the above-described conspiracy and to carry out the objectives thereof, the defendants and co-conspirators committed the following overt acts, among others, in the District of Columbia and elsewhere:
- 1. On or about July 15, 1982, in Vermont, LAURA WHITEHORN obtained a driver's license in the name Sharon Scott.
- 2. On or about July 1982, LAURA WHITEHORN and LINDA EVANS made notations concerning the manufacture of incendiary devices and bombs and the testing of components for such devices and bombs.
- 3. On or about September 3, 1982, an unknown co-conspirator applied for West Virginia birth certificates in the names Linda Lou Jeffries, Jo Ann Roth and Dora Brightwell.
- 4. On or about September 8, 1982, in New York, LAURA WHITEHORN obtained a United States passport in the alias Sharon Lee Scott.
- 5. On or about December 6, 1982, in Louisiana, LINDA EVANS applied for a driver's license using the alias Louise Robinett.

- 6. On or about January 28, 1983, one or more unknown co-conspirators set off a bomb in a ladies restroom outside the FBI office in the Federal Building on Staten Island, New York.
- 7. On or about January 29, 1983, an unknown co-conspirator completed a call to the New York office of United Press International (UPI) and claimed that the Revolutionary Fighting Group (RFG) had bombed the FBI office on Staten Island, New York.
- 8. On or about February 10 and 11, 1983, in Louisiana, LINDA EVANS purchased firearms using the alias Louise Robinett.
- 9. On or about March 1983, a male co-conspirator, using the alias William Bassler, rented mail service at 108-12 72nd Avenue, Forest Hills, New York.
- 10. On or about April 18, 1983, in New York, a male co-conspirator took a road test for a driver's license using the alias William Bassler.
- 11. On or about April 26, 1983, in the District of Columbia, an unknown co-conspirator completed a call to the UPI advising them that a bomb had been placed at Fort McNair.
- 12. On or about April 26, 1983, in the District of Columbia, one or more unknown co-conspirators set off a bomb at the National War College, Fort McNair.
- 13. On or about April 26, 1983, in the District of Columbia, the Armed Resistance Unit (ARU) mailed a communique claiming responsibility for the Fort McNair bombing.

- 14. On or about June 1, 1983, a co-conspirator rented an apartment on Giles Place, Bronx, New York, using the aliases Kenneth Abrams and Roberta Abrams.
- 15. From on or about July 1983, to on or about July 1984, LINDA EVANS rented an apartment in New Haven, Connecticut, using the alias Katherine Orloff.
- 16. From on or about July 1983, to on or about July 1984, SUSAN ROSENBERG frequented the above-mentioned apartment in New Haven, Connecticut, posing as Katherine Orloff's cousin.
- 17. From on or about July 1984, to on or about August 1984, a third female co-conspirator frequented the Orloff apartment in New Haven, Connecticut, using the alias "Anita."
- 18. On or about August 18, 1983, in the District of Columbia, one or more unknown co-conspirators set off a bomb at Computer Center Building at the Washington Navy Yard.
- 19. From on or about September 1983, to on or about September 1984, MARILYN BUCK rented an apartment in New Haven, Connecticut, using the alias Ann Erickson.
- 20. From on or about September 1983, to on or about September 1984, SUSAN ROSENBERG frequented the Ann Erickson apartment in New Haven, Connecticut.
- 21. On or about October 15, 1983, MARILYN BUCK registered a 1980 Oldsmobile issued tag number 614-BRH in Connecticut using the alias Louise Harmon.

- 22. On or about November 7, 1983, in the District of Columbia, one or more unknown co-conspirators set off a bomb inside the United States Capitol.
- 23. On or about November 7, 1983, in the District of Columbia, an unknown co-conspirator registered at the Master Hosts Inn using the alias "Ana Stackliff", with a vehicle identified as an Olds, Connecticut tag number 615-HRB.
- 24. On dates unknown to the grand jury LINDA EVANS, LAURA WHITEHORN and an unknown co-conspirator compiled in a notebook an "alias list" containing names and identifying information, including the aliases

"Ana E. Stackliff" and "Susan E. Knoll"

- 25. On or about November 7, 1983, the Armed Resistance Unit (ARU) mailed to National Public Radio and WAMU Radio, Washington, D.C., a communique concerning the bombing of the United States Capitol which stated in part: "[w]e purposely aimed our attack at the institutions of imperialist rule rather than at individual members of the ruling class and government. We did not choose to kill any of them this time. But their lives are not sacred...."
- 26. Between on or about November 7, 1983, and May 1985, the exact dates being unknown to the grand jury, ALAN BERKMAN wrote a letter which stated in part:

We wanted the paragraph in our last communique over why we choose not to kill the Senators to stimulate such debate, but the public movement has avoided it like the plague unfortunately. These are some of the issues we've been discussing. Currently, our

position seems to be consolidating around not doing a large scale attack on the military right now, but rather to do an action with a warning that will enable them to evacuate if they choose to.

- 27. From on or about early 1984 to April 1984, the exact dates being unknown to the grand jury, LAURA WHITEHORN wrote notes concerning plans about possible future bombing targets, including:
 - a. Notes concerning the targeting of companies shipping arms, the South African government, and Summit Aviation company.
 - b. Notes concerning an agreement to attack Israeli entities, to do a campaign concerning Central America and to find targets in addition to the Officer's Club.
 - c. Notes concerning the Israeli Aircraft Industries (IAI) building and interest in its fire stairs.
- 28. On or about April 5, 1984, in New York, one or more unknown co-conspirators set off a bomb in the third floor stairwell inside the Israeli Aircraft Industries (IAI) building.
- 29. On or about April 5, 1984, the Red Guerrilla Resistance (RGR) mailed to the Washington Post in Washington, D.C., a communique concerning the Israeli Aircraft Industries bombing; the communique was in an envelope bearing a corrected mailing label.

- 30. On or about April 19, 1984, in the District of Columbia, an unknown co-conspirator registered at the Master Hosts Inn using the alias "Susan Knoll" with a vehicle identified as an Olds, Connecticut tag number 668-BHN.
- 31. On or about April 20, 1984, in the District of Columbia, one or more unknown co-conspirators set off a bomb at the Officer's Club in the Washington Navy Yard.
- 32. On or about April 20, 1984, the Red Guerrilla Resistance (RGR) mailed to the Washington Post a communique concerning the Officer's Club bombing, using an exact copy of the corrected label used in mailing the IAI communique mentioned above in Overt Act 29.
- 33. On or about April 20, 1984, in the District of Columbia, an unknown co-conspirator completed a call to the UPI in which a female spoke and then played a recorded message concerning the bombing of the Officer's Club.
- 34. From on or about April 20, 1984, to on or about May, 1985, LAURA WHITEHORN wrote the following note:

"club -

N-successful in terms of our abil to carry it out

* * *

"Error: speaking in phone call instead of just playing the tape

C-nt major errors - only prob was nt disguising voice [at] all."

- 35. On or about September 2, 1984, in Connecticut, ALAN BERKMAN and TIMOTHY BLUNK robbed a Stop and Shop store using a bogus search warrant bearing the name DEA Agent Cleary.
- 36. On or about September 26, 1984, in New York, one or more unknown co-conspirators set off a bomb at the South African Consulate.
- 37. On or about September 26, 1984, in New York, the Red Guerrilla Resistance (RGR) placed in the mails communiques concerning the bombing of the South African Consulate.
- 38. On or about November 29, 1984, in Connecticut, TIMOTHY BLUNK rented a U-Haul trailer using the alias William J. Hammond.
- 39. On or about November 29, 1984, SUSAN ROSENBERG and TIMOTHY BLUNK travelled from New Haven, Connecticut, to Cherry Hill, New Jersey, in a 1980 Olds Cutlass bearing Connecticut tag number 614-BRH, registered in the name Louise Harmon.
- 40. On or about November 29, 1984, in Cherry Hill, New Jersey, SUSAN ROSENBERG and TIMOTHY BLUNK possessed a New York driver's license and New Management Concepts identification card in the alias Susan Knoll.
- 41. On or about November 29, 1984, in Cherry Hill, New Jersey, TIMOTHY BLUNK and SUSAN ROSENBERG possessed a New York driver's license and identification cards in the alias William A. Bassler.

- 42. On or about November 29, 1984, in Cherry Hill, New Jersey, SUSAN ROSENBERG and TIMOTHY BLUNK possessed explosive devices and more than 600 pounds of explosives, including approximately:
 - 75 Dupont #8 Electric Blasting Caps
 - 25 Hercules Delay Electric Blasting caps
 - 199 sticks of Hercules Unigel Tamptite Dynamite
 - 50 pound bag of Hercules "Hercomix", a blasting agent
 - 110 cartridges of Dupont Tovex 210 water gel explosives
 - 24 bags of Hercules Slurry HP-374, a blasting agent, and
 - detonating cord.

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- 43. On or about November 29, 1984, in Cherry Hill, New Jersey, SUSAN ROSENBERG and TIMOTHY BLUNK possessed ammunition, reloading equipment, firearms and firearm accessories including a Browning Hi-Power 9mm caliber pistol and a Ruger .223 caliber rifle.
- 44. On or about November 29, 1984, SUSAN ROSENBERG possessed a small notebook containing diagrams and notations.
- 45. On or about November 29, 1984, in Cherry Hill, New Jersey, TIMOTHY BLUNK and SUSAN ROSENBERG possessed a DEA identification document bearing the name of DEA Special Investigator J.M. Cleary.
- 46. On or about December 1984, ELIZABETH DUKE rented a garage in Doylestown, Pennsylvania, using the alias Karen Baker.

- 47. On or about January 1985, LINDA EVANS and MARILYN BUCK rented an apartment at The Alameda in Baltimore, Maryland, using the alias Ann Morrison.
- 48. On or about January 29, 1985, ELIZABETH DUKE rented an apartment at East 25th Street in Baltimore, Maryland, using the alias Janice Adams.
- 49. From on or about February 1, 1985, to May 11, 1985, MARILYN BUCK, LINDA EVANS and LAURA WHITEHORN resided in and used the apartment at The Alameda in Baltimore, Maryland.
- 50. On or about February 23, 1985, one or more unknown co-conspirators set off a bomb in the ladies restroom next to the offices of the Patrolmen's Benevolent Association (PBA) in New York.
- 51. On or about February 23, 1985, the Red Guerrilla Resistance (RGR) mailed a communique concerning the bombing of the Patrolmen's Benevolent Association to the Washington Post in Washington, D.C.
- 52. On or about May 10, 1985, in Baltimore, Maryland, MARILYN BUCK, LINDA EVANS and LAURA WHITEHORN did possess, among other items:
 - a. Copies of communiques issued for the bombings at Fort McNair, the United States Capitol, the Navy Yard Computer Center, and the Navy Yard Officer's Club;
 - b. A handwritten notebook containing lists of aliases and related identification information;
 - c. False identification documents;
 - d. Mock-ups of a search warrant;
 - e. Instructions on how to construct bombs and time-delay firing mechanisms;

- f. A case of constructed time-delay firing devices;
- g. Blank paper and film bearing the logo of the Red Guerrilla Resistance;
- h. A typewritten document and a typewritter ribbon imprinted with, among other matters, the following: "The Red Guerrilla Resistance is a communist politico/military organization . . . Over the last few years we have initiated a program of armed propaganda and a number of actions under the name of the Revolutionary Fighting Group and the Armed Resistance Unit, as well as the RGR:"
- i. Instructions on how to conduct surveillances of potential targets entitled "How to do a Study";
- j. A file entitled "In Progress" which contained, among other matters, handwritten surveillance notes, pictures, photographs, and miscellaneous documents pertaining to potential bombing targets including:
 - Summit Aviation Inc., Middletown, Delaware, (aka Hilltop)
 - The Old Executive Office Building, Washington, D.C.
 - The Cuban American National Foundation, Washington, D.C. (aka Gusanos)
 - The American Israel Public Affairs Committee Washington, D.C. (aka Settler's II)
 - The law office of Smathers, Symington and Herlong, Washington, D.C.
 - The Aberdeen Proving Ground, Maryland
 - The U.S. Naval Academy, Annapolis, Maryland (aka Annie).
- 53. On or about May 10, 1985, MARILYN BUCk and LINDA EVANS drove from Baltimore, Maryland, to Giles Place in the Bronx, New York, in a brown Toyota registered in the name Jo Ann Roth.
- 54. On or about May 10, 1985, MARILYN BUCK and LINDA EVANS drove to a shopping center located in Golden's Bridge, New York.

- 55. On or about May 11, 1985, in New York, MARILYN BUCK and LINDA EVANS possessed a camera and undeveloped film containing pictures of the United States Naval Academy at Annapolis and the shopping center at Golden's Bridge, New York.
- 56. On or about May 22, 1985, in Philadelphia, Pennsylvania, ELIZABETH DUKE rented a Hertz truck using the alias Loretta Polo.
- 57. On or about May 23, 1985, ALAN BERKMAN and ELIZABETH DUKE drove from Philadelphia to Doylestown, Pennsylvania, in a blue Toyota registered in the alías Francis Marshall.
- 58. On or about May 23, 1985, ALAN BERKMAN and ELIZABETH DUKE possessed in the blue Toyota false identification documents, among other items.
- 59. On or about May 23, 1985, in Pennsylvania, ALAN BERKMAN and ELIZABETH DUKE possessed keys to the Doylestown garage, rented by ELIZABETH DUKE under the alias "Karen Baker," which contained, among other things:
 - a. Destructive devices and more than 100 pounds of explosives including, approximately:
 - 3 Dupont #8 Electric Blasting Caps
 - 12 Hercules Delay Electric Blasting Caps
 - 162 sticks of Hercules Unigel Tamptite dynamite
 - 10 pounds of Gelodyne
 - 9 cartridges of Dupont Tovex 210 watergel explosives, and
 - detonating cord
 - b. Manuals on firearms, munitions and explosives;

- An UZI semi-automatic rifle;
- d. Handguns;
- e. Over 2,300 cartridges of live and spent ammunition;
- f. Bulletproof body armor; and
- g. False identification papers and materials including documents relating to federal and local law enforcement agencies.
- 60. From on or about November 30, 1984, to December 1984, SUSAN ROSENBERG wrote a letter concerning her arrest and possible "traces" therefrom.
- 61. From on or about November 30, 1984, to May 1985, LINDA EVANS wrote a note bearing the caption "Traces."
- 62. On or about May 12, 1985, MARILYN BUCK wrote a document captioned "I Detailed sequence of events, II possible ways of how got to us, III Traces."
- 63. On or about mid-May 1985, LINDA EVANS wrote a letter which included lists of evidentiary traces.
- 64. On or about mid-May 1985, LAURA WHITEHORN wrote a letter beginning "My dear comrades."
- 65. On or about May 23, 1985, ALAN BERKMAN and ELIZABETH DUKE had in their possession the ROSENBERG, BUCK, EVANS, and WHITEHORN documents described above in overt acts 60 64.
- 66. On or about May 23, 1985, ALAN BERKMAN and ELIZABETH DUKE had in their possession the following letters and a typewriter ribbon imprinted with the same text:

- a. A letter beginning: "Greetings comrades. We hope you are continuing well and strong despite the conditions of captivity. We are the RGR (formerly the ARU and the RFG). For the last 2 1/2 years, we have wanted to make contact with you."
- b. A letter dated March 1985, which stated in part: "We were extremely happy to be able to attack the PBA at this time."

(All in violation of Title 18, United States Code, Section 371.)

COUNT TWO

On or about April 26, 1983, within the District of Columbia, the defendants

LAURA WHITEHORN
LINDA EVANS
MARILYN BUCK
SUSAN ROSENBERG
TIMOTHY BLUNK
ALAN BERKMAN and
ELIZABETH DUKE

willfully, knowingly and maliciously did damage and destroy and attempt to damage and destroy, by means of fire and explosive, the National War College Building at Fort McNair, a building and personal and real property in whole and in part owned, possessed and used by the United States and a department and agency thereof, to wit, the Department of Defense.

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

COUNT THREE

On or about August 18, 1983, within the District of Columbia, the defendants

LAURA WHITEHORN
LINDA EVANS
MARILYN BUCK
SUSAN ROSENBERG
TIMOTHY BLUNK
ALAN BERKMAN and
ELIZABETH DUKE

willfully, knowingly and maliciously did damage and destroy and attempt to damage and destroy, by means of fire and explosive, the Computer Center (NARDAC), Washington Navy Yard, a building and personal and real property in whole and in part owned, possessed and used by the United States and a department and agency thereof, to wit, the Department of Defense.

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

COUNT FOUR

On or about November 7, 1983, within the District of Columbia, the defendants

LAURA WHITEHORN
LINDA EVANS
MARILYN BUCK
SUSAN ROSENBERG
TIMOTHY BLUNK
ALAN BERKMAN and
ELIZABETH DUKE

willfully, knowingly and maliciously did damage and destroy and attempt to damage and destroy, by means of fire and explosive, the United States Capitol, a building and personal and real property in whole and in part owned, possessed and used by the United States and its legislative bodies, the Senate and the House of Representatives.

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

COUNT FIVE

On or about April 20, 1984, within the District of Columbia, the defendants

LAURA WHITEHORN
LINDA EVANS
MARILYN BUCK
SUSAN ROSENBERG
TIMOTHY BLUNK
ALAN BERKMAN and
ELIZABETH DUKE

willfully, knowingly and maliciously did damage and destroy and attempt to damage and destroy, by means of fire and explosive, the Officer's Club at the Washington Navy Yard, a building and personal and real property in whole and in part owned, possessed

and used by the United States and a department and agency thereof, to wit, the Department of Defense.

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

A TRUE BILL

FOREPERSON

Attorney of the United States in and for the District of Columbia

JAY B. STEPHENS

UNITED STATES ATTORNEY