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**FILED**

**JAN 25 2006**

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA, ) NO. **206 - CR - 0035 MCE**  
12 Plaintiff, )  
13 v. ) VIOLATION: 18 U.S.C. § 844(n) -  
14 ERIC McDAVID, ) Conspiracy to Damage and  
ZACHARY JENSON, and ) Destroy Property by Fire and an  
15 LAUREN WEINER, ) Explosive  
16 Defendants. )  
17

18 I N D I C T M E N T  
19

20 The Grand Jury charges: T H A T

21 ERIC McDAVID,  
22 ZACHARY JENSON, and  
LAUREN WEINER,

23 defendants herein, from in or about June 2005 through on or about  
24 January 13, 2006, in Placer County, in the State and Eastern  
25 District of California, and elsewhere, did knowingly and  
26 intentionally agree, combine and conspire with each other, and  
27 others known and unknown to the Grand Jury, to maliciously damage  
28 and destroy, and attempt to do so, by means of fire and an

1 explosive, (1) a building, and personal and real property of the  
2 United States Forest Service, United States Department of  
3 Agriculture; (2) a building, and personal and real property of an  
4 institution and organization receiving financial assistance from  
5 the United States Bureau of Reclamation, United States Department  
6 of the Interior; and (3) personal and real property used in  
7 interstate commerce and in an activity affecting interstate  
8 commerce, specifically, cellular telephone towers and electric  
9 power stations, in violation of 18 U.S.C. §§ 844(f) and (i).

10 In furtherance of the conspiracy and to effect the  
11 objectives thereof, the defendants, ERIC McDAVID, ZACHARY JENSON,  
12 and LAUREN WEINER, performed the following overt acts:

13 a. During the weekend of November 18-20, 2005, all of  
14 the defendants met at a residence in Foresthill, California and  
15 conducted a planning meeting and identified targets to be  
16 destroyed by fire and an explosive;

17 b. Between approximately November 18, 2005 and  
18 December 8, 2005, Defendant WEINER ordered the book, Poor Man's  
19 James Bond, which contains instructions for creating explosive  
20 devices;

21 c. On January 10, 2006, all of the defendants visited  
22 the Nimbus Dam and Nimbus Fish Hatchery and, later that day,  
23 visited the United States Forest Service Institute of Forest  
24 Genetics to perform reconnaissance on those prospective targets  
25 for destruction and damage by fire and an explosive.

26 d. On January 11, 2006, all of the defendants traveled  
27 to a store in Sacramento to purchase ingredients necessary for  
28 the creation of an explosive device, including, but not limited

1 to, three bottles of bleach, a hot-plate, glassware, a gasoline  
2 can, a car battery, and three jars of petroleum jelly.

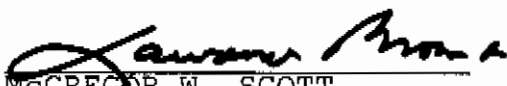
3 e. On January 12, 2006, Defendants WEINER and McDAVID  
4 measured and heated bleach on a hot-plate at a rented residence  
5 in Dutch Flat, California, in order to create crystals necessary  
6 for an explosive device.

7 All in violation of Title 18, United States Code, Section  
8 844(n).

9 A TRUE BILL.

10 /s/ Signature on file w/AUSA

11 FOREPERSON

12   
13 MCGREGOR W. SCOTT  
14 United States Attorney

No. \_\_\_\_\_

**UNITED STATES DISTRICT COURT**

*Eastern District of California*

*Criminal Division*

**THE UNITED STATES OF AMERICA**

vs.

ERIC McDAVID,  
ZACHARY JENSON, and  
LAUREN WEINER

2:06 - CR - 0035 MCE

**INDICTMENT**

**VIOLATION(S): 18 U.S.C. § 844(n) - Conspiracy to Damage or  
Destroy Property by Fire or Explosive**

*A true bill,*

*JS/*

*Foreman.*

*Filed in open court this \_\_\_\_\_ day*

*of \_\_\_\_\_, A.D. 20 \_\_\_\_\_*

*Clerk.*

*Bail, \$ Detained - family hearing and order.*

**GREGORY G. HOLLOWS**

PENALTY SLIP

ERIC McDAVID,

ZACHARY JENSON, and

LAUREN WEINER

**206 - CR - 0035**

**COUNT ONE**

VIOLATION: 18 U.S.C. § 844(n) - Conspiracy to Damage and Destroy Property  
by Fire and Explosive

PENALTY: Not more than \$250,000 fine, or  
At least 5 years to not more than 20 years imprisonment, or both  
Not more than 3 years of supervised release

PENALTY  
ASSESSMENT: \$100.00 special assessment