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Clerk, U.S. District Court District of Montana Great Falls

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ATTORNEY FOR PLAINTIFF UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA BUTTE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DANIEL ALAN VERBANEC,

Defendant.

CR 25-43-BU- DLC

INDICTMENT

THREAT TO MURDER AND ASSAULT A UNITED STATES OFFICIAL (Count 1) Title 18 U.S.C. § 115(a)(1)(B), (b)(4) (Penalty for Threat to Murder: Ten years of imprisonment, \$250,000 fine, and three years of supervised release) (Penalty for Threat to Assault: Six years of imprisonment, \$250,000 fine, and three years of supervised release)

INTERSTATE THREATS (Count 2)
Title 18 U.S.C. § 875(c)
(Penalty: Five years of imprisonment,
\$250,000 fine, and three years of supervised release)

THE GRAND JURY CHARGES:

COUNT 1

Beginning in or about January 2025 and continuing thereafter until in or about November 2025, at Belgrade, within Gallatin County, in the State and District of Montana, and elsewhere, the defendant, DANIEL ALAN VERBANEC, threatened to assault and murder a United States official, with the intent to impede, intimidate, and interfere with such official and judge, while engaged in the performance of official duties, and with the intent to retaliate against such official and judge on account of the performance of official duties, all in violation of 18 U.S.C. § 115(a)(1)(B), (b)(4)

COUNT 2

Beginning in or about January 2025, and continuing thereafter until in or about November 2025, at Belgrade, within Gallatin County, in the State and District of Montana, and elsewhere, the defendant, DANIEL ALAN VERBANEC, transmitted in interstate and foreign commerce any communication containing any threat to injure the person of another, including Facebook posts in which VERBANEC stated he would physically harm and kill numerous federal and state

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public officials throughout the United States, all of which VERBANEC identified by name, in violation of 18 U.S.C. § 875(c).

A TRUE BILL.

Foreperson Signature Redacted Original Document Filed Under Seal

FOREPERSON

KURT G. ALME

United States Attorney

CYNDEEL PETERSON

Criminal Chief Assistant U.S. Attorney