
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Michael A. Hammer
: :
v. : Mag. No. 13-4113 (MAH)
: :
KAREN WALLER : CRIMINAL COMPLAINT

I, Michael Biondo, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

From on or about May 4, 2013, to on or about June 21, 2013, in the District of New Jersey, and elsewhere, defendant KAREN WALLER knowingly and willfully deposited in a post office or authorized depository for mail matter to be sent or delivered by the Postal Service, and caused to be delivered by the Postal Service according to the direction thereon, a communication, with or without a name or designating mark subscribed thereto, addressed to another person, that contained a threat to injure the person of the addressee or another.

In violation of Title 18, United States Code, Section 876(c).

I further state that I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and that this complaint is based on the following facts:

SEE ATTACHMENT A


continued on the attached page and made a part hereof.


Michael Biondo, Special Agent
Federal Bureau of Investigations

Sworn to before me, and
subscribed in my presence

July 8, 2013 at
Newark, New Jersey

HONORABLE MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

ATTACHMENT A

I, Michael Biondo, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other evidence. Where statements of others are related herein, they are related in substance and in part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about June 6, 2013, a letter was received at the Town Hall in Woodbridge Township, New Jersey. The envelope was delivered by the United States Postal Service. The letter was postmarked June 4, 2013. The addressee on the letter was "WOODBRIDGE TOWN HALL 1 MAIN STREET WOODBRIDGE TOWNSHIP NEW JERSEY 07095."

2. An employee of Woodbridge Township opened the envelope. Inside the envelope was a picture and a one page letter. The letter was dated June 4, 2013, and was titled "DEMANDS."

3. The letter stated, in part:

BOMB ATTACKERS HAS ARRIVED ON YOUR UNITED
STATES OIL [Sic] MAYOR DESTRUCTION OF A MASS BOMB WILL
COME TO YOU ALL REMOVE ALL COUNTY STATE P.O.'s
FROM OFF THE STREETS. DO NOT PUSH MY BUTTONS[.]
DO NOT DISREGARD THIS LETTER. DO NOT
UNDERESTIMATE ME PERIOD!!! . . . LIGHTS OUT!!!

4. The letter was signed with the name Karen in script.

5. In response, a "shelter in place" was initiated at town hall and the Woodbridge Township Municipal Court was evacuated.

6. Between June 4, 2013, and June 21, 2013, more than 50 similar letters sent to individuals and/or entities inside and outside of New Jersey, including but not limited to:

A. Rutgers University wherein the letter stated in part that "YOUR BODY FACULTY MEMBERS AD STUDENTS WILL PAY WITH THERE [sic] LIVES, PERIOD!!!."

B. The Supreme Court wherein the letter stated that there were bomb attackers giving orders, demanding that the courts be closed, and stating that "ALL OF YOU SUPREME COURTS [sic] JUDGES WILL PAY WITH DEATH. . . PRESIDENT JIMMY CARTER/GEORGE W BUSH JR/BILL CLINTON

AND HILLARY CLINTON. They will BE KILLED AND SO WITH THE REST OF YOU ALL.”

- C. An insurance company in New Jersey wherein the letter stated that the insurance company’s buildings “Will BE Blown TO ANOTHER PLANET. . . . YOU All WILL FACE DEATH IN A VERY HARSH WAY.”

7. The letters referenced above all had a signature similar to letters included in a package sent to the Millburn, New Jersey, Township Police Department. Included in that package were letters addressing a dispute the author, who signed at the end of some of the letter “Karen,” in script, had with a public official. One letter in the package stated that the author could be contact at a specific telephone number. Public database records reveal that telephone number is a land line telephone number located at defendant KAREN WALLER’s residence.

8. The package discussed in paragraph seven (7) also included a shipping label, which label had a “ship to” address that included the name and address of the public official discussed in paragraph seven (7). Defendant KAREN WALLER’s name is on the shipping label. In addition, the address on the shipping label is defendant KAREN WALLER’s residence.