

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

RICHARD BUTLER III,
Defendant

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CRIMINAL NO.

**(Felon in Possession of an Explosive,
18 U.S.C. § 842(i)(1); Transportation
of Explosive Materials with Intent to
Injure, 18 U.S.C. § 844(d); Use of a
Destructive Device During and in
Relation to a Crime of Violence,
18 U.S.C. § 924(c)(1)(B)(ii))**

INDICTMENT

COUNT ONE

(Felon in Possession of an Explosive)

The Grand Jury for the District of Maryland charges that:

At all times relevant to this Indictment:

1. **RICHARD BUTLER III (“BUTLER”)** was a resident of Hyattsville, Maryland.
2. On or about March 4, 2016, **BUTLER** manufactured one or more improvised incendiary bombs (each of which qualified as an “explosive,” as that term is defined in 18 U.S.C. §§ 844(j) and 232(5)) at a Sunoco gas station located at 7620 Landover Road, Hyattsville, Maryland.
3. On or about March 4, 2016, **BUTLER** used one or more improvised incendiary bombs to set fire to Victim A’s apartment in Hyattsville, Maryland.

The Charge

4. On or about March 4, 2016, in the District of Maryland, the defendant,

RICHARD BUTLER III,

having been convicted of a crime punishable by imprisonment for a term exceeding one year did knowingly and unlawfully receive and possess explosives, to wit, one or more improvised incendiary bombs, that had been shipped and transported in and affecting interstate and foreign commerce.

18 U.S.C. § 842(i)(1)

COUNT TWO

(Transportation of Explosive Materials with Intent to Kill, Injure, and Intimidate)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 3 of Count One are incorporated here.
2. On or about March 4, 2016, in the District of Maryland, the defendant,

RICHARD BUTLER III,

transported, received and attempted to transport and receive in interstate and foreign commerce, explosive materials, to wit, one or more improvised incendiary bombs, with knowledge and intent that the said explosive materials would be used to kill, injure, and intimidate Victim A and to unlawfully damage and destroy, a building, vehicle, real property and personal property associated with Victim A.

18 U.S.C. § 844(d)

COUNT THREE

(Possession of a Destructive Device During and in Relation to a Crime of Violence)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 3 of Count One are incorporated here.
2. On or about March 4, 2016, in the District of Maryland, the defendant,

RICHARD BUTLER III,

did knowingly, intentionally, and unlawfully possess a destructive device during and in furtherance of a crime of violence, for which he may be prosecuted in a court of the United States, to wit, transportation of explosive materials with intent to kill, injure, and intimidate, in violation of 18 U.S.C. § 844(d), as set forth in Count Two of this Indictment, which is incorporated here.

18 U.S.C. § 924(c)(1)(B)(ii)

Rod J. Rosenstein
United States Attorney

A TRUE BILL:

Foreperson

Date: August 31, 2016