



1 **IND**  
2 STEVEN B. WOLFSON  
3 Clark County District Attorney  
4 Nevada Bar #001565  
5 MICHAEL R. DICKERSON  
6 Deputy District Attorney  
7 Nevada Bar #013476  
8 200 Lewis Avenue  
9 Las Vegas, Nevada 89155-2212  
10 (702) 671-2500  
11 Attorney for Plaintiff

DISTRICT COURT  
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,  
10 Plaintiff,

CASE NO: C-20-348860-2

11 -vs-

DEPT NO: XXI

12 ANDREW THOMAS LYNAM JR.,  
13 #8135403  
14 **STEPHEN THOMAS PARSHALL,**  
15 #5482046  
16 WILLIAM LAWRENCE LOOMIS,  
17 #6014156

INDICTMENT

Defendant(s).

17 STATE OF NEVADA }  
18 COUNTY OF CLARK } ss.

19 The Defendant(s) above named, ANDREW THOMAS LYNAM JR., STEPHEN  
20 THOMAS PARSHALL, WILLIAM LAWRENCE LOOMIS, accused by the Clark County  
21 Grand Jury of the crime(s) of ASSIST, SOLICIT OR CONSPIRE TO COMMIT AN ACT  
22 OF TERRORISM (CATEGORY A FELONY - NRS 202.445.2.b, 202.4415 - NOC 51518),  
23 PROVIDE MATERIAL SUPPORT FOR USE IN THE COMMISSION OF AN ACT OF  
24 TERRORISM (CATEGORY A FELONY - NRS 202.445.2.c, 202.4415, 202.443 - NOC  
25 51518); CONSPIRACY TO DAMAGE OR DESTROY A BUILDING BY MEANS OF  
26 EXPLOSIVES (CATEGORY B FELONY NRS 202.830 - NOC 51549) and POSSESSION  
27 OF COMPONENT OF EXPLOSIVE OR INCENDIARY DEVICE WITH INTENT TO  
28 MANUFACTURE EXPLOSIVE OR INCENDIARY DEVICE (Category B Felony - NRS

1 202.261 - NOC 51429), committed at and within the County of Clark, State of Nevada, on or  
2 between March 15, 2020 and May 30, 2020, as follows:

3 COUNT 1 - ASSIST, SOLICIT OR CONSPIRE TO COMMIT AN ACT OF TERRORISM

4 did willfully, unlawfully, feloniously, and knowingly or intentionally assist, solicit,  
5 and/or conspire with each other and/or other unnamed individuals to commit, cause, aid,  
6 further, and/or conceal an act of terrorism, to wit: to cause or attempt to cause great bodily  
7 harm or death to the general population and/or substantial destruction, contamination, and/or  
8 impairment of a building or infrastructure, communications, utilities and/or services, by  
9 entering into a course of conduct and through the course of the conspiracy agreeing and/or  
10 planning with, and/or training with, and/or transporting, and/or supplying materials to, and/or  
11 encouraging each other and/or other unnamed individuals to commit act(s) of violence and/or  
12 coercion against the government and/or public utilities, to cause substantial destruction or  
13 impairment of federal building(s) through the use of explosive(s), incendiary device(s)  
14 and/or fire; and/or cause substantial destruction or impairment of a power grid and/or a NV  
15 Energy Substation, and /or a Lake Mead ranger fee station, and/or a Las Vegas Metropolitan  
16 Police Substation, and/or a Las Vegas Metropolitan Police vehicle, to interrupt infrastructure,  
17 communications, utilities and/or services; and/or use explosive(s), incendiary device(s),  
18 and/or distractionary tactics and/or device(s) to cause panic and incite a reaction from the  
19 public or officers allowing the Defendants and/or other individuals to use violence upon  
20 officers through the use of explosive(s), incendiary device(s), firearm(s), and/or by manner  
21 and means unknown.

22 COUNT 2 – PROVIDE MATERIAL SUPPORT FOR USE IN THE COMMISSION OF AN  
23 ACT OF TERRORISM

24 did willfully, unlawfully, feloniously, and knowingly or intentionally provide material  
25 support with the intent that such material support be used, in whole or in part, to commit,  
26 cause, aid, further and/or conceal an act of terrorism and/or aid a terrorist or conceal a  
27 terrorist from detection or capture, by recruiting members, conducting reconisance and  
28 surveillance on law enforcement and/or potential targets and/or obtaining and providing

1 supplies, tactical plans and/or equipment, transportation, and/or weapons in an effort to  
2 mobilize a group of individuals to violently overthrow the government and/or cause civil  
3 unrest in their efforts to cause or commit or attempt to cause or commit an act of terrorism,  
4 to wit: to cause great bodily harm or death to the general population and/or substantial  
5 destruction, contamination, and/or impairment of a building or infrastructure,  
6 communications, utilities and/or services, the Defendants being criminally liable under one  
7 or more of the following principles of criminal liability, to wit: (1) by directly committing  
8 this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent  
9 that this crime be committed, by counseling, encouraging, hiring, commanding, inducing  
10 and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a  
11 conspiracy to commit this crime, with the intent that this crime be committed, Defendants  
12 and/or other unnamed individuals aiding or abetting and/or conspiring by Defendants other  
13 unnamed individuals acting in concert throughout.

14 COUNT 3 - CONSPIRACY TO DAMAGE OR DESTROY A BUILDING BY MEANS OF  
15 EXPLOSIVES

16 did willfully, unlawfully, feloniously, and maliciously conspire with each other and/or  
17 other unnamed individuals to damage or destroy, by means of an explosive, any building,  
18 vehicle or real property in the State, by entering into an agreement over the course of an  
19 ongoing conspiracy to damage or destroy a federal building and/or a building serving a  
20 power grid or electrical substation through the use of an incendiary or explosive device(s) or  
21 fire ignitor.

22 COUNT 4 - POSSESSION OF COMPONENT OF EXPLOSIVE OR INCENDIARY  
23 DEVICE WITH INTENT TO MANUFACTURE EXPLOSIVE  
24 OR INCENDIARY DEVICE

25 did willfully, unlawfully, feloniously, and knowingly possess any component of an  
26 explosive or incendiary device, to wit: glass bottles, rags, gasoline, aerosol can(s), and/or  
27 commercial firework(s) with intent to manufacture an explosive or incendiary device, the  
28 Defendants being criminally liable under one or more of the following principles of criminal  
liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the

1 commission of this crime, with the intent that this crime be committed, by counseling,  
2 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
3 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
4 crime be committed, Defendants and/or other unnamed individuals aiding or abetting and/or  
5 conspiring by Defendants other unnamed individuals acting in concert throughout.

6 DATED this 16<sup>TH</sup> day of June, 2020.

7 STEVEN B. WOLFSON  
8 Clark County District Attorney  
9 Nevada Bar #001565

10 BY /s/MICHAEL R. DICKERSON  
11 MICHAEL R. DICKERSON  
12 Deputy District Attorney  
13 Nevada Bar #013476

14  
15 ENDORSEMENT: A True Bill

16  
17 /s/BRIAN CONTRERAS  
18 Foreperson, Clark County Grand Jury

1 Names of Witnesses and testifying before the Grand Jury:

2 SMITH, JOHN – 1787 W. Lake Mead Blvd, Las Vegas, NV 89106

3 (Pseudonym; name will be provided to defense counsel immediately upon request)

4 VOGT, BLAKE – FBI SPECIAL AGENT

5  
6 Additional Witnesses known to the District Attorney at time of filing the Indictment:

7 CUSTODIAN OF RECORDS - CCDC

8 CUSTODIAN OF RECORDS - LVMPD COMMUNICATIONS

9 CUSTODIAN OF RECORDS - LVMPD RECORDS

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