

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA

CR. NO.: _____

v.

DYLANN STORM ROOF

18 U.S.C. § 249 (a) (1)
18 U.S.C. § 247 (a) (2)
18 U.S.C. § 247 (d) (1)
18 U.S.C. § 247 (d) (3)
18 U.S.C. § 924 (c) (1) (A)
18 U.S.C. § 924 (c) (1) (C)
18 U.S.C. § 924 (j)
18 U.S.C. § 3591
18 U.S.C. § 3592

INDICTMENT

THE GRAND JURY CHARGES:

1. Defendant DYLANN STORM ROOF is a white male who, on June 17, 2015, was twenty-one years old.

2. In April 2015, Defendant DYLANN STORM ROOF purchased a Glock, model 41, .45 caliber pistol.

3. In the months before June 17, 2015, Defendant DYLANN STORM ROOF decided to attack African-Americans because of their race. He further decided to attack African-American worshipers in an African-American church in order to make his attack more notorious.

4. Prior to June 17, 2015, Defendant DYLANN STORM ROOF obtained and used the website lastrhodesian.com. He

placed on that website a manuscript and photographs expressing his racist beliefs. In the manuscript, DYLANN STORM ROOF uses racial slurs to describe African-Americans, expresses his belief that white people are superior to African-Americans, and decries integration. The photographs on lastrhodesian.com include DYLANN STORM ROOF wearing a jacket with flags of two former apartheid African nations, displaying his Glock .45 caliber pistol, and holding a confederate flag.

5. On the evening of June 17, 2015, Defendant DYLANN STORM ROOF drove to the Emanuel African Methodist Episcopal (AME) Church in Charleston, South Carolina, commonly referred to as "Mother Emanuel," to attack African-American parishioners engaged in religious activities. He selected Emanuel AME Church because it had a predominately African-American membership, and because it was significant to the people of Charleston, of South Carolina, and of the Nation.

6. By attacking African-American parishioners, Defendant DYLANN STORM ROOF wanted to increase racial tensions across the Nation, and sought retribution for perceived wrongs he believed African-Americans had committed against white people.

7. On the evening of June 17, 2015, African-American parishioners at Emanuel AME Church were participating in a religious worship and Bible study group led by Reverend Clementa Pinckney (a forty-one-year-old African-American man) and attended by Reverend Sharonda Coleman-Singleton (a forty-five-year-old African-American woman), Cynthia Hurd (a fifty-four-year-old African-American woman), Susie Jackson (an eighty-seven-year-old African-American woman), Ethel Lee Lance (a seventy-year-old African-American woman), K.M. (an eleven-year-old African-American girl), Reverend DePayne Middleton-Doctor (a forty-nine-year-old African-American woman), Felicia Sanders (a fifty-eight-year-old African-American woman), Tywanza Sanders (a twenty-six-year-old African-American man), Reverend Daniel Simmons, Sr. (a seventy-four-year-old African-American man), Polly Sheppard (a seventy-year-old African-American woman), and Myra Thompson (a fifty-nine-year-old African-American woman).

8. On the evening of June 17, 2015, Defendant DYLANN STORM ROOF entered Emanuel AME Church with his Glock, model 41, .45 caliber pistol and eight magazines loaded with hollow-point bullets, with the intent of killing African-

Americans engaged in the exercise of their religious beliefs.

9. The parishioners welcomed Defendant DYLANN STORM ROOF into their Bible study group, and ROOF sat next to Reverend Clementa Pinckney.

10. While the parishioners were engaged in religious worship and Bible study, Defendant DYLANN STORM ROOF drew his pistol and opened fire on the parishioners, killing Reverend Sharonda Coleman-Singleton, Cynthia Hurd, Susie Jackson, Ethel Lee Lance, Reverend DePayne Middleton-Doctor, Reverend Clementa Pinckney, Tywanza Sanders, Reverend Daniel Simmons, Sr., and Myra Thompson; and attempting to kill K.M., Felicia Sanders, and Polly Sheppard.

COUNTS 1-9
(Hate Crime Act Resulting in Death)

THE GRAND JURY FURTHER CHARGES:

11. The allegations set forth in paragraphs 1 through 10 are repeated and realleged as if set forth fully herein.

12. On or about June 17, 2015, in the District of South Carolina, Defendant DYLANN STORM ROOF willfully caused bodily injury to the below-listed victims because of their actual and perceived race and color:

COUNT	VICTIM
1	Reverend Sharonda Coleman-Singleton
2	Cynthia Hurd
3	Susie Jackson
4	Ethel Lee Lance
5	Reverend DePayne Middleton-Doctor
6	Reverend Clementa Pinckney
7	Tywanza Sanders
8	Reverend Daniel Simmons, Sr.
9	Myra Thompson

The offenses resulted in the death of each of the victims in Counts 1 to 9.

All in violation of Title 18, United States Code, Section 249(a)(1).

COUNTS 10-12
(Hate Crime Act Involving An Attempt to Kill)

THE GRAND JURY FURTHER CHARGES:

13. The allegations set forth in paragraphs 1 through 10 are repeated and realleged as if set forth fully herein.

14. On or about June 17, 2015, in the District of South Carolina, Defendant DYLANN STORM ROOF, through the

use of a firearm (a Glock, model 41, .45 caliber pistol), attempted to cause bodily injury to the below-listed victims because of their actual and perceived race and color:

COUNT	VICTIM
10	K.M.
11	Felicia Sanders
12	Polly Sheppard

The offenses included an attempt to kill each of the victims in Counts 10 to 12.

All in violation of Title 18, United States Code, Section 249(a)(1).

COUNTS 13-21

(Obstruction of Exercise of Religion Resulting in Death)

THE GRAND JURY FURTHER CHARGES:

15. The allegations set forth in paragraphs 1 through 10 are repeated and realleged as if set forth fully herein.

16. On or about June 17, 2015, in the District of South Carolina, Defendant DYLANN STORM ROOF intentionally obstructed by force each victim listed below in the

enjoyment of that victim's free exercise of religious beliefs:

COUNT	VICTIM
13	Reverend Sharonda Coleman-Singleton
14	Cynthia Hurd
15	Susie Jackson
16	Ethel Lee Lance
17	Reverend DePayne Middleton-Doctor
18	Reverend Clementa Pinckney
19	Tywanza Sanders
20	Reverend Daniel Simmons, Sr.
21	Myra Thompson

The acts of Defendant DYLANN STORM ROOF resulted in the death of each victim listed in Counts 13 to 21 and were in and affected interstate commerce.

All in violation of Title 18, United States Code, Sections 247(a)(2) and 247(d)(1).

COUNTS 22-24

**(Obstruction of Exercise of Religion Involving An Attempt
to Kill and Use of a Dangerous Weapon)**

THE GRAND JURY FURTHER CHARGES:

17. The allegations set forth in paragraphs 1 through 10 are repeated and realleged as if set forth fully herein.

18. On or about June 17, 2015, in the District of South Carolina, Defendant DYLANN STORM ROOF intentionally obstructed by force and threat of force each victim listed below in the enjoyment of that victim's free exercise of religious beliefs, and attempted to do so:

COUNT	VICTIM
22	K.M.
23	Felicia Sanders
24	Polly Sheppard

The acts of Defendant DYLANN STORM ROOF included an attempt to kill each of the victims in Counts 22 to 24; involved the use of a dangerous weapon (a Glock, model 41, .45 caliber pistol); and were in and affected interstate commerce.

All in violation of Title 18, United States Code, Sections 247(a)(2), 247(d)(1), and 247(d)(3).

COUNTS 25-33

**(Use of a Firearm to Commit Murder During and In Relation
to a Crime of Violence)**

THE GRAND JURY FURTHER CHARGES:

19. The allegations set forth in paragraphs 1 through 10 are repeated and realleged as if set forth fully herein.

20. On or about June 17, 2015, in the District of South Carolina, Defendant DYLANN STORM ROOF knowingly used and discharged a firearm (Glock, model 41, .45 caliber pistol) during and in relation to a crime of violence for which he may be prosecuted in a court of the United States - violations of 18 U.S.C. § 249 as charged in Counts 1 to 9, and violations of 18 U.S.C. § 247 as charged in Counts 13 to 21 - and caused the death of each victim listed below through the use of the firearm in such a manner as to constitute murder as defined in 18 U.S.C. § 1111, in that the Defendant, with malice aforethought, did unlawfully kill each victim with the firearm.

COUNT	VICTIM
25	Reverend Sharonda Coleman-Singleton
26	Cynthia Hurd
27	Susie Jackson

28	Ethel Lee Lance
29	Reverend DePayne Middleton-Doctor
30	Reverend Clementa Pinckney
31	Tywanza Sanders
32	Reverend Daniel Simmons, Sr.
33	Myra Thompson

All in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(C), and 924(j)(1).

NOTICE OF SPECIAL FINDINGS PURSUANT TO TITLE 18, UNITED STATES CODE, SECTIONS 3591 AND 3592

THE GRAND JURY FURTHER FINDS:

21. The allegations set forth in paragraphs 1 through 20 are repeated and realleged as if set forth fully herein.

22. As to Counts 13-21 and 25-33, the Defendant DYLANN STORM ROOF:

(a) was 18 years of age or older at the time of the offense;

(b) intentionally killed Reverend Sharonda Coleman-Singleton, Cynthia Hurd, Susie Jackson, Ethel Lee Lance, Reverend DePayne Middleton-Doctor, Reverend Clementa Pinckney, Tywanza

Sanders, Reverend Daniel Simmons, Sr., and Myra Thompson (18 U.S.C. § 3591(a)(2)(A));

(c) intentionally inflicted serious bodily injury that resulted in the deaths of Reverend Sharonda Coleman-Singleton, Cynthia Hurd, Susie Jackson, Ethel Lee Lance, Reverend DePayne Middleton-Doctor, Reverend Clementa Pinckney, Tywanza Sanders, Reverend Daniel Simmons, Sr., and Myra Thompson (18 U.S.C. § 3591(a)(2)(B));

(d) intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and Reverend Sharonda Coleman-Singleton, Cynthia Hurd, Susie Jackson, Ethel Lee Lance, Reverend DePayne Middleton-Doctor, Reverend Clementa Pinckney, Tywanza Sanders, Reverend Daniel Simmons, Sr., and Myra Thompson died as a direct result of such act (18 U.S.C. § 3591(a)(2)(C));

(e) intentionally and specifically engaged in an act of violence, knowing that the act created a

grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and Reverend Sharonda Coleman-Singleton, Cynthia Hurd, Susie Jackson, Ethel Lee Lance, Reverend DePayne Middleton-Doctor, Reverend Clementa Pinckney, Tywanza Sanders, Reverend Daniel Simmons, Sr., and Myra Thompson died as a direct result of the act (18 U.S.C. § 3591(a)(2)(D));

(f) committed the offenses charged in Counts 13-21 and 25-33 after substantial planning and premeditation to cause the death of a person (18 U.S.C. § 3592(c)(9));

(g) committed the offenses in Counts 15 and 27 (for killing Susie Jackson who was eighty-seven years old), Counts 16 and 28 (for killing Ethel Lee Lance, who was seventy years old), and Counts 20 and 32 (for killing Reverend Daniel Simmons, Sr., who was seventy-four years old) on victims who were particularly vulnerable due to old age (18 U.S.C. § 3592(c)(11)); and

(h) in committing the offenses in Counts 13-21 and 25-33, intentionally killed and attempted to kill more than one person in a single criminal episode (18 U.S.C. § 3592(c)(16)).

A TRUE Bill

FOREPERSON

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CIVIL RIGHTS DIVISION

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA

V.

DYLANN ROOF


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CRIMINAL NO.

CERTIFICATE OF THE ATTORNEY GENERAL

I, Loretta E. Lynch, hereby certify that in my judgment, prosecution by the United States of Dylann Roof for violating Title 18, United States Code, § 249(a)(1), is in the public interest and is necessary to secure substantial justice and the state lacks jurisdiction to bring a hate crime prosecution. This certification is made pursuant to Title 18, United States Code, § 249.

Signed this 20th day of July, 2015.


Loretta E. Lynch
Attorney General

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA

V.

DYLANN ROOF


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CRIMINAL NO.

CERTIFICATE OF THE ATTORNEY GENERAL

I, Loretta E. Lynch, hereby certify that in my judgment, prosecution by the United States of Dylann Roof for violating Title 18, United States Code, § 247(a)(2), is in the public interest and is necessary to secure substantial justice. This certification is made pursuant to Title 18, United States Code, § 247 (e).

Signed this 1st day of July, 2015.


Loretta E. Lynch
Attorney General