

CITIZENS' GRAND JURY  
OCALA FLORIDA DIVISION

THE PEOPLE OF FLORIDA AND THE )  
UNITED STATES OF AMERICA )

Plaintiffs, )

v. )

BARACK HUSSEIN OBAMA II )  
PRESIDENT OF THE UNITED STATES )

U.S. ATTORNEY GENERAL )  
ERIC HIMPTON HOLDER, JR )

HILLARY RODHAM CLINTON )

*Douglas Schulman,* )  
*Steven Miller* )  
*Lois Lerner* )  
Defendants )

CRIMINAL INDICTMENT

THE GRAND JURY CHARGES THAT

GENERAL ALLEGATIONS

1. Defendant BARACK HUSSEIN OBAMA (hereinafter referred to as "Defendant OBAMA") was the President of the United States of America, who was sworn into office on January 20, 2009 and has served continuously until today.
2. Defendant ERIC HIMPTON HOLDER, JR. (hereinafter referred to as "Defendant HOLDER") is the Attorney General of the United States of America, who was sworn into office on February 3, 2009 and has served continuously until today.
3. Defendant HILLARY RODHAM CLINTON (hereinafter referred to as "Defendant CLINTON") is the wife of former President Bill Clinton, a former First Lady and U.S. Senator from New York State and at all times material herein Secretary of State in the administration of OBAMA.
4. The oath of federal office is contained in 5 U. S. C. § 3331 which reads as follows:  
"I, \_\_\_\_\_, do solemnly swear (or affirm) that I will support and defend the Constitution of the United States against all enemies, foreign and domestic; that I will bear true faith and allegiance to the same; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the duties of the office on which I am about to enter. So help me God."
5. The First Amendment to the U.S. Constitution states: "Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances."
6. The Fourth Amendment to the U.S. Constitution states: "The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be

- violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.
7. Defendant HOLDER knowingly and willingly authorized the release and transfer of thousands of firearms to known drug and firearms traffickers in Operation Fast and Furious.
  8. Defendant HOLDER, acting in concert with Defendant CLINTON, knowingly and willingly signed off on seizures of phone records and the implementation of wiretaps of Fox News correspondent James Rosen and others in Fox News in an effort to harass and put a stop to any critical and other investigative journalism aimed towards members of the federal government. Defendant HOLDER acted similarly with regard to reporters and business executives of Associated Press. Defendant HOLDER and Defendant CLINTON also lied to Congress, despite being under oath.
  9. Defendant HOLDER appeared before the House Judiciary and Government Oversight and Reform Committees on the matter of the terrorist attacks against the U.S. embassy in Benghazi and, with regard to Operation Fast and Furious wherein he knowingly and willingly interfered with a congressional investigation by providing false testimony. Defendant CLINTON also provided false testimony to Congress concerning the terrorist attacks against the U.S. Embassy in Benghazi.
  10. Defendants OBAMA and HOLDER targeted taxpayers and non-profit organizations and press organizations who dared to question or organize in opposition to President Obama's political agenda in an effort to silence them, ramping up their efforts in an election year.

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**COUNT ONE**

**(26 USC § 7217)**

**(Prohibition On Executive Branch Influence Over Taxpayer Audits And Other Investigations)**

**THE GRAND JURY FURTHER CHARGES:**

10. Paragraphs 1 through 10 of the General Allegations are realleged here.
11. Defendants OBAMA and HOLDER, employees of the executive branch, directly or indirectly requested or assisted and furthered by and through their agents, officers or employees of the Internal Revenue Service, including but not limited to former IRS Commissioner Doug Schulman, former Acting IRS Commissioner Steven Miller and former head of the tax exempt section Lois Lerner, to conduct audits and/or investigations of particular taxpayers and non-profit organizations who disagreed with the Defendant OBAMA's and his administration's political agenda and governance, including but not limited to those identifying themselves as members of or associated with the Tea Party or wishing to educate the public about the U.S. Constitution as well as those who were perceived to be critical of and/or oppose the policies and actions of the OBAMA administration and the government in general. These groups included but were not limited to conservative, pro-Israel and Christian and other religious groups.
12. Because of Defendant OBAMA's and HOLDER's direct or indirect requests and other enumerated actions for the conducting of audits and other discriminatory acts against particular taxpayers and nonprofit organizations based on their political affiliations and views and for having criticized the Obama administration, hundreds of such taxpayers and non-profit organizations were audited or made subject to scrutiny in other improper, discriminatory and illegal ways.

*Doug Schulman  
Steven Miller  
Lois Lerner's*

**COUNT TWO**

(18 USC § 1112 & Fla. Statutes §782.07)  
(Involuntary Manslaughter)

THE GRAND JURY FURTHER CHARGES:

13. Paragraphs 1 through 13 of the General Allegations are realleged here.
14. Defendant HOLDER authorized the release and transfer of hundreds of semi-automatic assault rifles and other firearms to known drug and firearms traffickers working for the Mexican drug cartels.
15. Defendant HOLDER allowed the firearms to be taken by the drug and firearms traffickers into Mexico and into neighboring states.
16. These semi-automatic assault rifles were used by the same drug and firearms traffickers in the December 14, 2010 murder of U.S. Border Patrol agent Brian Terry in Peck Canyon, Santa Cruz County, Arizona, eleven miles from the Mexican border. *+ automatic weapons*
17. Defendant HOLDER was thus responsible for the death of Agent Brian Terry which accrued in the perpetration of crimes of burglary, drug trafficking, and murder as a result of the release of the firearms.

**COUNT THREE**

(18 U.S.C. § 922(t)(18))

(Knowing Transfer Of Firearm Without Background Checks)

18. Paragraphs 1 through 18 of the General Allegations are realleged here.
19. Defendant HOLDER knowingly and willfully authorized the release of the firearms under the Fast and Furious operation.
20. These firearms were released to known drug and firearms traffickers without the use of a background check that would not have passed the mandatory background check.
21. Nearly 2,000 firearms were bought by straw purchasers during Fast and Furious under the direction and supervision of the Department of Justice. These included AK-47 variants, Barrett .50 caliber sniper rifles, .38 caliber revolvers, and FN Five-sevens.

**COUNT FOUR**

(18 USC § 1505 and 18 U.S.C. 1001)

(Obstruction Of Proceedings Before Departments, Agencies, And Committees and False Statements)

- LC* 21. Paragraphs 1 through 22 of the General Allegations are realleged here.
- LC* 22. Defendant HOLDER appeared before House Government Oversight and Reform Committee on May 3, 2012, the House Judiciary Committee on June 7, 2012, and the Senate Judiciary Committee on November 8, 2012, to answer the inquiry of members of the House of Representatives with regard to Operation Fast and Furious wherein nearly 2,000 firearms were transferred into the hands of known drug and firearms traffickers.
- LC* 23. Defendant HOLDER appeared and testified under oath before the House Judiciary Committee on May 13, 2013 and the House Oversight and Government Reform Committee to answer the inquiry of members of the House of Representatives with regard to the terrorist attack on the U.S. Embassy in Benghazi on September 11, 2012 wherein four U.S. citizens were brutally murdered including U.S. Ambassador J. Christopher Stevens, as well as other ~~occasions~~ *individuals.* Defendant *LC*

CLINTON appeared and testified under oath before the Senate Foreign Relations Committee on January 23, 2012.

- 24. Defendants HOLDER and CLINTON knowingly and willingly obstructed or impeded the proper administration of the law by falsely claiming executive privilege and/or providing false testimony in order to avoid answering questions to this and other Congressional Committees and refused to hand over subpoenaed documents, as well as falsely claimed memory loss and lack of involvement in the Obama administration's response to the terrorist attack.
- 25. Defendant HOLDER was held in contempt of Congress for refusing to properly and fully answer questions to the Congressional Committees with regard to Fast and Furious and refusing to hand over subpoenaed documents.
- 26. Because of these failures and false and misleading testimony under oath, Defendants HOLDER and CLINTON ARE obstructing Congressional Committee (s).


**COUNT FIVE**  
**(5 U. S. C. § 3331)**  
**(Violation of the Oath of Office)**

THE GRAND JURY FURTHER CHARGES:

- 27. Paragraphs 1 through 28 of the General Allegations are realleged here.
- 28. Defendants HOLDER and CLINTON failed to support and defend the Constitution of the United States by impeding on the First and Fourth Amendment rights of private citizens and members of the news media.
- 29. Defendant HOLDER authorized the seizure of phone records and wiretapping of members of the Associated Press in violation of the First Amendment's guarantee of freedom of the press.
- 30. Defendant HOLDER and Defendant CLINTON authorized and furthered the seizure of Fox News correspondent James Rosen's and others at Fox News emails, phone records and other confidential documents without probable cause in violation of the Fourth Amendment to the U.S. Constitution.
- 31. Because of his knowing and willful violation of the First and Fourth Amendments to the U.S. Constitution, Defendants HOLDER and CLINTON have violated their oaths of office to uphold and protect the U.S. Constitution.

  
LARRY KLAYMAN  
Citizens' Grand Jury Prosecutor

5/28/13  
Date

A TRUE BILL  
  
FOREPERSON  
