

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS

|                           |   |                                  |
|---------------------------|---|----------------------------------|
| UNITED STATES OF AMERICA, | ) |                                  |
|                           | ) |                                  |
| Plaintiff,                | ) |                                  |
|                           | ) |                                  |
| vs.                       | ) | Case No. 15- <u>15-40031-DDC</u> |
|                           | ) |                                  |
| ALEXANDER E. BLAIR,       | ) | Count 1: 18 U.S.C. §§ 2, 371     |
|                           | ) |                                  |
| Defendant.                | ) | <b><u>FILED UNDER SEAL</u></b>   |
| _____                     | ) |                                  |

**SEALED INFORMATION**

The United States Attorney charges:

**COUNT 1 – CONSPIRACY**

1. Beginning on or about March 17, 2015, and continuing until April 10, 2015, in the District of Kansas, the defendant,

**ALEXANDER E. BLAIR,**

knowingly and willfully combined, conspired, confederated, and agreed with John T. Booker, Jr.

(a/k/a “Mohammed Abdullah Hassan”) to commit offenses against the United States, that is:

to maliciously damage and destroy, by means of fire and explosives, buildings, vehicles, and other personal and real property in whole or in part owned and possessed by, and leased to, the United States and departments and agencies thereof, in violation of Title 18, United States Code, Section 844(f)(1).

2. In furtherance of the conspiracy, and to accomplish its purposes and objectives, the defendant committed the following overt acts, among others:

On or about March 17, 2015, the defendant provided Booker with money to rent a storage unit near Booker’s apartment in Topeka, Kansas, for the purpose of storing components that the defendant believed would be used to construct an explosive device to be used in a later attack on the military base at Fort Riley, Kansas.

3. The foregoing is in violation of Title 18, United States Code, Sections 2 and 371.

Respectfully submitted,

BARRY R. GRISSOM  
United States Attorney

/s/ Anthony W. Mattivi  
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Assistant United States Attorney  
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/s/ David C. Smith  
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/s/ Josh Parecki  
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