

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

FILED

2012 DEC -4 P 5:46

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
v. )  
)  
MICHAEL R. WALLI, )  
MEGAN RICE, and )  
GREG BOERTJE-OBED, )  
)  
Defendants. )

U.S. DISTRICT COURT  
EASTERN DIST. TENN.  
DEPT. OF JUSTICE

CASE NO. 3:12-CR-107  
JUDGES PHILLIPS/SHIRLEY

**SUPERSEDING INDICTMENT**

**COUNT ONE**

The Grand Jury charges that, on or about July 28, 2012, within the Eastern District of Tennessee, the defendants, MICHAEL R. WALLI, MEGAN RICE, and GREG BOERTJE-OBED, aiding and abetting each other, with the intent to injure, interfere with, and obstruct the national defense of the United States, did willfully injure, destroy, and contaminate, and attempt to injure, destroy and contaminate national-defense premises, specifically, buildings and grounds of the Y-12 National Security Complex, in violation of Title 18, United States Code, Sections 2155(a), 2151 and 2.

**COUNT TWO**

The Grand Jury further charges that, on or about July 28, 2012, within the Eastern District of Tennessee, the defendants, MICHAEL R. WALLI, MEGAN RICE, and GREG BOERTJE-OBED, aiding and abetting each other, at a place within the special maritime and territorial jurisdiction of the United States, namely, the United States Department of Energy, National Nuclear Security Administration, Y-12 National Security Complex, did willfully and maliciously

destroy, injure, and attempt to destroy and injure, a structure, and other real and personal property within the Y-12 National Security Complex, in violation of Title 18, United States Code, Sections 1363 and 2.

**COUNT THREE**

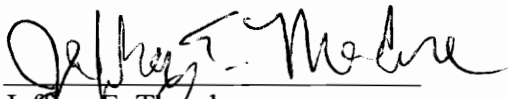
The Grand Jury further charges that, on or about July 28, 2012, in the Eastern District of Tennessee, the defendants, MICHAEL R. WALLI, MEGAN RICE, and GREG BOERTJE-OBED, aiding and abetting each other, willfully and by means of cutting, painting and defacing, did injure and commit a depredation against property of the United States and of the United States Department of Energy, National Nuclear Security Administration, Y-12 National Security Complex, and the resulting damage was in an amount exceeding \$1,000.00, in violation of Title 18, United States Code, Sections 1361 and 2.

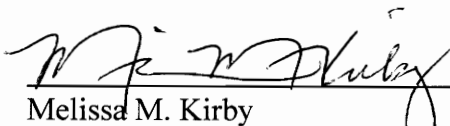
A TRUE BILL: \_\_\_\_\_

**SIGNATURE REDACTED**

\_\_\_\_\_  
GRAND JURY FOREPERSON

WILLIAM C. KILLIAN  
UNITED STATES ATTORNEY

By:   
\_\_\_\_\_  
Jeffrey E. Theodore  
Assistant United States Attorney

  
\_\_\_\_\_  
Melissa M. Kirby  
Assistant United States Attorney