

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

2021 JUL 20 PM 12:19

UNITED STATES OF AMERICA

: CASE NO.

:

: JUDGE

v.

:

: SEALED INDICTMENT

:

TRES GENCO,

: 18 U.S.C. § 249(a)(2)

: 18 U.S.C. § 922(o)

Defendant.

:

:

:

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

THE GRAND JURY CHARGES:

BACKGROUND

Unless otherwise indicated, at times material to this Indictment:

1. TRES GENCO, the defendant, was a resident of the Southern District of Ohio.

For a brief period of time material to this Indictment, GENCO lived in Georgia for military training.

GENCO's Identification as an Incel

2. "Incel" is a shortened form of "involuntary celibate." The Incel movement is an online community of predominantly men who harbor anger towards women. Incels advocate violence in support of their belief that women unjustly deny them sexual or romantic attention to which they believe they are entitled.

3. For example, on or about May 23, 2014, Elliot Rodger, a self-identified Incel, killed six people and injured 14 others, including shooting individuals outside a University of California, Santa Barbara sorority house. Prior to his attacks, Elliot Rodger shot a group of

college students with orange juice from a water gun. On Incel web forums, Elliot Rodger is often referenced as “ER.”

4. From at least in or about July of 2019 through on or about March 12, 2020, **GENCO** identified as an Incel. **GENCO** maintained profiles on a popular Incel website where he posted frequently.

5. For example, **GENCO** posted: “I put some orange juice in a water gun, I was planning to spray some foids and couples like ER did, when I finally did do it, it was ER’s birthday and I didn’t even know that. Felt like I spiritually connected to the saint on that day. I drove up to them saying hi and they didn’t even look up, they just went ‘uhuh’ so they get sprayed in the fucking face. I suggest it to all incels, extremely empowering action.” “Foids” is an Incel term short for “femoids,” referring to women.

6. On or about August 3, 2019, **GENCO** wrote a document entitled “A Hideous Symphony a manifesto written by Tres Genco, the socially exiled Incel.” In that document, **GENCO** wrote, in substance and in part, “I would hope these words resonate in sweet familiarity to fellow incels, either cognizant of their situation or not. . . . I am already set to go into the U.S. Army . . . this training will be for the attainment of one reality, the death of what I have been deprived most, but also cherish and fantasize at the opportunity of having but has been neglected of; Women. I will slaughter out of hatred, jealousy, and revenge. . . . I will take away the power of life that they withhold from me, by showing there is more than just happiness and fulfillment, there is all encompassing death, the great equalizer that will bear all of us into its seductively calm velvet of silence and serenity.”

GENCO’s Plot to Commit a Hate Crime

7. In or about January of 2019, **GENCO** purchased tactical gloves, a bullet proof vest, a hoodie bearing the word “Revenge,” cargo pants, a Bowie knife, and a skull facemask. In or about February of 2019, **GENCO** purchased a rifle. On or about May 20, 2019, **GENCO**

purchased two factory Glock 17 magazines, a 9mm Glock 17 clip, and a holster clip concealed carry for a Glock.

8. Sometime between on or about July 30, 2019 and on or about August 15, 2019, **GENCO** wrote a note that listed a university in the Southern District of Ohio and the following items, in substance and in part: “May 23, 2020 290 days! M-16 optimal, covert or mil-spec. Will get arms training in BCT, Georgia KC needs to be huge! 3,000? Aim big then[.]” “KC” is understood to be a reference to “kill count.”

9. On or about August 3, 2019, the same day that **GENCO** drafted his manifesto, he conducted online searches for sororities and a university in Ohio.

10. Also in or about August of 2019, **GENCO** researched gun modifications and saved illustrated guides to constructing M-16s. **GENCO** also conducted internet searches for topics including “Elliot Rodger,” “difference between full auto and semi auto,” “homemade flash bang,” and “how many days until may 23.”

11. In or about August of 2019 through in or about December of 2019, **GENCO** attended Army Basic Training in Georgia. He was discharged from the military for entry-level performance and conduct.

12. On or about January 11, 2020, after returning to the Southern District of Ohio, **GENCO** created a document entitled “isolated.” In this document, he wrote, in substance and in part, “If you’re reading this, I’ve done something horrible. Somehow you’ve come across the writings of the deluded and homicidal, not an easy task, and for that I congratulate you for your curiosity and willingness to delve into such a dark topic.” **GENCO** signed the document “Your hopeful friend and murderer[.]”

13. On or about January 15, 2020, **GENCO** conducted surveillance in the location of a university in Ohio. That same day, **GENCO** conducted internet searches for topics including “planning a shooting crime” and “When does preparing for a crime become an attempt?”

14. On or about March 11, 2020, **GENCO** conducted internet research of police scanner codes for Columbus, Ohio police and university police.

Recovery of Weaponry

15. On or about March 12, 2020, police officers responded to **GENCO**'s residence in Highland County, Ohio (the "Residence"). At the Residence, in the trunk of **GENCO**'s vehicle, police officers found, among other things, a Palmetto State Armory 5.56x45mm caliber firearm with a bump stock attached, several loaded magazines, body armor, and boxes of ammunition.

16. Inside the Residence, police officers found a Glock-style 9mm Luger caliber semiautomatic pistol, with no manufacturer's marks or serial number, hidden in a heating vent in **GENCO**'s bedroom.

COUNT ONE
(Attempted Hate Crime)

17. Paragraphs One through Sixteen of the Background are incorporated by reference as though set forth fully herein.

18. From on or about January of 2019 through on or about March 12, 2020, in the Southern District of Ohio and elsewhere, the defendant, **TRES GENCO**, attempted to willfully cause bodily injury to women, through the use of a firearm and a dangerous weapon, because of the actual and perceived gender of any person. The conduct described herein occurred during the course of the travel of the defendant over state lines; and the defendant used a channel, facility, and instrumentality of interstate and foreign commerce in connection with the conduct described herein, including a cellular telephone and a motor vehicle; and in connection with the conduct described herein, the defendant employed firearms and dangerous weapons that traveled in interstate and foreign commerce, including a semiautomatic weapon; and the conduct

described herein otherwise affected interstate and foreign commerce. The conduct included an attempt to kill.

All in violation of Title 18, United States Code, Section 249(a)(2).

COUNT TWO
(Unlawful Possession of a Machinegun)

19. Paragraphs Fifteen through Sixteen of the Background are incorporated by reference as though set forth fully herein.

20. On or about March 12, 2020, in the Southern District of Ohio and elsewhere, the defendant, **TRES GENCO**, did knowingly possess a machinegun, that is, a modified Glock-type, 9mm Luger caliber semiautomatic pistol, with no manufacturer's marks or serial number, in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

All in violation of Title 18, United States Code, Section 922(o).

A TRUE BILL

s/Foreperson

GRAND JURY FOREPERSON

VIPAL J. PATEL
ACTING UNITED STATES ATTORNEY


MEGAN GAFFNEY PAINTER
TIMOTHY MANGAN
ASSISTANT UNITED STATES ATTORNEYS