

**BEFORE THE CITIZEN'S GRAND JURY**

THE PEOPLE OF THE UNITED  
STATES OF AMERICA

Complainant,

v.

JOSEPH ROBINETTE BIDEN, Jr.  
of Wilmington, Delaware

Accused.

**CRIMINAL INDICTMENT**

Case No. 2021-\_\_\_\_\_

**CRIMINAL INDICTMENT**

THE CITIZENS GRAND JURY CHARGES THAT:

**I. GENERAL ALLEGATIONS**

1. This Citizens' Grand Jury indictment redresses the deaths of U.S. military personnel and civilians caused by the manner in which President JOSEPH ROBINETTE BIDEN, Jr. knowingly and willfully abandoned U.S. citizens and Afghan U.S. allies to terrorists and mortal enemies of the United States. In addition, he ordered a drone strike after U.S. military and Afghan allies were killed and wounded at the Kabul airport, despicably for political purposes, which resulted in the deaths of innocent civilians, including children. To date, JOSEPH ROBINETTE BIDEN'S administration will not name or identify who they killed to create the false impression that he was retaliating on the deaths of our military citizens and Afghan allies.

2. It is not within the scope of this indictment to decide whether or not the United States' military presence in Afghanistan should have ended, nor whether the previous administration should or should not have handled the issue differently.

3. JOSEPH ROBINETTE BIDEN, JR. was elected to the U.S. Senate as a Senator from the State of Delaware in 1972 and was re-elected continuously through the November 2008 election.<sup>i</sup>

4. In November 2008, JOSEPH ROBINETTE BIDEN, JR. was elected nationwide as Vice President in Barack Obama's Administration.<sup>ii</sup>

5. On or about November 3, 2020, JOSEPH ROBINETTE BIDEN, JR. was deemed elected President of the United States.<sup>iii</sup>

6. For decades in the U.S. Senate and during Barack Obama's election campaigns for President in 2008 and 2012, and his campaign in 2020 to be elected president, and thereafter, JOSEPH ROBINETTE BIDEN, JR. claimed and claims to be and was reputed to be a national expert in foreign policy and international relations.<sup>iv</sup>

7. President Barack Obama selected JOSEPH ROBINETTE BIDEN, JR. as his Vice-Presidential running mate, despite the small size of Biden's home state of Delaware in the Electoral College. Obama was largely perceived to have done this because he had little foreign policy experience while JOSEPH ROBINETTE BIDEN, JR. presented himself and was accepted by the Washington, D.C. establishment and news media as being highly knowledgeable in international relations and possessing a keen understanding of the United States' role in the world relative to other countries.

8. By his own admissions, JOSEPH ROBINETTTE BIDEN, JR., has studied and is familiar with the history of Afghanistan including the invasion by the Soviet Union, the coalition of Islamic jihadi fighters who defeated the Soviet Army, the terrorist attacks of September 11, 2001, and the U.S. military response to the Taliban as part of his focus and supposed expertise in international relations from 1973 through 2021.

9. In 2001, the government of Afghanistan was dominated by a terrorist force known as the Taliban.

10. In 2001, the United States demanded that the Taliban-led government of Afghanistan hand over to the United States for prosecution, alleged Al Qaeda leader and mastermind of the 9/11 attacks on the United States Osama bin Laden, along with other Al Qaeda leaders and fighters. Then U.S. President George W. Bush further demanded that the Taliban leaders end any support, sanctuary or comfort for Al Qaeda within Afghanistan's borders.

11. On September 11, 2001 and continuous to today, Taliban leaders maintain the United States has presented no evidence that Osama bin Laden played any role in the attacks, and has refused to comply with U.S. demands. When the Taliban failed to remove its support for and protection of Osama bin Laden and Al Qaeda, a coalition of nations led by the United States and the United Kingdom invaded Afghanistan on December 17, 2001.

12. During the 20-year military presence of the United States in Afghanistan, the U.S. military trained members of the Afghan military in the use and maintenance of U.S. military equipment and vehicles, including Humvees, MRAP attack vehicles, Blackhawk helicopters, sophisticated surveillance drones, advanced night vision optics, explosive ordnance, light arms, ammunition, body armor and more.

13. On January 20, 2017, Donald J. Trump was sworn in as President of the United States. <sup>v</sup>

14. During his term of office, President Trump made plans and implemented directives to end the military presence of the United States in Afghanistan.

15. The Trump Administration negotiated detailed agreement that specified

milestones and described a proposed timeline for the draw-down and withdrawal of the U.S. military from Afghanistan. The specific details of this negotiation are beyond the scope of this indictment.

16. The Trump Administration proposed the target date of May 1, 2021, for the withdrawal of the U.S. military from Afghanistan, provided the Taliban upheld the agreement and did not attack or thwart U.S. personnel.

17. After the United States, United Kingdom and a coalition of other countries overthrew the Taliban government in 2001 and 2002, the people of Afghanistan created their own constitution, ratified the Afghanistan Constitution, and conducted several elections by all the people of Afghanistan choosing their elected leaders under the Afghanistan Constitution.

18. The Trump Administration conducted negotiations and created plans with both the legitimate, elected, constitutional government of Afghanistan and the renegade terrorist Taliban forces which threatened it, who were illegal and illegitimate under the Afghanistan Constitution.

19. The Trump Administration's terms for military withdrawal included a requirement that the Taliban acknowledge the elected government of Afghanistan, pursuant to the Afghanistan Constitution, as the legitimate government of Afghanistan.

20. As the Trump Administration came to an end in late 2020, the Taliban increasingly violated their assurances and conditions of the U.S. withdrawal, and began taking cities and provinces by force, seizing control from the legitimate constitutional government of Afghanistan.

21. On November 3, 2020, the United States Presidential election took place. Amid controversy stemming from allegations of fraud and other election irregularities including but not

limited to the massive use of mail in ballots and a lack of bona fide voter identification in key swing states, JOSEPH ROBINETTE BIDEN, Jr. was elected.

22. On January 20, 2021, JOSEPH ROBINETTE BIDEN, Jr. was sworn in as President of the United States of America.

23. As President, JOSEPH ROBINETTE BIDEN, Jr. began a dramatic and rapid-paced campaign of reversing numerous significant decisions and policies of the Trump Administration by issuing record breaking numbers of executive orders in his first week in office explicitly over-turning Trump Administration decisions and policies.

24. President JOSEPH ROBINETTE BIDEN, Jr. deviated from President Trump's plans for the military withdrawal, including changing the withdrawal date from May 1, 2021, to August 31, 2021.

25. On or about April 13, 2021 the Associated Press reported that sources within the Biden Administration indicated that President JOSEPH ROBINETTE BIDEN, Jr. would withdraw all U.S. troops from Afghanistan by the 20<sup>th</sup> Anniversary of the terrorist attacks of September 11, 2001. (<https://apnews.com/article/joe-biden-afghanistan-taliban-d2c54073ce67f3b162c77b4f9f2f0ddd>)

26. In defiance of the Trump Administration agreement, President JOSEPH ROBINETTE BIDEN, Jr. changed the date of the withdrawal from May 1 to August 31.

27. Critics of President Biden claim he picked the date for arbitrary, political reasons and for his own benefit, anticipating he will be revered for ending the war at the time of remembrances of September 11, 2021.

28. On or about July 6, 2021, the Associated Press reported that U.S. military commanders and personnel shut down and abandoned Bagram Air Force Base. This included

cutting electrical power to the base and providing no information or warning to Afghan Commanders charged with operating the base.

29. In a press conference on or around August 27, 2021 President JOSEPH ROBINETTE BIDEN, Jr. affirmed that his U.S. military and intelligence advisors determined Bagram Air Base was of no significant value. President Biden reaffirmed his decision to deliberately close a large, sophisticated, defensible air base more than one month prior to the scheduled exfiltration of U.S. citizens, U.S. allies, military personnel and equipment.

30. After JOSEPH ROBINETTE BIDEN, Jr. was sworn in as President, the Taliban's military attacks accelerated and – in violation of their commitments to the Trump Administration – the Taliban conquered more and more towns, cities, and provinces.

31. JOSEPH ROBINETTE BIDEN, Jr. ignored these accelerating provocations and violations of the Taliban's commitments that the Taliban would honor the elected constitutional government of Afghanistan.

32. Taliban insurgents on August 11, 2021, captured airports in the Afghan provinces of Farah and Kunduz as the U.S. military withdrew. Reports also said the insurgents took control of an Afghani Army Corps base in Kunduz after hundreds of soldiers surrendered to them. <sup>vi</sup>

33. On August 11, 2021, at the direction of JOSEPH ROBINETTE BIDEN, Jr., the U.S. military abandoned and provided to the Taliban around 100 U.S.-made Humvees and MaxxPro Mine Resistant Ambush Protected vehicles (MRAPs) as well as U.S. ScanEagle drones, hundreds of high-power military automatic weapons, the Kunduz Airport, and about 85 billion dollars of other sophisticated American weaponry throughout the country. <sup>vii</sup>

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34. On or about August 2021, at the direction of JOSEPH ROBINETTE BIDEN, Jr., the U.S. military left behind thousands of prisoners, including Al Qaeda terrorists, who had been imprisoned at the air base. <sup>ix</sup>

35. As a result, the Taliban released the prisoners, adding to their numbers of fighters and terrorists in their assault upon the elected government of Afghanistan.

36. Following JOSEPH ROBINETTE BIDEN, Jr.'s orders, the U.S. military abandoned massive quantities of military vehicles, aircraft and equipment at Bagram. <sup>x</sup>

37. As a result, JOSEPH ROBINETTE BIDEN, Jr.'s orders fueled the rapid conquest of Afghanistan by replenishing the ranks of the Taliban fighters and arming the Taliban with military equipment, weapons, and supplies.

38. Reportedly, JOSEPH ROBINETTE BIDEN, Jr.'s orders provided the Taliban with enough military aircraft to have an air force larger than around 100 countries, including Australia.

39. Although some observers scoffed that the Taliban would not be able to use these aircraft, members of the Afghan Army trained by the U.S. military defected to the Taliban and have in fact been able to fly Blackhawk helicopters and other U.S. military vehicles and airplanes.

40. As a result, JOSEPH ROBINETTE BIDEN, Jr. further created an extremely dangerous situation by arming and replenishing the ranks of the Taliban forces soon attacking the capital of Kabul, Afghanistan.

41. JOSEPH ROBINETTE BIDEN, Jr. knowingly and willfully created an unreasonable and extreme danger of death, torture, imprisonment, kidnapping, hostage-taking, slavery, and/or rape to U.S. citizens and Afghan contractors to the U.S. Government.

42. JOSEPH ROBINETTE BIDEN, Jr., knew during these events that an estimated 11,000 to 49,000 U.S. citizens were present at that time in Afghanistan, not only in the capital of Kabul but throughout the countryside of Afghanistan.

43. JOSEPH ROBINETTE BIDEN, Jr. knew that thousands of Afghanistan nationals worked as employees or contractors of the U.S. military and/or U.S. Embassy in various roles as translators, guides, advisors, drivers, support staff, etc. during the 20-year occupation of Afghanistan by the coalition countries including the United States.

44. As part of the U.S. military's personnel, JOSEPH ROBINETTE BIDEN, Jr., owed these Afghans under conditions of military conflict, which he created, protection along with the U.S. military and U.S. citizens.

45. It was at all times relevant herein and is now JOSEPH ROBINETTE BIDEN, Jr. duty to safeguard the safety of U.S. civilians.

46. It was at all times relevant herein and is now JOSEPH ROBINETTE BIDEN, Jr. duty to know or find out which U.S. citizens were present in Afghanistan.

47. Because every U.S. citizen traveling abroad is issued on request a U.S. passport and is processed through international travel with that passport, it was possible for JOSEPH ROBINETTE BIDEN, Jr. to know or order the identification of all U.S. citizens present in Afghanistan through the U.S. State Department, the Embassy of Afghanistan in Washington, D.C., still under the control of the legitimate constitutional government of Afghanistan, and the U.S. Department of Homeland Security. Passport records, visa records from the Afghanistan Embassy and travel records could be assembled to identify all U.S. citizens who had traveled to Afghanistan and contact with those citizens could determine if they had safely left.

48. Instead, despite publicly stating that there were at least 11,000 U.S. civilian

citizens in Afghanistan, JOSEPH ROBINETTE BIDEN, Jr. directed the evacuation of only about 6,000 U.S. civilian citizens.

49. Specifically, JOSEPH ROBINETTE BIDEN, Jr. chose to maintain the withdrawal deadline of August 31, 2021, at the expense of intentionally, knowingly, and willfully leaving U.S. citizens including civilians abandoned and stranded inside Afghanistan behind enemy lines at risk of death, injury, and imprisonment as hostages.

50. Republican Members of Congress tried to get legislation passed that would require the U.S. military to remain in Afghanistan until such time and with sufficient force to protect and transport every U.S. citizen, including diplomats and civilians, out of Afghanistan,<sup>xi</sup> but the Speaker of the House Nancy Pelosi refused to allow a vote on the bill.

51. Furthermore, the U.S. State Department under the direction of JOSEPH ROBINETTE BIDEN, Jr. demanded payment of \$2,000 per person for U.S. citizens other than employees of the U.S. Embassy to be flown out of harm's way – harm created by JOSEPH ROBINETTE BIDEN, Jr. – from Kabul airport.

52. When Republican Members of Congress filed legislation to prohibit the Biden Administration for charging U.S. citizens for being saved from the danger of being left behind among the anti-American Taliban terrorists,<sup>xii</sup> the Biden Administration dropped the requirement.

53. However, the demand for payment to leave Afghanistan, including in official State Department forms and communications, discouraged U.S. citizens from finding their way to the airport to be evacuated, directly increasing the likelihood of U.S. citizens being stranded in Afghanistan.

54. Furthermore, as continued news flowed out – including contacts with U.S.

Members of Congress from the ground – of U.S. citizens being beaten, harassed, blocked, and questioned by the Taliban trying to reach the Kabul airport to escape, JOSEPH ROBINETTE BIDEN, Jr. prohibited military action outside of the security ring around Kabul airport prohibiting the U.S. military from traveling out in force and rescuing those U.S. citizens from chaotic crowds out in the city dominated by Taliban terrorists.

55. In fact, reports continued to flow out of Kabul that when U.S. citizens showed their U.S. passports at Taliban checkpoints to try to reach the U.S. evacuation at the Kabul airport, the Taliban terrorists routinely grabbed, stole, and confiscated the U.S. passports.

56. Nevertheless, JOSEPH ROBINETTE BIDEN, Jr. took no action and restrained the U.S. military from taking action by sending military forces out in strength to rescue these U.S. citizens and/or escort them safely to the airport.

57. Instead of taking all necessary action, including keeping the U.S. military in Afghanistan as long as necessary to evacuate all U.S. citizens, JOSEPH ROBINETTE BIDEN, Jr. stuck to the arbitrary and political deadline of August 31, 2021.

58. That is, JOSEPH ROBINETTE BIDEN, Jr. put the political goals of meeting that arbitrary deadline above and ahead of the safety and well-being of U.S. citizens.

59. Giving a speech to the nation on August 31, 2021, JOSEPH ROBINETTE BIDEN, Jr. admitted that he had abandoned in war-torn Afghanistan about 10% of the Americans who remained there, evacuating only about 90%:

The president during the speech said, “the bottom line” — now that the U.S. evacuations are complete and service members will not be shuttling Americans and high-risk Afghans out of the country — is only “90 percent of Americans in Afghanistan who wanted to leave were able to leave. And for those remaining Americans, there is no deadline. We remain committed to get them out if they want to come out.”

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60. However, from other pronouncements, the number abandoned could be between 6,000 and 40,000 U.S. citizens scattered throughout the entire country of Afghanistan, not just in the capital city of Kabul.

61. U.S. Secretary of State Antony Blinken was unable to say how many Americans were left in Afghanistan after the military finished withdrawing from the country. <sup>xiv</sup>

62. On Tuesday's broadcast of MSNBC's "Hallie Jackson Reports," Rep. Andy Kim (D-NJ) stated that his office has received more than 11,000 requests for evacuation from Afghanistan and has been pushing on requests from Americans that are still in the country. Kim further stated that "many of them have been stuck outside the airport gates for hours, and now that the final planes have left, they are left with a lot of concern about what comes next, and they have a lot of questions." <sup>xv</sup>

63. Kim stated, "My office, we've been inundated, we've now hit over 11,000 evacuation requests. The ones that we've been pushing the hardest on right now are the Americans that we still know there in Afghanistan, and I'll tell you, it was — it's been really tough for the last few days, just hearing how difficult it's been for them. They've been — many of them have been stuck outside the airport gates for hours, and now that the final planes have left, they are left with a lot of concern about what comes next and they have a lot of questions. So, we as a nation need to respond."

64. Massive, sophisticated private efforts to evacuate U.S. citizens and Afghans who served the U.S. military such as former U.S. military members code named "Task Force Pineapple Express" report that the U.S. State Department, at the direction of JOSEPH ROBINETTE BIDEN, has fought them at every step to prevent the rescue of U.S. citizens and Afghan allies.

65. A similar effort by the Nazarene Fund led by Glenn Beck and others funded by \$28 million in donations reported that the U.S. State Department reporting to JOSEPH ROBINETTE BIDEN, Jr. were standing in the way of evacuations from Afghanistan. <sup>xvi</sup>

66. The Nazarene Fund reported that that several neighboring countries to Afghanistan had already stepped up to take in Afghan refugees. However, the U.S. Department under JOSEPH ROBINETTE BIDEN, Jr. told these governments to stop taking in the Afghan refugees. <sup>xvii</sup>

67. When Oklahoma Congressman Markwayne Mullin (R) arrived in neighboring Tajikistan with a large amount of cash, to hire a helicopter to go into Afghanistan so he could rescue a family of five Americans, one woman and her four children, the U.S. Embassy refused to help this mission to rescue five U.S. civilian citizens and actively blocked Rep. Mullin's efforts to get these Americans out of Afghanistan.

68. Rep. Victoria Spartz (R-IN) said that her office has been in contact with an American left in the country by the Biden administration. She added that the person she was in contact with was not assisted by the offices set up by Biden's administration before the withdrawal was complete.

69. Spartz wrote to President JOSEPH ROBINETTE BIDEN, Jr. "In the aftermath of your administration's mishandled withdrawal from Afghanistan, it is estimated that hundreds of Americans wishing to leave Afghanistan were abandoned and remain in the Taliban-controlled country, facing terror and death." <sup>xviii</sup>

70. As just one example, a 3-year-old born near Sacramento with an American passport is stranded in Afghanistan, unable to leave the country, according to KGO, a Bay Area affiliate of ABC. The report hides the child's identity and his family members fear being captured by the Taliban terrorists. <sup>xix</sup>

71. James Brown is a veteran's advocate who has been working with Democrat Rep. Jackie Speier (CA)'s office to get the family back to the United States safely.

72. At least 24 students from the Sacramento area students are confirmed to be still stranded in Afghanistan. San Juan Unified School District staff said 24 students had not returned. <sup>xx</sup> After the final withdrawal of U.S. troops on August 30, 2021, the students were still in Afghanistan. <sup>xxi</sup>

73. The willful and negligent actions and non-actions of JOSEPH ROBINETTE BIDEN already resulted already in the murder of 13 U.S. servicemen, at least tens of U.S. servicemen wounded, and the deaths of hundreds of Afghans, involving an admitted ten civilians, including seven children, who worked for, allied to, and were loyal to the United States in its efforts to defeat the Taliban.

74. JOSEPH ROBINETTE BIDEN has given orders through the Department of State not to cooperate fully with private efforts by American patriots who are attempting to extract American citizens and Afghan allies from Afghanistan, and as a result private rescue missions and planes have been denied the ability to land at airports.

## II. COUNTS

### COUNT ONE

#### *Criminally Negligent Homicide (Covered within the broad reach of 18 U.S.C. 51)*

75. The previous allegations of the entirety of this Indictment are repeated and re-alleged as incorporated herein with the same force and effect as if fully set forth herein.

76. The crime of criminally negligent homicide involves causing someone's death by acting in a manner that was reckless, inattentive, or careless.

77. As required to indict, the prosecution has shown:

- a) That the defendant knew that their behavior included unjustifiable risk and that this caused another person to die. For instance, should someone be accidentally shot after playing with a gun, and a second person does not phone medical help, that person could be charged with negligent homicide, as this is an unjustifiable risk, since everyone is expected to know a shot wound can lead to death.
- b) That an act of omission took place. In some states, causation doesn't have to be demonstrated, and omission is enough for a charge. Using the example above of the gunshot wound, the state would have to prove that the defendant would have lived if the other did phone for medical help.
- c) That there is causation. Often, causation has to be demonstrated through an affirmative act. For instance, if someone drives over the speed limit in a school zone when children are exiting the school, and hits and kills a child, there is clear cause and effect relationship.

78. Negligent homicide, in other words, happens when someone causes the death of another through criminal negligence. Criminal negligence happens when someone behaves in a way that he or she should have known is risky. It is a much lower intent, but still a serious crime.

79. By the actions of JOSEPH ROBINETTE BIDEN, JR., tens if not hundreds of U.S. citizens and Afghans have suffered death, and many will suffer death, imprisonment, torture, beatings, enslavement, and/or rape.

80. JOSEPH ROBINETTE BIDEN, Jr. knowingly and willfully created an unjustified and foreseeably dangerous circumstance at the small city, civilian airport in Kabul, Afghanistan, besieged by Taliban fighters.

81. By surrendering the rest of the country, JOSEPH ROBINETTE BIDEN, Jr. created a circumstance in which the Taliban fighters throughout the country of Afghanistan were able to concentrate in Kabul to surround, harass and impede the evacuations from Kabul airport.

82. JOSEPH ROBINETTE BIDEN, Jr. creating a concentrated “kill zone” in the packed crowds around the civilian Kabul airport, JOSEPH ROBINETTE BIDEN, Jr. negligently caused the foreseeable death of at least 11 U.S. Marines (with other Marines seriously wounded) 1 Army soldier, 1 Navy Corpsman, as well as the deaths of around 100 Afghan nationals when a Taliban or ISIS suicide bomber and other terrorist shooters, obviously aligned with the anti-American and anti-Afghan terrorist interests of the Taliban attacked, maimed and killed the crowds assembled around Kabul airport trying to escape the country.

83. JOSEPH ROBINETTE BIDEN, Jr. has also abandoned as many as 6,000 U.S. civilian citizens – by his Administration’s own early numbers – distributed throughout Afghanistan – and removed their protection of the U.S. military such that hundreds of U.S. civilian citizens will be killed, injured, tortured, enslaved, and/or raped.

84. In addition, as disclosed recently, JOSEPH ROBINETTE BIDEN, Jr. ordered a drone strike to try to deflect from and to cover up for his own negligence, resulting not in the deaths of ISIS, Taliban, or Al Qaeda terrorists, but instead innocent civilians, at least 10 in

number, 7 of those deaths being those of children. The youngest victim Malika Ahmadi was only 2 years old. (htt)

**COUNT TWO**  
***Involuntary Manslaughter***

85. The previous allegations of the entirety of this Indictment are repeated and re-alleged as incorporated herein with the same force and effect as if fully set forth herein.

86. Involuntary manslaughter is defined as an unintentional killing that stems from reckless acts which constitute a criminal level of negligence.

87. In the alternative to reckless acts, the crime can also be a death that results from an unlawful act that is considered a misdemeanor or lower-level felony.

88. The basis of this crime when compared to voluntary manslaughter is that the victim's death was unintentional.

89. As per the first element of this crime, there is probable cause that someone was killed as a result of the actions of JOSEPH ROBINETTE BIDEN.

90. As per the second element of this crime, there is probable cause that the act was either inherently dangerous to others or was done with reckless disregard for the safety of people who could be affected.

91. The reckless disregard of danger to people's safety does not require the certainty that death will result but only the possibility of death. If the accused creates (by acts or failure to act) a risk of danger of injury or bodily harm not expecting anyone to die, but in fact as it turns out someone actually does die from that danger, the crime of involuntary manslaughter has been committed. There is probable cause of this as well.

92. As per the third and final element for this crime, there is probable cause that the JOSEPH ROBINETTE BIDEN knew or should have known that his or her conduct was a threat

to the lives or safety of others.

93. These elements include the accused creating a risk of injury or bodily harm to people short of death which actually does result in death. That is, if the accused could reasonably foresee that his actions or omissions could result in injury or bodily injury, and in fact death results instead, the crime of involuntary manslaughter has been committed. There is probable cause of this as well.

94. Reckless disregard of danger to people's safety does not require the certainty of death where the accused's actions or failures to act create the possibility of death. There is probable cause of this as well to indict JOSEPH ROBINETTE BIDEN.

**COUNT THREE**  
***Reckless Endangerment and Death of Vulnerable Children***

95. The previous allegations of the entirety of this Indictment are repeated and re-alleged as incorporated herein with the same force and effect as if fully set forth herein.

96. A person is guilty of reckless endangerment of a child either by (1) wanton or reckless conduct creating a substantial risk to a child or (2) wantonly and recklessly failing to take reasonable steps to reduce such a risk.

97. As stated above, JOSEPH ROBINETTE BIDEN, Jr. has knowingly placed children, both U.S. citizens and families of U.S. citizens, and families of Afghanistan, national employees, and contractors of the U.S. military in the hands of vicious terrorists who will mete out revenge and their version of the will of Allah by murdering, tormenting, enslaving, kidnapping, imprisoning, and/or raping these children.

98. In addition, as disclosed recently, JOSEPH ROBINETTE BIDEN, Jr. ordered a drone strike to try to deflect from and to cover up for his own negligence, resulting not in the deaths of ISIS, Taliban, or Al Qaeda terrorists, but instead innocent civilians, at least 10 in

number, 7 of those deaths being those of children. The youngest victim Malika Ahmadi was only 2 years old. (please properly cite. Website listed below “nbcnews”)

99. JOSEPH ROBINETTE BIDEN, Jr. knew that he could have used the most powerful military the world has ever known to take another week or two to evacuate all those who were in danger and needed to be evacuated to either the United States or another safe country in the region.

**COUNT FOUR**  
***Seditious Conspiracy***  
***(18 U.S.C. § 115)***

100. The previous allegations of the entirety of this Indictment are repeated and re-alleged as incorporated herein with the same force and effect as if fully set forth herein.

101. The criminal act element required for sedition is either advocating, aiding, organizing or publishing, or circulating written matter that advocates, aids, or teaches the overthrow of the U.S. government or any state, district, or territory thereof by *force or violence* (18 U.S.C. § 2385, 2011).

102. JOSEPH ROBINETTE BIDEN, Jr. has acted to arm the enemies of the United States, the terrorist Taliban regime, but also Russia, China, and Iran to whom the Taliban will sell the approximate \$85 billion of sophisticated U.S. military hardware and equipment left behind, for these and other enemies of the United States to study and reproduce our best military technology.

103. JOSEPH ROBINETTE BIDEN, JR. has armed, to a stunning level equal to or greater than Australia and 100 other nations, not only the terrorist group of the Taliban now in control of Afghanistan, but also all anti-American terrorist groups.

104. The Taliban in poor Afghanistan will be in great need of money and will

experience great pressure (foreseeable to JOSEPH ROBINETTE BIDEN, JR.) to sell U.S. military equipment and weapons to any and all terrorist groups and countries hostile to the United States.

105. JOSEPH ROBINETTE BIDEN, JR. is working actively against the United States in pursuit of his policies for destroying the United States as a separate sovereign nation that “puts America first.”

**COUNT FIVE**  
***Treason***  
**(18 U.S.C. § 2381)**

106. The previous allegations of the entirety of this Indictment are repeated and re-alleged as incorporated herein with the same force and effect as if fully set forth herein.

107. The **criminal act** element required for treason is that

- a) One owes allegiance to the United States, but also
- b) levies war against them the United States, or
- c) adheres to the enemies of the United States, or
- d) gives the enemies of the United States aid and comfort within the United States or elsewhere.

108. JOSEPH ROBINETTE BIDEN, JR. has effectively armed, to a stunning level equal to or greater than Australia and 100 other nations, not only the terrorist group of the Taliban now in control of Afghanistan, but also all anti-American terrorist groups.

109. The Taliban in poor Afghanistan will be in great need of money and will experience great pressure (foreseeable to JOSEPH ROBINETTE BIDEN, JR.) to sell U.S. military equipment and weapons to any and all terrorist groups and countries hostile to the United States.

110. JOSEPH ROBINETTE BIDEN, JR. has directly or indirectly armed militarily most or all of the enemies of the United States.

111. Furthermore, JOSEPH ROBINETTE BIDEN, JR. has taken these actions to directly benefit China, which has bribed JOSEPH ROBINETTE BIDEN, JR. through his son Hunter Biden.

112. Afghanistan has an estimated \$1 trillion worth of rare minerals and metals, notably Lithium, which the Afghans do not have the technology and expertise to extract.

113. China however has already moved to obtain those rare minerals, rare metals, and rare earth for the benefit of China's economy and military expansion program in return for funds badly needed by the Afghan people.

114. Simultaneously, JOSEPH ROBINETTE BIDEN, JR. is working to force U.S. drivers to switch to electric vehicles, which require rechargeable batteries which require lithium to operate.

115. The U.S. supply of lithium is too small to meet this demand.

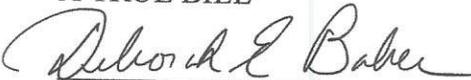
116. Thus, JOSEPH ROBINETTE BIDEN, JR. is shepherding the United States economy into dependency upon China, including the necessity of acquiring batteries made with lithium, lithium that JOSEPH ROBINETTE BIDEN, JR. has just in effect "gifted" to China and other adversaries such as Russia through the fall of Afghanistan to the financially-strapped Taliban.

117. JOSEPH ROBINETTE BIDEN, through the U.S. Department of State, has thwarted rescue efforts by Americans, including but not limited to retired military, to themselves remove American citizens and Afghan allies from Afghanistan, after American forces exited the country in total on August 30, 2021, and thus left these persons stranded and in great danger in a

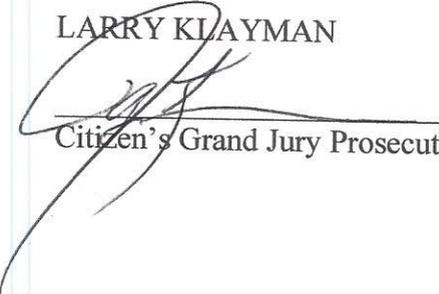
terrorist country.

118. JOSEPH ROBINETTE BIDEN, JR. actions were foreseeable, knowing, and willful well in advance of the actual events, with sufficient time to understand and avoid them.

A TRUE BILL

  
FOREPERSON

LARRY KLAYMAN

  
Citizen's Grand Jury Prosecutor

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- ii <https://www.whitehouse.gov/administration/president-biden/>
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- iv <https://www.cbsnews.com/news/obama-picks-joe-biden-as-running-mate/>
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[https://twitter.com/JulianRoepcke/status/1425751441629716485?ref\\_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwtterm%5E1425751441629716485%7Ctwgr%5E%7Ctwcon%5Es1\\_&ref\\_url=https%3A%2F%2Famericanmilitarynews.com%2F2021%2F08%2Fpics-videos-taliban-captures-hundreds-of-us-military-vehicles-drones-to-keep-taking-over-afghanistan%2F](https://twitter.com/JulianRoepcke/status/1425751441629716485?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwtterm%5E1425751441629716485%7Ctwgr%5E%7Ctwcon%5Es1_&ref_url=https%3A%2F%2Famericanmilitarynews.com%2F2021%2F08%2Fpics-videos-taliban-captures-hundreds-of-us-military-vehicles-drones-to-keep-taking-over-afghanistan%2F)
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- ix [https://twitter.com/CBS\\_Herridge/status/1426894617493098505?ref\\_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwtterm%5E1426894617493098505%7Ctwgr%5E%7Ctwcon%5Es1\\_&ref\\_url=https%3A%2F%2Fwww.dailywire.com%2Fnews%2Freport-taliban-overrun-bagram-air-base-numerous-high-value-prisoners-al-qaeda-members-freed](https://twitter.com/CBS_Herridge/status/1426894617493098505?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwtterm%5E1426894617493098505%7Ctwgr%5E%7Ctwcon%5Es1_&ref_url=https%3A%2F%2Fwww.dailywire.com%2Fnews%2Freport-taliban-overrun-bagram-air-base-numerous-high-value-prisoners-al-qaeda-members-freed)
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