

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA

v.

**DONALD RAY HURST JR.,
CHAD ALLEN KRON**

) CRIMINAL NO. 3:24-cr-00304
) 18 U.S.C. § 1366(a)
) 18 U.S.C. § 922(g)(1)
) 18 U.S.C. § 924(a)(8)
) 18 U.S.C. § 924(d)(1)
) 18 U.S.C. § 924(e)
) 18 U.S.C. § 981(a)(1)(C)
) 18 U.S.C. § 981(a)(1)(G)
) 26 U.S.C. § 5861(d)
) 26 U.S.C. § 5871
) 26 U.S.C. § 5872
) 28 U.S.C. § 2461
) 49 U.S.C. § 80303

**SEALED SECOND SUPERSEDING
INDICTMENT**

COUNT 1

THE GRAND JURY CHARGES:

That beginning at a time unknown to the Grand Jury, but beginning at least in or around 2022, and continuing thereafter, up to and including 2023, in the District of South Carolina, the Defendants, **DONALD RAY HURST JR.** and **CHAD ALLEN KRON**, did knowingly and willfully conspire and agree with each other to knowingly and willfully damage and attempt to damage the property of an energy facility involved in the production, storage, transmission, and distribution of electricity, in an amount exceeding or which would have exceeded \$100,000, and did cause a significant interruption or impairment of a function of the energy facility;

In violation of Title 18, United States Code, Section 1366(a).

RECEIVED

AUG 27 2024

FLORENCE, S.C.

COUNT 2

THE GRAND JURY FURTHER CHARGES:

That in or around April 2, 2024, in the District of South Carolina, the Defendant, **DONALD RAY HURST JR.**, knowingly possessed firearms in and affecting commerce, to wit, a Taurus Model PT 92, 9mm pistol and a Walther, Model P22, .22 caliber pistol, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(8), and 924(e).

COUNT 3

THE GRAND JURY FURTHER CHARGES:

That on or about April 2, 2024, in the District of South Carolina, the Defendant, **CHAD ALLEN KRON**, knowingly possessed a firearm, that is, a destructive device as defined in 26 U.S.C. § 5845(a) and (f), not registered to him in the National Firearms Registration and Transfer Record;

In violation of Title 26, United States Code, Sections 5861(d) and 5871.

FORFEITURE**FIREARM OFFENSES:**

Upon conviction for felony violations of Title 18 and Title 26, as charged in this Second Superseding Indictment, the Defendants, **DONALD RAY HURST JR.** and **CHAD ALLEN KRON**, shall forfeit to the United States all of the Defendants' rights, title, and interest in and to:

- (a) any firearms and ammunition (as defined in 18 U.S.C. § 921) –
 - (1) involved in or used in any knowing violation of 18 U.S.C. § 922, 26 U.S.C. § 5861 or violation of any other criminal law of the United States or intended to be used in a crime of violence.

DESTRUCTION OF AN ENERGY FACILITY:

Upon conviction for violation of Title 18, United States Code, Section 1366 as charged in this Second Superseding Indictment, the Defendants, **DONALD RAY HURST JR.** and **CHAD ALLEN KRON**, shall forfeit to the United States any property used or intended to be used, in any manner or part, to commit or facilitate the commission of the offense, and any property, real or personal, which constitutes, is traceable, or is derived from any proceeds the Defendants obtained, directly or indirectly, as the result of such violation.

PROPERTY:

Pursuant to Title 18, United States Code, Sections 924(d)(1), 981(a)(1)(C) and 981(a)(1)(G), Title 26, United States Code, Section 5872, Title 49, United States Code, Section 80303, and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for the offenses charged in this Second Superseding Indictment includes, but is not limited to, the following:

A. Firearms:

- (1) Taurus Model PT 92, 9mm pistol
Serial Number: TEX47387
Seized from: Donald Ray Hurst, Jr.
Asset ID: 24-FBI-003962
- (2) Walther, Model P22, .22-caliber pistol
Serial Number: Z044967
Seized from: Donald Ray Hurst, Jr.
Asset ID: 24-FBI-003962
- (3) Ruger MK II, .22LR caliber pistol
Serial Number: 1879952
Seized from: Chad Allen Kron
Asset ID: 24-FBI-006313

B. Ammunition/Magazines:

Miscellaneous ammunition and magazines
Seized from: Chad Allen Kron
Asset ID: 24-FBI-006313

C. Explosive Devices:

- (1) White Pipe with End Caps
Seized from: Chad Allen Kron
Asset ID: 24-FBI-006370
- (2) Grenade
Seized from: Chad Allen Kron
Asset ID: 24-FBI-006370
- (3) Four Black Cat 3-Peat Rocket Firework
Seized from: Chad Allen Kron
Asset ID: 24-FBI-006370
- (4) Grey PVS Pipe with End Cap
Seized from: Chad Allen Kron
Asset ID: 24-FBI-006370
- (5) Green Hobby Fuse
Seized from: Chad Allen Kron
Asset ID: 24-FBI-006370

(6) Firework Bottle Rockets – Whistling Moon Travelers
Seized from: Chad Allen Kron
Asset ID: 24-FBI-006370

(7) PVC End Caps
Seized from: Chad Allen Kron
Asset ID: 24-FBI-006370

(8) Hot Glue Sticks
Seized from: Chad Allen Kron
Asset ID: 24-FBI-006370

D. Cash Proceeds / Forfeiture Judgment:

A sum of money equal to all proceeds the Defendants obtained, directly or indirectly, from the offense charged in this Second Superseding Indictment, and all interest and proceeds traceable thereto, and/or that such sum equals all property derived from or traceable to their violation of 18 U.S.C. § 1366.

SUBSTITUTE ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of a Defendant-

- A. Cannot be located upon the exercise of due diligence;
- B. Has been transferred or sold to, or deposited with, a third person;
- C. Has been placed beyond the jurisdiction of the court;
- D. Has been substantially diminished in value; or
- E. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the Defendants up to the value of the forfeitable property.

Pursuant to Title 18, United States Code, Sections 924(d)(1), 981(a)(1)(C) and 981(a)(1)(G), Title 26, United States Code, Section 5872, Title 49, United States Code, Section 80303 and Title 28, United States Code, Section 2461(c).

A TRUE BILL
[REDACTED]
J FOREPERSON

ADAIR F. BOROURHS
UNITED STATES ATTORNEY

By: Michael G. Shedd

Michael G. Shedd (#13314)

Lamar J. Fyall (#13629)

Assistant United States Attorneys

1441 Main Street, Suite 500

Columbia, South Carolina 29201

Tel: (803) 929-3000

Fax: (803) 254-2943

Michael.Shedd@usdoj.gov

Lamar.Fyall@usdoj.gov

RECORD OF GRAND JURY BALLOT

C/R 3:24 cr 304

UNITED STATES OF AMERICA v. DONALD RAY HURST, JR, ET AL.

(SEALED UNTIL FURTHER ORDER OF THE COURT)

RECEIVED

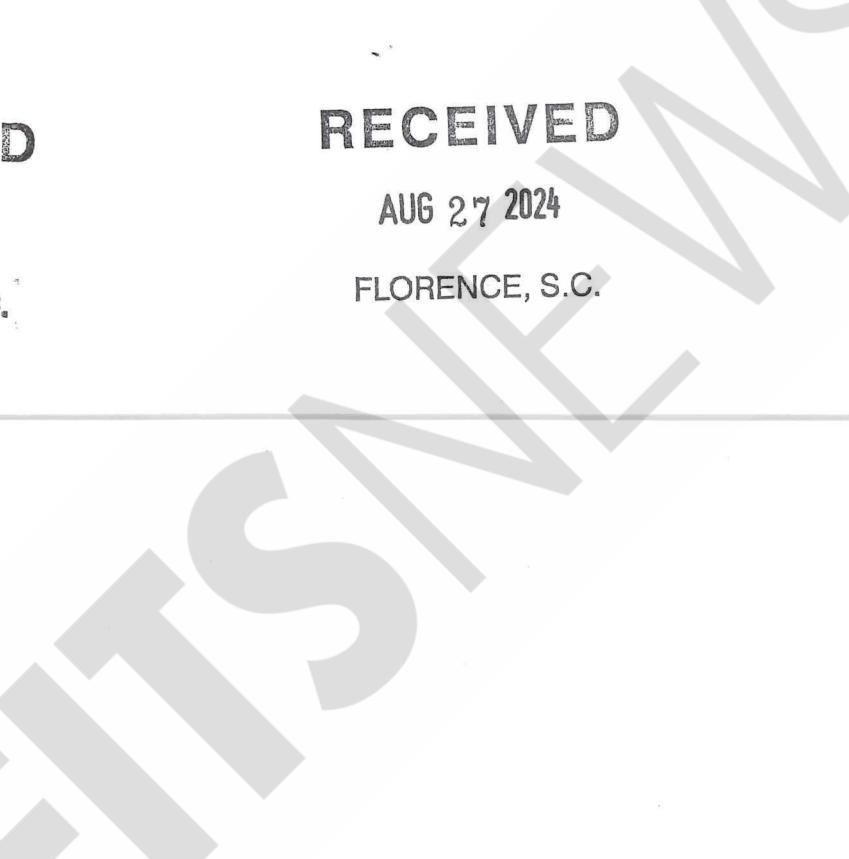
AUG 27 2024

FLORIDA, S.C.

RECEIVED

AUG 27 2024

FLORENCE, S.C.

A faint, large watermark is visible across the page, reading 'FIRST' vertically on the left and 'NEWS' vertically on the right, with a diagonal line separating them.