

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Criminal Case No. 24-cr-00006-CNS

UNITED STATES OF AMERICA,

Plaintiff,

v.

**ANDERSON LEE ALDRICH,
a/k/a Nicholas Brink,**

Defendant.

INFORMATION

The United States Attorney Charges that:

At all times relevant and material to this Information, unless otherwise
stated:

BACKGROUND

1. Club Q was one of only a few nightclubs in Colorado Springs, Colorado, catering to the LGBTQIA+ community. Club Q's large sign with rainbow colors, the rainbow-colored wood panels on its outside and its digital and physical advertising of scheduled programming proudly proclaimed its welcoming of people all along the gender and sexuality spectrums. Sign boards outside Club Q on November 19, 2022, showed that Club Q was hosting a drag show at 9:00 p.m. That show was part of a

weekend collection of events centered around Transgender Day of Remembrance that Club Q advertised.

2. The defendant ANDERSON LEE ALDRICH, a/k/a Nicholas Brink, (“the defendant”) used computers, internet service providers, web-based retail platforms, web-based financial payment process platforms, and interstate commercial mail carriers, to acquire firearm components, ammunition, and tactical gear in connection with a plan to commit a mass shooting at Club Q. Aldrich also used electronic communication service providers to plan the attack.

3. On or about November 19, 2022, the defendant drove to Club Q in a gold Toyota Highlander. Upon arrival, the defendant got out of the vehicle wearing a tactical vest with ballistic plates and walked into Club Q carrying a loaded 5.56 NATO caliber, gas-piston, AR-type Privately Manufactured Firearm (the “rifle”) and at least two additional magazines loaded with ammunition.

4. Once inside Club Q, the defendant began firing the rifle at Club Q’s patrons. The defendant killed five people, whose identities are known to the United States Attorney, with the rifle: D.A., R.G.V., K.L., A.P., and D.R.

5. As part of the premeditated attack on Club Q’s patrons, the defendant fired his rifle on the Club Q premises where forty-five patrons were present, whose identities are known to the United States Attorney, with the rifle: I.A., M.A., J.A., L.B., T.B., M.B., A.B., P.C., B.C., J.D., D.D., J.F., K.F., R.F., A.G., M.G., C.G., S.H., B.H., T.J., F.J., W.K., A.L., C.L., J.L., C.Lo, J.Lo, I.L., A.M., D.M., D.N., B.P., T.P.,

S.R., M.R., R.R., M.S., E.S., S.S., C.S., J.S., J.T., D.V., R.V., and B.W. All told, the defendant fired approximately 60 rounds of ammunition from the rifle.

6. As the defendant continued the attack, two of Club Q's patrons, R.F. and T.J., forcibly removed the rifle from the defendant's person. After being disarmed of the rifle, the defendant accessed a loaded Glock 17-type 9 x 19mm caliber Privately Manufactured Firearm (the "handgun") from the defendant's person and shot at patron T.J., who suffered serious bodily injury.

7. The defendant's attack on Club Q interfered with the club's ability to do business and provide a safe, fun, and welcoming environment for patrons who had gathered there during and after the drag show as part of a weekend of events related to Transgender Day of Remembrance. The defendant's attack further caused Club Q to cease commercial operations.

COUNTS 01-05

8. Paragraphs One through Five and Seven of this Information are hereby incorporated as to Counts One through Five of the Information.

9. On or about November 19, 2022, in the State and District of Colorado, the defendant ANDERSON LEE ALDRICH, a/k/a Nicholas Brink, willfully caused bodily injury to each of the people listed below, whose identities are known to the United States Attorney, because of the actual and perceived sexual orientation and gender identity of any person:

Count	Person
01	D.A.
02	R.G.V.
03	K.L.
04	A.P.
05	D.R.

In connection with each of the offenses in Counts One through Five, (1) the defendant used channels, facilities, and instrumentalities of interstate and foreign commerce; (2) the defendant employed a dangerous weapon that traveled in interstate and foreign commerce; (3) the defendant's conduct interfered with commercial and other economic activity in which the victims were engaged at the time; and (4) the defendant's conduct otherwise affected interstate and foreign commerce. The offenses resulted in the death of each person listed in Counts One through Five.

All in violation of Title 18, United States Code, Section 249(a)(2)(A)(ii)(I), (B)(ii), (B)(iii), (B)(iv)(I), and (B)(iv)(II).

COUNTS 06-24

10. Paragraphs One through Seven of this Information are hereby incorporated as to Counts Six through Twenty-Four of the Information.

11. On or about November 19, 2022, in the State and District of Colorado, the defendant ANDERSON LEE ALDRICH, a/k/a Nicholas Brink, willfully caused bodily injury to each of the people listed below, whose identities are known to the

United States Attorney, because of the actual and perceived sexual orientation and gender identity of any person:

Count	Person
06	I.A.
07	L.B.
08	T.B.
09	P.C.
10	J.D.
11	A.G.
12	B.H.
13	T.J.
14	F.J.
15	W.K.
16	C.L.
17	J.L.
18	J.Lo.
19	A.M.
20	T.Pr.
21	M.S.
22	E.S.

Count	Person
23	C.S.
24	J.S.

In connection with each of the offenses in Counts Six through Twenty-Four, (1) the defendant used channels, facilities, and instrumentalities of interstate and foreign commerce; (2) the defendant employed a dangerous weapon that traveled in interstate and foreign commerce; (3) the defendant's conduct interfered with commercial and other economic activity in which the victims were engaged at the time; and (4) the defendant's conduct otherwise affected interstate and foreign commerce. Each of the offenses charged in Counts Six through Twenty-Four included an attempt to kill.

All in violation of Title 18, United States Code, Section 249(a)(2)(A)(ii)(II), (B)(ii), (B)(iii), (B)(iv)(I), and (B)(iv)(II).

COUNTS 25-50

12. Paragraphs One through Seven of this Information are hereby incorporated as to Counts Twenty-Five through Fifty of the Information.

13. On or about November 19, 2022, in the State and District of Colorado, the defendant ANDERSON LEE ALDRICH, a/k/a Nicholas Brink, willfully attempted to cause bodily injury through the use of a firearm to each of the people listed below, whose identities are known to the United States Attorney, because of the actual and perceived sexual orientation and gender identity of any person:

Count	Person
25	M.A.
26	J.A.
27	M.B.
28	A.B.
29	B.C.
30	D.D.
31	J.F.
32	K.F.
33	R.F.
34	M.G.
35	C.G.
36	S.H.
37	A.L.
38	C.Lo.
39	I.L.
40	D.M.
41	D.N.
42	R.P.
43	S.R.

Count	Person
44	M.R.
45	R.R.
46	S.S.
47	J.T.
48	D.V.
49	R.V.
50	B.W.

In connection with each of the offenses in Counts Twenty-Five through Fifty, (1) the defendant used channels, facilities, and instrumentalities of interstate and foreign commerce; (2) the defendant employed a dangerous weapon that traveled in interstate and foreign commerce; (3) the defendant's conduct otherwise affected interstate and foreign commerce, and (4) the defendant's conduct interfered with commercial and other economic activity in which the victims were engaged at the time. Each of the offenses charged in Counts Twenty-Five through Fifty included an attempt to kill.

All in violation of Title 18, United States Code, Section 249(a)(2)(A)(ii)(II), (B)(ii), (B)(iii), (B)(iv)(I), and (B)(iv)(II).

COUNTS 51-55

14. Paragraphs One through Seven of this Information are hereby incorporated as to Counts Fifty-One through Fifty-Five of the Information.

15. On or about November 19, 2022, in the State and District of Colorado, the defendant ANDERSON LEE ALDRICH, a/k/a Nicholas Brink, knowingly used and carried firearms, namely, (1) an AR-15 style assault rifle with no serial number; and (2) a Glock-17-type pistol 9 mm, comprised of a Polymer 80, model PF940V2 9mm Caliber pistol with no serial number and a Glock slide and barrel bearing serial number AFXK404, during and in relation to, a crime of violence for which the defendant may be prosecuted in a court of the United States, namely, Hate Crimes Resulting in Death, in violation of Title 18, United States Code, Section 249(a)(2), as charged in Counts One through Five of this Information, and in the course of said offenses, discharged a firearm in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii). In the course of using, carrying, and discharging such firearms, the defendant caused the death of the persons listed below, whose identities are known to the United States Attorney, through the use of a firearm, which killings constituted murder, as defined in Title 18, United States Code, Section 1111(a):

Count	Corresponding Crime of Violence by Count	Person
51	01	D.A.
52	02	R.G.V.
53	03	K.L.
54	04	A.P.

Count	Corresponding Crime of Violence by Count	Person
55	05	D.R.

All in violation of Title 18, United States Code, Section 924(j)(1).

COUNTS 56-74

16. Paragraphs One through Seven of this Information are hereby incorporated as to Counts Fifty-Six through Seventy-Four of the Information.

17. On or about November 19, 2022, in the State and District of Colorado, the defendant ANDERSON LEE ALDRICH, a/k/a Nicholas Brink, knowingly used and carried firearms, namely, (1) an AR-15 style assault rifle with no serial number; and (2) a Glock-17-type pistol 9 mm, comprised of a Polymer 80, model PF940V2 9mm Caliber pistol with no serial number and a Glock slide and barrel bearing serial number AFXK404, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, namely, Hate Crimes, in violation of Title 18, United States Code, Section 249(a)(2), as charged in Counts Six through Twenty-Four of this Information, and in the course of said offenses, discharged a firearm.

Count	Corresponding Crime of Violence by Counts	Person
56	06	I.A.
57	07	L.B.
58	08	T.B.
59	09	P.C.
60	10	J.D.
61	11	A.G.
62	12	B.H.
63	13	T.J.
64	14	F.J.
65	15	W.K.
66	16	C.L.
67	17	J.L.
68	18	J.Lo.
69	19	A.M.
70	20	T.Pr.
71	21	M.S.
72	22	E.S.
73	23	C.S.

Count	Corresponding Crime of Violence by Counts	Person
74	24	J.S.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

COLE FINEGAN

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DEFENDANT: ANDERSON LEE ALDRICH a/k/a Nicholas Brink

AGE/YOB: 23/2000

COMPLAINT _____ Yes X No
FILED?

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ Yes X No

OFFENSE(S): Counts 1-5: 18 U.S.C. § 249(a)(2)(A)(ii)(I), (B)(ii), (B)(iii), (B)(iv)(I), and (B)(iv)(II) – Hate Crime Acts: Use of a Firearm or Dangerous Weapon To Cause Death
Counts 6-24: 18 U.S.C. § 249(a)(2)(A)(ii)(II), (B)(ii), (B)(iii), (B)(iv)(I), and (B)(iv)(II) – Hate Crime Acts: Use of a Firearm or Dangerous Weapon To Willfully Cause Bodily Injury and Attempt to Kill
Counts 25-50: 18 U.S.C. § 249(a)(2)(A)(ii)(II), (B)(ii), (B)(iii), (B)(iv)(I), and (B)(iv)(II) – Hate Crime Acts: Use of a Firearm or Dangerous Weapon To Attempt to Cause Bodily Injury and Attempt to Kill
Counts 51-55: 18 U.S.C. § 924(j)(1) – Use of a Firearm During and In Relation to a Crime of Violence to Commit Murder
Counts 56-74: 18 U.S.C. § 924(c)(1)(A)(iii) – Use of a Firearm During and in Relation to a Crime of Violence

LOCATION OF El Paso County, Colorado
OFFENSE:

PENALTY: Count 1-5: Any term of years or life imprisonment, NMT \$250,000 fine, or both; NMT 5 years' supervised release; \$100 Special Assessment.
Count 6-24: Any term of years or life imprisonment, NMT \$250,000 fine, or both; NMT 5 years' supervised release; \$100 Special Assessment.
Count 25-50: Any term of years or life imprisonment, NMT \$250,000 fine, or both; NMT 5 years' supervised release; \$100 Special Assessment.
Counts 51-55: Any term of years or life imprisonment or Death, NMT \$250,000 fine, or both; NMT 5 years' supervised release; \$100 Special Assessment.
Counts 56-74: NLT ten years' imprisonment, NMT life imprisonment, NMT \$250,000 fine, or both; NMT 5 years' supervised release; \$100 Special Assessment.

AGENT: SA Justin Kempf, FBI
SA Jason Walter, FBI

SA Chris Dishong, FBI

AUTHORIZED

BY:

Alison Connaughty, AUSA

Bryan Fields, AUSA

Maura White, Trial Attorney, CRT

ESTIMATED TIME OF TRIAL:

_____ five days or less; X over five days

THE GOVERNMENT:

X will seek detention in this case based on 18 U.S.C. § 3142(f)(1) and/or (f)(2).

_____ will not seek detention

The statutory presumption of detention **is** applicable to this defendant.