Case 3:20-cr-00103-KAD Document 11 Filed 07/08/20

0 Padjed States District Court District of Connecticut FILED AT NEW HAVEN Robin D. Tabora, Clerk By Deputy Clerk

UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT

GRAND JURY N-19-2

UNITED STATES OF AMERICA

v.

CHRISTOPHER RASCOLL

CRIMINAL NO. 3:20CR 103 (KAD) - (WIG)

VIOLATIONS: 42 U.S.C. § 3631(a) (Interference with Housing Rights)

18 U.S.C. § 875(c) (Threatening Communications)

INDICTMENT

The Grand Jury charges:

THE DEFENDANT AND VICTIM

At all times relevant to this Indictment:

1. The defendant CHRISTOPHER RASCOLL was itinerant and lived in multiple locations, including in the District of Connecticut.

2. The Victim, whose identity is known to the Grand Jury, was a person of Jewish faith and lived in the District of Connecticut.

<u>COUNT 1</u> (Interference with Housing Rights)

3. On or about the date set forth below, in the District of Connecticut and elsewhere, the defendant CHRISTOPHER RASCOLL by threat of force, willfully intimidated and interfered with, and attempted to intimidate and interfere with the Victim because of the Victim's religion and because the Victim was occupying a dwelling, and such acts included the threatened use of a dangerous weapon, explosives, and fire. Specifically, RASCOLL sent the Victim text messages containing the following:

COUNT	DATE	MESSAGE TYPE	MESSAGE
1	April 8, 2020	Text Message	"Seriously you cunt. I'm going to kill you. You better be gone because if you're in [Victim's housing community] Easter weekend I'm going to stick you in an oven. Or I'm going to shoot you. You're very TINY nobody. I will burn your house down with you in it you fucking trash cunt. I will kill you. Please go back to Jersey before I shoot you and burn you in the Pine Barrens. Please call the police. I dare you b[.] I'm back in [Victim's housing community] this weekend and you're dead if you're there. I should send you to a concentration camp."

All in violation of Title 42, United States Code, Section 3631(a).

<u>COUNTS 2 - 4</u> (Threatening Communications)

4. On or about the dates set forth below, in the District of Connecticut and elsewhere,

the defendant CHRISTOPHER RASCOLL knowingly and willfully transmitted in interstate and foreign commerce communications containing threats to injure the Victim. Specifically, RASCOLL sent the Victim text messages and left a voicemail message containing the following, as set forth below by count:

COUNT	DATE	MESSAGE TYPE	MESSAGE
2	May 5, 2020	Text Message	"Bitch I'm coming up there this week and I'm gonna shoot you in your fucking head I will fucking KILL U U SKANK WHORE CUNT ILk [sic] blow your fucking car and house up You're out. I'm gonna shoot you in your head Say your goodbyes [sic] to your family."
3	May 19, 2020	Text Message	"You're gonna die. I'll blow your fucking house and car up Call the police. I fucking DARE YOU TO I'm back in this weekend. Whether you or my mother like it or not. I'll shoot you dead in front of a cop."
4	June 26, 2020	Voicemail Message	"You better be gone by tomorrow. I'm coming in. I don't care if you like it or you don't. The police are not going to help you. The courts are not going to help you You

	can't hurt me legally or otherwise. Anything you have to say is null and void. You better be gone by tomorrow because if you're not I'm going to break your fucking door down and I'm gonna hit you over the head with a fuckin' bat I will kill you. If you go near my mother's house, if you go near my mother, if you go near anybody that has anything to do with us, any of our personal records, anything that is financially and legally classified by the government I will fuckin' kill you. I will shoot you in your fuckin' head."
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All in violation of Title 18, United States Code, Section 875(c).

A TRUE BILL:

/s/

FOREPERSON

UNITED STATES OF AMERICA

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LEONARD C. BOYLE FIRST ASSISTANT UNITED STATES ATTORNEY

AMANDA'S. OAKES ASSISTANT UNITED STATES ATTORNEY

ŚARALA V. NAGALA ASSISTANT UNITED STATES ATTORNEY