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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

| | | |
|---------------------------|---|---------------------------------------|
| UNITED STATES OF AMERICA, |) | No. 3:20-cr-00081-JMK-MMS |
| |) | |
| Plaintiff, |) | <u>COUNT 1:</u> |
| |) | TRANSMISSION OF INTERSTATE |
| vs. |) | THREAT |
| |) | Vio. of 18 U.S.C. § 875(c) |
| WILLIAM ALEXANDER, |) | |
| |) | <u>COUNT 2:</u> |
| Defendant. |) | OBSTRUCTION OF FREE EXERCISE |
| |) | OF RELIGIOUS BELIEFS |
| |) | Vio. of 18 U.S.C. § 247(a)(2), (d)(5) |
| |) | |

INDICTMENT

The Grand Jury charges that:

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COUNT 1

On or about November 1, 2019, within the District of Alaska, the defendant, WILLIAM ALEXANDER, called a synagogue in California and left a voicemail threatening to “kill” the congregants of the synagogue, and knowingly transmitted in interstate and foreign commerce any communication containing any threat to injure the person of another, for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat.

All of which is in violation of 18 U.S.C. § 875(c).

COUNT 2

On or about November 1, 2019, within the District of Alaska, the defendant, WILLIAM ALEXANDER, in and affecting interstate commerce, called a synagogue in California and left a voicemail threatening to “kill” the congregants of the synagogue, and intentionally obstructed and attempted to obstruct, by threat of force, any person in the enjoyment of that person’s free exercise of religious beliefs.

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All of which is in violation of 18 U.S.C. § 247(a)(2), (d)(5).

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Jonas Walker
JONAS M. WALKER
Assistant U.S. Attorney
United States of America

s/ Bryan Schroder
BRYAN SCHRODER
United States Attorney
United States of America

DATE: September 17, 2020