

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|---------------------------------|----------|--|
| UNITED STATES OF AMERICA | : | CRIMINAL NO. 23-276 |
| v. | : | DATE FILED: _____ |
| DONAVON ANTHONY PARISH | : | VIOLATIONS: |
| | : | 18 U.S.C. § 2261A(2) (cyberstalking - |
| | : | 1 count) |
| | : | 47 U.S.C. § 223(a)(1)(C) (abuse and |
| | : | harassment using a telecommunications |
| | : | device - 5 counts) |
| | : | Special Finding |

SUPERSEDING INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

BACKGROUND

At all times material to this Superseding Information:

1. Defendant DONAVON ANTHONY PARISH, a Mississippi resident, used a Voice over Internet Protocol (“VoIP”) service provider to obtain a telephone phone number which could be used from any smart phone, tablet, or desktop computer with an internet connection, despite having his own cellular telephone number.
2. VoIP technology allows users to transmit the human voice using a broadband internet connection instead of a cellular or analog telephone line.
3. Business 1, located in the Eastern District of Pennsylvania, is a delicatessen open daily to the public.

PARISH'S CYBERSTALKING TARGETING BUSINESS 1

4. Between on or about April 24, 2022 and April 29, 2022, in Philadelphia, in the Eastern District of Pennsylvania, the Southern District of Mississippi, and elsewhere, defendant **DONAVON ANTHONY PARISH,** with the intent to harass and intimidate employees and owners of Business 1, including S.T., B.S., and J.K., all known to the United States Attorney, used a facility of interstate and foreign commerce, that is, the internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to employees and owners of Business 1, including S.T., B.S., and J.K.

PARISH'S COURSE OF CONDUCT TARGETING BUSINESS 1

5. From in or about April 2022 to in or about May 2022, defendant DONAVON ANTHONY PARISH used VoIP calls to make a series of terroristic threats to individuals at Jewish institutions and organizations (including places of worship) and to individuals at Jewish-owned businesses across the United States. Defendant PARISH used VoIP to mask his identity.

6. In this series of VoIP calls, defendant DONAVON ANTHONY PARISH spoke to individuals answering the telephone on behalf of the institutions, organizations, or businesses. In these calls, defendant PARISH repeatedly referenced Adolf Hitler and the Nazi Party's genocide of approximately six million Jewish people, specifically stating, among other things, "HEIL HITLER," "ALL JEWS SHOULD BURN," "ALL JEWS MUST DIE," "WE WILL PUT YOU IN WORK CAMPS," "GAS THE JEWS," and "HITLER SHOULD HAVE FINISHED THE JOB."

7. Specifically, from on or about April 24 to on or about April 29, 2022, defendant DONAVON ANTHONY PARISH called Business 1 approximately 15 times.

8. During at least one of these calls to Business 1, defendant DONAVON ANTHONY PARISH stated to S.T., “HEIL HITLER.”

9. During other calls to Business 1, defendant DONAVON ANTHONY PARISH stated to B.S., “HEIL HITLER, “ALL JEWS MUST DIE,” and “KILL K***S.”

All in violation of Title 18, United States Code, Sections 2261A(2)(B) and 2261(b)(5).

COUNTS TWO THROUGH SIX

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

At all times material to this Superseding Information:

1. Paragraphs 1-2 and 5-6 of Count One are incorporated here.
2. Synagogue 1, located in the Eastern District of Pennsylvania, was a place of Jewish religious worship. Synagogue 1 operated a full day childcare and preschool program for children aged six weeks through five years old. In addition, Synagogue 1 rented its venues for parties, meetings, conferences, and other events including receptions, weddings, festivities, and family milestone celebrations.
3. Synagogue 2, located in the Eastern District of Pennsylvania, was a place of Jewish religious worship. Synagogue 2 also housed a preschool and kindergarten.
4. Synagogue 3, located in the Eastern District of Pennsylvania, was a place of Jewish religious worship.
5. Business 2, located in the Eastern District of Pennsylvania, is a delicatessen open daily to the public.
6. Business 3, located in the Eastern District of Pennsylvania, is a delicatessen open daily to the public.
7. On or about the dates specified below, in Philadelphia, in the Eastern District of Pennsylvania, the Southern District of Mississippi, and elsewhere, defendant

DONAVON ANTHONY PARISH

in interstate and foreign communications, made telephone calls and utilized a telecommunications device without disclosing his identity, and with intent to abuse, threaten, and harass a person at the called number, each victim constituting a separate count:

| Count | Victim | Date(s) |
|-------|---|---------------------------------|
| 2 | D.H., an employee of Synagogue 1 | May 2, 2022 |
| 3 | R.K. and B.B., employees of Synagogue 2 | May 2, 2022 |
| 4 | Z.G., an employee of Synagogue 3 | May 2, 2022 |
| 5 | N.D., an employee of Business 2 | April 24, 2022 - April 28, 2022 |
| 6 | J.I. and J.M., employees of Business 3 | April 28, 2022 |

All in violation of Title 47, United States Code, Section 223(a)(1)(C).

SPECIAL FINDING

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

Defendant DONAVON ANTHONY PARISH intentionally selected Businesses 1 – 3 and Synagogues 1 – 3, as the objects of the offenses charged in Counts One through Six of this Superseding Information, which are incorporated by reference, because of the actual and perceived religion of individuals associated with Businesses 1 – 3 and Synagogues 1 – 3.

In violation of U.S.S.G. § 3A1.1(a).

A handwritten signature in blue ink, appearing to read "V. C. Romero", is positioned above a horizontal line.

JACQUELINE C. ROMERO
UNITED STATES ATTORNEY

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

DONAVON PARISH

SUPERSEDING INFORMATION

18 U.S.C. § 2261A(2) (cyberstalking - 1 count)
47 U.S.C. § 223(a)(1)(C) (abuse and harassment using a telecommunications device - 5 counts)
Special Finding Under U.S.S.G. § 3A1.1(a)

A true bill.

Foreperson

Filed in open court this _____ day,
Of _____ A.D. 20_____

Foreperson

Bail, \$ _____
