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CENTRAL DISTRICT OF CALIFORNIA
BY: JB DEPUTY

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2020 Grand Jury

UNITED STATES OF AMERICA, Plaintiff, v. ALEX SCOTT ROBERTS, Defendant.	CR 2:20-cr-00554-AB I N D I C T M E N T [18 U.S.C. §§ 2261A(2)(A)–(B), 2261(b)(5): Stalking; 18 U.S.C. § 875(c): Threat by Interstate Communication]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 2261A(2)(A)–(B), 2261(b)(5)]

1. Beginning on or about July 29, 2020, and continuing to at least on or about August 18, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendant ALEX SCOTT ROBERTS ("ROBERTS"), with the intent to harass and intimidate Victim 1, used an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely, cellular telephone networks, interstate wires, and the Internet, to engage in a course of conduct, described in paragraph 2 below, that

placed Victim 1 in reasonable fear of death and serious bodily injury to Victim 1 and immediate family members of Victim 1, and that caused, attempted to cause, and would reasonably be expected to cause substantial emotional distress to Victim 1 and immediate family members of Victim 1.

2. Defendant ROBERTS's course of conduct included, among other things, the following:

a. On or about July 31, 2020, after being told by Victim 1 and her family that Victim 1 did not wish to communicate with him, defendant ROBERTS created a fake listing on the classifieds website Craiglist.com advertising a room for rent at Victim 1's home. The listing included Victim 1's name, home address, and included the following: "Room for Rent . . . Will explain upon visit [¶] Stop by anytime home is open."

b. On or about August 2, 2020, defendant ROBERTS sent anonymous text messages to a friend of Victim 1, demanding Victim 1's telephone number, threatening to send nude photographs of Victim 1, and threatening to send someone to rape Victim 1. The messages included the following:

> Fuck it then I will post her pictures [¶] Not kidding . . . U ignore me and all her naked pictures get posted [¶] So either give me her number or I post these . . . And ur silent [¶] Like a little bitch [¶] Do u want me to have someone rape her . . . If u don't respond I will send someone over to rape her . . . U have 1 minute to respond before I send.

c. Between on or about August 11, 2020 and on or about August 18, 2020, defendant ROBERTS sent numerous anonymous text messages, from multiple telephone numbers, to Victim 1's sister

(Victim 2), who lives with Victim 1. The text messages that defendant ROBERTS sent included the following:

i. On or about August 11 and 12, 2020, text messages that included the following:

> Since u think this is a game let's change your mind on that . . . Alright lets see what happens tomorrow then . . . Let's have some fun with your cars right now [¶] Until u respond [¶] Be there soon. . . Who's window is open [¶] Outside [¶] By [Victim 1's] car [¶] Which tire.

ii. On or about August 12, 2020, text messages that included the following:

> [S]o I'm outside . . . I see you guys [¶] look out towards topanga . . . [Victim 1] gets what she deserves. . . retribution is upon her and her life will depend on it. . . payback is a bitch and she gets what she deserves [¶] hope you all survive there will be blood . . .you wanted this so let's show u how serious I am.

iii. On or about August 12, 2020, text messages that included the following:

> I'm outside [¶] too scared to talk [¶] is [Victim 1] or [Victim 2] too scared [¶] poor babies . . . what happens if someone throws something over your wall [¶] and it blows the house up . . . payback is a bitch for what [Victim 1] has done [¶] and she will pay [¶] and so will u [Victim 2] . . . lucky for me I was able to hack your WiFi so thanks for the shower videos of the both of you . . . let's post these videos of the both of u in the shower . . . worst thing to do is ignore [¶] that's how people end up dead . . . be careful with the brake lines [¶] I cut them last night . . . cops tell u not to respond pretty stupid when I'm right here . . . so if u think ignoring me and not responding to me is smart it's pretty stupid[]. . . I know where u drive [¶] what time u guys leave [¶] I know your every move. . . one of you will be dead by the end of the day pick who it shall be.

iv. On or about August 12, 2020, text messages that included the following:

> [P]eople will be there soon glad u wanted this . . . have either of u been raped I guess u will experience that soon [¶] I have someone following both u and [Victim 1] [¶] hope you and [Victim 1] enjoy being raped . . . told the guys to bring guns too this should be interesting they will be there soon . . . [Victim 1] gets what she deserves [¶] pain . . . they will be there in 10 minutes [¶] are u ready [¶] u may be sore after . . . think I'm joking watch u will see [¶] but then again u won't be alive to see [¶] I have a sniper at the window shall I shoot . . . respond or I shoot.

v. On or about August 16, 2020, text messages that included the following:

> So hacking consists of breaking into a certain system or systems which allows the hacker to then break his way into your device. Are you following along or to stupid to understand. I will continue due to your inconsistent stupidity. Once the hacker is in the device he can access whatever he wants, . . . Payback is a bitch [Victim 2] and both you and [Victim 1] will pay [¶] I'll see on Tuesday.

vi. On or about August 16, 2020, text messages that included the question, "What else do I need to bring for Tuesday," and included a photograph of the window to Victim 1's bedroom, which appeared to have been taken from outside the house of Victim 1 and Victim 2.

vii. On or about August 16, 2020, text messages that included the following:

> I see you [¶] Time to kill you or [Victim 1] [¶] I see your car [¶] Who will die tonight or on Tuesday during clinic . . . U either respond or I start shooting whoever is in the room at the window adjacent to Topanga [¶] 1 minute [¶] 45 seconds until I start shooting [¶] Want to see how serious I am [¶] I have a gun aimed right at both your mom and dad . . . If u don[']t respond someone will die.

viii. On or about August 17, 2020, a text message that included the following: "[L]et's see will I kill [Victim 1] today or tomorrow at practice [¶] since u don't care and don't want to respond why worry."

ix. On or about August 18, 2020, text messages that included the following: "I will see the both of you today who will die [¶] Since u don't care [¶] You won't even know who I am."

COUNT TWO

[18 U.S.C. §§ 2261A(2)(A)–(B), 2261(b)(5)]

1. Beginning on or about July 29, 2020, and continuing to at least on or about August 18, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendant ALEX SCOTT ROBERTS ("ROBERTS"), with the intent to harass and intimidate Victim 2, used an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely, cellular telephone networks, interstate wires, and the Internet, to engage in a course of conduct, described in paragraph 2 below, that placed Victim 2 in reasonable fear of death and serious bodily injury to Victim 2 and immediate family members of Victim 2, and that caused, attempted to cause, and would reasonably be expected to cause substantial emotional distress to Victim 2 and immediate family members of Victim 2.

2. Defendant ROBERTS's course of conduct included, among other things, the following:

a. Between on or about August 11, 2020 and on or about August 18, 2020, defendant ROBERTS sent numerous anonymous text messages, from multiple telephone numbers, to Victim 2 (Victim 1's sister). The text messages that defendant ROBERTS sent included the following:

i. On or about August 11 and 12, 2020, text messages that included the following:

> Since u think this is a game let's change your mind on that . . . Alright lets see what happens tomorrow then . . . Let's have some fun with your cars right now [¶] Until u respond [¶] Be there soon. . . Who's window is

> open [¶] Outside [¶] By [Victim 1's] car [¶] Which tire.

ii. On or about August 12, 2020, text messages that included the following:

> [S]o I'm outside . . . I see you guys [¶] look out towards topanga . . . [Victim 1] gets what she deserves. . . retribution is upon her and her life will depend on it. . . payback is a bitch and she gets what she deserves [¶] hope you all survive there will be blood . . .you wanted this so let's show u how serious I am.

iii. On or about August 12, 2020, text messages that included the following:

> I'm outside [¶] too scared to talk [¶] is [Victim 1] or [Victim 2] too scared [¶] poor babies . . . what happens if someone throws something over your wall [¶] and it blows the house up . . . payback is a bitch for what [Victim 1] has done [¶] and she will pay [¶] and so will u [Victim 2] . . . lucky for me I was able to hack your WiFi so thanks for the shower videos of the both of you . . . let's post these videos of the both of u in the shower . . . worst thing to do is ignore [¶] that's how people end up dead . . . be careful with the brake lines [¶] I cut them last night . . . cops tell u not to respond pretty stupid when I'm right here . . . so if u think ignoring me and not responding to me is smart it's pretty stupid[]. . . I know where u drive [¶] what time u guys leave [¶] I know your every move. . . one of you will be dead by the end of the day pick who it shall be.

iv. On or about August 12, 2020, text messages that included the following:

> [P]eople will be there soon glad u wanted this . . . have either of u been raped I guess u will experience that soon [¶] I have someone following both u and [Victim 1] [¶] hope you and [Victim 1] enjoy being raped . . . told the guys to bring guns too this should be interesting they will be there soon . . . [Victim 1]

> gets what she deserves [¶] pain . . . they will be there in 10 minutes [¶] are u ready [¶] u may be sore after . . . think I'm joking watch u will see [¶] but then again u won't be alive to see [¶] I have a sniper at the window shall I shoot . . . respond or I shoot.

v. On or about August 16, 2020, text messages that included the following:

> So hacking consists of breaking into a certain system or systems which allows the hacker to then break his way into your device. Are you following along or to stupid to understand. I will continue due to your inconsistent stupidity. Once the hacker is in the device he can access whatever he wants, . . . Payback is a bitch [Victim 2] and both you and [Victim 1] will pay [¶] I'll see on Tuesday.

vi. On or about August 16, 2020, text messages that included the question, "What else do I need to bring for Tuesday," and included a photograph of the window to Victim 1's bedroom, which appeared to have been taken from outside the house of Victim 1 and Victim 2.

vii. On or about August 16, 2020, text messages that included the following:

> I see you [¶] Time to kill you or [Victim 1] [¶] I see your car [¶] Who will die tonight or on Tuesday during clinic . . . U either respond or I start shooting whoever is in the room at the window adjacent to Topanga [¶] 1 minute [¶] 45 seconds until I start shooting [¶] Want to see how serious I am [¶] I have a gun aimed right at both your mom and dad . . . If u don[']t respond someone will die.

viii. On or about August 17, 2020, a text message that included the following: "[L]et's see will I kill

[Victim 1] today or tomorrow at practice [¶] since u don't care and don't want to respond why worry."

ix. On or about August 18, 2020, text messages that included the following: "I will see the both of you today who will die [¶] Since u don't care [¶] You won't even know who I am."

COUNT THREE

[18 U.S.C. § 875(c)]

On or about August 12, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendant ALEX SCOTT ROBERTS, with intent to issue a threat and with knowledge that it would be viewed as a threat, knowingly transmitted in interstate and foreign commerce a communication containing a true threat to injure the person of another, that is, text messages to Victim 2 that included the following:

> [S]o I'm outside . . . I see you guys [¶] look out towards topanga . . . [Victim 1] gets what she deserves . . . retribution is upon her and her life will depend on it . . . payback is a bitch and she gets what she deserves [¶] hope you all survive there will be blood . . . you wanted this so let's show u how serious I am.

COUNT FOUR

[18 U.S.C. § 875(c)]

On or about August 12, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendant ALEX SCOTT ROBERTS, with intent to issue a threat and with knowledge that it would be viewed as a threat, knowingly transmitted in interstate and foreign commerce a communication containing a true threat to injure the person of another, that is, text messages to Victim 2 that included the following:

> I'm outside [¶] too scared to talk [¶] is [Victim 1] or [Victim 2] too scared [¶] poor babies . . . what happens if someone throws something over your wall [¶] and it blows the house up . . . payback is a bitch for what [Victim 1] has done [¶] and she will pay [¶] and so will u [Victim 2] . . . lucky for me I was able to hack your WiFi so thanks for the shower videos of the both of you . . . let's post these videos of the both of u in the shower . . . worst thing to do is ignore [¶] that's how people end up dead . . . be careful with the brake lines [¶] I cut them last night . . . cops tell u not to respond pretty stupid when I'm right here . . . so if u think ignoring me and not responding to me is smart it's pretty stupid[]. . . I know where u drive [¶] what time u guys leave [¶] I know your every move . . . one of you will be dead by the end of the day pick who it shall be.

COUNT FIVE

[18 U.S.C. § 875(c)]

On or about August 12, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendant ALEX SCOTT ROBERTS, with intent to issue a threat and with knowledge that it would be viewed as a threat, knowingly transmitted in interstate and foreign commerce a communication containing a true threat to injure the person of another, that is, text messages to Victim 2 that included the following:

> [P]eople will be there soon glad u wanted this . . . have either of u been raped I guess u will experience that soon [¶] I have someone following both u and [Victim 1] [¶] hope you and [Victim 1] enjoy being raped . . . told the guys to bring guns too this should be interesting they will be there soon . . . [Victim 1] gets what she deserves [¶] pain . . . they will be there in 10 minutes [¶] are u ready [¶] u may be sore after . . . think I'm joking watch u will see [¶] but then again u won't be alive to see [¶] I have a sniper at the window shall I shoot . . . respond or I shoot.

COUNT SIX

[18 U.S.C. § 875(c)]

On or about August 16, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendant ALEX SCOTT ROBERTS, with intent to issue a threat and with knowledge that it would be viewed as a threat, knowingly transmitted in interstate and foreign commerce a communication containing a true threat to injure the person of another, that is, text messages to Victim 2 that included the following:

> I see you [¶] Time to kill you or [Victim 1] [¶] I see your car [¶] Who will die tonight or on Tuesday during clinic . . . U either respond or I start shooting whoever is in the room at the window adjacent to Topanga [¶] 1 minute [¶] 45 seconds until I start shooting [¶] Want to

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see how serious I am [¶] I have a gun aimed right at both your mom and dad . . . If u don[']t respond someone will die.

A TRUE BILL

/S/
Foreperson

NICOLA T. HANNA
United States Attorney



CHRISOPHER D. GRIGG
Assistant United States Attorney
Chief, National Security Division

CAMERON L. SCHROEDER
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