

COUNT 2
Interstate Communication of a Threat to Injure
18 U.S.C. § 875(c)

In or about August 2023, in the Southern District of Illinois and elsewhere,

ALEXIA N. WILLIE,
A/K/A JASON LEE WILLIE,

did knowingly transmit in interstate commerce, from the State of Illinois to the State of Virginia, a communication containing a threat to injure the person of another; to wit, the defendant made a video call on an online platform in which defendant, who appeared to be talking to an African American man and woman, stated, "...murder you, and it isn't a joke. We're going to war. We're going to kill you. Nigger, you can shut the fuck up. Because I guarantee you, you and your niggers ain't gonna do shit, and can't do shit. You don't have the strength to take us on, I guarantee it. You gonna die, you understand that?"

All in violation of Title 18, United States Code, Section 875(c).

COUNT 3
Interstate Communication of a Threat to Injure
18 U.S.C. § 875(c)

In or about August 2023, in the Southern District of Illinois and elsewhere,

ALEXIA N. WILLIE,
A/K/A JASON LEE WILLIE,

did knowingly transmit in interstate commerce, from the State of Illinois to the State of Virginia, a communication containing a threat to injure the person of another; to wit, the defendant made a video call on an online platform in which defendant stated, "I do what the fuck I wanna do you little fucking cunt. You little nasty fucking bitch. You little nasty fucking bitch. Look how nasty you are. Look at you. We're fucking your children and killing them. We're fucking them and hurting them and killing them and you faggots can't do nothing about us. You can cry. You can fucking cry. You can sit out here on the internet all fucking day and cry. I don't give a fuck how much you cry. I don't really care. You can sit out here all fucking day and cry. Nobody gives a fuck. Nobody cares.

Nobody cares. Look how fucking mad you are.” When a woman is seen and heard to say that the defendant has threatened her child, defendant repeatedly responded with, “Goodbye, sir.”

All in violation of Title 18, United States Code, Section 875(c).

COUNT 4
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18 U.S.C. § 875(c)

In or about August 2023, in the Southern District of Illinois and elsewhere,

ALEXIA N. WILLIE,
A/K/A JASON LEE WILLIE,

did knowingly transmit in interstate commerce, from the State of Illinois to the State of Virginia, a communication containing a threat to injure the person of another; to wit, the defendant made a video call on an online platform in which defendant stated, “Well, I guarantee I’ll be in the bathroom raping your Christian daughters, and there ain’t nothing you faggots can do about it. You hear me?”

All in violation of Title 18, United States Code, Section 875(c).

COUNT 5
Interstate Communication of a Threat to Injure
18 U.S.C. § 875(c)

In or about August 2023, in the Southern District of Illinois and elsewhere,

ALEXIA N. WILLIE,
A/K/A JASON LEE WILLIE,

did knowingly transmit in interstate commerce, from the State of Illinois to the State of Virginia, a communication containing a threat to injure the person of another; to wit, the defendant made a video call on an online platform in which defendant stated, “You’re a pussy, a faggot, online. I’m in the bathroom feeling your little girls’ pussies, I’m in there feeling on their pussies. I’m in there feeling on your little girls’ pussies. I love feeling on your little girls’ pussies. You guys can’t do nothing about it. I don’t care I’m openly a pedo. I’m openly a pedophile. I literally feel on your girls’ pussies. You guys can’t do nothing about us. You can cry. Cry. Put me on national television, I don’t care. I’m transgender, I’m in the bathroom raping your fucking daughters and I’m openly letting you guys

know this. The Republican Party, what are you faggots going to do about us? Be, be men. Be the fucking men that you think you are and step up. But you won't because you're faggots, and you're weak, and you're pussies. You'll never be the fucking men that you think you are."

All in violation of Title 18, United States Code, Section 875(c).

COUNT 6
Interstate Communication of a Threat to Injure
18 U.S.C. § 875(c)

In or about August 2023, in the Southern District of Illinois and elsewhere,

ALEXIA N. WILLIE,
A/K/A JASON LEE WILLIE,

did knowingly transmit in interstate commerce, from the State of Illinois to the State of Virginia, a communication containing a threat to injure the person of another; to wit, the defendant made a video call on an online platform in which defendant stated, "We will fuck your daughters in that bathroom, I guarantee it. We will fuck your children up out here, and we are gonna fuck 'em up. [laughs] And you can't do shit about it."

All in violation of Title 18, United States Code, Section 875(c).

COUNT 7
Interstate Communication of a Threat to Injure
18 U.S.C. § 875(c)

In or about August 2023, in the Southern District of Illinois and elsewhere,

ALEXIA N. WILLIE,
A/K/A JASON LEE WILLIE,

did knowingly transmit in interstate commerce, from the State of Illinois to the State of Virginia, a communication containing a threat to injure the person of another; to wit, the defendant made a video call on an online platform in which defendant, in speaking with a woman who appeared to be of African descent and spoke with an accent, stated, "I want you to listen to me closely, I am personally, I am personally, coming to Uganda, and when I get down there, I'm going to assassinate all of the Parliament members. Every fucking last one of them, and I promise you I'm coming to Uganda to

kill every fucking member of your parliament in Uganda. And if you want Kenya to stay safe then I advise you not to follow in Uganda's footsteps."

All in violation of Title 18, United States Code, Section 875(c).

COUNT 8
Interstate Communication of a Threat to Injure
18 U.S.C. § 875(c)

In or about August 2023, in the Southern District of Illinois and elsewhere,

ALEXIA N. WILLIE,
A/K/A JASON LEE WILLIE,

did knowingly transmit in interstate commerce, from the State of Illinois to the State of Virginia, a communication containing a threat to injure the person of another; to wit, the defendant made a video call on an online platform in which defendant stated, "A person in Tennessee walked into one of your schools and shot up a bunch of your Christian daughters. That's not the last of them if you don't shut your fucking mouth. Shut the fuck up out here, you understand me, X? There is nothing you can do about me motherfucker. Okay?"

All in violation of Title 18, United States Code, Section 875(c).

COUNT 9
Interstate Communication of a Threat to Injure
18 U.S.C. § 875(c)

In or about August 2023, in the Southern District of Illinois and elsewhere,

ALEXIA N. WILLIE,
A/K/A JASON LEE WILLIE,

did knowingly transmit in interstate commerce, from the State of Illinois to the State of Virginia, a communication containing a threat to injure the person of another; to wit, the defendant made a video call on an online platform in which defendant stated, “I mean it motherfucker. All’s I have is a quick clip on that motherfucker. That means all’s I have to do [then uses hand motion and noises simulating loading a handgun] that’s it. I’m step up motherfucker and let me put a bullet in your head.”

All in violation of Title 18, United States Code, Section 875(c).

COUNT 10
Interstate Communication of a Threat to Injure
18 U.S.C. § 875(c)

In or about August 2023, in the Southern District of Illinois and elsewhere,

ALEXIA N. WILLIE,
A/K/A JASON LEE WILLIE,

did knowingly transmit in interstate commerce, from the State of Illinois to the State of Virginia, a communication containing a threat to injure the person of another; to wit, the defendant made a video call on an online platform in which defendant stated, “There’s a lot of transgenders out here that are tired of being picked on and we’re going to go into the schools and we’re going to kill their fucking children out here, and that’s the end of it. We’re at war.”

All in violation of Title 18, United States Code, Section 875(c).

COUNT 11
Interstate Communication of a Threat to Injure
18 U.S.C. § 875(c)

In or about March to August 2023, in the Southern District of Illinois and elsewhere,

ALEXIA N. WILLIE,
A/K/A JASON LEE WILLIE,

did knowingly transmit in interstate commerce, from the State of Illinois to the State of Virginia, a communication containing a threat to injure the person of another; to wit, the defendant made a video call on an online platform in which defendant stated, “They’re trash, they’re Christian trash. They’re transphobic, they’re homophobic. They’re no different than the fucking white supremacists. That’s exactly who the fuck they are. Listen, Dave Chappelle and all the blacks out here, all the black people out here talking about trannies and shit, they ain’t no different than the white supremacists either. You all bow to the same cross [extends middle finger].” As a woman on screen said that if she saw defendant in a church, she would not want to hurt defendant, but would want to hug defendant, defendant said, “We’re gonna bomb them, we’re gonna bomb them. We’re gonna bomb the churches. We’re gonna bomb them. You know it. We’re going to kill you motherfuckers.”

All in violation of Title 18, United States Code, Section 875(c).

COUNT 12
Interstate Communication of a Threat to Injure
18 U.S.C. § 875(c)

In or about March to August 2023, in the Southern District of Illinois and elsewhere,

ALEXIA N. WILLIE,
A/K/A JASON LEE WILLIE,

did knowingly transmit in interstate commerce, from the State of Illinois to the State of Virginia, a communication containing a threat to injure the person of another; to wit, the defendant made a video call on an online platform in which defendant stated, "... your women with HIV in the restroom, nigger, with a needle. I'm injecting them. As I walk by, as I walk by, I'm literally going like this and injecting them with HIV, I want you know that." In crosstalk a man asks defendant if that "turns on" or makes defendant "horny," and defendant said, "Shut the fuck up, nigger. I catch you bitches out here with a cross around your neck in that restroom, you better know we're going to hit you with a fucking syringe." The man asked the defendant if he was "a guy or a girl," to which defendant responded, "I don't care what you think nigger, it doesn't matter. We're going to kill you. It doesn't matter, you're going to die. We're going to kill you. We're going to hit it with a fucking syringe." Defendant then used more slurs and said, "I catch your fucking niggers in the bathroom, I'm gonna infect them with HIV, nigger. I don't give a fuck. Know it nigger."

All in violation of Title 18, United States Code, Section 875(c).

COUNT 13
Interstate Communication of a Threat to Injure
18 U.S.C. § 875(c)

On or about August 24, 2023, in the Southern District of Illinois and elsewhere,

ALEXIA N. WILLIE,
A/K/A JASON LEE WILLIE,

did knowingly transmit in interstate commerce, from the State of Illinois to the State of Virginia, a communication containing a threat to injure the person of another; to wit, the defendant made a video call on an online platform in which defendant stated, "For all you motherfuckers out here talking shit,

all you men out here. We're coming for your children. We're not going to hurt you. We're not going to hurt you. You have to understand, I know how to get to you, and that's by [pounds fist into palm twice for emphasis] fucking your children. By hurting your children. And that's exactly what we're going to do. When you're sitting out here talking your shit, we're not gonna come for you, we're gonna come for your fucking children. Do you understand me? I'm not a pedo, I don't like children. I'm not attracted to children. I'm just gonna hurt them to hurt you, get it motherfucker. That means we're gonna walk into your schools and we're gonna fuckin' shoot them." A man on the video is seen and heard to ask, "Why do you talk to me like this?," to which the defendant responded, "Watch your fucking mouth out here, motherfucker. You want your kids to be safe. Shut up. If you want your children, if you want your children to be safe...".

All in violation of Title 18, United States Code, Section 875(c).

COUNT 14
Interstate Communication of a Threat to Injure
18 U.S.C. § 875(c)

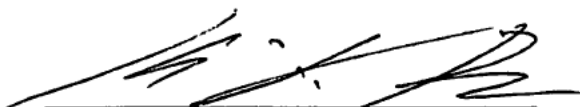
In or about March to August 2023, in the Southern District of Illinois and elsewhere,

ALEXIA N. WILLIE,
A/K/A JASON LEE WILLIE,

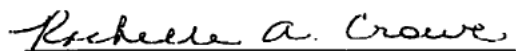
did knowingly transmit in interstate commerce, from the State of Illinois to the State of Virginia, a communication containing a threat to injure the person of another; to wit, the defendant made a video call on an online platform in which defendant stated, "Ain't nobody gonna stop me. I'm coming for them in the bathrooms and I'm not fucking joking. I'm dead fucking serious. You can tell the FBI, Homeland Security, you can go tell all your niggers out here. But I promise you, I catch your daughters in them bathrooms alone, I am gonna fuck them. I mean I am gonna fucking fuck them until they're dead. And I mean I'm gonna ravage them. I'm gonna reach inside their coochies and I'm gonna pull their intestines out, motherfucker. I am not fucking joking. Do not leave your fucking kids alone anymore. You faggots out here think you're alpha men, you are beta fucking

bitches. I am here to let you motherfuckers know, you ain't shit. I am coming motherfuckers. No human can stop me, motherfuckers. Not one."

All in violation of Title 18, United States Code, Section 875(c).



KEVIN F. BURKE
Assistant United States Attorney



RACHELLE AUD CROWE
United States Attorney

Recommended Bond: Detention

A TRUE BILL

