

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) No. 23-CR-40049-JPG
)
ALEXIA N. WILLIE,)
a/k/a JASON LEE WILLIE,)
)
Defendant.)

PROFFER OF EVIDENCE IN SUPPORT OF MOTION TO DETAIN

The United States of America, by Rachele Aud Crowe, United States Attorney for the Southern District of Illinois, and Kevin F. Burke, Assistant United States Attorney, having moved for the detention of the Defendant pending trial pursuant to Title 18, United States Code, Section 3142 (Doc. 9), submits the following proffer of evidence in support of that motion.

On August 14, 2023, the FBI National Threat Operation Section (NTOS) received an online tip from the “Meet Group,” the custodian of records for the global social networking app “MeetMe.” MeetMe is an online communication platform on which two users can communicate by audio and video on a split screen, while other observers can watch and type comments regarding the interactions. Meet Group reported that an account holder with the username “Mentally Unstable” had made threats to shoot children in school. The video is in a side-by-side format, with WILLIE appearing on one side and a female on the other side of the recorded frame. In the video, WILLIE is observed to say the following, which later formed the basis for Count 1 of the indictment:

We’re out here walking into your school, shooting your children, and I’m gonna tell you right now, I’m gonna be one of them and the FBI isn’t gonna stop me, but I’m gonna kill your children out here.

Meet Group reported the originating Internet Protocol Address (IP) for the account, NTOS received emergency disclosure information from the owning entity of that IP, and the address resolved to the residence of Joseph Kennedy in Nashville, Illinois.

Law enforcement recognized the person in the video as defendant WILLIE, a person known to live with Kennedy. The Perry County Sheriff was informed of the threats and arrested WILLIE for disorderly conduct, later adding a charge of resisting arrest. During transport to the Sheriff's Office, WILLIE was recorded and heard to say:

I'm never gonna stop, you guys are gonna get your children out here hurt, motherfuckers, you hear me? It ain't a joke." WILLIE then said, "You guys are really gonna get a lot of people out here hurt. I'm not joking, you think we're joking out here, we're not joking. It's not a joke and this ain't gonna stop me. This is just gonna make me worse, I guarantee it. I'll get out of jail right now, you watch me. And when I get out you have no idea.

During transport, WILLIE was recorded making further comments about being targeted for being transgender and expressed being sick of being bullied. WILLIE then said that law enforcement was trying to stick WILLIE with a felony so that WILLIE could not obtain a firearm but that it was not going to work [WILLIE was charged with state misdemeanors].

In a recorded interview that evening at the Sheriff's office, Kennedy, the man with whom WILLIE resides, said that he previously had called the FBI about threats made by WILLIE. Kennedy said that the FBI had come to his house a couple times over the last few years because of WILLIE's online conduct. He said that WILLIE goes on the internet to find preachers, or republicans, or black people, and said that WILLIE talks to people about how WILLIE is going to "have sex with their kids in the bathroom, and stuff like that." Kennedy said that he's trying to get mental health assistance for WILLIE. Kennedy said that WILLIE goes on different websites while at the residence, including MeetMe. Kennedy said that WILLIE is always yelling at people online and using the n-word and talking about having sex with their kids and references to bathrooms. Kennedy said he has heard WILLIE make threats toward school kids but has not

heard of threats to specific schools. Kennedy said that there were no firearms in the house, but that WILLIE had been talking about getting a gun and thought that WILLIE might have named specific types or brands of weapons and going places to “find these people” and “kill them.” Kennedy said that WILLIE has a lot of anger.

WILLIE was released from state custody on August 17, 2023. On August 24, 2023, Kennedy made a report to the Perry County Sheriff’s Office. According to the Sheriff’s report, Kennedy said that WILLIE claimed to be learning how to use firearms and how to obtain a firearm so that she could follow through on the threats that she had made. In a signed and written statement, Kennedy said that WILLIE had been getting worse since being released from custody and had resumed making threats to people online and to kill their children. Kennedy said that he told WILLIE to stop, and WILLIE told Kennedy that she would kill him too. Kennedy said that WILLIE had twice threatened to kill Kennedy or shoot him in his sleep in just the previous week.

On August 25, 2023, the FBI NTOS received an online tip from the Meet Group with additional threatening clips, at least one of which was made after WILLIE was released from state custody on August 17, 2023, as described in Count 13.

Prior to the recent investigation that resulted in the pending indictment, WILLIE’s online communications generated complaints to the FBI on at least four occasions from 2018 to 2022. In December of 2018, the FBI received reports of a threat on Facebook in which WILLIE claimed to have killed a preacher that had molested WILLIE and hundreds of other children and that millions would die, and that WILLIE was the entity mentioned by the United Nations coming to change humanity and that God was with WILLIE. In November of 2019, Amazon reported an online threat on Twitch (an online video communication platform often used by gamers) to kill people using bombs and an assertion that WILLIE will feel better when “they [people who discriminate against trans rights]” are dead. The FBI spoke with WILLIE who

claimed to not be sincere in the threats and claimed to have no firearms. In August of 2020, the FBI received reports of threatening Facebook posts by WILLIE about soon making “public appearances” to bring “something greater than any law” and that “all inhumanity will be destroyed.” In June of 2022, the FBI received a complaint that originated with a user of Facebook. The complaint included screenshots of postings by WILLIE that included the following language:

“I’ll see ur daughters in the restrooms..were coming for em all”... “u have no idea the carnage imma unleash on humanity..boom boom soon”... “churches are gonna fall..schools too mofo”... “Imma set a example humanity will never forget..ur hatred is going to cost allot of lives.”

On March 28, 2023, one day after the Covenant School shooting in Nashville, Tennessee, the FBI received a report that WILLIE posted on Facebook that there would be many more and larger attacks on Christians by transgender people and that Christians would come to know fear like never before.¹ WILLIE made explicit reference to the Covenant School shooting in one recorded online threat as described in Count 8. WILLIE made two additional threats in which WILLIE said that “we” are shooting children in schools, as described in Counts 1 and 13.

Respectfully submitted,

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s/ Kevin F. Burke

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¹ In the Covenant School shooting, a transgender individual, who was also a former student, shot and killed three adults and three children. <https://www.tennessean.com/story/news/crime/2023/03/27/nashville-mourns-mass-shooting-covenant-school/70052585007/>