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1 2015 OCT -7 PM 12: 19 2 CLERK U.S. DISTRICT COURT CENTRAL DIST. OF CALIF. SANTA ANA 3 4 5 6 8 UNITED STATES DISTRICT COURT 9 FOR THE CENTRAL DISTRICT OF CALIFORNIA September 2015 Grand Jury CA. | SA SA CR 15-00122 10 UNITED STATES OF AMERICA, 11 12 Plaintiff, <u>I N D I C T M E N T</u> 13 V. [18 U.S.C. § 875(c): Threats to Injure in Interstate Commerce; 18 14 PETER RONALD WEXLER. U.S.C. § 115(a)(1)(B): Threatening a Federal Officerl 15 Defendant. 16 17 The Grand Jury charges: 18 COUNTS ONE through TEN 19 [18 U.S.C. § 875(c)] 20 INTRODUCTORY ALLEGATIONS 21 At all times relevant to this indictment: 22 Defendant PETER RONALD WEXLER ("WEXLER") resided in 23 Orange County, within the Central District of California. 24 Defendant WEXLER maintained a blog on the Internet at b. 25 www.wexblog.prwexler.com. 26 c. Defendant WEXLER maintained a Google+ account,

PRWEXLER2, on the Internet (the "PRWEXLER2 Account").

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B. THE THREATS

2. On or about the following dates, in Orange County, within the Central District of California, and elsewhere, defendant PETER RONALD WEXLER ("WEXLER") with the purpose of issuing a threat, knowingly transmitted in interstate commerce the following communications containing true threats to injure the person of another:

COUNT	DATE	VICTIM	NATURE OF THREAT
ONE	09/08/2015	Federal Bureau of Investigation ("FBI") Agents	Posting on www.wexblog.prwexler.com: "Is it murder to kill an FBI Pig who knocks on your door without a warrant? I think not. To the FBI: Don't bother me, again, unless you're looking for a Left-Handed Shave with my kitchen knife, a Schrade SCHF9, which can chop down a tree and perfectly slice a juicy red, vine- ripened tomato, in that order!"
TWO	09/08/2015	D.B.	Posting on www.wexblog.prwexler.com: "Italian police should be shot in the back! So, too, should FBI Assistant Director [D.B.], of the Central District of California. That asshole just got under my skin, and my trigger finger is suddenly getting very itchy!"
THREE	09/09/2015	D.B. and FBI Agents	Posting on www.wexblog.prwexler.com: "MEMORANDUM: TO THE FBI

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2	COUNT	DATE	VICTIM	NATURE OF THREAT
3				ASSISTANT DIRECTOR [D.B.] OF THE CENTRAL DISTRICT OF
				CALIFORNIA! If your FUCKING
4				goons ever show up at my
5				house, again, like they did on Labor Day, well then, 'my
6				knife will strike the necks'
7				fuck you Paranoid ASSHOLES!!!!!!" and image
8				depicting D.B. being held at
9				the collar.
10 11	FOUR	09/09/2015	D.B. and FBI Agents	Posting on the PRWEXLER2 Account:
12				"A personal MEMO to David Bowdich
13				MEMORANDUM: TO THE FBI
14				ASSISTANT DIRECTOR [D.B.] OF THE CENTRAL DISTRICT OF
15				CALIFORNIA! If your FUCKING
16				goons ever show up at my house, again, like they did on
17				Labor Day, well then, 'my
18				knife will strike the necks' Paranoid ASSHOLES!!!!!!!" and
19				image depicting D.B. being
20				held at the collar.
21	FIVE	09/11/2015	D.B.	Posting on www.wexblog.prwexler.com:
22				"The FBI Scum arrested my soul
23				brother! I am an ISIS
24				supporting ONLINE TROLL. The
25				only difference between this guy and me is the target: I
26				want to shove my Fat Man Gadget up [D.B.'s] limpwristed
27				West Los Angeles ass, and I
28				intend to!"

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2	COUNT	DATE	VICTIM	NATURE OF THREAT
3	SIX	09/11/2015	D.B.	Posting on the PRWEXLER2 Account:
4 5				"The FBI Scum arrested my soul brother! I am an ISIS
6				supporting ONLINE TROLL. The only difference between this
7 8				guy and me is the target: I want to shove my Fat Man
9				Gadget up [D.B.'s] limpwristed West Los Angeles ass, and I intend to!"
10	SEVEN	09/13/2015	D.B.	Posting on
11				www.wexblog.prwexler.com:
12				Image depicting a hand pointing a gun at D.B.
13	EIGHT	09/13/2015	D.B.	
14		03/13/2013	D. B.	Posting on www.wexblog.prwexler.com:
15 16				Image depicting D.B. laying on the ground, person standing
17				over D.B. holding D.B.'s head with one hand while reaching
18				to D.B.'s neck with the other
19	NINE	09/16/2015	D.B.	Posting on
20				www.wexblog.prwexler.com:
21				Image depicting D.B.'s head in crosshairs
22	m rayı	00/16/2015	D. D.	
23	TEN	09/16/2015	D.B.	Posting on the PRWEXLER2 Account:
24				Image depicting D.B.'s head in
25				crosshairs
26				

COUNTS ELEVEN through TWENTY

[18 U.S.C. § 115(a)(1)(B)]

A. INTRODUCTORY ALLEGATIONS

1. The Grand Jury re-alleges and incorporates by reference paragraph one of this Indictment as though fully set forth herein.

B. THE THREATS

2. On or about the following dates, in Orange County, within the Central District of California, and elsewhere, defendant WEXLER, threatened to assault and murder federal law enforcement officers, namely, D.B., the Assistant Director in Charge of the Los Angeles Field Office of the Federal Bureau of Investigation ("FBI"), and FBI agents, with intent to impede, intimidate, and interfere with the federal law enforcement officers while engaged in the performance of official duties, and with intent to retaliate against such law enforcement officers on account of the performance of official duties:

COUNT	DATE	VICTIM	NATURE OF THREAT
ELEVEN	09/08/2015	FBI Agents	Posting on www.wexblog.prwexler.com:
			"Is it murder to kill an FBI Pig who knocks on your door without a warrant? I think not. To the FBI: Don't bother me, again, unless you're looking for a Left-Handed Shave with my kitchen knife, a Schrade SCHF9, which can chop down a tree and perfectly slice a juicy red, vine-ripened tomato, in that order!"

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2	COUNT	DATE	VICTIM	NATURE OF THREAT
3	TWELVE	09/08/2015	D.B.	Posting on
4				www.wexblog.prwexler.com:
5				"Italian police should be shot in the back! So, too,
6				should FBI Assistant Director
. 7				[D.B.], of the Central District of California. That
8				asshole just got under my
9				skin, and my trigger finger is suddenly getting very
10				itchy!"
11	THIRTEEN	09/09/2015	D.B. and FBI	Posting on
12			Agents	www.wexblog.prwexler.com:
13				"MEMORANDUM: TO THE FBI ASSISTANT DIRECTOR [D.B.] OF
14				THE CENTRAL DISTRICT OF
15				CALIFORNIA! If your FUCKING goons ever show up at my
16				house, again, like they did on Labor Day, well then, 'my
17				knife will strike the necks'
18				Fuck you Paranoid ASSHOLES!!!!!!!" and image
19				depicting D.B. being held at
				the collar.
20 21	FOURTEEN	09/09/2015	D.B. and FBI	Posting on the PRWEXLER2
22			Agents	Account: "A personal MEMO to David
				Bowdich
23				MEMORANDUM: TO THE FBI
24				ASSISTANT DIRECTOR [D.B.] OF THE CENTRAL DISTRICT OF
25				CALIFORNIA! If your FUCKING
26				goons ever show up at my house, again, like they did
27				on Labor Day, well then, 'my
28				knife will strike the necks'

1				T.
2	COUNT	DATE	VICTIM	NATURE OF THREAT
				Paranoid ASSHOLES!!!!!!!" and image depicting D.B. being held at the collar.
	FIFTEEN	09/11/2015	D.B.	Posting on www.wexblog.prwexler.com:
				"The FBI Scum arrested my soul brother! I am an ISIS
				supporting ONLINE TROLL. The only difference between this
		i		guy and me is the target: I want to shove my Fat Man
				Gadget up [D.B.'s] limpwristed West Los Angeles ass, and I intend to!"
	SIXTEEN	00/11/2015	D D	
	SIVIEEN	09/11/2015	D.B.	Posting on the PRWEXLER2 Account:
				"The FBI Scum arrested my
				soul brother! I am an ISIS supporting ONLINE TROLL. The
				only difference between this guy and me is the target: I
				want to shove my Fat Man Gadget up [D.B.'s]
				limpwristed West Los Angeles ass, and I intend to!"
F	SEVENTEEN	09/13/2015	D D	
	SEAEMICEM	09/13/2013	D.B.	Posting on www.wexblog.prwexler.com:
				Image depicting a hand
				pointing a gun at D.B.
	EIGHTEEN	09/13/2015	D.B.	Posting on www.wexblog.prwexler.com:
				Image depicting D.B. laying
				on the ground, person standing over D.B. holding
				D.B.'s head with one hand
IL				while reaching to D.B.'s neck

DATE	VICTIM	NATURE OF THREAT		
		with the other		
09/16/2015	D.B.	Posting on www.wexblog.prwexler.com: Image depicting D.B.'s head in crosshairs		
09/16/2015	D.B.	Posting on the PRWEXLER2 Account: Image depicting D.B.'s head in crosshairs		
	09/16/2015			

A TRUE BILL

Foreperson

EILEEN M. DECKER United States Attorney

Paruar QDonahue

PATRICIA A. DONAHUE Assistant United States Attorney Chief, National Security Division

CHRISTOPHER D. GRIGG Assistant United States Attorney Chief, Terrorism and Export Crimes Section

MIEKE B. TARWATER Assistant United States Attorney Terrorism and Export Crimes Section