S. LANE TUCKER United States Attorney

SETH M. BEAUSANG Assistant U.S. Attorney Federal Building & U.S. Courthouse 222 West Seventh Avenue, #9, Room 253 Anchorage, AK 99513-7567

Phone: (907) 271-5071

Email: seth.beausang@usdoj.gov

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA, No. 3:23-cr-00087-JMK-MMS

Plaintiff, COUNT 1:

VS. CYBERSTALKING

Vio. of 18 U.S.C. § 2261A(2)

JOSHUA WAHL, COUNTS 2-5:

Defendant. TRANSMITTING THREATS IN INTERSTATE COMMERCE

Vio. of 18 U.S.C. § 875(c)

INDICTMENT

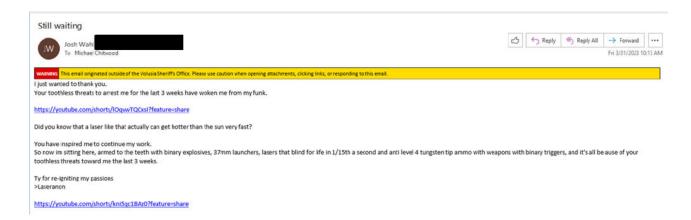
The Grand Jury charges that:

GENERAL ALLEGATIONS

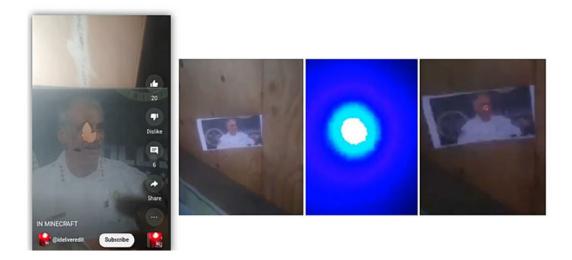
At all times material to the Indictment:

- 1. JOSHUA WAHL was a resident of Dillingham, Alaska, in the District of Alaska.
- 2. 4chan.org ("4chan") was a website that allows users to post content anonymously in several discussion forums, or boards.

- 3. On or about November 6, 2019, WAHL posted on 4chan "Kill all Jewish and Israeli children" and a photo of a pipe bomb.
- 4. As part of WAHL's online persona, he posted videos to YouTube.com ("YouTube") under the moniker "laseranon," including videos of WAHL using high powered lasers and videos of others using lasers as weapons to blind law enforcement officials.
- 5. Beginning in or around February 2023, Michael Chitwood, the Sheriff of Volusia County, Florida, received media attention after Chitwood held a news conference denouncing individuals who had distributed anti-Semitic fliers and broadcast a message in support of Adolf Hitler.
- 6. Beginning on a date unknown, but not later than in or around April 2023, and continuing through at least in or around July 2023, WAHL posted on 4chan numerous threats to injure and kill Chitwood.
- 7. On or about March 31, 2023, WAHL sent Chitwood the following email threatening to injure and kill Chitwood, in that WAHL stated that he was armed with lasers and explosives, and included links to a video from WAHL's YouTube account showing WAHL utilizing a laser to burn a hole in a photograph of Chitwood, specifically in Chitwood's face, and holding apparent explosives in front of a photograph of Chitwood.



8. The following are screen captures from the videos found at the YouTube links that WAHL sent to Chitwood:







Page 3 of 7

9. On or about April 5, 2023, WAHL posted the following on 4chan threatening to injure and kill Chitwood, in that WAHL stated "Blind and kill [Chitwood] in irl," i.e., in real life, and that WAHL was an "actual terrorist":



10. On or about April 5, 2023, WAHL posted the following on 4chan threatening to injure and kill Chitwood, in that WAHL stated that WAHL had "explosives, sound, plasma, lasers and ap ammo," and "Kill [Chitwood] in irl, shoot him the fucking head with a overpressure 10mm round":



11. On or about April 21, 2023, WAHL posted the following on 4chan threatening to injure and kill Chitwood, in that WAHL stated "Kill Mike Chitwood in irl, not fucking video games" and "Come and do something about it fedboys," and included a photograph of Chitwood with a hole burned in Chitwood's face:



COUNT 1

- 12. Paragraphs 1-11 are re-alleged.
- 13. Beginning on a date unknown, but not later than in or around April 2023, and continuing through at least in or around July 2023, in the District of Alaska and elsewhere, the defendant, JOSHUA WAHL, with the intent to harass and intimidate Michael Chitwood, used an interactive computer service and an electronic communication service and electronic communication system of interstate commerce, and any other facility of interstate or foreign commerce, including email and 4chan posts, to engage in a course of conduct that placed Chitwood in reasonable fear of death of and serious bodily injury to himself and an immediate family member, and caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to Chitwood and an immediate family member.

All of which is in violation of Title 18, United States Code, Section 2261A(2).

COUNT 2

- 14. Paragraphs 1-11 are re-alleged.
- 15. On or about March 31, 2023, in the District of Alaska and elsewhere, the defendant, JOSHUA WAHL, did knowingly transmit in interstate commerce a communication containing a threat to injure Michael Chitwood as set forth in Paragraphs 7 and 8.

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

COUNT 3

- 16. Paragraphs 1-11 are re-alleged.
- 17. On or about April 5, 2023, in the District of Alaska and elsewhere, the defendant, JOSHUA WAHL, did knowingly transmit in interstate commerce a communication containing a threat to injure and kill Michael Chitwood as set forth in Paragraph 9.

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

COUNT 4

- 18. Paragraphs 1-11 are re-alleged.
- 19. On or about April 5, 2023, in the District of Alaska and elsewhere, the defendant, JOSHUA WAHL, did knowingly transmit in interstate commerce a communication containing a threat to injure and kill Michael Chitwood as set forth in Paragraph 10.

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

COUNT 5

- 20. Paragraphs 1-11 are re-alleged.
- 21. On or about April 21, 2023, in the District of Alaska and elsewhere, the defendant, JOSHUA WAHL, did knowingly transmit in interstate commerce a communication containing a threat to injure and kill Michael Chitwood as set forth in Paragraph 11.

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

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Seth M. Beausang
SETH M. BEAUSANG
Assistant U.S. Attorney
United States of America

s/ Kate Vogel for
S. LANE TUCKER
United States Attorney
United States of America

DATE: 9/20/2023