

SEALED

FILED	RECEIVED
ENTERED	SERVED OF
COUNSEL/PARTIES OF RECORD	
JUL 16 2024	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPT _____

1 JASON M. FRIERSON
 United States Attorney
 Nevada Bar No. 7709
 2 JACOB H. OPERSKALSKI
 Assistant United States Attorney
 Nevada Bar No. 14746
 3 501 Las Vegas Boulevard South, Suite 1100
 Las Vegas, Nevada 89101
 4 Telephone: (702) 388-5063
 5 Email: Jacob.Operaskalski@usdoj.gov
 6 *Representing the United States of America*

7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,
 10 Plaintiff,

11 vs.

12 SPENCER CHRISTJENCODY GEAR,
 13 Defendant.

SEALED
CRIMINAL INDICTMENT

2:24-cr-0152-JAD-BNW

VIOLATIONS:

18 U.S.C. § 115(a)(1)(B)
 Threatening a Federal Official

18 U.S.C. § 875(c)
 Transmitting a Communication Containing
 a Threat to Injure

17 **THE GRAND JURY CHARGES THAT:**

18 **COUNT ONE**
 19 (Threatening a Federal Official)

20 On or about November 30, 2023, in the State and Federal District of Nevada,

21 **SPENCER CHRISTJENCODY GEAR,**

22 the defendant herein, threatened to assault and murder B.H., with intent to impede,

23 intimidate, and interfere with B.H. while engaged in the performance of official duties, and

24

1 with intent to retaliate against B.H. on account of the performance of official duties, in
2 violation of Title 18, United States Code, Section 115(a)(1)(B).

3 **COUNT TWO**

4 (Transmitting a Communication Containing a Threat to Injure)

5 On or about November 30, 2023, in the State and Federal District of Nevada,

6 **SPENCER CHRISTJENCODY GEAR,**

7 the defendant herein, knowingly transmitted in interstate commerce from Nevada to
8 Washington D.C., a telephone communication containing a threat to injure B.H.,
9 specifically, the defendant threatened to kill B.H., in violation of Title 18, United States
10 Code, Section 875(c).

11 **COUNT THREE**

(Threatening a Federal Official)

12 On or about December 17, 2023, in the State and Federal District of Nevada,

13 **SPENCER CHRISTJENCODY GEAR,**

14 the defendant herein, threatened to assault and murder B.H., with intent to impede,
15 intimidate, and interfere with B.H. while engaged in the performance of official duties, and
16 with intent to retaliate against B.H. on account of the performance of official duties, in
17 violation of Title 18, United States Code, Section 115(a)(1)(B).

18 **COUNT FOUR**

19 (Transmitting a Communication Containing a Threat to Injure)

20 On or about December 17, 2023, in the State and Federal District of Nevada,

21 **SPENCER CHRISTJENCODY GEAR,**

22 the defendant herein, knowingly transmitted in interstate commerce from Nevada to
23 Washington D.C., a telephone communication containing a threat to injure B.H.,
24 specifically, the defendant threatened to kill B.H., in violation of Title 18, United States
Code, Section 875(c).

COUNT EIGHT

(Transmitting a Communication Containing a Threat to Injure)

On or about January 22, 2024, in the State and Federal District of Nevada,

SPENCER CHRISTJENCODY GEAR,

the defendant herein, knowingly transmitted in interstate commerce from Nevada to New York, a telephone communication containing a threat to injure L.K., specifically, the defendant threatened to kill L.K., in violation of Title 18, United States Code, Section 875(c).

COUNT NINE

(Threatening a Federal Official)

On or about January 25, 2024, in the State and Federal District of Nevada,

SPENCER CHRISTJENCODY GEAR,

the defendant herein, threatened to assault and murder J.C., with intent to impede, intimidate, and interfere with J.C. while engaged in the performance of official duties, and with intent to retaliate against J.C. on account of the performance of official duties, in violation of Title 18, United States Code, Section 115(a)(1)(B).

COUNT TEN

(Transmitting a Communication Containing a Threat to Injure)

On or about January 25, 2024, in the State and Federal District of Nevada,

SPENCER CHRISTJENCODY GEAR,

the defendant herein, knowingly transmitted in interstate commerce from Nevada to Washington D.C., a telephone communication containing a threat to injure J.C., specifically, the defendant threatened to kill J.C., in violation of Title 18, United States Code, Section 875(c).

COUNT FOURTEEN

(Transmitting a Communication Containing a Threat to Injure)

On or about May 24, 2024, in the State and Federal District of Nevada,

SPENCER CHRISTJENCODY GEAR,

the defendant herein, knowingly transmitted in interstate commerce from Nevada to Washington D.C., a telephone communication containing a threat to injure J.M.C., specifically, the defendant threatened to kill J.M.C., in violation of Title 18, United States Code, Section 875(c).

COUNT FIFTEEN

(Transmitting a Communication Containing a Threat to Injure)

On or about May 25, 2024, in the State and Federal District of Nevada,

SPENCER CHRISTJENCODY GEAR,

the defendant herein, knowingly transmitted in interstate commerce from Nevada to Montana, a telephone communication containing a threat to injure P.W., specifically, the defendant threatened to kill P.W., in violation of Title 18, United States Code, Section 875(c).

COUNT SIXTEEN

(Transmitting a Communication Containing a Threat to Injure)

On or about June 3, 2024, in the State and Federal District of Nevada,

SPENCER CHRISTJENCODY GEAR,

the defendant herein, knowingly transmitted in interstate commerce from Nevada to New York, a telephone communication containing a threat to injure A.B. and J.M., specifically, the defendant threatened to kill A.B. and J.M., in violation of Title 18, United States Code, Section 875(c).

COUNT TWENTY

(Transmitting a Communication Containing a Threat to Injure)

On or about June 28, 2024, in the State and Federal District of Nevada,

SPENCER CHRISTJENCODY GEAR,

the defendant herein, knowingly transmitted in interstate commerce from Nevada to Washington D.C., a telephone communication containing a threat to injure C.C., specifically, the defendant threatened to kill C.C., in violation of Title 18, United States Code, Section 875(c).

COUNT TWENTY-ONE

(Threatening a Federal Official)

On or about July 7, 2024, in the State and Federal District of Nevada,

SPENCER CHRISTJENCODY GEAR,

the defendant herein, threatened to assault and murder J.M.C., with intent to impede, intimidate, and interfere with J.M.C. while engaged in the performance of official duties, and with intent to retaliate against J.M.C. on account of the performance of official duties, in violation of Title 18, United States Code, Section 115(a)(1)(B).

COUNT TWENTY-TWO

(Transmitting a Communication Containing a Threat to Injure)

On or about July 7, 2024, in the State and Federal District of Nevada,

SPENCER CHRISTJENCODY GEAR,

the defendant herein, knowingly transmitted in interstate commerce from Nevada to Washington D.C., a telephone communication containing a threat to injure J.M.C.,


1 specifically, the defendant threatened to kill J.M.C., in violation of Title 18, United States
2 Code, Section 875(c).

3
4 **DATED:** this 16th day of July, 2024.

5 **A TRUE BILL:**

6 /S/
7 FOREPERSON OF THE GRAND JURY

8 JASON M. FRIERSON
9 United States Attorney

10 
11 JACOB H. OPERSKALSKI
12 Assistant United States Attorney

13
14
15
16
17
18
19
20
21
22
23
24