

**FILED**

**AUG 12 2021**

CLERK U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

BY \_\_\_\_\_  
DEPUTY CLERK

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United States of America  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 WILLIAM LEE ROBINSON,

14 Defendants.  
15

CASE NO. 1:21 CR 00207 NONE-SKO

18 U.S.C. § 875(b)—INTERSTATE  
COMMUNICATION CONVEYING THREAT OF  
BODILY INJURY WITH INTENT TO EXTORT  
MONEY OR THING OF VALUE (FIVE COUNTS);  
18 U.S.C. § 2261A(2)(B)—STALKING (THREE  
COUNTS); 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. §  
2461(c) (CRIMINAL FORFEITURE)

16  
17 **INDICTMENT**

18 **COUNTS ONE THROUGH FIVE:**

[18 U.S.C. § 875(b)—Interstate Communication Conveying  
Threat of Bodily Injury with Intent to Extort Money or  
Thing of Value]

19 The Grand Jury charges:  
20

21 WILLIAM LEE ROBINSON,

22 defendant herein, as follows:

23 **I. INTRODUCTION**

24 At all times relevant to this indictment,

- 25 1. Defendant WILLIAM LEE ROBINSON resided in Fresno, California, within the State  
26 and Eastern District of California, and in Astoria, New York, and elsewhere.  
27 2. O.A.I. is a Delaware corporation with its principal place of business in Fresno, California.  
28

1 3. ROBINSON worked as a Systems Engineer at O.A.I. in Fresno, California, from on or  
2 about June 14, 2017, to on or about November 28, 2017. O.A.I. terminated ROBINSON involuntarily.

3 4. J.T. was O.A.I.'s Information Technology Manager and ROBINSON'S direct supervisor  
4 at O.A.I. J.T. resided and worked in Fresno County, California, in the State and Eastern District of  
5 California.

6 5. R.W. was the Vice President of Human Resources for O.A.I. R.W. resided and worked in  
7 Fresno County, California, in the State and Eastern District of California.

8 6. K.P. worked in Human Resources for O.A.I. K.P. resided and worked in Fresno,  
9 California, in the State and Eastern District of California.

10 **II. COMMUNICATIONS CONTAINING THREATS**

11 7. Beginning on or about March 5, 2018 and continuing until on or about May 24, 2018,  
12 defendant WILLIAM LEE ROBINSON sent a series of threats to O.A.I. employees, including J.T.,  
13 R.W., and K.P. ROBINSON sent these threats through text message and email from the State of New  
14 York to the Eastern District of California. In these communications, Robinson referenced the location of  
15 the employees' personal residences, made repeated references to visiting the employees at their  
16 residences, and threatened to kill and physically harm the employees and their families. Robinson made  
17 the threats because he wanted O.A.I. to pay him between \$10,000 and \$20,000, which included the costs  
18 Robinson incurred when he moved to New York after O.A.I. terminated his employment.

19 8. On or about the dates set forth below in the State and Eastern District of California and  
20 elsewhere, defendant WILLIAM LEE ROBINSON, knowingly and with intent to extort money and  
21 things of value from O.A.I., J.T., R.W., K.P., and others., did transmit and cause to be transmitted in  
22 interstate commerce from the State of New York to the State and Eastern District of California, the  
23 written communications set forth below, and the communications contained threats to injure the person  
24 of another:

25 ///

26 ///

27 ///

28 ///

COUNT	APPROXIMATE DATE OF COMMUNICATION	DESCRIPTION
One	3/5/2018	Text message transmitted by ROBINSON from the State of New York to the cellular phone of J.T. in Fresno County, California
Two	5/17/2018	Electronic message transmitted by ROBINSON from the State of New York to the business email of R.W. and accessed by R.W. in Fresno County, California
Three	5/17/2018	Text message transmitted by ROBINSON from the State of New York to the cellular phone of J.T. in Fresno County, California
Four	5/17/2018	Text message transmitted by Robinson from the State of New York to the cellular phone of K.P. in Fresno County, California
Five	5/24/2018	Text message transmitted by Robinson from the State of New York to the cellular phone of J.T. in Fresno County, California

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

**COUNT SIX:** [18 U.S.C. § 2261A(2)(B)—Stalking]

The Grand Jury charges:

WILLIAM LEE ROBINSON,

defendant herein, as follows:

9. Paragraphs one through eight above are adopted and incorporated as though fully set forth herein.

10. Defendant WILLIAM LEE ROBINSON, beginning on or about December 21, 2017, until on or about May 24, 2018, in the County of Fresno, State and Eastern District of California, with the intent to kill, injure, harass and intimidate J.T., used an interactive computer service, electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce, to wit: used the telephone, electronic mail, the internet and internet-based social media applications, to engage in a course of conduct that caused, attempted to cause, and

1 would be reasonably expected to cause substantial emotional distress to J.T., all in violation of Title 18,  
2 United States Code, Section 2261A(2)(B).

3  
4 COUNT SEVEN: [18 U.S.C. § 2261A(2)(B)—Stalking]

5 The Grand Jury charges:

6 WILLIAM LEE ROBINSON,

7 defendant herein, as follows:

8 11. Paragraphs one through eight above are adopted and incorporated as though fully set  
9 forth herein.

10 12. Defendant WILLIAM LEE ROBINSON, beginning on or about December 21, 2017,  
11 until on or about May 17, 2018, in the County of Fresno, State and Eastern District of California, with  
12 the intent to kill, injure, harass and intimidate R.W., used an interactive computer service, electronic  
13 communication service or electronic communication system of interstate commerce, or any other facility  
14 of interstate or foreign commerce, to wit: used the telephone, electronic mail, the internet and internet-  
15 based social media applications, to engage in a course of conduct that caused, attempted to cause, and  
16 would be reasonably expected to cause substantial emotional distress to R.W., all in violation of Title  
17 18, United States Code, Section 2261A(2)(B).

18 COUNT EIGHT: [18 U.S.C. § 2261A(2)(B)—Stalking]

19 The Grand Jury charges:

20 WILLIAM LEE ROBINSON,

21 defendant herein, as follows:

22 13. Paragraphs one through eight above are adopted and incorporated as though fully set  
23 forth herein.

24 14. Defendant WILLIAM LEE ROBINSON, beginning on or about December 21, 2017,  
25 until on or about May 17, 2018, in the County of Fresno, State and Eastern District of California, with  
26 the intent to kill, injure, harass and intimidate K.P., used an interactive computer service, electronic  
27 communication service or electronic communication system of interstate commerce, or any other facility  
28

1 of interstate or foreign commerce, to wit: used the telephone, electronic mail, the internet and internet-  
2 based social media applications, to engage in a course of conduct that caused, attempted to cause, and  
3 would be reasonably expected to cause substantial emotional distress to K.P., all in violation of Title 18,  
4 United States Code, Section 2261A(2)(B).

5 FORFEITURE ALLEGATION: [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal  
6 Forfeiture]

7 Upon conviction of the offenses alleged in this Indictment, the defendant shall forfeit to the  
8 United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or  
9 person, constituting or derived from proceeds traceable to said violations.

10 If any property subject to forfeiture, as a result of the offenses alleged in this Indictment

- 11 a. cannot be located upon the exercise of due diligence;  
12 b. has been transferred or sold to, or deposited with, a third party;  
13 c. has been placed beyond the jurisdiction of the court;  
14 d. has been substantially diminished in value; or  
15 e. has been commingled with other property which cannot be divided without difficulty;

16 it is the intent of the United States pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to  
17 seek forfeiture of any other property of said defendant up to the value of the property subject to  
18 forfeiture.

19 A TRUE BILL.

20  
21 /s/ Signature on file w/AUSA

22 FOREPERSON

23  
24 PHILLIP A. TALBERT  
Acting United States Attorney

25 **KIRK E. SHERRIFF**

26 By: KIRK E. SHERRIFF  
27 Assistant U.S. Attorney  
Chief, Fresno Office  
28

**FILED**

No. \_\_\_\_\_

AUG 12 2021

**UNITED STATES DISTRICT COURT**

*Eastern District of California*

*Criminal Division*

CLERK U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY \_\_\_\_\_ DEPUTY CLERK

THE UNITED STATES OF AMERICA

vs.

WILLIAM LEE ROBINSON

INDICTMENT

1:21 CR 00207 NMLSKO

VIOLATION(S): 18 U.S.C. § 875(b)—INTERSTATE COMMUNICATION CONVEYING THREAT OF BODILY INJURY WITH INTENT TO EXTORT MONEY OR THING OF VALUE (FIVE COUNTS); 18 U.S.C. § 2261A(2)(B)—STALKING (THREE COUNTS); 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) (CRIMINAL FORFEITURE)

A true bill,

151

Foreman.

Filed in open court this \_\_\_\_\_ day

of \_\_\_\_\_, A.D. 20 \_\_\_\_\_

Clerk.

Bail, \$ \_\_\_\_\_ ISSUE NO BAIL WARRANT

*Gay A B*

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

See Indictment

Petty

Misdemeanor

Felony

Place of offense  
FRESNO COUNTY

U.S.C. Citation  
See Indictment

**DEFENDANT -- U.S. vs.**  
**WILLIAM LEE ROBINSON**

Address

7: 2 1 CR · 0 0 2 0 7 NONE SKO

Birth Date

Male

Alien

Female

(if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

FBI - ADRIAN RAMIREZ

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y  Defense

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW  
DOCKET NO.

MAGISTRATE  
JUDGE CASE NO.

**DEFENDANT**

**IS NOT IN CUSTODY**

- 1)  Has not been arrested, pending outcome of this proceeding  
If not detained, give date any prior summons was served on above charges
- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges  Fed'l  State  
If answer to (6) is "Yes," show name of institution

Has detainer been filed?  Yes  No

If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or, ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

Name and Office of Person Furnishing Information on

THIS FORM

DEBRA DE LA PENA

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

VINCENTE TENNERELLI

This report amends AO 257 previously submitted

**ADDITIONAL INFORMATION OR COMMENTS**

ADD FORFEITURE UNIT (Check if Forfeiture Allegation)

**ISSUE NO BAIL WARRANT**

**United States v. William Lee Robinson**  
**Penalties for Indictment**

**COUNTS 1-5:**      **WILLIAM LEE ROBINSON**

1:21 CR:00207 NONE SKO

**VIOLATION:**      18 U.S.C. § 875(b)—interstate communication of threat of bodily injury  
with intent to extort

**PENALTIES:**      Maximum of 20 years in prison; or  
Fine of up to \$250,000; or both fine and imprisonment  
Supervised release of up to 3 years

**SPECIAL ASSESSMENT:** \$100 (mandatory on each count)

**COUNTS 6-8:**      **WILLIAM LEE ROBINSON**

**VIOLATION:**      18 U.S.C. § 2261A(2)(B)—stalking

**PENALTIES:**      Maximum of 5 years in prison; or  
Fine of up to \$250,000; or both fine and imprisonment  
Supervised release of up to 3 years

**SPECIAL ASSESSMENT:** \$100 (mandatory on each count)