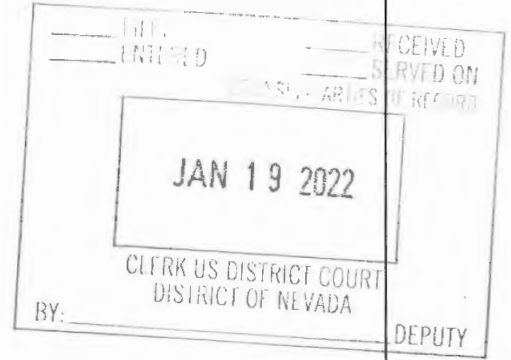


1 COREY R. AMUNDSON  
Chief, Public Integrity Section  
2 Criminal Division  
JONATHAN E. JACOBSON  
3 Trial Attorney, Public Integrity Section  
1301 New York Ave. NW, 10th Fl.  
4 Washington, DC 20005  
202-514-1412  
5 Email: Jonathan.Jacobson@usdoj.gov  
*Attorneys for the United States*



7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA,

10  
11 Plaintiff,

12 v.

13 GJERGI LUKE JUNCAJ,  
14 a/k/a "Gjergj Juncaj,"  
15 a/k/a "Gjurgj Juncaj,"  
a/k/a "George Juncaj,"

16 Defendant.  
17

SEALED  
CRIMINAL INDICTMENT

Case No. 2:22-cr-008 JCM EJY

VIOLATIONS:

Counts One-Four:

47 U.S.C. § 223(a)(1)(C)

(Threatening Telephone Call)

18  
19 THE GRAND JURY CHARGES THAT:

20 BACKGROUND ALLEGATIONS

21 1. At all times material to this Indictment, unless otherwise set forth, with all dates  
22 and times alleged to be "on or about" or "approximately":  
23

1           2.     The defendant, GJERGI LUKE JUNCAJ, a/k/a “Gjergj Juncaj,” a/k/a  
2 “Gjurgj Juncaj,” a/k/a “George Juncaj,” was an individual who resided in the State of  
3 Nevada and possessed a cellular telephone associated with the phone number (248) \*\*\*-1551  
4 (the “1551 phone number”).

5           3.     On January 6, 2021, the United States Congress convened to certify the vote of  
6 the Electoral College for the 2020 United States Presidential Election. The certification  
7 process was disrupted by a violent crowd.

8           4.     Under Nevada law, the Nevada Secretary of State is the Chief Officer of  
9 Elections for the state and is responsible for the execution and enforcement of state and federal  
10 laws relating to elections in Nevada.

11                   **THE THREATENING COMMUNICATIONS ON JANUARY 7, 2021**

12           5.     On January 7, 2021, at 8:07 a.m., JUNCAJ, from the 1551 phone number,  
13 called a publicly listed phone number for the Nevada Secretary of State’s Office. The call was  
14 transferred to the Elections Division and S.M.—a Nevada Secretary of State’s Office  
15 employee—answered the call. JUNCAJ then stated to S.M. in a raised voice, in sum and  
16 substance: “I want to thank you for such a great job you all did on stealing the election. I hope  
17 you all go to jail for treason. I hope your children get molested. You are all going to fucking  
18 die.” S.M. stated to JUNCAJ, in sum and substance, that she did not have to “take this abuse”  
19 and she ended the call.

20           6.     Approximately 12 minutes later, at 8:19 a.m., JUNCAJ, from the 1551 phone  
21 number, again called the Nevada Secretary of State’s Office and was transferred to S.M. On  
22  
23  
24

1 this call, JUNCAJ stated in a raised voice, in sum and substance: "You are all going to die."  
2 S.M. replied that she was contacting the police.

3 7. As a result of JUNCAJ's threatening communication, S.M. became fearful and  
4 upset, and, at 8:21 a.m., called the Nevada Capitol Police. On that call, S.M. informed  
5 Officer-1 about JUNCAJ's threatening calls. S.M. also provided Officer-1 with the 1551  
6 phone number and explained that the threatening calls had come from that number.

7 8. At 8:24 a.m., JUNCAJ, from the 1551 phone number, again called the Nevada  
8 Secretary of State's Office and was transferred to S.M. JUNCAJ stated in a raised voice, in  
9 sum and substance: "You guys really fucked this election up." JUNCAJ added, in sum and  
10 substance, that S.M. and others in her office "are all going to die."

11 9. At 8:25 a.m., JUNCAJ, from the 1551 phone number, again called the Nevada  
12 Secretary of State's Office and was transferred to S.M. JUNCAJ stated in a raised voice, in  
13 sum and substance: "This is what you're going to fucking get from now on. You are all going  
14 to fucking die and it is what you deserve."

15 10. At 8:26 a.m., S.M. again contacted Officer-1 about JUNCAJ's threatening  
16 calls.

17 11. At 8:40 a.m., Officer-1 called JUNCAJ at the 1551 phone number. On that call,  
18 JUNCAJ complained in a raised voice, in sum and substance, that Officer-1 was harassing  
19 him. JUNCAJ ended the call.

20 12. At no time on any of the preceding calls did JUNCAJ disclose his identity.  
21  
22  
23  
24



**COUNT ONE**

(47 U.S.C. § 223(a)(1)(C) – Threatening Telephone Call)

13. Paragraphs One through Twelve are incorporated and realleged as if fully set forth herein.

14. On January 7, 2021, at 8:07 a.m., within the District of Nevada, the defendant,

**GJERGI LUKE JUNCAJ**

did, in interstate and foreign communications, make a telephone call, whether or not conversation or communication ensued, without disclosing his identity and with intent to threaten any specific person, to wit: to state on a telephone call to S.M., an employee of the Nevada Secretary of State Elections Division, in sum and substance: “You are all going to fucking die.”

In violation of Title 47, United States Code, Section 223(a)(1)(C).

**COUNT TWO**

(47 U.S.C. § 223(a)(1)(C) – Threatening Telephone Call)

15. Paragraphs One through Twelve are incorporated and realleged as if fully set forth herein.

16. On January 7, 2021, at 8:19 a.m., within the District of Nevada, the defendant,

**GJERGI LUKE JUNCAJ**

did, in interstate and foreign communications, make a telephone call, whether or not conversation or communication ensued, without disclosing his identity and with intent to threaten any specific person, to wit: to state on a telephone call to S.M., an employee of the Nevada Secretary of State Elections Division, in sum and substance: “You are all going to die.”

1 In violation of Title 47, United States Code, Section 223(a)(1)(C).

2 **COUNT THREE**

3 (47 U.S.C. § 223(a)(1)(C) – Threatening Telephone Call)

4 17. Paragraphs One through Twelve are incorporated and realleged as if fully set  
5 forth herein.

6 18. On January 7, 2021, at 8:24 a.m., within the District of Nevada, the defendant,

7 **GJERGI LUKE JUNCAJ**

8 did, in interstate and foreign communications, make a telephone call, whether or not  
9 conversation or communication ensued, without disclosing his identity and with intent to  
10 threaten any specific person, to wit: to state on a telephone call to S.M., an employee of the  
11 Nevada Secretary of State Elections Division, in sum and substance: “You are all going to  
12 die.”

13 In violation of Title 47, United States Code, Section 223(a)(1)(C).

14 **COUNT FOUR**

15 (47 U.S.C. § 223(a)(1)(C) – Threatening Telephone Call)

16 19. Paragraphs One through Twelve are incorporated and realleged as if fully set  
17 forth herein.

18 20. On January 7, 2021, at 8:25 a.m., within the District of Nevada, the defendant,

19 **GJERGI LUKE JUNCAJ**

20 did, in interstate and foreign communications, make a telephone call, whether or not  
21 conversation or communication ensued, without disclosing his identity and with intent to  
22 threaten any specific person, to wit: to state on a telephone call to S.M., an employee of the  
23

1 Nevada Secretary of State Elections Division, in sum and substance: "This is what you're  
2 going to fucking get from now on. You are all going to fucking die and it is what you deserve."

3 In violation of Title 47, United States Code, Section 223(a)(1)(C).  
4

5 **DATED:** this 19<sup>th</sup> of January, 2022

6 **A TRUE BILL:**  
7

8 151  
9 FOREPERSON OF THE GRAND JURY

10  
11 COREY R. AMUNDSON  
12 Chief, Public Integrity Section

13  
14 JONATHAN E. JACOBSON  
15 Trial Attorney  
16  
17  
18  
19  
20  
21  
22  
23  
24