

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 21-
	:	
	:	
ALAN WALLACE	:	18 U.S.C. § 875(c)

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:
 - a. Defendant ALAN WALLACE (“WALLACE”) was a resident of Georgia.
 - b. Company-1 was a publicly traded company with its headquarters in New Jersey.
 - c. WALLACE was employed by Company-1 from in or around 1999 through in or around October 2017, when he was involuntarily terminated.
 - d. Victim-1 was an executive officer of Company-1 and a resident of New Jersey.
2. On or about February 5, 2021, WALLACE sent an email to Victim-1 with the subject line “Blood Bath,” which stated in the body of the email: “[Victim-1], it seems you don't care about your family. This will be an absolute

blood bath if stock isn't over \$200 in 2 weeks. Your hurt [sic] so many, and now it is your turn to experience it.”

3. On or about February 5, 2021, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

ALAN WALLACE

knowingly and willfully did transmit in interstate and foreign commerce a communication via email to Victim-1, with the intent to make a threat and with knowledge that the communication would be viewed as a threat.

In violation of Title 18, United States Code, Section 875(c).


PHILIP R. SELLINGER
United States Attorney