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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,)
)
 Plaintiff)
)
 v.)
)
 ALESSANDRO CALCAGNI,)
)
 Defendant.)

REDACTED

Criminal Action No. 21-34-VNA

INDICTMENT

MAY - 4 2021

The Grand Jury for the District of Delaware charges that:

INTRODUCTION AND BACKGROUND

1. Defendant **ALESSANDRO CALCAGNI** is a citizen of Italy and, at all times relevant to this Indictment, was located outside of the United States.

2. **UNINDICTED CO-CONSPIRATOR** is a dual citizen of Israel and of the United States and, at all times relevant to this Indictment, was located outside of the United States. **UNINDICTED CO-CONSPIRATOR** has been separately indicted outside of the District of Delaware.

3. In 2016 and 2017, **UNINDICTED CO-CONSPIRATOR** made hundreds of threats to schools, Jewish Community Centers, and police agencies in the United States. Schools in Sussex County, Delaware were particularly hard hit by these threats.

4. On January 19, 2016, a Delaware State Senator, Victim 1, whose district is in Sussex County, had an interview with a local television station. A summary of this interview was later posted online, with the title “[Victim 1]: Cowards making bomb threats will be caught.” A copy of this article was saved on **UNINDICTED CO-CONSPIRATOR**’s laptop.

5. At all times relevant to this Indictment, information on the family of Victim 1 – to include the names and approximate ages of his children – was available online. Information regarding Victim 1’s physical and email addresses, phone numbers, and family members was saved on **UNINDICTED CO-CONSPIRATOR**’s laptop.

6. On or about January 21, and on or about January 24, 2016, local police received calls where the caller stated that he was holding individuals hostage at a residence associated with Victim 1. Both calls caused an emergency police response to that location. Recordings of both calls were found on **UNINDICTED CO-CONSPIRATOR**’s laptop.

7. This type of activity is referred to as “SWATTING” – a technique often used in online or other harassment campaigns. SWATTING is the act of harassing a victim by triggering a police response to that person’s location based on a false report of an emergency – such as a bomb threat, murder, or other violent act.

8. Between on or about August 17, 2016, and on or about November 23, 2016, Victim 1 and others received emails threatening to harm Victim 1 and his family and demanding payment in Bitcoin. Drafts of some of these emails and log-in information for some of the email addresses from which they were sent were found on **UNINDICTED CO-CONSPIRATOR**’s laptop.

9. Between on or about August 26, 2016, and on or about September 3, 2016, Victim 1’s family received four packages, addressed to Victim 1 and his family members, including one of his children. Three packages, which appeared to be mailed from Europe and Canada, contained small amounts of various drugs, including methylenedioxymethamphetamine (commonly known as “MDMA” or “ecstasy”), delta-9 tetrahydrocannabinol (commonly known as “THC”), and heroin. The fourth package contained a small knife inside a fake credit card. Receipts for these packages were found on **UNINDICTED CO-CONSPIRATOR**’s laptop.

10. From in or around July 2016 through in or around December 2016, **ALESSANDRO CALCAGNI** made voice calls from outside of the United States to locations in the District of Delaware and elsewhere in the United States. When making these voice calls, **ALESSANDRO CALCAGNI** used a “spoofing” service. “Spoofing” occurs when a caller deliberately falsifies information transmitted to a caller ID display, thereby allowing him to disguise his identity.

11. **ALESSANDRO CALCAGNI** made many of these voice calls in coordination with, and/or in return for payment from, **UNINDICTED CO-CONSPIRATOR**. On certain occasions, **UNINDICTED CO-CONSPIRATOR** provided **ALESSANDRO CALCAGNI** details about what entities to call and what to say. If the calls were deemed “successful” by **UNINDICTED CO-CONSPIRATOR**, meaning that they caused a law enforcement reaction, the **UNINDICTED CO-CONSPIRATOR** offered to transfer virtual currency to **ALESSANDRO CALCAGNI** as payment. Following the calls, **UNINDICTED CO-CONSPIRATOR** maintained electronic records related to the threatening calls made by **ALESSANDRO CALCAGNI**.

12. On or about September 24, 2016, **ALESSANDRO CALCAGNI** made a voice call from outside the United States to a residence affiliated with Victim 1. **ALESSANDRO CALCAGNI** addressed the person who answered the phone, using Victim 1’s first name, and threatened to “kidnap [Victim 1’s children] and kill them in my basement if you do not pay me two Bitcoin.” **ALESSANDRO CALCAGNI** also referenced email communication, stating: “I know you are reading my emails.”

13. In or around July and December 2016, **ALESSANDRO CALCAGNI** used the spoofing service to call in a series of bomb threats targeting airplanes.

- a. On or about July 26, 2016, **ALESSANDRO CALCAGNI** called in a bomb threat concerning Southwest Airlines flight 254, flying from Baltimore, Maryland to Tampa, Florida. He claimed that he worked for a group of terrorists who had placed a bomb on the plane, which would detonate before arrival.
- b. On or about July 27, 2016, **ALESSANDRO CALCAGNI** called in a bomb threat concerning United Airlines flight 1696, flying from Newark, New Jersey to Seattle, Washington. He claimed that he had smuggled a bomb on to the plane and that it would detonate prior to landing. As a result, the flight was diverted to Chicago, Illinois, the passengers were offloaded, and a bomb squad conducted a check of the plane and the luggage.
- c. On or about December 10, 2016, **ALESSANDRO CALCAGNI** called in a bomb threat concerning United Airlines flight 443, flying from San Francisco, California to Newark, New Jersey. He claimed that he had constructed a bomb that had been smuggled onto the plane with the help of airport employees and that the bomb would detonate prior to landing.
- d. On or about December 12, 2016, **ALESSANDRO CALCAGNI** called in a bomb threat concerning United Airlines flight 209, flying from San Francisco, California to Dulles, Virginia. He claimed that he placed a bomb on the plane, which was in the possession of a passenger on the flight, and which would detonate prior to landing. As a result, after landing, a bomb squad completed a full sweep of the airplane.
- e. On or about December 12, 2016, **ALESSANDRO CALCAGNI** called in a bomb threat concerning Delta Airlines flight 2424, flying from Seattle, Washington to

Detroit, Michigan. He claimed that airport employees had helped him smuggle a bomb onto the plane and that it would detonate prior to arrival.

- f. On or about December 12, 2016, **ALESSANDRO CALCAGNI** called in a bomb threat concerning Lufthansa flight 441, flying from Houston, Texas to Frankfurt, Germany. He claimed that he and his associates had smuggled a bomb on the plane. As a result, the flight was diverted to John F. Kennedy airport in New York. All passengers and luggage were offloaded from the plane and a thorough search was conducted.

14. In or around October and December 2016, **ALESSANDRO CALCAGNI** used the spoofing service to call in bomb threats to multiple schools within the United States.

- a. On or about October 11, 2016, **ALESSANDRO CALCAGNI** called in a bomb threat targeting School 1, located in New Jersey, claiming that he had placed a bomb inside the school and would detonate the bomb if he saw any law enforcement. The school was evacuated and law enforcement responded to the threat.
- b. On or about October 13, 2016, **ALESSANDRO CALCAGNI** called in a bomb threat targeting the University 1, located in California, threatening to “turn the university into a college of body parts” and requesting that law enforcement be present when he detonated pressure cooker bombs he had placed throughout he school.
- c. On or about October 14, 2016, **ALESSANDRO CALCAGNI** called in a bomb threat targeting School 2, located in New Jersey. He claimed that he had placed a bomb in the school and that he would detonate the bomb if he saw law enforcement

nearby. He stated that he had a grudge against law enforcement and that he wanted to take revenge. Law enforcement responded to this threat and the school was evacuated.

- d. On or about December 7, 2016, **ALESSANDRO CALCAGNI** again called in a bomb threat targeting School 2, claiming that he had made a bomb, which an associate had placed in the school, again to take revenge. Law enforcement responded to this threat and the school was evacuated.

15. As a result of the voice calls made by **ALESSANDRO CALCAGNI**, law enforcement in the District of Delaware and other jurisdictions across the United States spent time and resources responding to the threats. No explosive devices were found in any of the schools or airplanes **ALESSANDRO CALCAGNI** targeted and there is no evidence that Victim 1's family was physically harmed by **ALESSANDRO CALCAGNI**.

COUNT ONE

Conspiracy

16. The allegations contained in paragraphs 1 - 15 of this Indictment, along with subparagraphs 13(a)-(f) and 14(a) and 14(c)-(d), are incorporated by reference as if fully stated herein.

17. From on or about July 26, 2016 through on or about December 17, 2016, in the District of Delaware and elsewhere, the defendant **ALESSANDRO CALCAGNI** and **UNINDICTED CO-CONSPIRATOR** knowingly and intentionally combined, conspired, confederated and agreed with each other, to commit the following offenses against the United States: making interstate communications with the intent to extort, in violation of 18 U.S.C. § 875(b); conveying false information regarding explosives, in violation of 18 U.S.C. § 844(e)); and conveying false information related to aircraft, in violation of 18 U.S.C. § 35(b).

Objects of the Conspiracy

18. It was a part and object of the conspiracy for **ALESSANDRO CALCAGNI** and **UNINDICTED CO-CONSPIRATOR** to knowingly and with the intent to extort a thing of value – to wit, Bitcoin – from Victim 1, transmit in interstate or foreign commerce, using the Internet and telephone services, a threatening communication to an individual believed to be Victim 1, containing a threat to kidnap, injure, and murder the family of Victim 1, in violation of 18 U.S.C. § 875(b).

19. It was a part and object of the conspiracy for **ALESSANDRO CALCAGNI** and **UNINDICTED CO-CONSPIRATOR** through the use of the instruments of interstate and foreign commerce, including the telephone and Internet, to knowingly, willfully, and maliciously threaten and convey false information knowing the same to be false, concerning an attempt or alleged attempt being made, and to be made, to kill, injure, and intimidate other individuals, and to unlawfully damage and destroy a building, real property, or personal property by means of fire or explosive, in violation of 18 U.S.C. § 844(e).

20. It was a part and object of the conspiracy for **ALESSANDRO CALCAGNI** and **UNINDICTED CO-CONSPIRATOR** to willfully and maliciously, and with reckless disregard for the safety of human life, impart and convey false information, knowing the information to be false, concerning an attempt and an alleged attempt being made or to be made to place a destructive device or substance in an aircraft likely to endanger the safety of that aircraft, a crime prohibited by 18 U.S.C. § 32(a)(2), in violation of 18 U.S.C. § 35(b).

Manner and Means

It was part of the conspiracy that:

21. **UNINDICTED CO-CONSPIRATOR** communicated information regarding targets of the threats to **ALESSANDRO CALCAGNI**.

22. **ALESSANDRO CALCAGNI** called in the threats from outside the United States to various buildings, property, and individuals located within the United States.

23. **UNINDICTED CO-CONSPIRATOR** saved recordings of phone calls made by **ALESSANDRO CALCAGNI** to the targets in the **UNINDICTED CO-CONSPIRATOR**'s personal electronic storage.

24. **UNINDICTED CO-CONSPIRATOR** transferred cryptocurrency to **ALESSANDRO CALCAGNI** on several occasions in December 2016 in recognition of threats deemed successful.

Overt Acts

In furtherance of the conspiracy and in order to accomplish its objects, defendant **ALESSANDRO CALCAGNI** and **UNINDICTED CO-CONSPIRATOR** committed overt acts in the District of Delaware and elsewhere, including:

25. On or about July 26, 2016, **ALESSANDRO CALCAGNI** called Tampa International Airport, located in Florida, and claimed there was a bomb on Southwest Airlines flight 254.

26. On or about July 27, 2016, **ALESSANDRO CALCAGNI** called Seattle Airport, located in Washington, and Newark Airport, located in New Jersey, and claimed there was a bomb on United Airlines flight 1696.

27. On or about August 17, 2016, Victim 1 received an e-mail, sent from an unknown email address, the log-in information for which was saved on **UNINDICTED CO-CONSPIRATOR**'s computer. The subject line of the email was "I want to negotiate not harming you and your family." The email stated that Victim 1's interview in January 2016 was a "crime against" the sender and demanded payment in Bitcoin or he would "strike you and your family without warning. when I strike I strike hard and I will go after [Victim 1's children] before you."

28. On or before August 26, 2016, **UNINDICTED CO-CONSPIRATOR** arranged to have a package containing methylenedioxymethamphetamine, commonly known as "MDMA" or "ecstasy," which was addressed to Victim 1's child, mailed to Victim 1's family home in Delaware.

29. On or before August 30, 2016, **UNINDICTED CO-CONSPIRATOR** arranged to have a package containing delta-9 tetrahydrocannabinol, commonly known as "THC," and cannabiniol, a metabolite of THC, which was addressed to Victim 1, mailed to Victim 1's business address in Delaware.

30. On or before August 31, 2016, **UNINDICTED CO-CONSPIRATOR** arranged to have a package containing heroin, which was addressed to Victim 1's then-wife, mailed to Victim 1's family home in Delaware.

31. On or before September 3, 2016, **UNINDICTED CO-CONSPIRATOR** arranged to have a package containing a knife concealed inside a fake credit card, which was addressed to Victim 1's then-wife, mailed to Victim 1's family home in Delaware.

32. On or about September 24, 2016, **ALESSANDRO CALCAGNI** called what he believed to be the residence of Victim 1, which was located in Delaware. On the call he threatened to kidnap and murder Victim 1's family, including Victim 1's children, unless he was paid in Bitcoin.

33. On or about October 2, 2016, **UNINDICTED CO-CONSPIRATOR** sent **ALESSANDRO CALCAGNI** an email containing detailed information about bomb threats to be called into schools, including School 1 and School 2, offering \$65 United States Dollars per successful threat. **UNINDICTED CO-CONSPIRATOR** included a draft script for the calls in the email (although noted that **ALESSANDRO CALCAGNI** could “edit it and say things you make up”) including the following suggestions: “if I see law enforcement I will detonate the explosive device and slaughter lots of children”; “there is going to be a bloodbath in this school”; and “my intentions are to kill as many children as possible.”

34. On or about October 11, 2016, **ALESSANDRO CALCAGNI** called Local Police Department 1 and School 1, both located in New Jersey, and claimed that he had placed a bomb inside School 1.

35. On or about October 14, 2016, **ALESSANDRO CALCAGNI** called Local Police Department 2 and School 2, both located in New Jersey, and claimed there was a bomb in School 2.

36. On or about November 22, 2016, Victim 1 received an email sent from an unknown email address, the log-in information for which was saved on **UNINDICTED CO-CONSPIRATOR**'s computer. The email stated: “You did not paid [sic] me the ransom. You are not forgotten. You will be harmed.”

37. On or about December 7, 2016, **ALESSANDRO CALCAGNI** again called School 2, located in New Jersey, and claimed there was a bomb inside the school.

38. On or about December 10, 2016, **ALESSANDRO CALCAGNI** called the San Francisco Airport, located in California, claiming there was a bomb on United Airlines flight 443.

39. On or about December 12, 2016, **ALESSANDRO CALCAGNI** called Dulles Airport, located in Virginia, and claimed that there was a bomb on United Airlines flight 309.

40. On or about December 12, 2016, **ALESSANDRO CALCAGNI** called Seattle Airport, located in Washington, and claimed there was a bomb on Delta Airlines flight 2424.

41. On or about December 12, 2016, **ALESSANDRO CALCAGNI** called Lufthansa airlines, and claimed there was a bomb on Lufthansa flight 441.

All in violation of 18 U.S.C. § 371.

COUNT TWO

Extortion Call to State Senator

42. The allegations contained in paragraphs 1-12 and 15, of this Indictment are incorporated by reference as if fully stated herein.

43. On or about September 24, 2016, in the District of Delaware and elsewhere, defendant **ALESSANDRO CALCAGNI**, knowingly and with intent to extort a thing of value to the defendant – to wit, Bitcoin – from Victim 1, did transmit in interstate and foreign commerce, using the Internet and telephone services, a threatening communication to an individual he believed to be Victim 1, containing a threat to kidnap, injure, and murder the family of Victim 1,

All in violation of 18 U.S.C. § 875(b).

COUNTS THREE THROUGH SIX

School Bomb Threats

44. The allegations contained in paragraphs 1-3, 10, 11, 14, and 15 of this Indictment, along with sub-paragraphs 14(a)-(d), are incorporated by reference as if fully stated herein.

45. On or about the dates listed below, the defendant **ALESSANDRO CALCAGNI**, through the use of the telephone and other instruments of interstate and foreign commerce,

including the Internet, and in and affecting interstate and foreign commerce, did knowingly and willfully make a threat, and maliciously convey false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, to kill, injure, and intimidate any individual, and to unlawfully damage and destroy any building and other real and personal property by means of fire and explosive, as follows:

Count	Date	Targeted School	Calls Made To	Threat
3	October 11, 2016	School 1, New Jersey	Local Police Department 1, New Jersey School 1, New Jersey	"I placed a bomb inside the school."
4	October 13, 2016	University 1, California	Office of Undergraduate Admissions at University 1, California Local Police Department 3, California	"I have planted a number of pressure cooker bombs in various departments and bombs across the school."
5	October 14, 2016	School 2, New Jersey	Local Police Department 2, New Jersey School 2, New Jersey	"There is a bomb on [School 2]."
6	December 7, 2016	School 2, New Jersey	School 2, New Jersey	"There is a bomb inside the school."

All in violation of 18 U.S.C. § 844(e).

COUNTS SEVEN THROUGH ELEVEN

Airline Bomb Threats

46. The allegations contained in paragraphs 1-3, 10, 11, 13, and 15 of this Indictment, along with the sub-paragraphs in 13(a)-(e), are incorporated by reference as if fully stated herein.

47. On or about the dates listed below, the defendant **ALESSANDRO CALCAGNI**, through the use of the telephone and other instruments of interstate and foreign commerce, including the Internet, and in and affecting interstate and foreign commerce, did knowingly and willfully make a threat, and maliciously convey false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, to kill, injure, and intimidate any individual, and to unlawfully damage and destroy any building and other real and personal property by means of fire and explosive, as follows:

Count	Date	Targeted Flight	Calls Made To	Threat
7	July 26, 2016	Southwest Airlines 254	Tampa Airport, Florida	“There is a bomb. On a plane.” “It should detonate before the arrival of the plane.”
8	July 27, 2016	United Airlines 1696	Seattle Airport, Washington Newark Airport, New Jersey	“There is a bomb. On a specific plane.” “It should blow up like forty-five minutes before the arrival.”
9	December 10, 2016	United Airlines 443	San Francisco Airport, California	“We placed a bomb in United Airlines 443.” “The bomb has a timer and it will . . . detonate a few minutes before landing.”

10	December 12, 2016	United Airlines 309	Dulles Airport, Virginia	“There’s a C4 timed bomb.” It will go off “a few minutes before landing.”
11	December 12, 2016	Delta Airlines 2424	Seattle Airport, Washington	“There is a bomb inside a plane.” “The bomb will detonate a few minutes before landing.”

All in violation of 18 U.S.C. § 844(e).

COUNTS TWELVE THROUGH SEVENTEEN

Conveying False Information about Bombs on Airlines

48. The allegations contained in paragraphs 1-3, 10, 11, 13, and 15 of this Indictment, along with the sub-paragraphs in 13(a)-(f), are incorporated by reference as if fully stated herein.

49. On or about the dates listed below, the defendant **ALESSANDRO CALCAGNI**, willfully and maliciously, and with reckless disregard for the safety of human life, imparted and conveyed false information, knowing the information to be false, concerning an attempt and alleged attempt being made to place a destructive device or substance in an aircraft likely to endanger the safety of that aircraft, as described below, a crime prohibited by Title 18, United States Code, Section 32(a)(2), Destruction of Aircraft or Aircraft Facilities, as follows:

Count	Date	Targeted Flight	Threat
12	July 26, 2016	Southwest Airlines 254	“There is a bomb. On a plane.” “It should detonate before the arrival of the plane.”
13	July 27, 2016	United Airlines 1696	“There is a bomb. On a specific plane.” “It should blow up like forty-five minutes before the arrival.”

14	December 10, 2016	United Airlines 443	“We placed a bomb in United Airlines 443.” “The bomb has a timer and it will . . . detonate a few minutes before landing.”
15	December 12, 2016	United Airlines 309	“There’s a C4 timed bomb.” It will go off “a few minutes before landing.”
16	December 12, 2016	Delta Airlines 2424	“There is a bomb inside a plane.” “The bomb will detonate a few minutes before landing.”
17	December 12, 2016	Lufthansa 441	“There is a bomb on a plane.”

All in violation of 18 U.S.C. § 35(b).

NOTICE OF FORFEITURE

50. The allegations contained in Counts One through Eleven of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(B) and Title 18, United States Code, Section 2461(c).

51. Upon conviction of the offense set forth in Count One of the Indictment, the defendant, **ALESSANDRO CALCAGNI**, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(B), and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations.

52. Upon conviction of the offense in violation set forth in Count Two of the Indictment, the defendant, **ALESSANDRO CALCAGNI**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States

Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

53. Upon conviction of the offenses set forth in Counts Three through Eleven of this Indictment, the defendant, **ALESSANDRO CALCAGNI**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(B), and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations.

54. If any of the property described above, as a result of any act or omission of the defendant:

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

I, ALESSANDRO CALCAGNI having
been presented with a copy of the
Indictment, upon arraignment, I do
hereby enter a plea of Not guilty
to the Indictment filed in this case.

Dated this ____ day of _____, 20 ____

Def.

Cnsl.