

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

FILED

NOV 13 2024

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JULIAN ALCALA,

Defendant.

4:24CR594 HEA/SRW

INDICTMENT

GENERAL ALLEGATIONS

The Grand Jury charges that:

At all times relevant to this Indictment:

1. The Florissant Police Department ("FPD") was a law enforcement agency in the Eastern District of Missouri;
2. Among other functions, the FPD was responsible for responding to and investigating crimes occurring in Florissant, Missouri;
3. Defendant JULIAN ALCALA was employed by the FPD as a police officer;
4. Defendant JULIAN ALCALA was sworn to uphold the United States Constitution, as well as the laws of the State of Missouri.

COUNT ONE  
[18 U.S.C. §1519]

5. Paragraphs 1-4 are incorporated here.
6. On or about February 6, 2024, within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly concealed and covered up a record with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, the defendant sent a video via text message and iCloud from the cell phone of Confidential Victim 1 to his personal cell phone without the knowledge or permission of Confidential Victim 1, and then attempted to delete evidence of the sent text message from Confidential Victim 1's cell phone.

In violation of and punishable under Title 18, United States Code, Section 1519.

**COUNT TWO**  
**[18 U.S.C. §242]**

7. Paragraphs 1-4 are incorporated here.

8. On or about February 6, 2024, within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 1 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 1's cell phone under the auspices of confirming Confidential Victim 1's insurance coverage and then defendant searched through Confidential Victim 1's cell phone contents without a warrant or probable cause justifying the same, found a video depicting Confidential Victim 1 engaged in sexual activity, and sent the video via text message and iCloud from Confidential Victim 1's cell phone to his personal cell phone. Further, the defendant searched through Confidential Victim 1's cell phone contents without a warrant or probable cause justifying the same, and then took a

photograph of an image on Confidential Victim 1's cell phone which depicted Confidential Victim 1 in a state of nudity with his personal cell phone. That image was found on the defendant's iCloud.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT THREE**  
**[18 U.S.C. §242]**

9. Paragraphs 1-4 are incorporated here.

10. On or about February 11, 2024, between 7:05 a.m. and 7:16 a.m., within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 2 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 2's cell phone under the auspices of confirming Confidential Victim 2's insurance coverage, searched through Confidential Victim 2's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of an image on Confidential Victim 2's cell phone which depicted Confidential Victim 2 in a state of nudity with his personal cell phone. That image was found on the defendant's iCloud.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT FOUR**  
**[18 U.S.C. §242]**

11. Paragraphs 1-4 are incorporated here.

12. On or about February 11, 2024, between 10:45 a.m. and 10:55 a.m., within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 3 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 3's cell phone under the auspices of confirming Confidential Victim 3's insurance coverage, searched through Confidential Victim 3's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of an image on Confidential Victim 3's cell phone which depicted Confidential Victim 3 in a state of nudity with his personal cell phone. That image was found on the defendant's iCloud.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT FIVE**  
**[18 U.S.C. §242]**

13. Paragraphs 1-4 are incorporated here.

14. On or about February 11, 2024, between 12:51 p.m. and 12:59 p.m., within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 4 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 4's cell phone under the auspices of confirming Confidential Victim 4's insurance coverage, searched through Confidential Victim 4's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of an image on Confidential Victim 4's cell phone which depicted Confidential Victim 4 in a state of nudity with his personal cell phone. That image was found on the defendant's iCloud.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT SIX**  
**[18 U.S.C. §242]**

15. Paragraphs 1-4 are incorporated here.

16. On or about February 11, 2024, between 1:11 p.m. and 1:23 p.m., within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 5 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 5's cell phone under the auspices of confirming Confidential Victim 5's insurance coverage, searched through Confidential Victim 5's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of an image on Confidential Victim 5's cell phone which depicted Confidential Victim 5 in a state of nudity with his personal cell phone. That image was found on the defendant's iCloud.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT SEVEN**  
**[18 U.S.C. §242]**

17. Paragraphs 1-4 are incorporated here.

18. On or about February 11, 2024, between 4:50 p.m. and 4:54 p.m., within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 6 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws

of the United States. In so doing, the defendant took possession of Confidential Victim 6's cell phone under the auspices of confirming Confidential Victim 6's insurance coverage, searched through Confidential Victim 6's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of one or more images on Confidential Victim 6's cell phone which depicted Confidential Victim 6 in a state of nudity with his personal cell phone. Those images were found on the defendant's iCloud.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT EIGHT**  
**[18 U.S.C. §242]**

19. Paragraphs 1-4 are incorporated here.

20. On or about February 14, 2024, within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 7 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 7's cell phone under the auspices of confirming Confidential Victim 7's vehicle registration, searched through Confidential Victim 7's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of one or more images on Confidential Victim 7's cell phone which depicted Confidential Victim 7 in a state of nudity with his personal cell phone. Those images were found on the defendant's iCloud.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT NINE**  
**[18 U.S.C. §242]**

21. Paragraphs 1-4 are incorporated here.

22. On or about February 19, 2024, within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 8 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 8's cell phone under the auspices of confirming Confidential Victim 8's insurance coverage, searched through Confidential Victim 8's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of one or more images on Confidential Victim 8's cell phone which depicted Confidential Victim 8 in a state of nudity with his personal cell phone. Those images were found on the defendant's iCloud.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT TEN**  
**[18 U.S.C. §242]**

23. Paragraphs 1-4 are incorporated here.

24. On or about February 20, 2024, within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 9 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 9's cell

phone under the auspices of confirming Confidential Victim 9's insurance coverage, searched through Confidential Victim 9's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of one or more images on Confidential Victim 9's cell phone which depicted Confidential Victim 9 in a state of nudity with his personal cell phone. Those images were found on the defendant's iCloud.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT ELEVEN**  
**[18 U.S.C. §242]**

25. Paragraphs 1-4 are incorporated here.

26. On or about February 25, 2024, within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 10 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 10's cell phone under the auspices of confirming Confidential Victim 10's insurance coverage, searched through Confidential Victim 10's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of an image on Confidential Victim 10's cell phone which depicted Confidential Victim 10 in a state of nudity with his personal cell phone. That image was found on the defendant's iCloud.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT TWELVE**  
**[18 U.S.C. §242]**

27. Paragraphs 1-4 are incorporated here.



28. On or about February 28, 2024, within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 11 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 11's cell phone under the auspices of confirming Confidential Victim 11's insurance coverage, searched through Confidential Victim 11's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of an image on Confidential Victim 11's cell phone which depicted Confidential Victim 11 in a state of nudity with his personal cell phone. That image was found on the defendant's iCloud.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT THIRTEEN**  
**[18 U.S.C. §242]**

29. Paragraphs 1-4 are incorporated here.

30. On or about February 29, 2024, between 2:16 p.m. and 2:25 p.m., within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 12 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 12's cell phone under the auspices of confirming Confidential Victim 12's insurance coverage, searched through Confidential Victim 12's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of one or more images on Confidential Victim

12's cell phone which depicted Confidential Victim 12 in a state of nudity with his personal cell phone. Those images were found on the defendant's iCloud.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT FOURTEEN**  
**[18 U.S.C. §242]**

31. Paragraphs 1-4 are incorporated here.

32. On or about February 29, 2024, between 3:57 p.m. and 4:06 p.m., within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 13 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 13's cell phone under the auspices of confirming Confidential Victim 13's insurance coverage, searched through Confidential Victim 13's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of one or more images on Confidential Victim 13's cell phone which depicted Confidential Victim 13 in a state of nudity with his personal cell phone. Those images were found on the defendant's iCloud.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT FIFTEEN**  
**[18 U.S.C. §242]**

33. Paragraphs 1-4 are incorporated here.

34. On or about February 29, 2024, between 4:26 p.m. and 4:37 p.m., within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 14 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 14's cell phone under the auspices of confirming Confidential Victim 14's insurance coverage, searched through Confidential Victim 14's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of an image on Confidential Victim 14's cell phone which depicted Confidential Victim 14 in a state of nudity with his personal cell phone. That image was found on the defendant's iCloud.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT SIXTEEN**  
**[18 U.S.C. §242]**

35. Paragraphs 1-4 are incorporated here.

36. On or about March 5, 2024, within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 15 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 15's cell phone under the auspices of confirming Confidential Victim 15's insurance coverage, searched through Confidential Victim 15's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of an image on Confidential Victim 15's cell phone which depicted an Unidentified Person in a state of nudity with his personal cell phone. That image was found on the defendant's iCloud.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT SEVENTEEN**  
**[18 U.S.C. §242]**

37. Paragraphs 1-4 are incorporated here.

38. On or about May 8, 2024, between 2:48 p.m. and 3:01 p.m., within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 16 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 16's cell phone under the auspices of confirming Confidential Victim 16's insurance coverage, searched through Confidential Victim 16's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of an image on Confidential Victim 16's cell phone which depicted Confidential Victim 16 in a state of nudity with his personal cell phone. That image was found on the defendant's cell phone.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT EIGHTEEN**  
**[18 U.S.C. §242]**

39. Paragraphs 1-4 are incorporated here.

40. On or about May 8, 2024, between 3:35 p.m. and 3:44 p.m., within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 17 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 17's cell

phone under the auspices of confirming Confidential Victim 17's insurance coverage, searched through Confidential Victim 17's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of an image on Confidential Victim 17's cell phone which depicted Confidential Victim 17 in a state of nudity with his personal cell phone. That image was found on the defendant's cell phone.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT NINETEEN**  
**[18 U.S.C. §242]**

41. Paragraphs 1-4 are incorporated here.

42. On or about May 9, 2024, between 4:36 p.m. and 4:46 p.m., within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 18 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 18's cell phone under the auspices of confirming Confidential Victim 18's insurance coverage, searched through Confidential Victim 18's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of an image on Confidential Victim 18's cell phone which depicted Confidential Victim 18 in a state of nudity with his personal cell phone. That image was found on the defendant's cell phone.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT TWENTY**  
**[18 U.S.C. §242]**

43. Paragraphs 1-4 are incorporated here.

44. On or about May 9, 2024, between 6:31 p.m. and 6:39 p.m., within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 19 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 19's cell phone under the auspices of confirming Confidential Victim 19's insurance coverage, searched through Confidential Victim 19's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of an image on Confidential Victim 19's cell phone which depicted a Confidential Person known to Confidential Victim 19 in a state of nudity with his personal cell phone. That image was found on the defendant's cell phone.

In violation of and punishable under Title 18, United States Code, Section 242.

**COUNT TWENTY-ONE**  
**[18 U.S.C. §242]**

45. Paragraphs 1-4 are incorporated here.

46. On or about May 18, 2024, within the Eastern District of Missouri, the defendant,

**JULIAN ALCALA,**

while acting under color of law, willfully deprived Confidential Victim 20 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 20's cell phone under the auspices of confirming Confidential Victim 20's insurance coverage, searched through Confidential Victim 20's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of one or more images on Confidential Victim 20's cell phone which depicted Confidential Victim 20 in a state of nudity with his personal cell

phone. Those images were found on the defendant's cell phone.

In violation of and punishable under Title 18, United States Code, Section 242.

A TRUE BILL.

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FOREPERSON

SAYLER A. FLEMING  
United States Attorney

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CHRISTINE H. KRUG #42586MO  
Assistant United States Attorney