

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

FILED  
OCT 04 2022  
U.S. CLERK'S OFFICE  
INDIANAPOLIS, INDIANA

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
V. )  
)  
PATRICK KEARNEY, )  
)  
Defendant. )

CAUSE NO. 1:22-cr-

1 : 22 -cr- 0146 TWP -DML

**INDICTMENT**

The Grand Jury charges that:

**Background**

At all times relevant to this Indictment:

1. In 2019 and up to and including the present date, Defendant PATRICK KEARNEY resided in both the Northern District of Illinois and the District of Arizona.
2. Victim #1 and Victim #2 resided in the Southern District of Indiana. Victim # 1 and Victim #2 were married to each other in April of 2022.
3. In the early 2000s, KEARNEY and Victim #1 attended the same university. KEARNEY pursued a relationship with Victim #1 by trying to walk with her after class, meeting her at her dorm, and leaving mail for her at her dorm mailbox. Victim #1 did not reciprocate the relationship.
4. Victim #1 graduated from college and never saw KEARNEY again.

### **General Allegations**

5. As set forth below, beginning in September of 2019 and continuing through the present, KEARNEY engaged in a stalking and harassment campaign targeting Victim #1.

6. In September of 2019, KEARNEY began mailing Victim #1 anonymous letters using the United States mail. The letters were all postmarked either “Carol Stream, IL” or “Phoenix AZ”. Postmarks are imprints on letters, flats, and parcels that show the name of the United States Postal Service processing plant that processed the mail, along with the state, the first three digits of the plant zip code, and the date of processing.

7. KEARNEY sent approximately 22 handwritten letters to Victim #1 between September 2019 and September 2022. Most of the letters stated that Victim #1 should have died on September 11, 2001. They typically included pictures or drawings of the World Trade Center burning.

8. For example, in early September 2019, KEARNEY mailed a letter to Victim #1 stating, *“This is where you should have been on 9/11 you evil wicked ruinous devil. You would have saved the world much misery and grief. God will judge you and guess where you will go bitch! is what this stupid country really is? Divided States of America”*. The letter was written on a printed photo of the World Trade Center burning on September 11, 2001.

9. On or about September 28, 2019, KEARNEY mailed a second letter to Victim #1. The letter included a crude sketch of a plane flying into the Twin Towers. Above the drawing was a handwritten note stating, *“This is where you*

*should have been on 9/11! You would have saved the world much misery, grief, and despair you evil piece of shit bitch!”*

The note continued below the drawing, stating, “*When Jesus comes again I hope you burn in hell for all the misery you have caused the world. You pretty poison evil CUNT. Think about the evil grief you caused the world BITCH! You belong in hell where you came from! GO BACK THERE!*” This letter and all subsequent letters received by Victim # 1 were addressed to Victim #1’s current address in Indianapolis, IN.

10. Beginning in October of 2019, KEARNEY started repeatedly calling Victim #1’s cell phone. KEARNEY left multiple voicemails telling Victim #1 to check the mail and calling Victim #1 a “bitch” or a “cunt.” KEARNEY did not identify himself by name in any of the voicemails.

11. KEARNEY mailed a third letter to Victim #1 in early October 2019, though the specific date is not legible on the postmark. KEARNEY wrote the letter on a print-out of a CBS News web page entitled “Remembering 9/11 – Unforgettable 9/11 Images.” The web page included a photo of smoke billowing from the World Trade Center. Above the photo is an arrow pointing to the World Trade Center with a handwritten note stating, “*This is where your superficial, douchebag, asshole boyfriend [first name of Victim #1’s college boyfriend] should have been on 9/11 in the other tower.*”

The note continues next to the photo, with another arrow drawn to the photo: “*This is where you should have been on 9/11. You would have saved the*

*world misery, grief, and torment. You evil, cunt, piece of shit bitch! There's a hell for evil people like you. I can't wait until you get sent there like you deserve."*

12. On or about October 28, 2019, KEARNEY mailed a fourth letter to Victim #1. KEARNEY wrote the letter on same web page print out used in the third letter. KEARNEY wrote the following note above the photo of the World Trade Center: *"Watch the 9/11 videos and think of how you should have been in the tower or airplane bitch! Divided States of America is what this stupid country really is."*

Next to and below the photo, there is a hand-drawn arrow pointing to the World Trade Center, with the following handwritten note: *"If there is any God you will some day suffer for the misery you caused the world BITCH. This is where you should have been on 9/11. Above the impact. You would have saved the world sorrow, misery, and grief you fucking stuck-up, mean, cold-hearted bitch. And [first name of Victim #1's college boyfriend] should have been in the other tower. Your superficial douchebag ex-boyfriend."* The letter also included a crude sketch of what appears to be an upside-down American flag.

13. On or about January 14, 2020, KEARNEY mailed a fifth letter to Victim #1 from Phoenix, AZ, stating *"This should have been you on 9/11 (One of the jumpers). This is where you should have been on 9/11. Above the impact. You would have saved the world a lot of misery, grief, and sorrow you fucking CUNT evil bitch. You are wicked, evil, and God will punish you and people like you in the end bitch! Watch the 9/11 videos and think how you really deserved to die that DAY BITCH!"* The letter included crude sketches of an upside-down American

flag and a plane flying towards the World Trade Center, as well as a stick figure that appeared to be jumping from one of the towers.

The letter also stated, "*This is really the Divided States of America! Down with the USA!! Go Al-Queda!* [sic]" and referred to Marwan al-Shehhi as "*My hero.*" Marwan al-Shehhi was one of the hijackers aboard United Airlines Flight 175, which crashed into the South Tower of the World Trade Center on September 11, 2001.

The envelope of this letter listed a "Julio Iglesias" as the return addressee.

14. In March and April of 2020, KEARNEY left multiple voicemails on Victim #1's cell phone referencing the January 2020 letter. On March 25, 2020, KEARNEY left a voicemail for Victim #1 stating, "*It's Julio Iglesias, did you get my letter.*" KEARNEY left another voicemail for Victim #1 on March 25, 2020, stating, "*Be sure to check your mail, bitch.*"

15. On April 1, 2020, KEARNEY left two more voicemails for Victim #1, stating, "*Hello, it's Julio Iglesias, I was wondering if you got my letter*" and "*This is Julio Iglesias calling, how are you?*"

16. On or about March 27, 2020, KEARNEY sent another letter to Victim # 1. The letter included an almost identical sketch of the World Trade Center as was included in the fifth letter, postmarked January 2020. Above the sketch of the World Trade Center, KEARNEY wrote "*The Divided States of America is what this stupid country really is. My heroes Mohammad Atta*". To the left of the sketch, KEARNEY wrote "*Marwan al-Shehhi my heroes against America the great Satan*". To the right of the sketch, KEARNEY drew a stick figure and wrote below it:

*“jumpers should have been you and your dick friend [first name of Victim #1’s college boyfriend] too bitch!!”*

The letter continued below the sketch: *“This is where you should have been on 9/11. Above the impact. You would have saved the world a lot of misery, grief, sorrow, and pain. You fucking evil cunt bitch. Think of the people you have harmed in your life. God will punish wicked people like you the the Judgement Day. The attacks on 9/11 were blessed. Go Bin Laden! Down with evil people like you bitch!!”*

17. On April 5, 2020, at approximately 8:03 am, KEARNEY called Victim #1 and left a voicemail stating, *“You’re gonna go to hell.”*

18. On April 15, 2020, at approximately 12:46 am, KEARNEY left a voicemail for Victim # 1 stating, *“Fuck you.”*

19. KEARNEY mailed another letter to Victim #1 on or about April 10, 2020. This letter contained almost identical sketches to the sketch in the fifth and sixth letters, except this letter added a second stick figure that appeared to be jumping from the World Trade Center and stated *“Should have been you and your stupid friend [first name of Victim #1’s college boyfriend].”*

The note continued below the sketch: *“This is where you should have been on 9/11. Above the impact. You would have saved the world a lot of misery, grief, sorrow, and pain. God will punish evil people like you on the judgement. Think of people you’ve hurt and think that it not only should but will come back to you. The 9/11 attacks were blessed by God you evil.”* The note also states *“Allah u Akbar! America is the great Satan.”*

20. On April 17, 2020, at approximately 9:12 am, KEARNEY left called Victim #1 and left a voicemail stating, *“be sure to check your mail.”*

21. On or about May 26, 2020, KEARNEY sent another letter to Victim #1, stating, *“If there is a God or Karma he will punish wicked people like you for the evil pain you have caused the world. Don’t think you can act wicked and not have it catch up with you. You should have been on United Airlines Flight 175 hijacked by Marwan al-Shehhi when it crashed into the World Trade Center on 9/11. You would have saved the world much pain, misery, grief, and sorrow you fucking evil wicked stupid cunt bitch. The Divided States of America is what this stupid country really is. Down with the USA! Go Al-Quaeda! You will both go to hell if there is a God! And your superficial idiot friend [first name of Victim #1’s college boyfriend] should have jumped out of the towers too. FUCK YOU!!”* The letter included a crude sketch of an upside-down American flag.

22. On or about June 15, 2020, KEARNEY sent another letter to Victim #1. It read as follows: *“United Airlines Flight 175 flew into the South Tower You should watch the 9/11 videos and think how much misery, grief, and pain you would have saved the world if you would have leaped from the tower or been on the airplane flown in by MARWAN ALL-SHEHHI you fucking evil cunt piece of shit BITCH! You should be condemned to hell for your wicked acts along with your sack of shit friend [first name of Victim #1’s college boyfriend]. People like you make people want to commit terrorist acts against THE DIVIDED STATES OF AMERICA. Down with the USA! Go Al-Quaeda! Allah u Akbar! Bin Laden is GOD!”* The letter also included a crude sketch of an upside-down American flag on fire.

23. On June 26, 2020, at approximately 6:24 am, KEARNEY left a voicemail for Victim # 1 stating, *“Check your mail you fucking cunt.”*

24. On or about July 7, 2020, KEARNEY sent another letter to Victim # 1. It read as follows: *“You’re a fucking evil stuck-up cunt bitch who should have either died on 9/11 or been shot at Columbine. You would have saved the world a lot of misery, pain, and grief. Go Al-Queda! Down with the USA! Allah Akbar! God is Great! Bin Laden should have nailed you too! ‘Divided States of America’ is what this fucked up stupid ‘country’ really is.”*

25. On or about August 3, 2020, KEARNEY sent another letter to Victim #1. The letter was written on what appeared to be a partial print-out of a CNN webpage listing the 9/11 hijackers. There were arrows drawn to the list of hijackers with a handwritten note stating, *“You should have been on one of these airplanes on 9/11. You evil fucking cunt.”*

26. On or about August 22, 2020, KEARNEY mailed a letter to Victim #1 that stated, *“Enjoy this you fucking evil cunt.”* The envelope contained multiple pages of pornographic images that appeared to have been cut out from magazines.

27. KEARNEY sent additional letters to Victim # 1 referencing the September 11, 2001 terror attacks on or about the following dates:

<b>Date</b>	<b>Postmark Location</b>
September 8, 2020	Carol Stream, IL
November 2, 2020	Carol Stream, IL
November 13, 2020	Carol Stream, IL

January 5, 2021	Phoenix, AZ
August 3, 2021	Carol Stream, IL
December 23, 2021	Phoenix, AZ
February 28, 2022	Phoenix, AZ
March 17, 2022	Phoenix, AZ
May 11, 2022* *addressed to both Victim #1 and Victim # 2	Phoenix, AZ
August 1, 2022	Phoenix, AZ

28. KEARNEY's pattern of calling and leaving voicemails slowed in 2021, but did not entirely stop. KEARNEY called Victim #1 approximately 16 times in 2021. KEARNEY left two voicemails for Victim #1 in 2021 but did not say anything in the voicemails.

29. On or about February 22, 2022, KEARNEY mailed a package to Victim #1 containing Raid brand roach bait and a handwritten note stating, "*Here is some poison for you and give the rest to your idiot [first name of Victim #1's college boyfriend]! You fucking evil sack of shit!*"

30. Victim #1 and Victim #2 got married in the Spring of 2022. As they were planning their wedding, they created a wedding website on theknot.com that included their wedding registry information and the date of the ceremony. The couple registered at, among other places, Crate & Barrel and Target.

31. At approximately 11:28 p.m. on March 28, 2022, KEARNEY left the

following voicemail for Victim #1: *“Are you still gonna have the wedding? I would go to your wedding, but I think, I feel a little better because you’re, I guess you’re not with [first name of Victim #1’s college boyfriend] anymore. No, why don’t you give - why don’t you and [first name of Victim #1’s college boyfriend] both, um, eat some bug poison? The poisonous horrible people that you are. But you’re not with that idiot anymore. But you know, I think the poisonous piece of shit that you are, you deserve to have more than poison be sent to you, you fucking sack of worthless shit.”*

32. Approximately two minutes later, KEARNEY called and left another voicemail for Victim #1 stating, *“I hope something terrible happens to you. And if it doesn’t happen to you, I will make it happen to you, you evil fucking fucking devil motherfucker.”*

33. On April 1, 2022, at approximately 2:10 a.m., KEARNEY left the following voicemail for Victim #1: *“Kinda funny how you ended up in that little shack you got there. Man, that’s kinda funny. I think my garage is bigger than your house. So, uh, I’d like to crash your wedding. Maybe I’ll find out where your wedding is and I’ll make sure to ruin it for you just like you’ve ruined people in your life. You stupid motherfucker. FUCK YOU.”*

34. On April 10, 2022, at approximately 2:44 am, KEARNEY called Victim #1 and left the following voicemail: *“[U/I] incredible that I’m calling you to - is this your wedding night? But I guess you didn’t marry [first name of Victim #1’s college boyfriend] from [city where Victim #1 attended college], whatever happened with [first name of Victim #1’s college boyfriend], that stupid idiot you were seeing in*

*[city where Victim #1 attended college]? Now you're seeing some other douchebag who, you know what, I don't really care who he is or how you met him. Wanted to tell you that if you choose to mentally and emotionally damage someone, not only twenty years ago, but the fact that the person is calling you on your wedding night to confront you on the damage you inflicted on them back at [city where Victim #1 attended college], you should really think that you are a terrible, evil, malicious person who deserves to have horrible things happen to you for what you chose to do to people twenty years ago in [city where Victim #1 attended college]. You fucking bitch. Fuck you and your superficial fucking [first name of Victim #1's college boyfriend] fraternity piece of shit, and this fucking idiot you're seeing now, you evil bitch. FUCK YOU."*

35. On May 3, 2022, at approximately 5:23 am, KEARNEY left the following voicemail for Victim #1: *"You know what? Why didn't you invite me to your wedding? Whether it was in your pathetic excuse of a house, um, or, I don't know where it was. If I would have gone, I would have crashed your wedding. But since I wasn't there, I just want to destroy the rest of your life, like you chose to destroy other people's lives in your life, you stupid piece of shit. I don't think you're pretty poison, you're just poison. You're a poisonous person and you should eat poison. Along with this other piece of - idiot who you have texting me now. I'd love to kick his and your ass for the sacks of shit that you both are."*

36. In addition to calling Victim #1, KEARNEY began calling Victim #2 in May of 2022. KEARNEY also began addressing letters and packages to both Victim #1 and Victim #2, as opposed to just to Victim #1, around that same time.

37. For example, KEARNEY mailed a letter on or about May 11, 2022, and addressed the envelope to both Victim #1 and Victim #2. It was written on a printed webpage from Reuters.com entitled “Defining Images from the 9/11 attacks” that showed a photo of the Brooklyn Bridge with the World Trade Center burning in the background.

The letter stated, “*This is where you, your superficial ugly frat boy fuck [first name of Victim #1’s college boyfriend] and [Victim #2] should have been on 9/11. Above the impact. It would have saved the world a lot of misery and grief. You are an evil, terrible person who deserves to have your life ruined the same way you chose to ruin others lives. This is the ‘divided States of America.’ You are proof of the wickedness of people and of America ‘The Great Satan.’ And the undeniable Division of this pathetic ‘country’ we are forced to live in. People like you makes terrorists want to carry out acts such as this. May your evil soul burn in hell forever.*”

38. On or about May 16, 2022, KEARNEY mailed Victim #1 and Victim #2 a package containing Combat brand cockroach poison. The package was addressed to “[first name of Victim #1] and [first name of Victim #2] (newlyweds)” and included a note stating, “*Dear Newlyweds: Congratulations from C & B! We all wanted to Congratulate you on your BIG day! We all know the poisonous terrible people you REALLY are so that's why we wanted to give you poison. Put it on your wedding cake, in your water or just eat it plain for the terrible, poisonous people you are and that you've caused others in your pathetic life. If you destroy peoples life, their mental health self worth don't think it won't come back to YOU*

*you poisonous BITCH! FUCK BOTH OF YOU! For the horrible people you really are. May you both rot in the hottest, worst parts of hell! The superficial frat boy? What happened to [first name of Victim # 1's college boyfriend]? [First name of Victim #2], [first name of Victim # 1's college boyfriend]? Different people? Both douchebag?"*

39. On May 22, 2022, KEARNEY called Victim #2's cell phone and left the following voicemail, referencing the package KEARNEY had just sent to Victim #1 and Victim # 2: "Hi [first name of Victim #2], this is uh, Crate and Barrel, uh, calling. We sent you a wedding gift and uh, we just wanted to follow up and ask you, um, did you, did you like it? Um, we noticed you signed for it the other day. so we just, [laughter] we just wanted to ask you did you like your wedding gift? Um, we usually base our ratings on a scale of 1 to 10. 1 is not at all satisfied, and 10 is satisfied. The thing is, I was very satisfied [laughter] but I was wondering how satisfied were you with the gift that you got on May 19th from, uh, Crate and Barrel? I mean you signed for it, so we wanted to know uh, did you like the gift?"

40. On June 3, 2022, KEARNEY called Victim #2 and left the following voicemail: "Oh hi, it's Crate & Barrel. We wanted to just follow up. We usually do this when we send gifts out, but especially when it's a special occasion. We wanted to truly let you know we really thought it out that we tried to give people gifts that reflect the kind of people they really are. So in, so getting our gift we wanted to let you know that we took a lot of time into choosing our gift and we wanted to truly give you a gift that reflects the people that you really are and not how you...the phony bullshit way you try to portray yourself on theknot. I'd like to

*turn her wedding dress into a knot and choke both of you. You sacks of shit! Fuck you!*

41. On July 5, 2022, at approximately 9:21 am, KEARNEY called Victim #2 and left the following voicemail: *“Fuck you [first name of Victim #2] and fuck the stupid cunt you married. I hope you both go to fucking hell.”*

42. Also on July 5, 2022, at approximately 9:28 am, KEARNEY called Victim #2 and left the following voicemail: *“I don’t think you’ll be laughing the next thing I choose to do to you, you motherfucker. Fuck you!”*

43. On July 11, 2022, at approximately 5:04 am, KEARNEY called Victim #2 and left the following voicemail: *“Hey [first name of Victim #2], [laughter] you fucker, I’d love to kick your ass you fucking, fucking douchebag sack of shit. Get in the ring, asshole. I’d love to kick your fucking ass. FUCK YOU.”*

44. Also on July 11, 2022, at approximately 7:32 am, KEARNEY called Victim #2 and left the following voicemail: *“[laughter] I don’t know how many wedding gifts you got. Hopefully you didn’t get any, but, I was just wondering, um, Crate and Barrel, remember, you got something from Crate and Barrel? Did you like the gift from Crate and Barrel? You fucking sack of shit. I’d love to kick your fucking ass, you fucker. FUCK YOU.”*

45. On or about July 17, 2022, KEARNEY mailed a package to Victim #2 containing a DVD of a pornographic film titled “Dream Fucker” and Always brand feminine hygiene products. The package also contained a handwritten note stating, *“Dear [first name of Victim #2]: It’s OK! Everyone knows about your secret dark side!! Maybe it’s not so secret anymore!!”*

46. On August 4, 2022, at approximately 5:10 a.m., KEARNEY called Victim #2 and left the following voicemail: *Hey [first name of Victim #2], it's Target calling, we just wanted to know if you liked your wedding gift. Cuz we, it's ok, that you have another side to you, but we know all about it. So we just wanted to, you know, just say it's ok to have that other side to you. So we wanted to reflect that your dark, your secret side, but it's not so secret anymore. But it's ok we just wanted to know if you liked the gift.*"

47. KEARNEY called Victim #2 again on August 4, 2022, at approximately 10:44 p.m. and left a voicemail, stating, *"Hey [first name of Victim #2], I really like, actually I really hated your picture on theknot but [laughter] I know you're on theknot and I'd like to fucking twist a knot around your fucking throat if I could. But did you like your wedding gift, you motherfucker? Yeah, and if you want to call the cops, go ahead, I really don't give a shit. Cuz I don't know what you would even charge me with, because whatever happened with me and the piece of shit you married? You know how long ago that was? Restraining orders expire after two years. So if you want to reinstate another one, you and the piece of shit you married would have to like go to court and file another one, so, you fucking sack of fucking shit. Go ahead, I really don't care, because if she chose to destroy my life in 2002, in 2022 I will destroy your and her life. Not just your life, but your pathetic internet life that you're trying to portray. Which I know all about. It's public information, as the police say. yeah, so if you want to call the police, I really don't give a flying fuck. I've been to jail and prison, you motherfucker. I don't think me*

*calling you is the death penalty. I think you and her should be shot in the fucking head.”*

48. On August 26, 2022, at approximately 3:22 am, KEARNEY called Victim #2 and left a voicemail singing the following song lyrics: *“Exit light, enter night, off to never-never land.”* KEARNEY then stated, *“I’m gonna send you to never-never land, you shithead.”*

49. Between October of 2019 and September of 2022, KEARNEY has placed approximately 357 phone calls to Victim #1’s cell phone and has left over 120 voicemails.

50. Between May of 2022 and August of 2022, KEARNEY has placed approximately 47 phone calls to Victim #2’s cell phone and has left at least 35 voicemails.

51. On August 18, 2022, KEARNEY texted Victim #1 on WhatsApp, an instant messaging application. KEARNEY texted *“Hi”* and *“How are you”* and then sent Victim #1 a photo of a woman with her breasts exposed. KEARNEY texted again, *“U like that?”*, *“You stupid bitch”*, *“Fuck you”* and *“Suck my dick bitch!!!”* along with what appeared to be a pornographic image or video.

52. On or about September 21, 2022, KEARNEY sent another letter to Victim #1. The letter was postmarked Phoenix, Arizona. The envelope contained a printed copy of a photo of Holocaust victims, with the following note handwritten below: *“It’s too bad your worthless dead body wasn’t added to this pile at Dachau. God would it have saved the world much shit.”*

COUNT 1  
Stalking  
18 U.S.C. § 2261A(2)(B)

53. Paragraphs 1 through 52 of this Indictment are incorporated by reference as though fully set forth herein.

54. Beginning in or about September of 2019, and continuing through and including September of 2022, in the Southern District of Indiana and elsewhere, the defendant, PATRICK KEARNEY, did, with the intent to harass and intimidate another person, use any electronic communication service and electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, including the mail and the telephone, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim #1,

All in violation of Title 18, United States Code, Section 2261A(2)(B).

COUNT 2  
Stalking  
18 U.S.C. § 2261A(2)(B)

55. Paragraphs 1 through 52 of this Indictment are incorporated by reference as though fully set forth herein.

56. Beginning in or about 2022 and continuing through and including August of 2022, in the Southern District of Indiana and elsewhere, the defendant, PATRICK KEARNEY, did, with the intent to harass and intimidate another person, use any electronic communication service and electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, including the mail and the telephone, to

engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim #2,

All in violation of Title 18, United States Code, Section 2261A(2)(B).

COUNT 3  
Transmitting Threats via Interstate Communications  
18 U.S.C. § 875(c)

57. Paragraphs 1 through 52, 54, and 56 of this Indictment are incorporated by reference as though fully set forth herein.

58. On or about August 26, 2022, in the Southern District of Indiana and elsewhere, the defendant, PATRICK KEARNEY, knowingly and willfully did transmit in interstate commerce a communication which contained a threat to injure Victim #2, in violation of Title 18, United States Code, Section 875(c).

COUNTS 4 through 9  
Harassing Telephone Calls  
47 U.S.C. § 223(a)(1)(C)

59. Paragraphs 1 through 52 of this Indictment are incorporated by reference as though fully set forth herein.

60. On or about the dates set forth below, in the Southern District of Indiana And elsewhere, the defendant, PATRICK KEARNEY, in interstate communications, made the following telephone calls without disclosing his identity and with the intent to abuse, threaten, or harass Victim #1 and/or Victim #2:

Date	Time	Victim	Content
March 28, 2022 [Count 4]	11:28 PM	Victim #1	I hope something terrible happens to you. And if it doesn't happen to you, I will make it happen to you, you evil fucking fucking devil motherfucker.
April 24, 2022 [Count 5]	9:27 PM	Victim #1	What's up, you stupid fucking cunt. I'm gonna make sure the rest of your pathetic life is miserable, horrible, just like the fucking horrible person that you are, you stupid fucking cunt.
July 2, 2022 [Count 6]	4:19 AM	Victim #1	Yeah what's up you stupid fucking cunt? Did you like your wedding gift? [laughter] You know what's kind of priceless? It's priceless to get back at horrible people like you. But to do it at a time where, you, their wedding day or shortly thereafter that. Did you like the gift from Crate and Barrel? You fucking piece of shit. Fuck you. FUCK YOU.
July 5, 2022 [Count 7]	9:23 AM	Victim #2	I don't think you'll be laughing the next thing I choose to do to you, you motherfucker. Fuck you!
July 11, 2022 [Count 8]	5:04 AM	Victim #2	Hey [first name of Victim #2]. (Laughs) You fucker. I'd love to kick your ass, you fucking douche bag sack of shit. Get in the ring, asshole. I'd love to kick your fucking ass. Fuck you!
August 12, 2022 [Count 9]	1:03 AM	Victim #2	Hey what's up [first name of Victim #2], you worthless sack of shit? Did you like your wedding gift, you motherfucker? If you'd like to fight me, you know where I am. I know I could kick your ass. So why don't you just come and I'll kick your fucking ass, motherfucker. FUCK YOU

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

A TRUE BILL:



FOREPERSON

ZACHARY A. MYERS  
United States Attorney

By:   
\_\_\_\_\_  
Kelsey L. Massa  
Assistant United States  
Attorney