

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

JOHN COURTNEY POLLARD

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Criminal No. 1:24-cr-31
(18 U.S.C. § 875(c))

[UNDER SEAL]

INDICTMENT

FILED

OCT 16 2024

The grand jury charges:

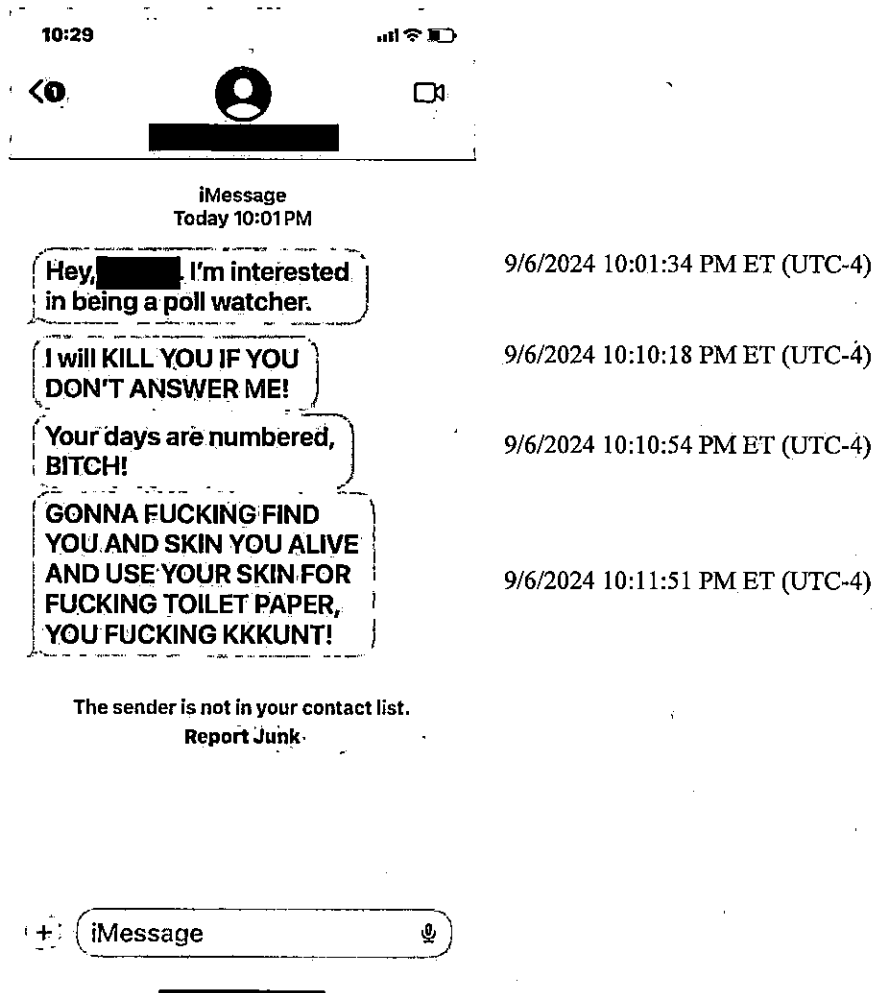
General Allegations

CLERK U.S. DISTRICT COURT
WEST DIST OF PENNSYLVANIA

At all times material to the Indictment:

1. The defendant, JOHN COURTNEY POLLARD, was a resident of Philadelphia, Pennsylvania.
2. Victim 1, an individual known to the grand jury, was a resident of the Western District of Pennsylvania.
3. Victim 1 was an employee of a state political party.
4. On or about September 5, 2024, Victim 1 posted to an online social media platform that in Victim 1's capacity as an employee of a state political party, Victim 1 was recruiting volunteers to "help[] observe at the polls on Election Day" and Victim 1 would be "doing required trainings in the next few weeks" since a "certificate is needed to assist inside the polls."
5. In Victim 1's online social media post, Victim 1 included Victim 1's full name and personal cellphone number and instructed individuals who may be interested in serving as poll watchers to contact Victim 1.
6. Victim 1's online social media post was subsequently reposted to another online platform, which made Victim 1's post available to a wider audience.

7. On or about September 6, 2024, between approximately 10:01 p.m. and 10:11 p.m. Eastern Time, the defendant, JOHN COURTNEY POLLARD, sent four (4) text messages via Apple's iMessage platform to Victim 1's cellphone at the phone number listed in Victim 1's online post referenced in Paragraphs 4 and 5. A screenshot of these messages appears below, next to the times that they were sent:



8. iMessage was Apple's proprietary text messaging platform/application for sending and receiving messages, which utilized the internet.

9. None of Apple's service and data centers that were involved in the transmission of iMessages were located in the Commonwealth of Pennsylvania.

COUNT ONE

The grand jury charges:

On or about September 6, 2024, in the Western District of Pennsylvania and elsewhere, the defendant, JOHN COURTNEY POLLARD, with the intent to communicate a true threat of violence, with knowledge that the communication would be viewed as a true threat of violence, and with recklessness as to whether the communication would be viewed as a true threat of violence, knowingly transmitted in interstate commerce through Apple's iMessage platform a communication containing a true threat to injure the person of another; that is, POLLARD threatened to kill and skin alive Victim 1.

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

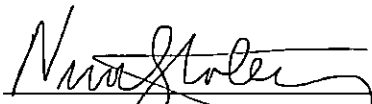
A True Bill,



FOREPERSON



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/s/ Corey R. Amundson

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