

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

UNITED STATES OF AMERICA :

- v. - : SUPERSEDING INFORMATION

JUAN THOMPSON, : S1 17 Cr. 165 (PKC)

Defendant.. :

- - - - - x

COUNT ONE

(Cyberstalking)

The United States Attorney charges:

1. From at least in or about July 2016 up to and including at least in or about March 1, 2017, in the Southern District of New York and elsewhere, JUAN THOMPSON, the defendant, willfully and knowingly, and with the intent to injure, harass, and intimidate another person, did use the mail, an interactive computer and electronic communication service, and an electronic communication system of interstate commerce, and a facility of interstate and foreign commerce to engage in a course of conduct that placed that person in reasonable fear of death or serious bodily injury to that person, an immediate family member of that person, and the spouse and intimate partner of that person, and that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to that person, an immediate family member of that

person, and the spouse and intimate partner of that person, to wit, THOMPSON circulated false and threatening information to, about, and in the name of a woman ("Victim-1") over the Internet, which caused Victim-1 substantial emotional distress.

(Title 18, United States Code, Sections 2261A(2) and 2.)

COUNT TWO

(False Information and Hoaxes)

The United States Attorney further charges:

2. From at least in or about January 2017 up to and including at least in or about March 2017, in the Southern District of New York and elsewhere, JUAN THOMPSON, the defendant, did intentionally convey false and misleading information under circumstances where such information may reasonably have been believed, under circumstances where such information indicated that an activity had taken, was taking, or would take place that would constitute a violation of Title 18, United States Code, Sections 2332a(a) and 2332f(a), to wit, THOMPSON conveyed at least twelve hoax threats in THOMPSON's own name and in Victim-1's name to bomb, or commit acts of violence against, Jewish Community Centers, organizations that

provide service to and on behalf of the Jewish community,
schools, and police departments.

(Title 18, United States Code, Section 1038(a)(1).)



JOON H. KIM

Acting United States Attorney

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(18 U.S.C. §§ 2261A(2), 1038(a)(1) and
2.)

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