

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	CRIMINAL NO:
v.	:	
	:	
ANTHONY DOUGLAS ELONIS,	:	VIOLATIONS:
Defendant	:	18 U.S.C. § 2261A
	:	(Cyberstalking)

INDICTMENT

THE GRAND JURY CHARGES:

Introduction and Background

At all times relevant herein:

1. Victim #1 was an Assistant United States Attorney in the Eastern District of Pennsylvania.

2. In 2010, Victim #1 was assigned to investigate a series of threatening communications which the defendant, Anthony Elonis, posted on Facebook. The investigation resulted in a grand jury indictment which charged Elonis with five counts of making threatening communications, in violation of 18 U.S.C. § 875 (c). More specifically, the indictment charged Elonis with transmitting in interstate and foreign commerce, via a computer and the internet,

threatening communications to others, including communications containing: 1) a threat to injure patrons and employees of Dorney Park and Wildwater Kingdom in Allentown, Pennsylvania, where the defendant had previously been employed; 2) a threat to injure and kill his ex-wife; 3) a threat to injure employees of the Pennsylvania State Police and the Berks County Sheriff's Department; 4) a threat to injure a kindergarten class of elementary school children; and 5) a threat to injure an Agent of the Federal Bureau of Investigation who was involved in the investigation of Elonis' case.

3. In October 2011, after a jury trial, Elonis was convicted of four of the five counts. In September 2012, Elonis was sentenced to a 44-month term of imprisonment, to be followed by a three-year term of supervised release.

4. Victim #1 was involved in the Elonis case from investigation through trial and sentencing.

5. While Elonis was still serving his prison sentence at FCI Fort Dix, he sent a letter to Victim #1, dated March 29, 2013. The letter stated, *"I am rapidly approaching the date of my release. Accordingly, I would like to begin researching the ordinances of the municipality in*

*which you reside. I simply do not wish to run afoul of any of them when I set fire to a cross in your yard.* The sentence was followed by an emoticon depicting a face with a tongue sticking out ( “:-p” ). The letter continued, “*I just thought you would appreciate my newfound respect for the law,*” and was signed, “*With Love, Your BFF Anthony Douglas Elonis.*”

6. Elonis sent a second letter to Victim #1, dated September 22, 2013. The letter stated, “*You may have won the battle but you’ll never stop me from wearing my I am Adam [Lanza] t-shirt in public.*” The letter also referenced the date “*February 14, 2014,*” which was Elonis’ projected release date from prison, followed by an emoticon depicting a “smiley face” ( “:-)” ). The letter was signed “*Anthony Elonis.*”

7. Adam Lanza, then age 20, was the perpetrator of the Sandy Hook Elementary School shootings in Newtown, Connecticut, on December 14, 2012, in which twenty-six people, including twenty children between six and seven years old, and six adult staff members, were shot and killed.

8. On January 5, 2020, at approximately 2:26 p.m., Victim #1 received an email from Elonis, who was using the email address

elonisvtheworld@gmail.com, at Victim #1's work email address. The subject of the email was "Hi." The email stated, *"I hope these dick pics finds (sic) you well. Please accept them in lieu of a burning cross. Sincerely, Your Powerful Tool, Anthony Elonis."* Attached to the email were three sexually explicit images, each depicting an erect penis. In one of the images, Elonis' face is visible and he is naked. In another image, a female, identified as a former girlfriend of Elonis, is depicted performing a sexual act.

9. On January 5, 2020, at approximately 2:38 p.m., Victim #1 received a similar email from Elonis, using the email address elonisvtheworld@gmail.com, including the same three sexually explicit images. However, in this email, Elonis corrected the word "finds" in the earlier email to the word "find."

10. In addition, on January 5, 2020, Elonis posted a "tweet" via his Twitter account @anthonyelonis, *"It's one thing to joke about sending your dick pics to the prosecutor that tried your case. It's another thing entirely to actually do it. And, yeah, I did."* The tweet included a screenshot of the email message Elonis sent to Victim #1 that day.

11. On January 30, 2020, at approximately 12:52 p.m., Victim #1 received another email from Elonis, using the email address elonisvtheworld@gmail.com, at Victim #1's work email address. The subject of the email was "Guilt." The email included a picture of the "Joker" character from the "Batman" movie series holding a photograph of Adam Lanza, the Sandy Hook shooter. Words inserted on the picture, in all capital letters, stated, "HELL HATH NO FURY LIKE A CRAZY MAN IN A KINDERGARTEN CLASS," and, "THE ONLY QUESTION IS . . . WHICH ONE?" Below the picture, Elonis asked, "*Do you ever feel guilty about all the pain we've caused?*" The email included a paragraph citing to an Illinois law defining the term "threatens," and stated, "*I'm excited about this new development to the stalking law in Illinois. There's going to be a fresh batch of souls for us to collect.*" The email was signed, "*Your BFF, Anthony Elonis.*"

The quote, "HELL HATH NO FURY LIKE A CRAZY MAN IN A KINDERGARTEN CLASS," and, "THE ONLY QUESTION IS . . . WHICH ONE?" was part of a Facebook posting Elonis made on November 16, 2010, for which he was previously prosecuted and convicted in the Eastern District of Pennsylvania. The November 16,

2010, Facebook posting, in its entirety, read as follows:

“That’s it, I’ve had about enough

I’m checking out and making a name for myself

Enough elementary schools in a ten mile radius

to initiate the most heinous school shooting ever imagined

*And hell hath no fury like a crazy man in a Kindergarten class*

*The only question is . . . which one?”*

12. On January 30, 2020, at approximately 2:46 p.m., Victim #1 received another email from Elonis, using the email address [elonisvtheworld@gmail.com](mailto:elonisvtheworld@gmail.com), at Victim #1’s work email address. The subject of the email was “Guilt.” Elonis forwarded the prior January 30, 2020, email in the chain and added a picture of the “Jigsaw” character from the “Saw” horror movie series. The following words were inserted in all capital letters on the picture:

“LET’S TALK ABOUT THE POWER THAT LIES IN THE  
LEGITIMACY OF STATEMENT. THERE’S A RHYME FOR EVER  
(sic) REASON. A PURPOSE FOR EVERY ACTION. RHYME IS MY  
MEDICINE, PURPOSE MY GAME. IF YOU CONSPIRE TO LIE,  
CHEAT, AND DEFAME TO ATTAIN YOUR DESIRES, YOU FORM A

WEB THAT CANNOT BE FULLY HIDDEN NO MATTER HOW  
MANY ATTEMPTS YOU MAKE TO DUST YOUR COBWEBS.

YOU CAN CHOOSE TO BEAR WITNESS, CONSPIRE TO BEAR  
FALSE WITNESS, OR YOU CAN CHOOSE TO REMAIN SILENT.  
EITHER WAY, YOU'LL BE A CHARACTER IN MY PLAY. THE  
GAME DOESN'T STOP UNTIL THE TRUTH IS REVEALED. NOW  
SWALLOW MY MEDICINE BITCH!"

Under the picture, Elonis asked, *"Is the government prepared to swallow?"* The email included a link to a previously filed petition to modify the conditions of Elonis' supervised release, and the comment, *"No reason for the government to fear me unless it's the truth. And it has to be the truth because I planned it. Not alone. You were and always will be my co-conspirator. Read the discovery."* The email also included postings from 2010.

13. On January 30, 2020, at approximately 3:29 p.m., Victim #1 received an email from Elonis, using the email address [elonisvtheworld@gmail.com](mailto:elonisvtheworld@gmail.com), at Victim #1's work email address. The subject of the email was "Guilt." The email included the previous emails in the chain and added, *"You want to know how I reached a troubled*

*young man like Adam Lanza? Pull up the attached discovery, search “gay,” then “child.”* Elonis included a PDF file and attached a text from 2010. He then stated at the bottom of the text, *“I knew then that the arrest and subsequent press would be the accelerant needed to ignite the flame I lit. Sad thing is it would have petered out in time but for you. Inciting the most heinous school shooting ever imagined; that should qualify me (us) as the most hated person (people), don’t you think?”*

14. On January 31, 2020, at approximately 10:53 a.m., Victim #1 received another email from Elonis, using the email address [elonisvtheworld@gmail.com](mailto:elonisvtheworld@gmail.com), at Victim #1’s work email address. The subject of the email was “Guilt.” Elonis forwarded the previous emails in the chain and added a picture of the Sandy Hook Elementary School shooting victims, with the following words in capital letters in red: “I TOOK PAYMENT IN BLOOD.” The picture included an insert stating, *“He also admitted posting messages boasting that any attempt to prosecute him would end in failure and, in turn, would generate a compensatory payment to him.”*

15. On February 9, 2020, at approximately 11:44 a.m., Victim #1



received another email from Elonis, using the email address [elonisvtheworld@gmail.com](mailto:elonisvtheworld@gmail.com), at Victim #1's work email address. The subject of the email again was "Guilt." Elonis forwarded the previous emails in the chain and added the following communication in large font: *"He knew the people he wanted to see the messages . . . would go there," in order to "protect themselves."* Elonis then added in smaller font, *"Let me rephrase your words. I knew that through arrest and prosecution and the subsequent media reports my words would reach their intended target . . . one Adam Lanza."*

Elonis then included a portion of a Facebook posting he made on November 30, 2010, for which he was previously prosecuted and convicted in the Eastern District of Pennsylvania. The portion of the November 30, 2010, Facebook posting read as follows:

*I was jus' waitin for y'all to handcuff me and*

*pat me down*

*Touch the detonator in my pocket and we're all*

*Goin'*

*[BOOM!]*

*Are all the pieces comin' together?*

*Shit, I'm just a crazy sociopath*

*that gets off playin you stupid fucks like a*

*fiddle*

*And if y'all didn't hear, I'm gonna be famous*

*Cause I'm just an aspiring rapper who likes the*

*attention*

*who happens to be under investigation for*

*terrorism*

*cause y'all think I'm ready to turn the Valley into*

*Fallujah*

*But I ain't gonna tell you which bridge is gonna*

*fall*

*into which river or road*

*And if you really believe this shit*

*I'll have some bridge rubble to sell you*

*tomorrow*

*[BOOM!][BOOM!][BOOM!]*

The email then concluded, *"You shouldn't have touched the detonator [first name of Victim #1]. You believed these were threats.*

*Now I get to sell my "bridge rubble."*

16. On February 9, 2020, at approximately 11:50 a.m., Victim #1 received another email from Elonis, using the email address elonisvtheworld@gmail.com, at Victim #1's work email address. The subject of the email again was "Guilt." Elonis forwarded the prior email chain and added a page stating, *"I was last decade's Charles Manson. Give me what I am owed."* He included a picture of Charles Manson along with an insert stating, *"Sporting an Adolph Hitler-style mustache, the 29-year-old former rides supervisor at Dorney Park & Wildwater Kingdom told [name of the trial judge] that the government had taken his Facebook posts out of context."*

17. On April 6, 2020, Elonis, utilizing the Twitter username "MC Sandy Hook @GaslitSCOTUS," posted a "tweet" which read as follows: *"So much control I have been able to exert. I could send the prosecution my dick pics without retort."* The tweet included a screenshot of the email Elonis sent to Victim #1 on January 5, 2020, including the three sexually explicit images, and clearly displays Victim #1's work email address.

18. Elonis posted additional "tweets" to Twitter regarding

Victim #1. For instance, on June 26, 2020, Elonis, utilizing the Twitter username “Atone Dougie @GaslitSCOTUS,” posted a “tweet” which read as follows: “*[name of FBI Agent who investigated his prior case] and [name of Victim #1] are what happens when pussy passes for FBI Agent and U.S. Attorney, respectively.*” The tweet included an earlier Elonis tweet from June 7, 2020, which reads: “*You undersold me, [first name of Victim #1], I think you meant subversive behavior.*” The tweet also included a screen shot of a quotation regarding Elonis’ previous trial and sentencing, which read: “*[last name of Victim #1] also noted that Elonis told a psychologist during a mental health evaluation that he had grown a Hitler mustache in prison in an attempt to employ reverse psychology against the judge and his attorney at the time, and in an expression of anti-authoritarianism and rebellion.*”

19. On September 7, 2020, Elonis, utilizing the Twitter username “Atone Dougie @GaslitSCOTUS,” posted a “tweet” which read: “*I’m sorry to tell you this, [first name of Victim #1], but more important people than you have told me I am a candidate for Revolution. It’s my birthright.*” The posting included an earlier tweet from Elonis on June 26, 2020, which read: “*and this is why there’s an*

*Elonis v. United States, kids. Sit around and let me tell you the true story about some real witches who infected an entire nation with a horrible disease.*

*[first name of Victim #1]  
[first name of Elonis' ex-wife]  
[first name of FBI Agent who investigated his prior case]."*

20. On September 15, 2020, Elonis, utilizing the Twitter username "Atone Dougie @GaslitSCOTUS," posted a "tweet" which included the following quote: *"Assistant U.S. Attorney [name of Victim #1] said it didn't matter if Elonis actually planned to harm someone."* Elonis then wrote: *"You literally told him it didn't matter if he planned to kill those kids."* Elonis then added another quote: *"You did this to us. You did it" – Eminem.*" The tweet included a screen shot of *"The Big Book of Granny"* – a book authored by Adam Lanza, the perpetrator of the Sandy Hook Elementary School shootings. The book contains a series of short stories describing violence against children and violent acts committed by children, including homicide.

21. On December 11, 2020, Elonis, utilizing the Twitter username "Atone Dougie @GaslitSCOTUS," posted a "tweet" which included the following quote: *"It probably did not help his case that,*

*according to one reporter, Elonis appeared to be smirking at Assistant U.S. Attorney [name of Victim #1] during cross-examination.” Elonis then wrote: “I couldn’t stop thinking of my future SCOTUS case or the impending terrorist attacks.”*

**Statutory Allegation**

**Count 1**  
**(Cyberstalking)**

The allegations set forth in paragraphs 1 through 21 are hereby realleged and incorporated by reference.

From on or about January 5, 2020, and continuing through December 2020, in the Eastern District of Pennsylvania and elsewhere, the defendant,

**ANTHONY DOUGLAS ELONIS,**

did knowingly and intentionally, with the intent to harass and intimidate another person, use an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional

distress to a person, that is, Victim #1.

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

**THE GRAND JURY FURTHER CHARGES:**

**Introduction and Background**

At all times relevant herein:

22. Victim #2 was an ex-girlfriend of the defendant, Anthony Elonis. Victim #2 started dating Elonis in August 2015. The relationship ended in the summer of 2018. Victim #2 has a child by Elonis. Victim #2 has full custody of that child.

23. After the relationship between Victim #2 and Elonis ended, Elonis sent numerous harassing communications to Victim #2, including text messages, telephone calls and voicemails. For instance, between June 19, 2019 and June 21, 2019, Elonis was in the hospital. Victim #2 received approximately 48 phone calls and messages from Elonis over this three-day period.

24. In July 2019, Elonis followed Victim #2 as she was leaving a

store. Elonis began kicking and banging on Victim #2's car. At other times, Elonis would come to Victim #2's residence, bang on the doors and windows of Victim #2's residence, and demand to be let into the residence.

25. On or about August 1, 2019, Elonis appeared in the parking lot of Victim #2's place of employment. Elonis followed Victim #2 back to her residence. Once outside Victim #2's residence, Elonis began banging on the windows of Victim #2's vehicle.

26. On August 5, 2019, Victim #2 applied for, and was granted, a "Temporary Protection from Abuse Order" against Anthony Elonis in the Court of Common Pleas of Northampton County, Pennsylvania.

27. On August 16, 2019, Victim #2 obtained a "Final Protection from Abuse Order," known as a "PFA," against Anthony Elonis in the Court of Common Pleas of Northampton County, Pennsylvania. The Protection from Abuse Order expires on August 16, 2022. The Order prohibits Elonis from contacting Victim #2 by telephone or by any other means, including through third persons.

28. Despite the PFA order, Elonis continued to contact Victim #2 by text messages, telephone calls and voicemails. For example, in or



about September 2019, Elonis sent a text message to Victim #2, his ex-wife, and another ex-girlfriend. The text message read as follows:

*“[First name of Elonis’ ex-wife],  
[First name of Elonis’ other ex-girlfriend],  
[First name of Victim #2]:*

*I don’t know if the news will definitely drop this week but you three need to prepare yourselves for the reality that Adam Lanza was inspired by my writing and that the Obama Administration lied to the American people about it. I don’t know what that means for me, you, our children, or the country but you need to be made aware.”*

29. On or about September 25, 2019, Victim #2 filed a Complaint for Indirect Criminal Contempt with the Court of Common Pleas of Northampton County, Pennsylvania, alleging that Elonis had violated the terms and conditions of the PFA Order.

30. In or about October 2019, Elonis, utilizing the Twitter username “The Forgotten Man @AnthonyElonis,” posted a tweet which read as follows: *“A little update to U.S. history: The last Protection from Abuse order issued by the Commonwealth of Pennsylvania against me resulted in the deaths of 20 children at Sandy Hook Elementary School in Newtown, Connecticut.”*

31. On or about October 18, 2019, Elonis was found guilty of Indirect Criminal Contempt, by the Court of Common Pleas of Northampton County, Pennsylvania, for violating the terms and conditions of the PFA Order.

32. On or about October 24, 2019, Elonis, utilizing the Twitter username “Arthur Fleck @AnthonyElonis,” posted a tweet which included a sexually explicit image of Victim #2.

33. Elonis, on numerous occasions, using different telephone numbers, continued to contact Victim #2 by text messages, telephone calls and voicemails.

34. On or about October 20, 2020, Victim #2 filed a Complaint for Indirect Criminal Contempt with the Court of Common Pleas of Northampton County, Pennsylvania, alleging that Elonis had again violated the terms and conditions of the PFA Order.

35. Elonis posted additional “tweets” to Twitter regarding Victim #2. For instance, on October 24, 2020, Elonis, utilizing the Twitter username “The Forgotten Man’s Revenge @GaslitSCOTUS,” posted a tweet which read as follows:

*“The Three Amighoes*

*Using their victimhood to get the state to engage in acts of violence against men.*

*Well, ladies two can play at that game.*

*And I don’t like to lose.”*

The tweet included images of Victim #2, Elonis’ ex-wife, and Elonis’ other ex-girlfriend.

36. On or about December 2, 2020, Elonis was again found guilty of Indirect Criminal Contempt, by the Court of Common Pleas of Northampton County, Pennsylvania, for violating the terms and conditions of the PFA Order.

37. On February 11, 2021, Elonis, utilizing the Twitter username “Tony Whispers (Anthony Elonis) @GaslitSCOTUS,” posted a tweet which read as follows:

*“[First name of Elonis’ ex-wife],  
[First name of Elonis’ other ex-girlfriend],  
[First name of Victim #2]*

*Do these women have any idea the collective harm they’ve caused to the United States of America?”*

38. On March 29, 2021, Elonis, utilizing the Twitter username “Tony Whispers (Anthony Elonis) @GaslitSCOTUS,” posted a tweet

which read as follows:

*“My trophy black ex-girlfriend with the CIA daddy. Let’s talk about her.”*

The post included an image depicting Elonis and Victim #2.

39. On March 31, 2021, Elonis, utilizing the Twitter username “Tony Whispers (Anthony Elonis) @GaslitSCOTUS,” posted a tweet which read:

*“She informed me of my true societal influence, boys. I had to waterboard her.”*

The post contains an image of Elonis and Victim #2.

40. On April 6, 2021, Elonis, utilizing the Twitter username “Tony Whispers (Anthony Elonis) @GaslitSCOTUS,” posted a tweet which read as follows:

*“It’s an erotic act.”*

The post contains an earlier post and an image depicting Victim #2, in a grocery store, while pregnant.

### **Statutory Allegation**

#### **Count 2** **(Cyberstalking)**

The allegations set forth in paragraphs 22 through 40 are hereby realleged and incorporated by reference.

From in or about June 2018 and continuing to the date of this indictment, in the Eastern District of Pennsylvania and elsewhere, the defendant,

**ANTHONY DOUGLAS ELONIS,**

did knowingly and intentionally, with the intent to harass and intimidate another person, use an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional distress to a person, that is, Victim #2.

**All in violation of Title 18, United States Code, Sections 2261A(2)(B), 2261(b)(6), and 2265A.**

## **THE GRAND JURY FURTHER CHARGES:**

### **Introduction and Background**

At all times relevant herein:

41. Victim #3 was the ex-wife of Anthony Elonis. Victim #3 has two children by Elonis. Victim #3 separated from Elonis in May 2010 and obtained a divorce from Elonis thereafter.

42. Elonis' previous indictment in 2011 charged him with transmitting in interstate commerce and foreign commerce, via computer and the internet, threatening communications, including a communication containing a threat to injure and kill Victim #3, in violation of 18 U.S.C. § 875 (c). Victim #3 testified as a government witness in Elonis' 2011 jury trial in the Eastern District of Pennsylvania. Elonis was found guilty of threatening to injure and kill Victim #3.

43. Victim #3 previously obtained a Protection from Abuse Order (PFA) against Elonis, but Victim #3 allowed the PFA to lapse while Elonis was in federal prison.

44. Since his release from prison, Elonis has sent numerous harassing communications to Victim #3, including text messages,

telephone calls and voicemails.

45. Since 2019, Elonis has come to Victim #3's residence on multiple occasions, without invitation, in spite of the fact that Victim #3 told Elonis a number of times not to come to her residence. In or about October/November 2020, Elonis came to Victim #3's residence late at night and rang the doorbell of her residence. Elonis later left Victim #3 a voicemail stating that he was the person who was ringing the doorbell of her residence.

46. In 2020, on Victim #3's birthday, Elonis left a gift on the doorstep of Victim #3's residence. In 2020, on the date of what would have been their wedding anniversary, Elonis left an "Elmo" doll, as well as a hat displaying the word "Wifey," on Victim #3's doorstep. Elonis had signed his name on the brim of the hat.

47. In addition, Elonis left innumerable messages on Victim #3's answering machine. Many times, Elonis would fill up the space on Victim #3's voicemail, so that no additional messages could be left. Victim #3 attempted to block Elonis' telephone number, but Elonis would call from different telephone numbers, or use an "app" to disguise his number and continue to leave additional voicemails. Among the

numerous voicemails Victim #3 received from Elonis were the following:

On or about October 25, 2020, Elonis left Victim # 3 a voicemail which stated in part:

*“ . . . I don’t know why you’re doin this. You blocked me . . . you don’t want to talk to me . . . um . . . we have kids together . . . um . . . I’m not lyin when I say I have data on top of data . . . I could release it all, I don’t want to . . . um . . . yeah, I’m pretty much . . . um . . . you don’t know the power that I’ve been able to take for myself, [First name of Victim #3] I do not want to do this! I don’t ! . . . I want you to apologize for what you did to me . . . and I don’t . . . I’ve been apologizing for years . . . I apologized in 2010. It’s pathetic, it’s sad what you did to me. It’s pathetic what I did to you . . . um . . . would you call me . . . please.”*

48. On or about October 29, 2020, Elonis left Victim #3 a voicemail which stated in part:

*“Hi [First name of Victim #3], it’s me, um, I just wanted to say that was me knockin or ringing your doorbell, I’m sorry. I don’t care, I just wanted to drive. I didn’t expect you to answer . . . I know, like, when I like give away the hatred, like, I’m sorry for what I did, um, recently. . . um, I tried not to, and I tried to have thick skin . . . but [First name of Victim #3] your criticism is the only one ever . . . your criticism, sorry, your criticism is the only one that I care about . . . so when you say that, like, you like the fact that I could possibly be in jail, I know you wanna shut my mouth, . . . and I know the things I said, you know . . . I fucked up, I fucked up again, I just fucked up again . . . I don’t want to be hated by you . . .”*

49. On or about November 1, 2020, Elonis left Victim #3 a voicemail which stated in part:

*“Hey [First name of Victim #3], I’m gonna keep it short because,*



*um, you know how much space there is on the box . . . listen I'm not stupid, I know you read my shit, I know [name of Elonis' other ex-girlfriend] reads my shit, I know [name of Victim #2] reads my shit, and all three of you talk to each other, so I don't know . . . what you guys are tryin to do to me, but. . . . Listen I always took responsibility for everything I ever did to you and I don't think you ever have . . ."*

50. On or about December 6, 2020, Elonis left Victim #3 a voicemail which stated in part:

*"Hey [First name of Victim #3], two quick things, um, I deleted my Twitter, um, basically indefensible, I'm sorry for all the awful things I said on there, specifically the stuff about you, and, um, it's gone, it's deleted . . ."*

51. Elonis also posted numerous "tweets" to Twitter regarding Victim #3. For instance, on September 16, 2020, Elonis, utilizing the Twitter username "Tony Whispers (Anthony Elonis) @GaslitSCOTUS," posted a tweet which read:

*"It was after your testimony at trial that I decided to grow a Hitler mustache to wear at sentencing in an effort to make contact with a troubled artist and seal the deal that would become known as Sandy Hook."*

The tweet included a screen shot of *"The Big Book of Granny"* – a book authored by Adam Lanza, the perpetrator of the Sandy Hook Elementary School shootings, and included an additional tweet by Elonis which read:

*“I had to say all that. There’s no trespass I wouldn’t forgive, even unrequited. I still love you, [First name of Victim #3].”*

52. On October 22, 2020, Elonis, utilizing the Twitter username “Tony Whispers (Anthony Elonis) @GaslitSCOTUS,” posted a tweet which read:

*“In her hymn of a hundred names from the Mundamala-tantra, [First Name of Victim #3] is called ‘She Who Likes Blood,’ ‘She Who is Smearred with Blood,’ and ‘She Who Enjoys Blood Sacrifice.’ – Wikipedia.”*

53. On November 3, 2020, Elonis, utilizing the Twitter username “Tony Whispers (Anthony Elonis) @GaslitSCOTUS,” posted a tweet which read:

*“I don’t think you understand how damaging your fear has been to the safety and security of the people of the United States of America, [First Name and Middle Name of Victim #3].*

*I love you. Probably always will. It’s my cross.”*

54. On November 4, 2020, Elonis, utilizing the Twitter username “Tony Whispers (Anthony Elonis) @GaslitSCOTUS,” posted a tweet which read:

*“I was fascinated by the Oklahoma City bombing. I read the entire Newsweek article in my sex therapist’s waiting room at the age of 12. I fell in love with terror [First name of Victim #3] in the summer of 2001. I’m not going to lie. Terrorism has always made my dick hard.”*

55. On December 9, 2020, Elonis, utilizing the Twitter username “Tony Whispers (Anthony Elonis) @GaslitSCOTUS,” posted a tweet which read:

*“I take no issue with your friendship.*

*But*

*[First name of Victim #3] I listened to rap and I adored your taste in music.*

*[First name of Elonis’ other ex-girlfriend] You were there when your Mom falsely accused me of hitting her with a cooking pot. you both lied under oath. So be careful.”*

### **Statutory Allegation**

#### **Count 3** **(Cyberstalking)**

The allegations set forth in paragraphs 41 through 55 are hereby realleged and incorporated by reference.

From on or about January 1, 2018 and continuing to the date of this indictment in the Eastern District of Pennsylvania and elsewhere, the defendant,

**ANTHONY DOUGLAS ELONIS,**

did knowingly and intentionally, with the intent to harass and intimidate another person, use an interactive computer service, an electronic communication service, an electronic communication system

of interstate commerce, and other facilities of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional distress to a person, that is, Victim #3.

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

A TRUE BILL:

07/21/2021  
DATE

  
GRAND JURY FOREPERSON

BRUCE D. BRANDLER  
ACTING U.S. ATTORNEY  
MIDDLE DISTRICT OF  
PENNSYLVANIA

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Acting Under Authority  
Conferred by 28 U.S.C. § 515

No. \_\_\_\_\_

**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

**THE UNITED STATES OF AMERICA**

vs.

**ANTHONY DOUGLAS ELONIS**

**INDICTMENT**

Counts

18 U.S.C. 2261A (Cyberstalking – 3 counts)



Filed in open court this \_\_\_\_\_ day,

Of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

Clerk

Bail, \$ \_\_\_\_\_