



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

KIERNAN MAJOR,

Defendant.

CR No. 2:22-cr-00387-DSF

I N D I C T M E N T

[18 U.S.C. §§ 2261A(2)(A), (B),
2261(b)(5): Stalking; 18 U.S.C.
§ 875(c): Threat by Interstate
Communication]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 2261A(2)(A), (B), 2261(b)(5)]

1. Beginning on or about October 2020, and continuing to at least on or about July 10, 2022, in Los Angeles County, within the Central District of California, and elsewhere, defendant KIERNAN MAJOR, with the intent to harass and intimidate Victim 1, used an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely, cellular telephone networks, email, interstate wires, and the Internet, to engage in a course of conduct, described in paragraph 2 below, that

1 placed Victim 1 in reasonable fear of death and serious bodily injury
2 to Victim 1 and immediate family members of Victim 1, and that
3 caused, attempted to cause, and would reasonably be expected to cause
4 substantial emotional distress to Victim 1 and immediate family
5 members of Victim 1.

6 2. Defendant MAJOR's course of conduct included, among other
7 things, the following:

8 a. On or about April 25, 2021, defendant MAJOR sent an
9 email to Victim 1 titled "Show dad and his friends" which stated: "I
10 will kill you and mutilate your siblings for years. It's only a
11 matter of time the way you are acting. Please report me ASAP it will
12 help you at least a little."

13 b. On or about April 25, 2021, defendant MAJOR sent an
14 email to Victim 1 titled "Re: Show dad and his friends" which stated:
15 "I will kill your family one by one. And then i will have a field day
16 embarrassing your whore parents next week. Lol this is what you get
17 for blocking me. Cunt. [¶] Wait till i target [Victim 1's brother]
18 and [Victim 1's brother] hahaha.. bye."

19 c. On or about April 25, 2021, defendant MAJOR sent an
20 email to Victim 1 which stated: im killing you and whoever lives at
21 all the addresses i know you reside at."

22 d. On or about May 12, 2021, defendant MAJOR sent an
23 email to Victim 1 titled "Warning" which stated: "[Victim #1], I
24 cannot sustain the suffrage that comes with our dispute at the
25 present moment. It genuinely drives me insane to re-experience the
26 past everyday with counsel, especially in such detail. For these
27 reasons am temporarily choosing to focus on and invest in my own
28 well-being for a change. This message serves only as a purpose to

1 forewarn you of what is patiently awaiting each and every living
2 specimen of your past, current and future and to update you on the
3 status of your court summons'. The nastiest truth's about all of you
4 will be relentlessly exposed and I will conduct this in such as
5 public manner that it will continue to haunt you guys in every corner
6 of this planet until I finally succeed in your guys' total
7 extinction. You and your father are absolutely terrible people and do
8 not ever attempt to convince yourselves otherwise. This doesn't even
9 scratch the surface of how I feel about you or the 'discomfort'
10 you're all about to experience for the rest of your lives. Good luck
11 to you all :) I almost hope you underestimate me. Count your fucking
12 blessings, -Kiernan"

13 e. On or about May 14, 2021, defendant MAJOR sent a
14 series of messages to Victim 1 which stated:

15 i. "We have just made our first round of calls to
16 your employers. I wish you a horrible weekend. Please commit suicide
17 sooner rather than later. See ya in court ya slut [¶] You will have
18 to lock me up for life to stop me from going after you, your family
19 and your friends. I am insanely creative and have been prepping this
20 for over a year. Don't ruin your life. I beg you because when you
21 apologize I'll end up feeling really bad. This will destroy your
22 family without question. My last warning. I just feel it's moral to
23 warn you. Sorry to harass."

24 ii. "You will always be an entitled little gold
25 digging cunt. You're nothing but a waitress turned glorified nanny.
26 Get over yourself and your fabricated reality. Remember that you have
27 gotten no where in life on your own, neither has anyone in your
28 family. You will never earn shit in your life unless throwing your

1 pussy at rich men counts. I will expose you and our megalomaniac
2 father. Your time is running thin slut and I will not relent. You can
3 think you are making progress but you could own the state of NY and
4 it wouldn't prevent what's to come. Good luck. You'll really need it.
5 Sad you think I'm all talk. Bye."

6 f. On or about May 17, 2021, defendant MAJOR sent a
7 series of messages to Victim 1 which stated:

8 i. "Be lucky I don't fucking kill your dad and you.
9 Pussy whore cunt."

10 ii. "Fucking die whore.Pussy ass bitch."

11 iii. "Your homes are about to blasted."

12 iv. "Kill yourselves before I end up doing it."

13 g. On or about July 31, 2021, defendant MAJOR sent a
14 series of messages to Victim 1 which stated:

15 i. "And if I don't kill him myself, I hope your
16 father dies."

17 ii. "I'll kill all of your family any day. It's just
18 a matter of will. You are the one who begs for hell."

19 h. On or about September 21, 2021, defendant MAJOR sent a
20 series of messages to Victim 1 which stated:

21 i. "You're a slut and a gold diggin whore and I'll
22 prove it."

23 ii. "If I don't kill someone you know, I'm ll be
24 surprised."

25 iii. "If I see you I'm killing you on the spot"

26 iv. "You're a fucking bitch. A whore cunt bitch and
27 you'll pay for it."

28 v. "Slut ass bitch"

1 vi. "I will kill you and your pathetic family"

2 i. On or about November 23, 2021, defendant MAJOR sent a
3 message to Victim 1 which stated: "I adore how simple it is to get
4 you (and your family) to hang yourselves by your own rope."

5 j. On or about June 27, 2022, defendant MAJOR sent a
6 series of messages to Victim 1 which stated:

7 i. "I'd say within a year or two someone gets
8 brutally hurt over this if things are unchanged. But that's just my
9 guess."

10 ii. "I'm not going anywhere. I will burn your life to
11 the ground if I have to."

12 iii. "You have no real friends don't forget that."

13 iv. "And one day you'll die in front of your kids."

14 k. On or about July 1, 2022, defendant MAJOR sent a
15 series of messages that included the following:

16 i. "I would stay inside this independence day."

17 ii. "I could kill your father in about 30 minutes so
18 relax."

19 iii. "I hope you're dumb enough to ignore this because
20 I'm 200% killing you or someone you know 1"

21 iv. "Without a doubt I will kill someone by Monday."

22 v. "IM GONNA KILL ALL OF YOU FUCKING BITCHES"

23 vi. "When I kill your father what would you like me
24 to use?"

25 vii. "You will never stop me no matter what the fuck
26 you do from killing them now."

27 viii. "And you're whole family about to get
28 murdered tonight for it."

ix. "If I need to find ANYONE you know and kill them I will"

x. "AND ILL KILL YOU FOR THAT"

xi. "ON FUCKING GOD I WILL KILL YOU"

xii. "YOU'RE DAD IS GETTING MURDERED TONIGHT"

xiii. "I will fucking kill you and I swear I hate this because I am not this person"

l. On or about July 6, 2022, defendant MAJOR sent a series of messages to Victim 1 which stated:

i. "And you're whole family about to get murdered tonight for it"

ii. "I will fucking fix this now or I will do something to someone"

iii. " I will go to jail to accomplish this"

iv. "If I need to find ANYONE you know and kill them I will"

v. "BUT DONT THINK I WONT HIT YOUR SISTER FIRST TJAT WHOE"

vi. "I COULD SHOOT THAT BUTCH ANY DAY"

vii. "Figure it out because I have set out to learn your father and sisters' patter of life."

m. On or about July 10, 2022, defendant MAJOR sent emails to Victim 1 which were titled: "YOU WILL DIE OVER THIS IF YOU DONT SMARTEN UP" and "I WILL MAKE SURE YOUR FATHER DIES A BRUTAL DEATH."

COUNT TWO

[18 U.S.C. §§ 2261A(2)(A), (B), 2261(b)(5)]

3. Beginning on or about May 29, 2022, and continuing to at least on or about July 10, 2022, in Los Angeles County, within the Central District of California, and elsewhere, defendant KIERNAN MAJOR, with the intent to harass and intimidate Victim 2, used an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely, cellular telephone networks, email, interstate wires, and the Internet, to engage in a course of conduct, described in paragraph 4 below, that placed Victim 2 in reasonable fear of death and serious bodily injury to Victim 2 and immediate family members of Victim 2, and that caused, attempted to cause, and would reasonably be expected to cause substantial emotional distress to Victim 2 and immediate family members of Victim 2.

4. Defendant MAJOR's course of conduct included, among other things, the following:

a. On or about May 29, 2022, defendant MAJOR sent a series of messages to Victim 2 which stated:

i. "I honestly believe you guys want me to die"
ii. "I PROMISE it someone checks on my welfare I will kill Everyone"

b. On or about June 25, 2022, after Victim 2 demanded payment for money she lent defendant MAJOR, defendant MAJOR sent a series of messages to Victim 2 which stated:

i. "You'll get paid on my terms or you'll get my promises made."

1 ii. "My 'friends' aren't as nice."

2 iii. "What's your faggot fathers number"

3 iv. "You or your bitch ass father can call me. "

4 v. "I don't make threats I make promises btw."

5 c. On or about June 27, 2022, defendant MAJOR sent a
6 series of messages to Victim 2 which stated:

7 i. "You've drank too much of [Victim # 1's] Kool-
8 Aide."

9 ii. "For that expect to suffer life-long consequences
10 along side her until you guys get over yourselves and take your
11 fathers cock out of your mouths. And its sad you're naïve enough to
12 believe her. [Victim # 1] IS A LIAR!"

13 iii. "I will fucking find you fuckers and I will
14 fucking hold you accountable by whatever means necessary. MEET WITH
15 ME AND BE EVEN"

16 iv. "Or fucking DIE"

17 v. "And I mean DIE"

18 vi. "You will both regret this"

19 vii. "Just speak to me on the phone or meet in person
20 and it's over. Until then you're 1 year away from a bullet in your
21 head. Metaphorically... that is..."

22 viii. "But I'm gonna fucking make you guys pay for
23 this"

24 ix. "YOU SPEAK HONESTLY OR YOU AND YOUR FAMILY CAN
25 DIE ALONG WITH [Victim 1]"

26 d. On or about July 1, 2022, defendant MAJOR sent a
27 series of messages to Victim 2 which stated:

28 i. "I INTEND TO KILL YOUR WHOLE FAMILY"

1 ii. "HOW DARE YOI"
2 iii. "IM COMING TO KILL THE FIRST FUCKING PERSON I
3 SEE"
4 iv. "YOU MOTHERFUCKING BITCH"
5 v. "I WILL FIND YOU"
6 vi. "AND I WILL FUCKING SLAUGHTER YOU"
7 vii. "I promise my life goal is to revenge you and I
8 don't care what it takes"
9 viii. "I will kill [Victim 2's brother] if I have
10 to"
11 ix. "I don't give one fuck"
12 x. "I will not tolerate lies!"
13 xi. "YOU FUCKING BETRAYING CUNT"

COUNT THREE

[18 U.S.C. § 875(c)]

On or about May 31, 2021, in Los Angeles County, within the Central District of California, and elsewhere, defendant KIERNAN MAJOR, with intent to issue a threat and with knowledge that it would be viewed as a threat, knowingly transmitted in interstate and foreign commerce a communication containing a true threat to injure the person of another, that is, messages to Victim 1 that included the following: "I'll kill all of your family any day. It's just a matter of will. You are the one who begs for hell."

COUNT FOUR

[18 U.S.C. § 875(c)]

On or about July 1, 2022, in Los Angeles County, within the Central District of California, and elsewhere, defendant KIERNAN MAJOR, with intent to issue a threat and with knowledge that it would be viewed as a threat, knowingly transmitted in interstate and foreign commerce a communication containing a true threat to injure the person of another, that is, text messages to Victim 1 that included the following: "I hope you're dumb enough to ignore this because I'm 200% killing you or someone you know [. . .] IM GONNA KILL ALL OF YOU FUCKING BITCHES [. . .] ON FUCKING GOD I WILL KILL YOU."

COUNT FIVE

[18 U.S.C. § 875(c)]

On or about July 10, 2022, in Los Angeles County, within the Central District of California, and elsewhere, defendant KIERNAN MAJOR, with intent to issue a threat and with knowledge that it would be viewed as a threat, knowingly transmitted in interstate and foreign commerce a communication containing a true threat to injure the person of another, that is, an email to Victim 1 with the following in the subject line: "I 100% WILL SCALP YOUR FATHER ALIVE."

COUNT SIX

[18 U.S.C. § 875(c)]

On or about June 27, 2022, in Los Angeles County, within the Central District of California, and elsewhere, defendant KIERNAN MAJOR, with intent to issue a threat and with knowledge that it would be viewed as a threat, knowingly transmitted in interstate and foreign commerce a communication containing a true threat to injure the person of another, that is, messages to Victim 2 that included the following: "MEET WITH ME AND BE EVEN [. . .] Or fucking DIE [. . .] And I mean DIE."

COUNT SEVEN

[18 U.S.C. § 875(c)]

On or about July 1, 2022, in Los Angeles County, within the Central District of California, and elsewhere, defendant KIERNAN MAJOR, with intent to issue a threat and with knowledge that it would be viewed as a threat, knowingly transmitted in interstate and foreign commerce a communication containing a true threat to injure the person of another, that is, messages to Victim 2 that included the following: I INTEND TO KILL YOUR WHOLE FAMILY [. . .] HOW DARE YOI [. . .] IM COMING TO KILL THE FIRST FUCKING PERSON I SEE [. . .] YOU MOTHERFUCKING BITCH [. . .] I WILL FIND YOU [. . .] AND I WILL FUCKING SLAUGHTER YOU."

A TRUE BILL

/s/

Foreperson

STEPHANIE S. CHRISTENSEN
Acting United States Attorney



SCOTT M. GARRINGER
Assistant United States Attorney
Chief, Criminal Division

DAVID T. RYAN
Assistant United States Attorney
Deputy Chief, General Crimes
Section

JUAN M. RODRIGUEZ
Assistant United States Attorney
General Crimes Section