

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

**Criminal Case No.**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**1. KRISTIN LEIGH HALL,**

**Defendant.**

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**INDICTMENT**

**18 U.S.C. § 2261A(2) [Interstate Stalking];  
18 U.S.C. § 875(c) [Interstate Communications To Threaten]**

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The Grand Jury charges:

**COUNT ONE**

**18 U.S.C. § 2261A(2) - Interstate Stalking**

1. Between in or about July 2009 and in or about February 2010, within the State and District of Colorado and elsewhere, the defendant KRISTIN LEIGH HALL, with intent to harass or cause substantial emotional distress to a person in another State and with the intent to place a person in another State in reasonable fear of serious bodily injury to that person, a member of the immediate family of that person and a spouse of that person, used an interactive computer service and a facility of interstate commerce to engage in a course of conduct that caused substantial emotional distress to that person and placed that person in reasonable fear of serious bodily injury to that person, a member of her immediate family, and her spouse; to wit, defendant KRISTIN LEIGH HALL, who lived in Pennsylvania, sent harassing and

threatening communications in the form of electronic messages and telephone communications to an individual, D.B. and her family who resided in Colorado, and thereby caused D.B. substantial emotional distress, and placed D.B. in reasonable fear of serious bodily injury to D.B., her immediate family and her spouse, all in violation of 18 U.S.C. § 2261A(2).

**COUNT TWO**  
**18 U.S.C. § 875(c)**  
**[Interstate Communications To Threaten]**

2. On or about December 31, 2009, within the State and District of Colorado and elsewhere, the defendant KRISTIN LEIGH HALL transmitted in interstate commerce a communication containing any threat to injure the person of another; to wit, defendant KRISTIN LEIGH HALL telephoned from the State of Pennsylvania to D.B. in the State of Colorado, and threatened in substance to “visit you,” “kick your ass” and “show up at your place with a crowbar because I’m seriously getting pissed. I mean, I’m not going to kill you or anything but a little assault and battery charge won’t do anything for me,” all in violation of Title 18, United States Code, Section 875(c).

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**COUNT THREE**  
**18 U.S.C. § 875(c)**  
**[Interstate Communications To Threaten]**

3. On or about January 10, 2010, within the State and District of Colorado and elsewhere, the defendant KRISTIN LEIGH HALL transmitted in interstate commerce a communication containing any threat to injure the person of another; to wit, defendant KRISTIN LEIGH HALL transmitted an electronic message from the State

of Pennsylvania to D.B. in the State of Colorado, and threatened in substance to “pepper spray u and stick a stun gun up your ass” and “rip your clothes off and make u walk thru prologis naked,” all in violation of Title 18, United States Code, Section 875(c).

**COUNT FOUR**  
**18 U.S.C. § 875(c)**  
**[Interstate Communications To Threaten]**

4. On or about January 15, 2010, within the State and District of Colorado and elsewhere, the defendant KRISTIN LEIGH HALL transmitted in interstate commerce a communication containing any threat to injure the person of another; to wit, defendant HALL transmitted an electronic message from the State of Pennsylvania to D.B. in the State of Colorado, and threatened in substance to “show u somebonding - when I stun u, kick u, have ur head and rip ur clothes off and post in on twitter and youtube,” all in violation of Title 18, United States Code, Section 875(c).

A TRUE BILL

Ink signature on file in the Clerk’s Office  
FOREPERSON

DAVID GAOUETTE  
United States Attorney

by: s/ Patricia Davies  
PATRICIA DAVIES  
Assistant United States Attorney  
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Attorney for the United States

DEFENDANT: KRISTIN LEIGH HALL

DOB: 1971

ADDRESS: Pennsylvania

COMPLAINT FILED? \_\_\_\_\_ YES X NO  
IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_  
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES \_\_\_\_\_ NO

OFFENSE: Count 1: 18 U.S.C. § 2261A(2): Interstate Stalking  
Counts 2-4: 18 U.S.C. § 875(c) Interstate Communications  
to Threaten

LOCATION OF OFFENSE: Denver County, CO & Pennsylvania

PENALTY: Counts 1-5: NMT 5 years imprisonment; NMT \$250,000 fine,  
or both; NMT 3 years supervised release; \$100 special  
assessment fee<sup>1</sup>

AGENT: Special Agent Stephen Roberts  
Federal Bureau of Investigation.

AUTHORIZED BY: Patricia Davies, Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:  
\_\_\_\_\_ X five days or less \_\_\_\_\_ over five days \_\_\_\_\_ other

THE GOVERNMENT

\_\_\_\_\_ X will seek detention in this case \_\_\_\_\_ will **not** seek  
detention in this case

The statutory presumption of detention **is not** applicable to this defendant.

OCDEF CASE: \_\_\_\_\_ Yes X No

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<sup>1</sup>Pursuant to 18 U.S.C. §§ 2261A(2) and 2261(b)(6), whoever commits the crime of stalking in violation of a temporary or permanent civil or criminal injunction, restraining order, no-contact order or other order shall be punished by imprisonment for not less than 1 year.