

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO. 22-_____**
v. : **DATE FILED: _____**
PATRICK McGOVERN-ALLEN : **VIOLATION:**
: **18 U.S.C. § 2261A(1) (stalking - 2 counts)**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about December 18, 2021, in the Eastern District of Pennsylvania and elsewhere,
defendant

PATRICK McGOVERN-ALLEN

traveled in interstate commerce from the State of New Jersey to Abington Township in the Commonwealth of Pennsylvania, with the intent to harass and intimidate another person, A.R., a juvenile, and in the course of and as a result of such travel caused substantial emotional distress to A.R. and placed a member of A.R.'s immediate family in reasonable fear of death or serious bodily injury, and the defendant used a dangerous weapon during the offense, in violation of Title 18, United States Code, Sections 2261A(1), 2261(b), and 2261B.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 2, 2022, in the Eastern District of Pennsylvania and elsewhere,
defendant

PATRICK McGOVERN-ALLEN

traveled in interstate commerce from the State of New Jersey to Westtown East Goshen Township in the Commonwealth of Pennsylvania, with the intent to harass and intimidate another person, K.M., and in the course of and as a result of such travel placed K.M. in reasonable fear of death or serious bodily injury, and the defendant used a dangerous weapon during the offense, in violation of Title 18, United States Code, Sections 2261A(1), and 2261(b).

A TRUE BILL:

[REDACTED]

SON



JACQUELINE C. ROMERO
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

PATRICK McGOVERN-ALLEN

INDICTMENT

Counts

18 U.S.C. § 2261A(1) (stalking – 2 counts)

Filed in open court this _____ day,
Of September A.D. 20 22

Clerk

Bail, \$ _____
