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CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

| | | |
|---|---|---|
| UNITED STATES OF AMERICA | ) | Criminal No. 26- 131 |
| | ) | |
| v. | ) | (18 U.S.C. §§ 875(c), and 115(a)(1)(B) and 115(b)(4)) |
| | ) | |
| ROBERT HLOVCHIEC | ) | |
| | ) | [**UNDER SEAL**] |

**INDICTMENT**

The grand jury charges:

GENERAL ALLEGATIONS

At all times material to this Indictment:

1. The defendant, ROBERT HLOVCHIEC, was a resident of Allegheny County, in the Western District of Pennsylvania.

2. Victim 1, whose identity is known to the grand jury, was a Member of Congress.

3. YouTube was an online video sharing platform where certain users could upload, view, share, and comment on videos. YouTube subscribers could use their Google accounts to sign in to YouTube and create YouTube channels. Individuals who had YouTube channels could publicly comment on videos uploaded by others. The defendant, ROBERT HLOVCHIEC, was the subscriber to the Google account associated with e-mail "bobmanuniversal@gmail.com" and display name "Robert H."

4. Between on or about February 8, 2026, and on or about March 6, 2026, the defendant, ROBERT HLOVCHIEC, posted comments to YouTube videos while using his Robert H account. The defendant, ROBERT HLOVCHIEC's YouTube comments threatened acts of violence against Victim 1, Democrats, transgender people, and minority groups, including

Hispanics, African Americans, and Muslims. The defendant, ROBERT HLOVCHIEC, occasionally referred to himself as a Nazi or a white supremacist, which are groups that are historically synonymous with genocide and acts of violence against minorities. Further, the defendant, ROBERT HLOVCHIEC, detailed the acts of violence that he desired, to include mass shootings, assassinations, and running people over with his truck. At times, the defendant referred to the intended victims of these violent acts by racial slurs. For example, the defendant, ROBERT HLOVCHIEC, posted comments, on or about the dates set forth below, to YouTube videos in which he stated words to the effect of:

a. February 20, 2026: "I AM A NAZI"; "Transgenders will get killed in groups soon. We are planning it"; "WHITE POWER "; I am a white supremacist I have been for 14 years professionally"; and "White Christians own America. You will have to kill us to take it back."

b. February 24, 2026: "Bullets belongs in every liberals head. Anti American scum. Obsessed with illegals immigrants. Supports drug traffickers. Death to all liberals and Democrats obsessed with destroying America. DIE"; "I'll do a mass shooting against Mexicans"; "I'll do a mass shooting against liberals : democrats and Mexicans"; "I'll do a mass shooting against Mexicans. Stay out of America scum third world pieces of shit"; "TRANS PEOPLE NEED KILLED"; "If I ever get the chance I'll do a trans mass shooting……."; and "I'll do a mass shooting agaisnt trans ppl[.]"

c. February 27, 2026: "anyone living within driving range to [Victim 1] please highly consider murdering [Victim 1]. Our bodies are shells. Somerhing greater comes after death. America is not for sale. Do not be afraid us"; "Do not be

scared to drive to [Victim 1] and assinate [Victim 1]"; "Anyone living within driving distance to [Victim 1] needs to highly consider murdering her. Our bodies are shells. There is somerhing greater after death. Don't be afraid …"; and "Im praying [Victim 1] gets killed soon. Anyone living near [Victim 1] please do not be scared to take action. America is at risk of being taken over by Muslims."

d. March 2, 2026: "Bullets coming for all democrats soon. Anti American scum pieces of shit. We are tracking all of you"; and "Democrats need KILLED so unbelievably anti American. If I get the chance I'll put a bullet in any democratic politician head[.]"

e. March 6, 2026: "Im a REAL American I will do a mass shooting against 100s of Muslims in America if I ever get the opportunity. Not because of their religion but for the longevity of the America us empire[.]"

**COUNTS ONE THROUGH SIX**

The grand jury further charges:

5. Paragraphs 1 through 4 of this Indictment are incorporated as if fully set forth herein.

6. On or about each of the following dates, as set forth below, in the Western District of Pennsylvania, the defendant, ROBERT HLOVCHIEC, did transmit in interstate commerce a communication containing a threat to injure the person of another; that is, the defendant, ROBERT HLOVCHIEC, transmitted through YouTube, an Internet communication platform, a threat to injure the person of Victim 1, a Member of Congress whose identity is known to the grand jury, as described below for each count, each transmission constituting a separate count:

| COUNT | DATE | TRANSMITTED THREAT |
|---|---|---|
| ONE | February 27, 2026 | "If i get the chance im going to do a mass shooting wherever [Victim 1] is standing. [Victim 1]needs to die. All trailers to America beware. America is not for sale. America is not a Muslim country." |
| TWO | February 27, 2026 | "If i get the chance I'll shoot everyone in [Victim 1]'s family. America is a white Christian nation. We are ready to kill and die before foreigner ll Muslims take over" |
| THREE | February 27, 2026 | "I would put a bullet in [Victim 1]'s head. [Victim 1] isn't American" |
| FOUR | March 1, 2026 | "I would shoot [Victim 1] if I get close enough to [Victim 1]" |
| FIVE | March 2, 2026 | "I'll shoot [Victim 1] if I get the chance" |
| SIX | March 2, 2026 | "I'll put a bullet in any democrats head especially democrat politician or [Victim 1]" |

In violation of Title 18, United States Code, Section 875(c).

## COUNTS SEVEN THROUGH TWELVE

The grand jury further charges:

7. Paragraphs 1 through 4 of this Indictment are incorporated as if fully set forth herein.

8. On or about each of the following dates, as set forth below, in the Western District of Pennsylvania, the defendant, ROBERT HLOVCHIEC, did threaten to assault and murder a United States official; that is, Victim 1, a Member of Congress whose identity is known to the grand jury, with intent to impede, intimidate, interfere with, and retaliate against said official while they were engaged in, and on account of, their performance of their official duties, by posting a comment to YouTube, an Internet communication platform, as described below for each count, each transmission constituting a separate count:

| COUNT | DATE | TRANSMITTED THREAT |
|---|---|---|
| SEVEN | February 27, 2026 | "If i get the chance im going to do a mass shooting wherever [Victim 1] is standing. [Victim 1]needs to die. All trailers to America beware. America is not for sale. America is not a Muslim country." |
| EIGHT | February 27, 2026 | "If i get the chance I'll shoot everyone in [Victim 1]'s family. America is a white Christian nation. We are ready to kill and die before foreigner ll Muslims take over" |
| NINE | February 27, 2026 | "I would put a bullet in [Victim 1]'s head. [Victim 1] isn't American" |
| TEN | March 1, 2026 | "I would shoot [Victim 1] if I get close enough to [Victim 1]" |
| ELEVEN | March 2, 2026 | "I'll shoot [Victim 1] if I get the chance" |
| TWELVE | March 2, 2026 | "I'll put a bullet in any democrats head especially democrat politician or [Victim 1]" |

In violation of Title 18, United States Code, Sections 115(a)(1)(B) and 115(b)(4).

A True Bill,

FOREPERSON

TROY RIVETTI
United States Attorney
PA ID No. 56816

BRENDAN J. McKENNA
Assistant U.S. Attorney
PA ID No. 314315

ALYSSA R. ANGOTTI
Assistant United States Attorney
PA ID No. 323007