

SUPERIOR COURT OF PENNSYLVANIA

Commonwealth v. Kylen Pratt

2026 Pa. Super. 73 · No. 3013 EDA 2024 · Decided April 17, 2026

SUMMARY

The Pennsylvania Superior Court affirmed Kylen Pratt’s judgment of sentence for first-degree murder, possession of an instrument of crime, abuse of a corpse, and tampering with evidence. The court held that a summary of voluminous cell-phone records was properly admitted under Pennsylvania Rules of Evidence 1002 and 1006, that Google searches were relevant and not unfairly prejudicial, and that the consecutive sentences imposed for the non-murder offenses did not constitute an abuse of discretion.

CASE DETAILS

COURT	Superior Court of Pennsylvania
WRITING FOR THE COURT	Stevens, P.J.E.; Murray, J.; Lane, J.
JURISDICTION	Pennsylvania Superior Court
DECIDED	April 17, 2026
DOCKET	3013 EDA 2024
DISPOSITION	affirmed
PROCEDURAL POSTURE	Direct appeal from a judgment of sentence following a jury conviction for first-degree murder, possession of an instrument of crime, abuse of a corpse, and tampering with evidence.
STANDARD OF REVIEW	Evidentiary rulings and rulings on motions in limine are reviewed for abuse of discretion. A challenge to the discretionary aspects of sentencing is reviewed for manifest abuse of discretion after the appellant satisfies the jurisdictional four-part substantial-question test.
PRECEDENTIAL VALUE	published precedential opinion of the Superior Court of Pennsylvania
PARTIES	Kylen Pratt v. Commonwealth of Pennsylvania

TOPICS

- evidence
- best evidence rule
- standard of review
- sentencing
- appellate procedure

PRACTICE AREAS

- criminal law
- criminal procedure
- evidence
- appellate sentencing

QUESTIONS PRESENTED

1. Whether the trial court properly admitted a detective's chart summarizing voluminous cell-phone timing-advance records under Pennsylvania Rules of Evidence 1002 and 1006.
2. Whether the trial court properly denied a motion in limine seeking to exclude Google searches for male-on-male pornography, sex with dead bodies, and traits of a psychopath.
3. Whether the aggregate consecutive sentences imposed for possession of an instrument of crime, abuse of a corpse, and tampering with evidence constituted an abuse of discretion.

HOLDINGS

1. The trial court properly admitted the detective's summary of the cell-phone records because the records were voluminous, the detective was competent and familiar with the originals, the originals were available to the defense, and the summary complied with Rules 1002 and 1006.
2. The trial court did not abuse its discretion by admitting Pratt's Google searches because the searches were relevant to the Commonwealth's theories concerning motive, state of mind, and consciousness of guilt, and their probative value was not outweighed by unfair prejudice.
3. The aggregate consecutive sentence of four and one-half to nine years imposed for the three non-murder offenses was not manifestly excessive and did not constitute an abuse of discretion.

KEY QUOTATIONS

"To constitute reversible error, an evidentiary ruling must not only be erroneous but also harmful or prejudicial to the complaining party." (4)

"The summary of the phone records was properly admitted because the requirements of Rules 1002 and 1006 were met." (7)

"A substantial question exists where an appellant sets forth a plausible argument that the sentence violates a particular provision of the Sentencing Code or is contrary to the fundamental norms underlying the sentencing process." (12)

FACTUAL BACKGROUND

Naasire Johnson traveled to the block where Pratt lived and disappeared; his burned body was later found near Kelly Drive with a bullet lodged in his neck. Cell-phone location data placed Pratt's and Johnson's phones together near Pratt's home and later near the location where Johnson's body was found. A search of Pratt's home revealed blood matching Johnson's DNA, bleach stains suggesting cleanup, and a firearm consistent with the bullet recovered from Johnson. Investigators also recovered Google searches concerning male-on-male pornography, sex with dead bodies, psychopathy, murder, and news reports about Johnson's body.

PROCEDURAL HISTORY

A jury convicted Pratt of all charged offenses on September 23, 2024. The Court of Common Pleas of Philadelphia County imposed a mandatory life sentence for first-degree murder and consecutive sentences totaling four and one-half to nine years for the remaining offenses. The trial court denied post-sentence motions,

and Pratt timely appealed, challenging the admission of summarized cell-phone evidence, Google-search evidence, and the discretionary aspects of his sentence.

DISPOSITION

affirmed

CASES CITED

- Commonwealth v. Dengler, 890 A.2d 372, 379 (Pa. 2005)
- Commonwealth v. Lopez, 57 A.3d 74, 81 (Pa. Super. 2012)
- Keller v. Porta, 94 A.2d 140 (Pa. Super. 1953)
- Commonwealth v. Zugay, 745 A.2d 639 (Pa. Super. 2000)
- Commonwealth v. Hudson, 414 A.2d 1381 (Pa. 1980)
- Commonwealth v. Brown, 414 A.2d 70 (Pa. 1980)
- Commonwealth v. Shain, 471 A.2d 1246, 1249 (Pa. Super. 1984)
- Commonwealth v. Lang, 275 A.3d 1072, 1085 (Pa. Super. 2022)
- Commonwealth v. Frederick, 475 A.2d 754 (Pa. Super. 1984)
- Commonwealth v. Lark, 543 A.2d 491, 497 (Pa. 1988)
- Commonwealth v. Gonzalez, 858 A.2d 1219, 1223 (Pa. Super. 2004)
- Commonwealth v. Hargrave, 745 A.2d 20, 21 (Pa. Super. 2000)
- Commonwealth v. Flamer, 53 A.3d 82, 88 (Pa. Super. 2012)
- Commonwealth v. McLaine, 150 A.3d 70, 76 (Pa. Super. 2016)
- Commonwealth v. Brown, 249 A.3d 1206, 1211 (Pa. Super. 2021)
- Commonwealth v. Crawford, Commonwealth v. Crawford, 257 A.3d 75, 78 (Pa. Super. 2021)
- Commonwealth v. Lloyd, 878 A.2d 867, 873 (Pa. Super. 2005)
- Commonwealth v. Guth, 735 A.2d 709, 711 (Pa. Super. 1999)
- Commonwealth v. Mouzon, 828 A.2d 1126, 1128 (Pa. Super. 2003)
- Commonwealth v. Walls, 926 A.2d 957, 961 (Pa. 2007)
- Commonwealth v. Conte, 198 A.3d 1169, 1177 (Pa. Super. 2018)
- Commonwealth v. Yuhasz, 923 A.2d 1111, 1118 (Pa. 2007)