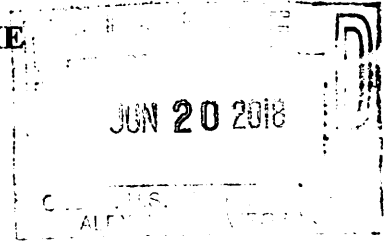


UNDER SEAL

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

Alexandria Division



UNITED STATES OF AMERICA)

v.)

MARKARA MAN,)

Defendant.)

Criminal No. 1:18-MJ-289

UNDER SEAL

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, John Bamford, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a police officer with the Arlington County Police Department, which is located in northern Virginia, and have been so employed for 10 years. Currently, I am assigned as a Task Force Officer with the Federal Bureau of Investigation. In this role, I investigate computer-related crimes. As such, I have participated in numerous investigations involving computer and high technology related crimes including computer intrusions, online extortion, online threats, internet fraud, credit card fraud, and bank fraud.

2. The facts and information contained in this Affidavit are based upon my training and experience, participation in federal investigations, personal knowledge, and observations during the course of this investigation, as well as the observations of other agents involved in this investigation. All observations not personally made by me were related to me by the individuals who made them or were conveyed to me through my review of records, documents, and other physical evidence obtained during the course of this investigation. This Affidavit contains

information necessary to support probable cause and is not intended to include each and every fact and matter observed by me or known to the government.

3. This Affidavit is submitted in support of a criminal complaint charging **MARKARA MAN** with threatening to murder members of the immediate family of a U.S. official—to wit, an individual who, at the time of relevant offense conduct, resided in Arlington, Virginia, within the Eastern District of Virginia, and was the head of a federal agency in the Executive Branch of the U.S. government (hereinafter, “Federal Official 1”)—with the intent to intimidate and interfere with such official while engaged in the performance of official duties, and with intent to retaliate against such official on account of the performance of official duties, all in violation of Title 18, U.S. Code, Sections 115(a)(1)(A) and 1114. As set forth in greater detail below, based on the investigation, there is probable cause to believe that on or about December 20, 2017, **MAN** sent an email to Federal Official 1 that threatened to kill Federal Official 1’s children, and did so with the intent to intimidate and interfere with Federal Official 1’s performance of official duties and to retaliate against Federal Official 1 on account of the performance of official duties.

PROBABLE CAUSE

4. As explained below, between on or about December 19 and 20, 2017, **MAN** sent emails via **STUBBLEMANLINESS@GMAIL.COM** to email accounts belonging to Federal Official 1. One of the emails expressly threatened the killing of Federal Official 1’s children. Read together, and as admitted by **MAN**, the threatening email was sent in response to an official action that Federal Official 1 and other federal officials had taken on or about December 14, 2017, which resulted in the repeal of particular regulations (hereinafter, the “Official Action”).

A. Background on Federal Official 1

5. I know from this investigation that Federal Official 1 is the head of a federal agency in the Executive Branch of the U.S. government, and held this position at the time of the offense conduct discussed in this Affidavit. I also know that the aforementioned agency is located in Washington, D.C.

6. Through this investigation, I also know that, at the times relevant to the offense conduct discussed in this Affidavit, Federal Official 1 had two minor children and resided with his children in Arlington, Virginia, which is within the Eastern District of Virginia.

B. Emails Sent on or about December 19 and 20, 2017

7. On or about December 19, 2017, at approximately 5:03 p.m. EST, an email was sent from STUBBLEMANLINESS@GMAIL.COM to Federal Official 1's government address. The email, which had a subject line that read "I agree with you," included the following text:

Two kids have killed themselves over [the Official Action] so far.

Since you're the tiebreaker vote...

Stares hauntingly past you

Slowly raises arm and points directly at you

Their blood is forever on your hands.

Beneath this text was an image of what appears to be a news article concerning a minor child who allegedly had committed suicide because of the Official Action. An image of Federal Official 1 eating popcorn appeared to be superimposed over the news article.

8. The next day, on or about December 20, 2017, at approximately 3:47 p.m. EST, an email was sent from STUBBLEMANLINESS@GMAIL.COM to Federal Official 1's government and personal email addresses. The subject line of the email was "Cheers" and the

body of the email listed the names and addresses of three preschools located in or around Arlington, Virginia, followed by the following sentence: "I will find your children and I will kill them."

9. I know that, at the time this email was sent, Federal Official 1 had at least one preschool-aged child, and that it was possible to find this information via news articles and other publically available sources. I also know that none of Federal Official 1's children attended any of the preschools listed in the email described above.

10. Shortly after the email described above was sent, at approximately 3:51 p.m. EST, another email was sent from STUBBLEMANLINESS@GMAIL.COM to Federal Official 1's government and personal email addresses. This email, which had a blank subject line and no text in the body of the email, contained an image depicting Federal Official 1 in what appears an interview style setting. Visible in the foreground of the image is a slightly out-of-focus, framed photograph depicting Federal Official 1 with his wife and minor children.

C. Google's Records Regarding STUBBLEMANLINESS@GMAIL.COM

11. Based on a review of records provided by Google, it appears that Google did not retain the Internet Protocol (IP) address that had been used to send the aforementioned emails to Federal Official 1 via STUBBLEMANLINESS@GMAIL.COM. Google, however, did provide the IP address utilized by the account during a different time period. Those records indicate that STUBBLEMANLINESS@GMAIL.COM was utilized in connection with IP address 47.148.111.93 on or about December 31, 2017, at approximately 9:24:46 UTC.

12. Using an open source tool, I determined that IP address 47.148.111.93 is affiliated with Frontier Communications. Records subsequently received from Frontier Communications indicate that IP address 47.148.111.93 was assigned to an individual believed to be MAN's

father at a residence located in Norwalk, California, from on or about December 7, 2017, at approximately 19:35:58 UTC, to on or about January 10, 2018, at approximately 9:50:47 UTC.

13. During the course of this investigation, I reviewed the contents of STUBBLEMANLINESS@GMAIL.COM and related account data provided by Google, and did not discover any evidence that would indicate that the email account was accessed without authorization by another person in or around the times when the aforementioned emails were sent.

D. MAN's Use and Ownership of STUBBLEMANLINESS@GMAIL.COM

14. A review of Google's records for STUBBLEMANLINESS@GMAIL.COM also provides reason to believe that MAN owns or controls the account.

15. As an initial matter, Google's records indicate that STUBBLEMANLINESS@GMAIL.COM is associated with MARKARAMAN@GMAIL.COM. This is so for at least two reasons:

a. First, I know from Google's records that STUBBLEMANLINESS@GMAIL.COM was created on or about August 20, 2012, and is associated with the following recovery email address: MARKARAMAN@GMAIL.COM. I know from my training and experience that users of a Google email account may associate a recovery email address with their accounts so that they can regain access to their accounts in the event they forget login information or otherwise lose access to their accounts. Because it sometimes is possible to reestablish access to an email account via a recovery email address, in my training and experience, it is extremely unlikely that a user would provide another person's email address such that the user would not have control over the recovery address.

b. Second, Google's records indicate that on December 31, 2017, at approximately 09:24:46 UTC, STUBBLEMANLINESS@GMAIL.COM and MARKARAMAN@GMAIL.COM were accessed at the same time via IP address 47.148.111.93.

16. In addition, there are at least two reasons to believe that MARKARAMAN@GMAIL.COM is MAN's email account:

a. First, records obtained from Facebook indicate that an account under the vanity name "UncleMark.9" has three registered email addresses, one of which is MARKARAMAN@GMAIL.COM. In addition, a comparison of records provided by Facebook and Google reveals that the telephone number associated with the UncleMark.9 Facebook account also is listed as the Short Message Service (SMS) number for STUBBLEMANLINESS@GMAIL.COM.

b. Second, during the course of the investigation, I learned that MARKARAMAN@GMAIL.COM and the telephone number discussed above in Paragraph 16(a) were provided to the U.S. government in connection with an application for a U.S. passport in MAN's name. A review of that passport application, which was signed by an individual purporting to be MAN on or about August 24, 2016, also indicates that MAN's residence at the time of the application was a Norwalk, California residence, an address that corresponds to the one associated with the Frontier Communications records discussed above.

17. I submit that the foregoing provides reason to believe that MAN owns or controls MARKARAMAN@GMAIL.COM, and by extension STUBBLEMANLINESS@GMAIL.COM. Such a conclusion also is consistent with my training and experience. I know that individuals engaged in online criminal activities often will use multiple email addresses in an effort to hide their true identities or locations.

E. Search of MAN's Residence and Interview of MAN on or about May 17, 2018

18. On or about May 15, 2018, the U.S. District Court for the Central District of California issued a search warrant for the aforementioned Norwalk, California residence.

Federal law enforcement officers executed that warrant on or about May 17, 2018.

19. MAN was present at the time the search warrant was executed, and he agreed to an interview during the course of the search warrant execution. Through this interview, which was audio recorded, I learned, among other things, the following:

a. MAN acknowledged his ownership of STUBBLEMANLINESS@GMAIL.COM and MARKARAMAN@GMAIL.COM. MAN stated he had used STUBBLEMANLINESS@GMAIL.COM since in or around 2014.

b. MAN admitted sending the December 20, 2017 email that threatened to kill Federal Official 1's children, as discussed above. He stated that he transmitted the email via his cellular phone while he was located at his residence in Norwalk, California. He also stated that he used STUBBLEMANLINESS@GMAIL.COM to send the email to hide who he was and because he thought the email handle sounded "tougher."

c. MAN stated that he was "angry" about the Official Action because "'they pretty much ignored, like, 80 percent of comments . . . they ignored 'us,' and just didn't care.'" Asked whether he sent the email in an effort to scare Federal Official 1, MAN responded, "pretty much." MAN also was asked about his intent in sending an image to Federal Official 1 that depicted Federal Official 1's children. MAN stated that he found the image via Google by using the search query "[Federal Official 1] children," and that he sent the image "to scare [Federal Official 1]." When asked if his purpose in scaring Federal Official 1 was to change Federal Official 1's mind, MAN stated, "pretty much." MAN also was asked if, at the time of his

conduct, he thought his plan would work, and he stated he “was not really thinking” and was “just angry and frustrated.”

d. MAN also admitted to possessing a “dox” of Federal Official 1, and indicated that he believed he had saved the “dox” to his Google Keep account. I know from my training and experience that the term “dox” is an abbreviation for documents and is derived from “doxing,” which is the practice of researching and publishing on the Internet an individual’s personal identifying information. I also know from my training and experience that Google Keep is a note-taking service provided by Google that allows users to create notes, lists, and reminders.

e. MAN further stated that the schools referenced in one of his December 20, 2017 emails were found via Google Maps.

20. MAN also provided law enforcement with a written apology letter. The letter read: “Dear [Federal Official 1], I’m sorry I made a threat against your kids. That was crossing the line. I hope you’ll change your mind on [Official Action] but I doubt it. Best Regards, Mark [signature].”

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