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JJ/PMC: USAO#2017R00882

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
EQUITY

UNITED STATES OF AMERICA

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CRIMINAL NO.

BY JKB-19-0530

v.

**(Cyberstalking, 18 U.S.C. § 2261A(2)(B);
Intentional Damage to a Protected
Computer, 18 U.S.C. § 1030(a)(5)(A);
Forfeiture, 18 U.S.C. § 982(a), 18 U.S.C.
§ 1030(i), 21 U.S.C. § 853)**

AHMAD KAZZELBACH,

Defendant.

CRIMINAL INFORMATION

**COUNT ONE
(Cyberstalking)**

The United States Attorney for the District of Maryland charges that:

From in or about July 2016, through in or about June 2017, in the District of Maryland and elsewhere, the defendant,

AHMAD KAZZELBACH,

did, with the intent to harass and intimidate another person, use any interactive computer service and electronic communication service and electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, including the internet, the mail, and the telephone, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to J.K.

18 U.S.C. § 2261A(2)(B)
18 U.S.C. § 2261(b)(5)

COUNT TWO

(Intentional Damage to a Protected Computer)

The United States Attorney for the District of Maryland further charges that:

On or about August 28, 2016, in the District of Maryland and elsewhere, the defendant,

AHMAD KAZZELBACH,

knowingly caused the transmission of a program, information, code, and command, and as a result of such conduct, intentionally caused damage without authorization, to a protected computer, and the offense caused the modification or impairment, and the potential modification or impairment, of the medical examination, diagnosis, treatment, or care of J.K.

18 U.S.C. § 1030(a)(5)(A)

18 U.S.C. § 1030(c)(4)(A)(i)(II), (c)(4)(B)

FORFEITURE

1. The allegations contained in Count Two of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1030(i).

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 1030, set forth in Count Two of the Information, the defendant,

AHMAD KAZZELBACH,

shall forfeit to the United States of America:

a. pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1030(i), any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense; and

b. pursuant to Title 18, United States Code, Section 1030(i), any personal property that was used or intended to be used to commit or to facilitate the commission of such offense. The property to be forfeited includes, but is not limited to:

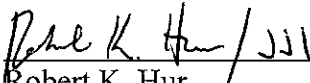
1. Apple MacBook model A1534, Serial No. C02QH0CWGCN3; and
2. iPhone 7 Plus, Serial No. C38T3PLQHFY7.

3. Pursuant to Title 21, United States Code, Section 853(p), if any of the property described above as being subject to forfeiture, as a result of any act or omission by the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the property charged with forfeiture in the paragraphs above.

18 U.S.C. § 982(a)(2)(B)
18 U.S.C. § 1030(i)
21 U.S.C. § 853



Robert K. Hur
United States Attorney

11/7/2019

Date