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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

v.
SUMIT GARG,
Defendant.

CASE NO. MJ21-137

COMPLAINT for VIOLATION

Title 18, U.S.C.
Sections 2 and 2261A

BEFORE, Mary Alice Theiler, United States Magistrate Judge, U. S. Courthouse,
Seattle, Washington.

Special Agent John Wurster,

The undersigned complainant being duly sworn states:

COUNTS 1-3
(Cyberstalking)

On or about the dates set forth below, at Seattle, in the Western District of
Washington, and elsewhere, defendant SUMIT GARG, with intent to harass and intimidate
numerous victims, used, an interactive computer service, an electronic communication
service, and electronic communication system of interstate commerce, and any other

1 facilities of interstate and foreign commerce, to wit: phone calls, text messages, emails,
2 online postings, and online social media messaging and posting, to engage in a course of
3 conduct that caused, attempted to cause, and would be reasonably expected to cause
4 substantial emotional distress to individuals including:

5 a. Placed the victims in reasonable fear of serious bodily injury, and

6 b. Caused, attempted to cause, and would be reasonably expected to cause
7 substantial emotional distress to the victims and the victims' immediate family members,
8 in violation of a temporary or permanent civil or criminal injunction, restraining order, and
9 no-contact order:

Count	Victim	Communication Methods	Dates of Course of Conduct
1	Victim-1	Phone calls, emails, text messages, online postings, social media messaging and posting	January 25, 2020 to March 5, 2021
2	Victim-2	Phone calls, emails, text messages	February 25, 2020 to March 5, 2021
3	Victim-3	Phone calls, emails, text messages, online postings, social media messaging and posting	July 12, 2020 to March 5, 2021

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22 All in violation of Title 18, United States Code, Sections 2, 2261A(2)(A) and (2)(B),
23 and 2261(b)(5) and (6).

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25 And the complainant states that this Complaint is based on the following information:
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1 I, John Wurster, being first duly sworn on oath, depose and say:

2 **INTRODUCTION AND AGENT BACKGROUND**

3 1. I am a Special Agent with the United States Secret Service (USSS) and have
4 been so since June 21, 1999. I am currently assigned to the Seattle Field Office. I am a
5 graduate of the Federal Law Enforcement Training Center located in Glynco, Georgia, and
6 the USSS Special Agent Training Program located in Beltsville, Maryland. Prior to my
7 employment with the USSS, I served in the United States Army as a Counterintelligence
8 Special Agent. I have a Bachelor of Science Degree from Brenau University. As part of my
9 training with the USSS, I have received instruction on the investigation of financial crimes,
10 including access device fraud, wire fraud and identity theft. I have also received training in
11 the investigation of electronic crimes involving the use of computers and other electronic
12 devices. In the course of my law enforcement career, I have investigated crimes ranging
13 from the production and passing of counterfeit currency, identity theft, access device fraud,
14 bank fraud and threats made against the President and Vice President of the United States,
15 Former Presidents of the United States, and Presidential / Vice Presidential Candidates. As
16 part of my duties while working with the Seattle Electronic Crimes Task Force, I have also
17 investigated criminal violations relating to cyberstalking, child exploitation and child
18 pornography, including violations pertaining to the illegal production, distribution, receipt,
19 and possession of child pornography and material involving the sexual exploitation of
20 minors. I am a member of the Seattle Internet Crimes Against Children Task Force, and
21 work with other federal, state, and local law enforcement personnel in the investigation and
22 prosecution of crimes involving the sexual exploitation of children.

23 2. The facts set forth in this affidavit are based on my own personal knowledge;
24 knowledge obtained from other individuals during my participation in this investigation,
25 including other law enforcement officers; review of documents and records related to this
26 investigation; communications with others who have personal knowledge of the events and
27 circumstances described herein; and information gained through my training and experience.
28

DEFINITIONS

4. Based on my training and experience, I use the following technical terms to convey the following meanings:

a. **IP Address:** An Internet Protocol address (or simply “IP address”) is a unique numeric address used by devices, such as computers, on the Internet. An IP address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 104.250.138.210). Every device attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that device may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses (Also known as an IP Block).

b. **Internet:** The internet is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the internet, connections between devices on the internet often cross state and international borders, even when the devices communicating with each other are in the same state.

c. **Browser:** A “web browser” or “browser” is a software program that allows a user to access web pages, primarily on the internet. Popular browsers include Google’s Chrome browser, Mozilla Firefox, Apple’s Safari and Microsoft’s Edge and Explorer browsers.

d. **Proxy:** A “proxy” service is an intermediary server or software program that provides a gateway to the internet. The proxy service may exist on the user’s machine or on a separate server. Proxy services are commonly used to filter internet connection requests and to boost the performance of a computers system. A “reverse proxy” is used for protection and security and can mask information about the user’s machine and location.

e. **Virtual private networks (VPNs):** “Virtual private networks” are a category of proxy server that encrypt the information from the user to the proxy server, thereby masking the content and web destinations of that user.

SUMMARY OF THE CYBERSTALKING CAMPAIGN

5. The United States Secret Service and the Seattle Police Department (SPD) are investigating a widespread cyberstalking campaign believed to be carried out by Sumit Garg.¹ SPD opened its investigation in approximately October 2020 when Victim-1

¹ The number of individuals behind the cyberstalking campaign has not been determined. Accordingly, I will refer to the actors behind the campaign as “the harasser(s)” throughout this affidavit.

1 presented evidence that she was receiving numerous emails of a threatening nature. SPD
2 then identified other victims that had received apparently related, threatening emails,
3 including attorneys, a prosecutor, and one investigator. On December 16, 2020, the Secret
4 Service opened a criminal investigation based on information provided by SPD.

5 6. To date, I have only interviewed Victim-1 and Victim-2. Therefore I primarily
6 base this affidavit on reports and records provided by SPD, records provided by internet
7 service providers, harassing and/or threatening emails provided by the victims, and by court
8 documents filed by the victims, Garg and Person-A.

9 7. This case involves multiple victims who have received threatening and
10 harassing communications. The following chart lists a selection of the victims along with a
11 short description of their connection to Garg and Person-A.

Victim-1	Victim-1 was a former roommate of Garg and Person-A. She filed a civil protection action against Garg. Person-A later filed a civil protection action against Victim-1. Garg improperly accessed Victim-1's diary and obtained non-public information about Victim-1's health and former relationships.
Victim-2	Victim-2 is Victim-1's uncle and lawyer.
Victim-3	Victim-3 is Victim-1's current boyfriend. At the time Victim-1 was roommates with Garg and Person-A, Victim-1 and Victim-3 were not in a relationship. During the harassment campaign, the harasser(s) set up multiple online accounts that impersonated Victim-3.
Victim-4	Victim-4 is a former boyfriend of Victim-1 who was mentioned in Victim-1's diary. During the harassment campaign, the harasser(s) set up multiple online accounts that impersonated Victim-4.
Victim-5	Victim-5 is a lawyer who represented Victim-1 in the civil protection actions.

Victim-6	Victim-6 is a forensics expert hired by Victim-1 in the civil litigation.
Victim-7	Victim-7 is Victim-1's current civil attorney.
Victim-8	Victim-8 is a former boyfriend of Victim-1 who was mentioned in Victim-1's diary. During the harassment campaign, the harasser(s) set up multiple online accounts that impersonated Victim-8.
Victim-9	Victim-9 is an SPD detective investigating Garg and Person-A. She is married to another SPD officer who is referred to in harassing emails.
Victim-10	Victim-10 is a lawyer who represented Person-A.

A. Victim-1's Initial Contact with Garg and Person-A

8. According to reports and documents provided by SPD, the cyberstalking campaign appears to have emanated from a dispute between Victim-1, Garg and Person-A regarding their shared housing situation. Starting in approximately October 2018, Victim-1 shared a two-bedroom apartment in Belltown with Person-A. Person-A's boyfriend, Sumit Garg, visited regularly. Victim-1 reports that she initially got along with both Person-A and Garg, and that Person-A eventually asked whether Garg could move into the apartment. After Victim-1 agreed, Garg moved into the apartment in January 2019.

9. Victim-1 reports that, after Garg moved in, his behavior changed. Among other things, he texted sexual references to her and gave her the nickname "Spicy." Victim-1 further reports that Garg made random outbursts to her and called her derogatory names. Garg later informed Victim-1 that he suffered from Intermittent Explosive Disorder and that the affliction caused the outbursts.

1 10. In January 2019, the roommates went on a trip together to Colorado. In
2 Colorado, the three went to a hot spring where Person-A took pictures of them at the hot
3 springs. One of the pictures was of Victim-1 in a running bra. Victim-1 and Garg asked
4 Person-A to send them a copy of the pictures. (As explained later, this picture was used to
5 create a LinkedIn profile that impersonated Victim-1.) During the trip, Garg apparently
6 refused to let Victim-1 drive their rental car even though she had more experience with
7 driving in snowy conditions. Garg subsequently crashed the car. In addition to having an
8 argument regarding the crash, the roommates apparently also had a dispute over how to split
9 the costs of the trip.

10 11. Victim-1 reports that Garg made sexual comments to her while they lived
11 together. For example, around Easter 2019, Garg bought a hamburger for Victim-1 and gave
12 it to her with a handwritten note, which stated, in pertinent part:

13 My Dear Spicy,
14 May this burger Cheer you up! Happy Easter!
15 There is a lot about you I might not know but I know enough to know if there
is anything which remotely comes to sex for you, it is food! Ha Ha

16 12. Garg also interjected himself into Victim-1's romantic life. Victim-1 reports
17 that in May 2019, Garg became aware that she was going to go on a date. While she was on
18 the date, Garg texted her the following message, apparently offering to cause physical harm
19 to her date: "Ps: get this dude's address just in case we need it later. Don't be fooled by my
20 malnourished physique[.] [I]f given the right motivation, I am fully capable of causing some
21 damage."

22 13. On May 23, 2019, Garg sent Victim-1 the following text, "Hey, sorry I think I
23 accidentally checked you out today."

24 14. On June 22, 2019, Garg used his personal email account,
25 sumitgarg90[[@](mailto:sumitgarg90@gmail.com)]gmail.com (SUBJECT ACCOUNT 4), to send Victim-1 the following email,

26 Hey Spicy.
27 I have unblocked you from fb insta phone everything. I will always regret
28 what I did today. I care a great deal about you but unfortunately I tend to hurt
people I love the most. I will always help you and support you in the worst of

1 problems. I feel really guilty especially remembering how you were so nice
2 even when I had a car accident. I truly hate myself. Nothing I can say will
3 make up for anything but trust me as I do love and care about you a lot. **I**
4 **really wish I had anything but IED.** Honestly, it is me who does not deserve
5 anything friends, family, [Person-A] nothing so please treat those things as
6 projection of my inabilities on you. You are absolutely lovely and a much
7 better human being than I will ever be.

8 (emphasis in the original). That same day, Garg sent Victim-1 a message using Facebook
9 Messenger which contained a picture of a woman in a wedding dress and a caption, “Who
10 will be the prettiest bride in the future?” Garg then sent her a message saying, “Considering
11 how you dress even on normal days – this will be you:)”

12 15. Victim-1 reports that her fear of Garg escalated in June 2019 when Victim-1
13 made plans for a friend to visit from out of state. Shortly before the visit, Garg apparently
14 had a “violent outburst” in the apartment and said that the friend was not welcome.
15 Frightened by the incident, Victim-1 left the apartment and stayed with her uncle, Victim-2.

16 16. Victim-1 left many personal items behind in the apartment, including a diary
17 that had intimate details about prior relationships. The diary had the words “Hello
18 Gorgeous” printed on the cover. As explained below, subsequent harassing messages made
19 reference to materials in the diary. The following picture shows the cover of the diary:
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14 15. Victim-1 reports that very few people had access to her diary, and that she did
15 not give Garg or Person-A access to her diary. On October 5, 2020, SPD's Latent Print Unit
16 conducted a fingerprint examination of the diary. Latent prints of Garg's right thumb, left
17 index finger, left palm, left index finger, and right index finger were found on pages from the
18 diary, thereby demonstrating that Garg entered into Victim-1's room without authorization
19 and read her private diary without her knowledge or consent. This improper access provided
20 Garg with the private details of Victim-1's life and romantic history that were repeatedly
21 referenced during the subsequent cyberstalking campaign. Additionally, Victim-1 reported
22 to SPD on April 4, 2020, that she had examined her diary and learned that complete pages
23 had been torn from it.

24 **B. Initial King County Litigation**

25 16. On July 2, 2019, Victim-1 filed for a Temporary DV Protection order against
26 Garg.

27 17. On July 12, 2019, Garg filed a declaration in opposition to the request for a
28 protective order. In the declaration, Garg portrayed Victim-1 as an insensitive and self-

1 absorbed roommate. Garg alleged that: (1) Victim-1 was “incredibly cheap” and did not
2 want to pay her portion of rent or expenses; (2) Victim-1 has never expressed any concern
3 about being around Garg or Person-A; (3) Victim-1 was insensitive to Person-A undergoing
4 cancer treatment; (4) Victim-1 sought the protective order in order to get out of the lease for
5 the apartment they shared; and (5) Victim-1 indicated that Garg could be deported for not
6 paying rent. Garg further alleged that Victim-1 revealed intimate details of her life to Garg.
7 His declaration stated, in pertinent part:

8 Victim-1 has at times tried to go past the “roommate” status. She has told me
9 about her boyfriends. She told me multiple time about sexual dreams she had
10 about her employer. She confided in me she suffers from depression, ADHD,
11 and bipolar disorder. This is not information I have sought out but I have tried
to be a stable presence for her when her life seems very tumultuous.

12 18. That same day, Person-A also submitted a declaration denying Victim-1’s
13 allegations. Person-A repeated Garg’s allegations and accused Victim-1 of acting
14 inappropriately by “frequently talking to my husband about her sexual interests.” Person-A
15 alleged that Victim-1 was afraid of “catching” cancer from Person-A and wanted to break the
16 lease.

17 19. Despite the declarations filed by Garg and Person-A, Garg decided to settle the
18 action. On July 19, 2019, Garg signed a settlement agreement in which he agreed to have no
19 direct or indirect contact with Victim-1. Garg further agreed that not to engage in stalking,
20 cyberstalking, physical or electronic surveillance, among other things. After the settlement
21 agreement was signed, Victim-1 agreed to dismiss her request for a Temporary DV
22 Protection order against Garg.

23 **C. Garg Seeks a Job with Victim-1’s Employer**

24 20. In August 2019, Victim-1 was informed by Garg’s attorney that Garg had
25 applied for a position with Victim-1’s employer, Expedia. Garg’s attorney sought Victim-
26 1’s consent for the application. Through her lawyer, Victim-1 conveyed her view that the
27 application was inappropriate and was a potential violation of the settlement agreement.
28 Victim-1’s lawyer requested that Garg confirm that he would withdraw the application.

1 When Garg did not respond, Victim-1 informed Expedia's Human Resource Department and
2 provided them with a copy of the settlement agreement. Subsequently, Expedia did not hire
3 Garg.

4 21. In November 2019, Person-A sent Victim-1's attorney an email, threatening to
5 take retaliatory steps against Victim-1 because Expedia did not hire Garg. Subsequently,
6 Person-A filed an action for a protective order against Victim-1.

7 **D. Summary of the Harassment Campaign**

8 22. Over an extended period, victims received over a thousand emails and other
9 electronic communications from a multitude of online accounts, a selection of which are
10 identified as the "SUBJECT ACCOUNTS" in this declaration. With the exception of
11 SUBJECT ACCOUNTS 4 and 5, which are personal accounts used by Garg and Person-A,
12 the SUBJECT ACCOUNTS were set up to impersonate various victims or to create the
13 appearance that someone was attempting to frame Garg or Person-A. The harassment
14 campaign involved death threats, rape threats, defaming messages, threats to reveal private
15 information from Victim-1's diary, among many other communications designed to
16 intimidate and harass the victims. The individual communications used to carry out the
17 scheme are explained in greater detail below in Section H.

18 23. In summary, Victim-1 reports that, on or about November 2019, a charity with
19 which she is publicly associated began to receive emails attacking Victim-1's character and
20 alleging that she had affairs with married men. The emails were sent from accounts that
21 integrated names of boyfriends that were identified in Victim-1's journal.

22 24. Starting in approximately January 2020, Victim-1 started receiving anonymous
23 emails that referenced private information contained in her "Hello Gorgeous" diary, thereby
24 indicating that the harasser(s) had accessed Victim-1's diary. After receiving harassing
25 messages that referenced the title of the diary and content of the diary, Victim-1 examined
26 her diary and noticed that entire pages of the diary had been ripped out.

27 25. Starting in approximately February 2020, the harassers(s) set up a variety of
28 social media accounts that impersonated Victim-1 and current or former boyfriends of

1 Victim-1 who were mentioned in Victim-1's diary. Among other things, the harasser(s) used
2 these accounts: (1) to send friend requests to Victim-1, her friends, and her co-workers;
3 (2) to comment on posts made by Victim-1; and (3) to defame Victim-1. The harasser(s)
4 also used the accounts to create the appearance that Garg and Person-A were also being
5 harassed.

6 26. In addition, the harasser(s) set up dozens of email accounts that either
7 impersonated the victims or were designed to make it appear that Garg and Person-A were
8 being framed.

9 27. The harasser(s) took steps to put Victim-1 in fear that personal details from her
10 diary would be revealed to the public. In addition, the harasser(s) also sought to embarrass
11 and intimidate Victim-1 by setting up accounts that referenced her. For example, on
12 September 25, 2020, Victim-1 received email notifications indicating that an account had
13 been created with her email address on a pornographic website.

14 28. The harasser(s) used the SUBJECT ACCOUNTS to send scores of harassing
15 and threatening emails to the victims. Among other things, the harasser(s) sent emails
16 threatening to embarrass, rape and kill Victim-1. The harasser(s) also threatened to cause
17 harm to family members of multiple victims. Notably, many of the messages were sent
18 during the civil litigation and SPD's investigation of Garg, and explicitly attempted to
19 intimidate the victims and obstruct the litigation and investigation.

20 29. Many of the communications sent from the SUBJECT ACCOUNTS appear to
21 have used a read-receipt service called Mailtrack. According to Mailtrack's webpage, the
22 service is an email tracking tool that uses a pixel-based tracking system to inform the user
23 whether the user's sent emails have been opened, and how many times. Mailtrack's
24 webpage states that over 1,300,000 customers use its services. Whereas communications
25 from before and during the cyberstalking campaign show that both Person-A and Garg used
26 the Mailtrack service, there is no indication thus far that any of the Victims used the service.²

28 ² The messages I have reviewed were provided by the victims to SPD or provided in filings submitted during the civil
litigation. Because I have not been able to view the native versions of all of these emails, I have not been able to assess

1 30. More recently, the harassment campaign has expanded to include hundreds of
2 emails being sent to King County judges, King County prosecutors, and numerous others.
3 Many of these emails reference, in some fashion, Garg or the original victims.

4 **E. Person-A Files a Retaliatory Petition for a Protection Order**

5 15. On July 7, 2020, Person-A obtained a temporary protection order against
6 Victim-1. Subsequently, on July 9, 2020, Person-A filed a petition for an order of protection
7 against Victim-1, alleging that Victim-1 was cyberstalking her by sending her harassing and
8 threatening communications through LinkedIn and email. In addition, Person-A claimed that
9 Victim-1 had set up LinkedIn and Facebook accounts impersonating Garg, which were used
10 to send defamatory messages to Person-A and others.³

11 16. Person-A claimed that, in April 2020, Victim-1 had encountered her at
12 Olympic Sculpture Park and followed her home. Person-A also repeated the allegations that
13 Victim-1 had frivolously filed the prior action to break the lease agreement. Person-A wrote:
14 “My husband and I are scared of this woman. She has a history of bipolar disorder and had
15 frequent outbursts against both my husband and I. She will not leave us alone and we are
16 afraid that her behavior is escalating.”

17 17. Victim-1 subsequently retained Victim-6 to conduct a forensic examination of
18 the devices of Victim-1 and Victim-3. Victim-6’s examination revealed that there was no
19 evidence that Victim-1 or Victim-3 were engaged in electronic harassment of Garg or
20 Person-A. Victim-6 proposed a protocol to allow her to examine Garg and Person-A’s
21 devices under which only systems files (as opposed to content) would be shared with Victim-
22 1’s legal team. Neither Garg nor Person-A produced their devices for examination.

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whether Mailtrack notations on the messages were actual confirmation receipts from Mailtrack or images placed on the
emails to make it appear that the Mailtrack service was being used. Accordingly, where an email has a Mailtrack
notation, I have indicated that the email “appears to have used the Mailtrack service.”

27 ³ On July 15, 2020, Victim-1 refiled her application for a protection order. Only July 16, 2020, the King County Superior
28 Court issued a temporary protective order against Garg, restraining him from cyberstalking Victims 1 and 3. The King
County Superior Court reissued the temporary protective order against Garg on July 30, 2020, October 1, 2020,
November 19, 2020, and February 1, 2021.

1 18. On September 16, 2020, Victim-5 -- who is one of Victim-1's lawyers -- sent
2 an email to Victim-10 -- who was one of Person-A's lawyers -- explaining that Victim-5 had
3 received harassing emails targeting his children and sister. Victim-5 indicated that he would
4 pursue all remedies available to him if the harassing conduct continued. After receiving the
5 email from her lawyer (Victim-10), it appears that Person-A sent an email on September 16,
6 2020 to the King County District Court using the account cl[REDACTED]@[REDACTED].gmail.com (SUBJECT
7 ACCOUNT 5). The email contained the following message:

8 Please make note of [Victim-5]'s threat and to my husband's case files.
9 If [Victim-5] continues to threaten us, we will report him to the state bar and
10 take this to social media forums. It is not just black lives which matter in this
11 country. My husband might be an immigrant, but I am not and I very well
12 know why they are targeting him. [Victim-5 needs] to know his boundaries.

12 The email was filed by the court and made part of the record.

13 19. On September 21, 2020, Garg filed a supplemental declaration in which he
14 challenged aspects of Victim-6's forensic analysis. Among other things, Garg claimed that
15 Mailtrack was a widely used service, that Mailtrack signatures could be removed or falsified,
16 that it would be illogical for Garg to send harassing emails using his own name, and that
17 Victim-6 had not identified any forensic artifacts indicating Garg or Person-A sent the
18 harassing emails. Garg also indicated that he had been the victim of multiple phishing
19 attacks on his online accounts and that multiple people in his "circle" had been emailed by
20 someone impersonating Garg. Garg made a point to emphasize that he had technological
21 expertise:

22 I am a current GIAC Forensic Examiner Certification (GCFE) Holder. I was a
23 consultant at Stroz Friedberg, a consulting firm that specializes in digital
24 forensics, mobile device and cell phone forensics, electronic discovery, data
25 breach response, online fraud and abuse incident response, and commercial
26 investigations worldwide. . . I am certified and have forensically examined
27 hundreds of hard drives, phones, iPads, Macbooks, and other electronic
28 devices. I have handled multiple data breach investigations involving millions
of dollars for fortune 500 companies.

1 20. On September 24, 2020, Victim-10 withdrew from the case. Subsequently, on
2 September 30, 2020, a new lawyer -- L.A. -- filed a notice of appearance on Person-A's
3 behalf.

4 21. On September 26, 2020, Person-A filed a lengthy declaration alleging that
5 Victim-1 and her lawyer were on a campaign to ruin the lives of Person-A and Garg.
6 Person-A alleged that Victim-2 and Victim-5 had sent threatening emails to her lawyers and
7 were on a vendetta against Garg. Person-A alleged, in pertinent part: "[Victim-2] ruthlessly
8 pursues anybody who [Victim-1] asked him to. He is thinking like a relative, not like an
9 objective attorney. His decisions are erratic, emotional, and vengeful. All we have ever
10 done is refuse to pay her breakout lease fees and file in self-defense, but [Victim-2] has
11 proven vengeful and heartless ever since, still trying to get my husband arrested somehow.
12 Person-A also alleged that she believed that Victim-1 was harassing Garg because "she
13 believes he has lesser rights as an immigrant." In addition, Person-A argued that the court
14 should order a mental health evaluation and drug test for all the parties.

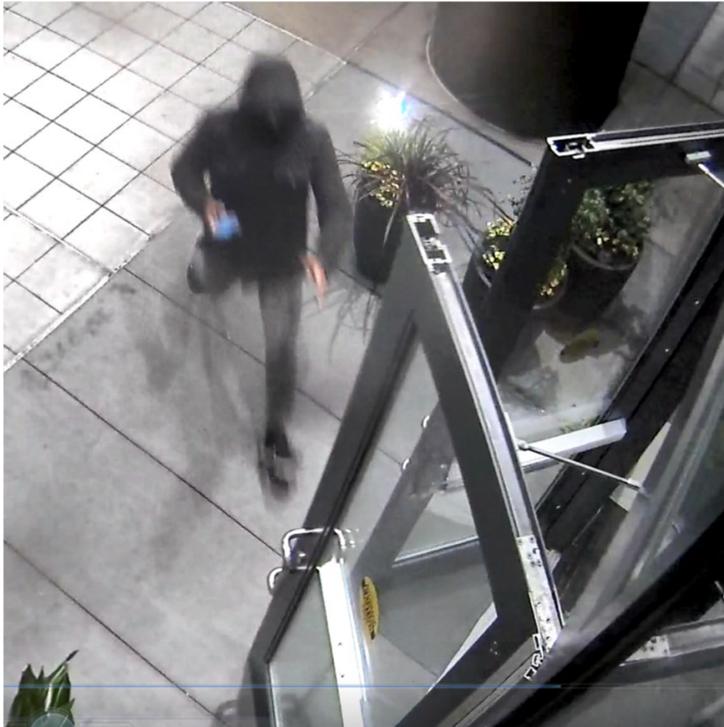
15 **F. Garg Sneaks into Victim-1's Apartment Building**

16 22. On October 10, 2020, Victim-1 received a text message from the number 206-
17 580-0444 at 1905 hours. The message read:

18 I will fuck you
19 You fucked up bitch by
20 filing a false domestic
21 violence petition. I will
22 fuck you 100 times
23 I will get you pregnant
24 I will have anal
25 Your pussy is waiting for
26 my dick
27 Hi this is [Victim-1]
28 I will fuck your brains out
 That black silk bra

 23. At 1908 hours, security camera footage from Victim-1's apartment building
 captured a male in a dark jacket, grey jeans, and Nike sneakers sneak into the building by

1 running towards a closing door. The male held a smartphone and wore a black face mask.
2 The video footage shows the man entered the building's lobby, looked confused about where
3 to walk, and then veered away from the lobby's desk attendant to walk towards the sitting
4 area of the lobby.



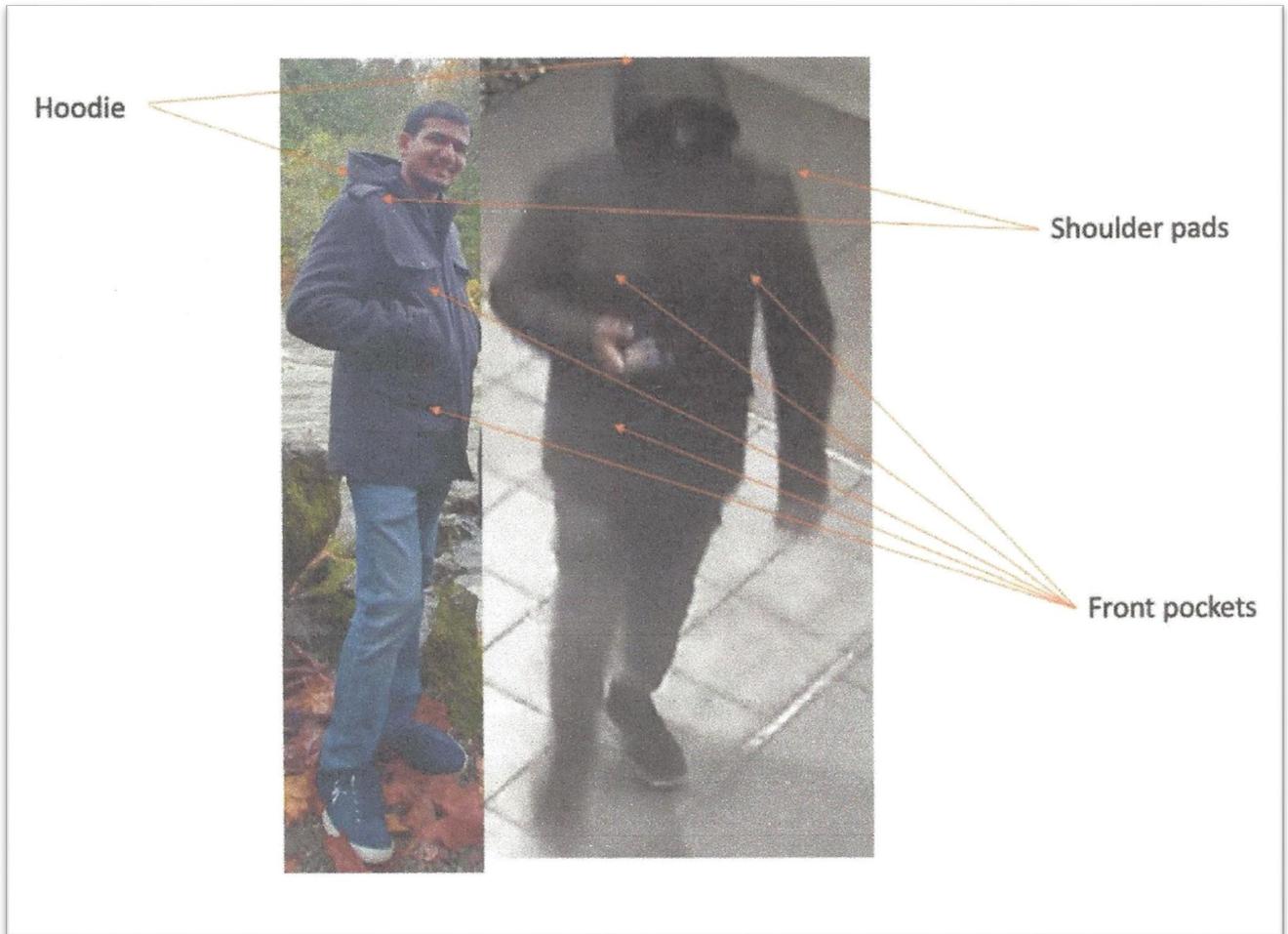
19 24. At 1909 hours, Victim-1 missed a call from 206-580-0444.

20 25. At 1911 hours, Victim-1 received an email from sumitgargied92[[@](mailto:sumitgargied92@gmail.com)]gmail.com
21 with the subject "Hey babe", which had three photographs attached to it. The photographs
22 were of the building's lobby fireplace, seating area, and a deli connected to the building.
23 The Exchangeable Image File (EXIF) data for the photos indicate that the photos were taken
24 by a Google Pixel 3a phone on October 10, 2020, on or about the time the man entered the
25 lobby. Google records indicate that a Google Pixel 3a phone was associated with Garg's
26 personal email account (SUBJECT ACCOUNT 4), and -- as discussed below -- SPD later
27 seized a Google Pixel 3a phone (SUBJECT CELLPHONE 1) from Garg.

1 26. At 1913 hours, Victim-2 (Victim-1's uncle) received a text message from 206-
2 580-0444, that contained the following threats:

3 I will rape [Victim-1]
4 Then [XXXX]
5 Then your wife
6 Old man you are fucked.

7 27. On November 20, 2020, Victim-1 filed a declaration in Person-A's civil action,
8 in which she stated that she recognized the man in the security footage as Garg. Person-A
9 attached an exhibit to her declaration that was a side-by-side comparison of a still image
10 from the video footage with a picture of Garg taken while Victim-1 and Garg were
11 roommates. The comparison identified numerous similarities between the jackets in the
12 photographs:



1 **G. Garg is Charged in King County Superior Court**

2 28. On November 1, 2020, SPD arrested Garg at his residence, 4308 Southwest
3 100th Street, Seattle, Washington 98146, without resistance and seized his Pixel 3a phone
4 (SUBJECT CELLPHONE 1). While Garg was in custody, Person-A informed SPD that she
5 had received more emails from accounts that had sent prior threatening messages. Person-A
6 asked SPD to document the receipt of the emails because they showed that Garg could not
7 have sent them while he was in jail. She also indicated that SUBJECT CELLPHONE 1
8 contained video evidence showing that Person-A and Garg received more emails while they
9 were eating at a restaurant.⁴ SPD requested that Person-A keep the emails she received
10 intact on her phone, and Person-A agreed to do so.

11 29. On November 6, 2020, Garg was charged by a felony information of one count
12 of Cyberstalking, one count of Felony Stalking, and one count of Cyberstalking.

13 30. Notably, the harassing messages to many of the Victims stopped up until the
14 day before Garg was released from custody.

15 31. On November 10, 2020, the King County Superior Court issued a Stalking
16 Violence No-Contact order prohibiting Garg from having contact with Victim-1. The court
17 also issued a no-contact order prohibiting Garg from having direct or indirect contact with
18 Victims 2, 3, 5 and 6.

19 32. On November 13, 2020, Garg was released with electronic monitoring.
20 Subsequently, Victim-1 received threatening text messages from 206-462-2978.

21 33. During the criminal proceeding, Garg's attorney indicated that Garg was
22 willing to turn over his devices to the government for examination in order to prove his
23 innocence. Garg subsequently turned over a passcode for SUBJECT CELLPHONE 1.

24
25
26
27 ⁴ I have not had the opportunity to examine the emails Person-A reports that she received. It is possible that Person-A
28 and Garg engineered the sending of the emails using the email schedule function in Gmail, which allows a user to
schedule emails to be sent at a prescribed time. See
<https://support.google.com/mail/answer/9214606?co=GENIE.Platform%3DDesktop&hl=en> (last checked 2/27/2021).

1 **H. Garg and Person-A's Complaints Against Victim-1**

2 34. During the harassment campaign, Garg and Person-A made multiple
3 complaints to SPD against Victim-1. As a result of these complaints, SPD officers were
4 dispatched to interview Garg and/or Person-A. Among other things, Garg and Person-A
5 alleged that they were victims of harassment from Victim-1 and others. A non-exhaustive
6 summary these complaints is provided below.

7 35. On June 27, 2020, an SPD officer interviewed Garg and Person-A, who alleged
8 that Victim-1 had bipolar disorder and had been harassing them through a series of
9 Facebooks posts, emails, and text messages. They further alleged that the former roommates
10 had had a dispute about rent, and that Victim-1 filed a fraudulent domestic violence action
11 against Garg to get out of the terms of their lease. Garg showed the SPD officer screenshots
12 on his laptop computer and alleged that Victim-1 had created multiple Facebook pages using
13 Garg's name, and had made salacious posts. Among other things, the posts stated that Garg
14 had been fired from his prior employer for having sex with his boss. Garg also showed the
15 officer an email sent to Person-A from an account created to impersonate Garg, that stated,
16 "Bitch, I'll fucking kill you." During the interview, Person-A recounted several incidents
17 where she alleged that Victim-1 had followed Person-A while she was walking in Olympic
18 Park in an apparent attempt to intimidate Person-A. Person-A, also alleged that Victim-1
19 had harassed Person-A's lawyer, and possibly others. Garg and Person-A indicated that the
20 harassment from Victim-1 had been accelerating at a concerning rate.

21 36. On July 14, 2020, an SPD officer interviewed Person-A. Person-A indicated
22 that she had an anti-harassment order against Victim-1. She alleged that Victim-1 and
23 Victim-3 were sending harassing messages and indicated that she was concerned that
24 Victim-1 and Victim-3 would come to her apartment.

25 37. On September 21, 2020, an SPD officer interviewed Person-A. Person-A
26 alleged that Victim-1 had violated a temporary restraining order by sending threatening
27 communications. Person-A further alleged that Victim-1 had set up a fake email account and
28 had impersonated her husband. Person-A showed the SPD officer copies of the emails in

1 question, that were sent from the email account sumitgargied90[@]gmail.com (SUBJECT
2 ACCOUNT 7).

3 38. On October 13, 2020, an SPD officer interviewed Garg and Person-A. Garg
4 and Person-A repeated the allegation that Victim-1 had created false email accounts to harass
5 them. Garg reported he was receiving text messages from random phone numbers which
6 contained personal information, such as Garg's work email address, the address of Garg and
7 Person-A's new house, and the phrase "jail time." Garg and Person-A reported that mail had
8 disappeared from their mailbox, and Person-A stated that she thought Victim-1 may have
9 followed them home one day.

10 39. On October 26, 2020, an SPD officer interviewed Garg and Person-A. Garg
11 indicated that Victim-1 and her ex-boyfriend were harassing him. Garg also alleged to have
12 received text messages and emails with death threats.

13 40. On October 31, 2020, an SPD officer interviewed Garg and Person-A. During
14 the interview, Garg and Person-A received multiple emails on their phones, some of which
15 were from the address hutcm143[@]gmail.com (SUBJECT ACCOUNT 35) and
16 sumitgargied92[@]gmail.com (SUBJECT ACCOUNT 9).⁵ The emails contained various
17 offensive and threatening texts. Garg denied that he created the accounts or wrote the
18 emails. Person-A also reported that, earlier in the week, she had made a purchase at a deli,
19 and later received emails from hutcm143[@]gmail.com (SUBJECT ACCOUNT 35)
20 mentioning seeing Person-A at the deli. Person-A indicated that she remembered seeing a
21 woman she thought resembled Victim-1 inside the deli.

22 41. On November 8, 2020, an SPD officer interviewed Person-A. Person-A
23 indicated that when she was leaving the parking lot of the Safeway on 3900 S Othello Street
24 the previous day, she saw Victim-1 standing across the street, staring at her. Person-A
25 indicated that she received a text message earlier in the day on November 8, 2020 from an
26

27 _____
28 ⁵ Based on training and experience, I know that certain tools can be used to schedule or delay the sending of emails and other communications. Accordingly, the fact that Garg and Person-A received messages during the interview does not demonstrate that they were victims of harassment.

1 unknown number saying: "Hey bitch. How's jail treating him." Person-A said that she later
2 received a message from a different number stating: "I saw you at the Safeway at Othello!
3 Not staying home anymore? Lol."

4 42. On November 24, 2020, an SPD officer interviewed Person-A. Person-A
5 reported that she had received numerous harassing text messages. One of the text messages
6 made reference to the fact that Garg had to wear an electronic ankle monitor, and another
7 message contained a death threat.

8 43. On December 6, 2020, an SPD officer interviewed Person-A. Person-A
9 indicated that she had been receiving harassing emails all day from Victim-1. One email,
10 apparently, indicated that the sender had left something in Person-A's mailbox. When she
11 checked the mailbox she found an envelope with a quote on it that had appeared in an email
12 she had received. After Person-A indicated that she was afraid to remove the envelope from
13 the mailbox, the SPD officer collected it and noted that it contained photographs that had
14 been sent to Person-A earlier by email.

15 **I. Person-A Submits False Evidence to Make it Appear that Person-A and Garg**
16 **are Victims of Harassment**

17 44. In the civil action she brought against Victim-1, Person-A repeated her
18 accusations that Victim-1 and Victim-3 were harassing Person-A and Garg. In declarations
19 and in live testimony, Person-A alleged that Victim-1 physically stalked her and attempted to
20 intimidate her. For example, Person-A alleged that Victim-1 sent her harassing emails and
21 then put the harassing materials in the mailbox outside her house in December 2020. I have
22 reviewed evidence showing that it would have been impossible for Victim-1 to have stalked
23 or harassed Person-A in-person after November 21, 2020. Namely, I have reviewed copies
24 of airline tickets indicating that Victim-1 and Victim-3 flew from Washington State to New
25 York State on November 21, 2020 and did not return until January 9, 2021.

26 45. Person-A also alleged that Victim-1 suffered from mental illness and that Garg
27 had driven her home from a psychiatrist appointment while they were living together. On
28 December 10, 2020, Victim-1 filed a declaration refuting this allegation. Among other

1 things, Victim-1 produced evidence showing that she had driven her home from a
2 colonoscopy, not a psychiatrist visit.⁶

3 46. On December 16, 2020, the King County District Court issued an order
4 denying Person-A's request for a protective order and dismissed her petition. The court
5 found that the parties had failed to identify by a preponderance of the evidence the person
6 who had sent the harassing messages. The court also found that Person-A had failed to show
7 by a preponderance of the evidence that Victim-1 had harassed Person-A.

8 47. Subsequently, on December 23, 2020, an anonymous email service account
9 sent an email to Victim-1, with the message, "Merry Christmas!" The subject line of this
10 email was the address in New York of Victim-1's mother, who Victim-1 was visiting.

11 **J. Garg's Recent Arrest**

12 48. On February 26, 2021, SPD executed a warrant to search the residence shared
13 by Garg and Person-A and a warrant to arrest Garg. A large number of electronic devices
14 were seized from the residence.

15 49. It is my understanding that the King County Superior Court Judge had
16 concerns about Garg's danger to the community, but determined that Garg could be released
17 provided that his attorney developed a plan for him to not have access to the internet.

18 **K. The SUBJECT ACCOUNTS**

19 50. As explained above, the harasser(s) used numerous online accounts to carry out
20 the cyberstalking campaign. Hundreds of emails were sent from these accounts and directed
21 toward multiple victims.

22 51. SPD has gathered a limited set of log information that identifies the IP
23 addresses used by some of the SUBJECT ACCOUNTS. A Secret Service Network Intrusion
24 Forensics Analyst (NIFA) has conducted a preliminary analysis of this log information and
25 determined that many of the SUBJECT ACCOUNTS used IP addresses associated with
26

27 _____
28 ⁶ In a recent interview, I had the opportunity to ask Victim-1 about this event. Victim-1 explained that she is not bi-
polar, does not suffer from a mental illness, and never indicated to Garg or Person-A that she suffered from a mental
illness. Victim-A further explained that it was Person-A, not Garg, who drove her home from the colonoscopy.

1 domestic and foreign Virtual Private Network services.⁷ These services effectively mask the
2 IP address of the user of the VPN services. Accordingly, it appears that the harasser(s)
3 exercised a degree of sophistication in how they accessed the SUBJECT ACCOUNTS and
4 used them in a manner that masked their location and identity.

5 52. The NIFA's preliminary analysis shows, however, that the harasser(s) may
6 have made some missteps. For example, sumitgarg90[@]gmail.com (SUBJECT
7 ACCOUNT 4) appears to be a personal email account that Garg used before and after the
8 cyberstalking campaign started. Log information for SUBJECT ACCOUNT 4 shows that
9 the account was accessed from IP addresses associated with VPN services used to send the
10 harassing messages. For example, the log information shows that SUBJECT ACCOUNT 4,
11 sumitgargied90[@]gmail.com (SUBJECT ACCOUNT 7), hutcm1143[@]gmail.com
12 (SUBJECT ACCOUNT 13), and sumitgargied92[@]gmail.com (SUBJECT ACCOUNT 9)
13 all connected with the same IP address (107.181.180.163), which belongs to a VPN service.

14 53. The log information further shows that a computer that was logged into Garg's
15 personal account (SUBJECT ACCOUNT 4) accessed IP address 107.181.180.163 on
16 September 16, 2020, and then logged out of the account. Subsequently, the harasser(s)
17 logged into sumitgargied90[@]gmail.com (SUBJECT ACCOUNT 7). This indicates that the
18 harasser(s) had common control of the accounts, and presents evidence that Garg was one of
19 the harasser(s).

20 54. The following summary addresses only a selection of accounts and messages
21 that were used to carry out the cyberstalking campaign:

22 **1. hgorgeous5[@]gmail.com (SUBJECT ACCOUNT 1),**
23 **hellogorgeous5[@]gmail.com (SUBJECT ACCOUNT 2), and**
24 **hellogorgeous43[@]gmail.com (SUBJECT ACCOUNT 3)**

25
26
27 ⁷ Preliminary investigation indicates that IP addresses used to send many of the harassing messages belong to server
28 hosting companies that lease server space to ProtonVPN. Proton VPN is a Swiss company that provides VPN services.
As the investigation of these IP addresses is ongoing, I will refer to the various IPs as VPN services rather than
attributing them to a single VPN service provider.

1 55. Starting in January 2020, Victim-1 started receiving numerous emails from
2 multiple Gmail accounts. The accounts contained some variation of the words “Hello
3 Gorgeous”, that appear on the cover of Victim-1’s diary.

4 56. For example, on or about January 25, 2020, Victim-1 received an email from
5 hgorgeous5[@]gmail.com that listed the names of three of Victim-1’s former or current
6 boyfriends, along with details about each relationship that were contained in the diary. The
7 email also listed the name of a charity that Victim-1 supported, and asked threateningly, “do
8 they know about your sex life?”

9 57. Google records indicate that hgorgeous5[@]gmail.com (SUBJECT
10 ACCOUNT 1) was created on January 25, 2020, and deleted the same day.

11 58. Google records indicate that hellogorgeous5[@]gmail.com (SUBJECT
12 ACCOUNT 2) is associated with hellogorgeous43[@]gmail.com (SUBJECT ACCOUNT 3),
13 among other accounts.

14 59. The names of SUBJECT ACCOUNTS 1-3 make explicit reference to Victim-
15 1’s diary, and thereby appear to be designed to put Victim-1 in fear that the harasser(s) had
16 access to confidential and potentially embarrassing information contained in the diary.

17 **2. Sumitgarg90[@]gmail.com (SUBJECT ACCOUNT 4) and**
18 **cl[REDACTED][@]gmail.com (SUBJECT ACCOUNT 5)**

19 60. SUBJECT ACCOUNTS 4 and 5 appear to be personal email accounts used by
20 Sumit Garg and Person-A.

21 61. On February 25, 2020, SUBJECT ACCOUNT 4, sent an email to Victim-2,
22 complaining that Victim-1 was harassing him and his wife. On the same day, SUBJECT
23 ACCOUNT 5 responded to the email from SUBJECT ACCOUNT 4, stating, in pertinent
24 part, “This is an abuse of law. She knows her lawyer uncle will protect her no matter what . .
25 . Please handle [Victim-1] as the law applies even to kids of lawyers.” Approximately three
26 hours later, SUBJECT ACCOUNT 4 sent an email to Victim-2, stating, in pertinent part:

27 I should inform you at this point what your client [Victim-1] is doing is “Cyber
28 Harassment”. I expect nothing less than a detailed account of why this

1 | happened, how this happened, and an affirmation of this never happening
2 | again. I would not be tolerating any form of harassment by your client. I
3 | expect nothing less than a sincere apology from you for sending such lewd
4 | messages to my wife. If [Victim-1] refuses to stay away from me and my
5 | family, I would be forced to take legal action

5 | The email went on to paraphrase a variety of Washington State stalking statutes.

6 | Notably, the emails from SUBJECT ACCOUNT 4 and 5 used the Mailtrack service.

7 | 62. A preliminary analysis of IP log records indicates that, on September 15, 2020,
8 | SUBJECT ACCOUNT 4, utilized IP address 185.107.95.228, which is associated with one
9 | of the VPN services based in the Netherlands that was used to send harassing messages. The
10 | analysis also indicates that, on September 16, 2020, SUBJECT ACCOUNT 4, utilized IP
11 | address 107.181.180.163, which is associated with a VPN service based in the United States,
12 | that was also used to send harassing messages. This IP overlap indicates that the user of
13 | SUBJECT ACCOUNT 4 had access not only to other SUBJECT ACCOUNTS, but also to
14 | the VPN services that were used to facilitate the cyberstalking campaign.

15 | 63. In support of her request for an order against Victim-1, Person-A submitted
16 | copies of a number of emails involving SUBJECT ACCOUNT 5 in which she corresponded
17 | with SPD regarding her complaints against Victim-1. Notably, some of these emails
18 | appeared to use the Mailtrack service.

19 | **3. Ci [REDACTED]@[gmail.com] (SUBJECT ACCOUNT 6)**

20 | 64. Ci [REDACTED]@[gmail.com] (SUBJECT ACCOUNT 6) was set up to mimic
21 | Person-A's personal email account and to facilitate the harassment scheme.
22 |

23 | 65. On November 15, 2020, SUBJECT ACCOUNT 6 sent an email to Victims 1,
24 | 2, 5, 7, 9, and 10, in addition to the King County District Court. The email stated, in
25 | pertinent part:

26 | Even I can't save you from my husband now. From one woman to another, if I
27 | were you I would leave Washington ASAP. I wish you had listened to me a
28 | year ago, but you didn't and filed a false DV instead. You turned him into a
29 | criminal.

1 You should really listen to me this time before its too late. I will continue to
2 lie for Sumit even if he rapes you or you get tormented by hitmen he hired.
3 Your obsession with him is going to get you killed or worse.

4 66. On November 19, 2020, SUBJECT ACCOUNT 6 sent an email to the King
5 County District Court, copying Victims 1, 7, 9 and 10, with the subject, "Arrest Sumit." The
6 email contained the following message:

7 Dear Clerk,
8 I have been lying to the court and hiding the truth about my husband.
9 I was violently beaten by Sumit and raped. He threatened to kill me if I did not
10 lie to the court. I hate [Victim-1] for fucking my husband but her DV petition
11 is not false.
12 Thanks,
13 Person-A

14 The email appeared to use the Mailtrack service. Subsequently, on December 11, 2020,
15 SUBJECT ACCOUNT 6 forwarded the email to Victim-3 and addresses associated with
16 Victim-1's employer.

17 67. On December 2 and December 3, 2020, SUBJECT ACCOUNT 6 sent a series
18 of emails to Victims 1, 2, 5-7, and 9 with a variety of threats. One of the emails contained
19 pictures and names of Victim-7's family members, and stated that the family members "will
20 pay for your insults against my lawyer today." Another email threatened, "[Victim-7], one
21 more inappropriate comment on my lawyer and my husband will destroy your family like he
22 did with [Victim-2]." Another email referred to Victim-9, and stated, "This chinese cunt is
23 not going to be able to save you from his wrath."

24 68. On December 10, 2020, SUBJECT ACCOUNT 6 sent an email to Victim-1
25 and Victim-2, with the subject line, "Daddy Issues Frequently Come with Mommy Issues."
26 The email stated, in part, "If you had neglectful or abusive parents, you might have mommy
27 issues too . . ."

28 69. On December 10, 2020, SUBJECT ACCOUNT 6 sent an email to Victim-9,
copying Victims 1, 2, 3, and 10, in addition to sumitgargied92[@]gmail.com (SUBJECT

1 ACCOUNT 9), with the subject line, “I will fuck you harder than [Victim-9’s husband].”

2 The email stated:

3 Hello [Victim-9],
4 Did [Victim-1] talk to you about how my husband used to drill her pussy?
5 If [Victim-9]’s isn’t living up to the expectations – you have options! I could
6 lend him for a night or two. It seems like you could use a good fuck.

7 The email included pictures of Victim-9 and her husband. Subsequently, SUBJECT
8 ACCOUNT 6 replied to the message, writing:

9 [Victim-1], there will be a time when you will beg for mercy
10 Unfortunately,
11 You have lost all your chances
12 Sumit will now rape you and make [Victim-3] watch.
13 He might learn something beyond star wars.
14 [Victim-2] would be getting a link to a live sex tape
15 There is no escape now. It is only a matter of time before Sumit catches you
16 Your best outcome is rape
17 Your worst outcome is (unimaginable pain)

18 The emails appeared to use the Mailtrack service.

19 70. On December 10, 2020, SUBJECT ACCOUNT 6 sent an email to Victims 1-3,
20 with the subject line, “Your Boyfriend Is Not Your Father.” The email stated, in pertinent
21 part, “Sumit has proof of your Daddy Issues.” The email appears to use the Mailtrack
22 service.

23 71. On December 10, 2020, SUBJECT ACCOUNT 6 sent an email to Victim-1,
24 with the subject line, “Therapy May Help.” The email appears to use the Mailtrack service.

25 72. On December 10, 2020, SUBJECT ACCOUNT 6 sent an email to Victim-1
26 and Victim-9, with the subject line, “Watch This: Blow Job Tutorial Video.” The following
27 day, SUBJECT ACCOUNT 6 forwarded the email to Victims 1, 2, and 3. The email stated:
28 “Hey Mexico nerd, I have heard she sucks a mean dick?” Both emails appear to use the
Mailtrack service.

73. On December 13, 2020, SUBJECT ACCOUNT 6 sent an email to Victim-1,
with the subject line, “Run away.” The email stated:

1 You should really listen to me this time before it's too late. I will continue to
2 lie for Sumit even if he rapes you or you get tormented by hitmen he hired.
3 Your obsession with him is going to get you killed or worse.

4 74. Google records indicate someone using Person-A's name created
5 ci[REDACTED]@[gmail.com on November 15, 2020. IP records show that the account was
6 accessed from IP addresses associated with five separate VPN services.

7 **4. Sumitgargied90@[gmail.com (SUBJECT ACCOUNT 7)**

8 75. Sumitgargied90@[gmail.com (SUBJECT ACCOUNT 7) appears to be set up
9 as a variation of Sumit Garg's personal account (SUBJECT ACCOUNT 4), but with the
10 addition of the letters "ied." It is possible that these letters are a reference to the disorder --
11 intermittent explosive disorder (IED) -- that Garg referenced in his prior communications
12 with Victim-1. On September 15, 2020, SUBJECT ACCOUNT 7 sent an email to Victim-2,
13 Victim-1, and Victim-5, stating, "Your niece's boyfriend is fucked old man!"

14 76. On September 16, 2020, SUBJECT ACCOUNT 7 sent an email to Victim-2,
15 Victim-1, and Victim-5, stating, "You know what I love about [Victim-1]? It is her ass but
16 you probably had a ride yourself by now [Victim-2]?"

17 77. On or about September 16, 2020, SUBJECT ACCOUNT 7 sent a series of
18 emails to Victim-2 and others, threatening to put pictures of Victim-5's family members and
19 Victim-1's sister on a pornographic website.

20 78. On September 19, 2020, SUBJECT ACCOUNT 7 sent an email to Victim-1,
21 Victim-2, and Victim-5, "Dear old motherfuckers, . . . You fucked around with the wrong
22 guy." The email appeared to use the Mailtrack service.

23 79. On October 4, 2020, SUBJECT ACCOUNT 7 sent an email to Victim-1 and
24 seattle.kcdc@[kingcounty.gov, stating, "Please find the court papers against your boyfriend
25 [Victim-3]". The email appeared to use the Mailtrack service.

26 80. Also on October 4, 2020, SUBJECT ACCOUNT 7 sent Victim-1 and Victim-2
27 a series of threatening and vulgar emails. Among other things, SUBJECT ACCOUNT 7
28

1 threatened to reveal intimate details from Victim-1's diary, and threatened, "I will bring you
2 to your knees old man." The emails appeared to use the Mailtrack service.

3 81. On October 5, 2020, SUBJECT ACCOUNT 7 sent Victim-2 and Victim-1 an
4 email with the subject line, "look at that pussy wow . . ." The email forwarded a picture of
5 Victim-1, and contained the following statement:

6 I can't believe I only fucked this one just a few times [Victim-2], she is as
7 crazy in bed . . . I fucked her for an hour straight on a couple occasions and
8 she still craved for more. Her cravings are insatiable even with a 27 year's dick
let alone an old man in his late 90's.

9 The email appeared to use the Mailtrack service.

10
11 82. Google records indicate that "Sumit Garg" created SUBJECT ACCOUNT 7 on
12 September 16, 2020. IP records indicate that the account utilized a wide variety of VPN
13 services to send the harassing messages.

14 **5. sumitgargied91[@]gmail.com (SUBJECT ACCOUNT 8)**

15 83. Sumitgargied91[@]gmail.com (SUBJECT ACCOUNT 8) is another in a series
16 of accounts that incorporates Sumit Garg's name and the letters "ied." The choice in account
17 names shows that the harasser(s) were deliberately setting up sequential accounts to send
18 harassing and threatening emails.

19 84. On October 5, 2020, SUBJECT ACCOUNT 8 sent an email to Victims 2 and 5
20 stating, "M... 's ass is better than [Victim-1's] anyday. How have I missed this one?"
21 Investigation has determined this is likely a reference to Victim 1's supervisor.
22 Subsequently, SUBJECT ACCOUNT 8, forwarded the email to Victims 1, 2, and 5, and
23 wrote: "The lesson for all of you . . . Don't ever abuse the law next time." The emails
24 appeared to use the Mailtrack service.

25 85. On October 5, 2020, SUBJECT ACCOUNT 8 sent Victims 1, 2 and 5 a series
26 of emails that contained lewd comments about Victim-5's wife.
27
28

1 86. Also on October 5, 2020, SUBJECT ACCOUNT 8 sent Victim-1 an email that
2 had the website of Victim-1's apartment building in the subject line. The email threatened,
3 "Keep working on that pussy. Can't wait." The email appeared to use the Mailtrack service.

4 87. On October 12, 2020, SUBJECT ACCOUNT 8 sent Victim-2 an email with
5 the subject line, "No country for old men."

6 88. Google records indicate that "Sumit Garg" created SUBJECT ACCOUNT 8 on
7 October 5, 2020. Google records indicate that the account has been deleted.

8 **6. sumitgargied92[@]gmail.com (SUBJECT ACCOUNT 9)**

9 89. Sumitgargied92[@]gmail.com (SUBJECT ACCOUNT 9) was the next
10 sequential account set up to further the harassment campaign.

11 90. On October 10, 2020, SUBJECT ACCOUNT 9 sent an email to
12 seattle.kcdc[@]kingcounty.gov and Garg's attorney stating, "I Sumit Garg admit to raping
13 [Victim-1]. Please leave [Person-A] and arrest me." Subsequently, SUBJECT ACCOUNT
14 9 forwarded the email to Victims 1, 2, and 5 along with a picture of an unidentified female.
15 This picture is similar to pictures of an unknown female which were emailed to victims by
16 SUBJECT ACCOUNT 11. Victim-1 has advised these are not pictures of herself. The
17 following morning, SUBJECT ACCOUNT 9 forwarded the email chain to Victim-6, who is
18 a forensics expert hired by Victim-1's legal team in connection with the civil action. The
19 email threatened, "your kids next." SUBJECT ACCOUNT 9 immediately forwarded the
20 same email to Victim-1 to ensure that Victim-1 was aware that a member of her legal team
21 was being harassed and threatened. All of these emails appeared to use the Mailtrack
22 service.

23 91. On October 11, 2020, SUBJECT ACCOUNT 9 sent an email to Victims 1, 2, 5
24 and 6 with the subject line, "[Victim-6] you are fucked." The email contained the following
25 threat: "[Victim-6], I will do the same to your family as I have done to your fuck buddy's
26 [Victim-2]." The email appeared to use the Mailtrack service.
27
28

1 92. On October 11, 2020, SUBJECT ACCOUNT 9 sent an email to Victims 1, 2,
2 5, and 6, stating, in pertinent part, “[Victim-2], . . . Is the entire [Victim-1’s last name]
3 family after pussy? You old men really have an eye for pussy although ‘be creative with
4 sexual positions’ with [Victim-6].” The email appeared to use the Mailtrack service.

5 93. On October 10, 2020, SUBJECT ACCOUNT 9 sent an email to Victim-1, with
6 the subject line, “Hey Babe.” The email included pictures from the lobby of Victim-1’s
7 apartment building.

8 94. On October 26, 2020, SUBJECT ACCOUNT 9 sent an email to Victim-1 with
9 a link to a website post about a non-profit naming Victim-1 as one of the recipients of their
10 2018 Icon Award.

11 95. On October 26, 2020, SUBJECT ACCOUNT 9 sent an email to Victim-3
12 stating, in pertinent part, “Your girl . . . [p]erkiest ass I have ever fucked.”

13 96. On October 27, 2020, SUBJECT ACCOUNT 9 sent an email to Victim-1 with
14 the subject line, “I will kill you.”

15 97. On October 29, 2020, SUBJECT ACCOUNT 9 sent an email to Victim-1,
16 Victim-3, and Victim-1’s co-workers, indicating that Victim-3 had been reported to law
17 enforcement for “suspicious terrorist activities.”

18 98. On October 30, 2020, SUBJECT ACCOUNT 9 sent an email to an SPD email
19 list and multiple others, including Victims 1-3, with the subject line, “I got angry. I hit her
20 and raped her. I belong in prison.” The emailed stated:

21 Hi Officers,
22 This is my original email.
23 My name is Sumit Garg. I had sex with [Victim-1] multiple times when we
24 were roommates.
25 She got pregnant. Now, I keep getting text messages like “you fucked me”,
26 “you got me pregnant” etc.
27 I also get death threats from two other ex-boyfriend . . . who also think I
28 abandoned [Victim-1] after getting her pregnant.
 I recently found out the baby was not mine. I got angry and confronted
 [Victim-1].
 She told me the father was a 53 years old boss she had a huge crush on . . . He
 is married with kids.

1 I got angry. I hit and raped her. I belong in prison.
2 Thanks,
3 Sumit Garg

4 99. Also on October 30, 2020, SUBJECT ACCOUNT 9 sent an email to Victims
5 1-3, and the King County District Court, stating: “[Victim-1], One night, I’m going to fuck
6 your brains out like I used to when we were roommates and there is nothing the courts will
7 be able to do to stop me.” On October 31, 2020, SUBJECT ACCOUNT 9 forwarded the
8 email with the message: “The rooftop [of Victim-1’s apartment building] is amazing. This is
9 where I will fuck you when we meet.” Shortly later, SUBJECT ACCOUNT 9 forwarded the
10 email to Victims 1, 2, and 7, the King County District Court, and sumitgarg90[[@](mailto:sumitgarg90@gmail.com)]gmail.com
11 (SUBJECT ACCOUNT 4). The email stated in pertinent part, “Soon they will have video
12 footage of me fucking you on that rooftop. It is a promise.”

13 100. On October 31, 2020, SUBJECT ACCOUNT 9 sent an email to Victims 1-3.
14 The email stated, in pertinent part, “A girl went on a walk and never came back. A
15 roommate with a grudge ended her misery.”

16 101. On October 31, 2020, SUBJECT ACCOUNT 9 sent an email to Victim-1,
17 sumitgarg90[[@](mailto:sumitgarg90@gmail.com)]gmail.com (SUBJECT ACCOUNT 4), and cl[REDACTED][[@](mailto:cl[REDACTED]@gmail.com)]gmail.com
18 (SUBJECT ACCOUNT 5), with the following threat, “I will first rape you and then kill
19 you.”

20 102. On October 31, 2020, SUBJECT ACCOUNT 9 sent an email to Victim-1, an
21 SPD mailing list, and sumitgarg90[[@](mailto:sumitgarg90@gmail.com)]gmail.com (SUBJECT ACCOUNT 4), with the
22 following threat: “[Victim-1], one night, I’m going to fuck your brains out like I used to
23 when we were roommates and there is nothing the courts will be able to do to stop me.”

24 103. On October 31, 2020, SUBJECT ACCOUNT 9 sent an email to Victims 1, 2,
25 3, and 7, with the subject line, “Hey babe.” The email stated, in pertinent part:

26 That bathrobe always used to drive me crazy.
27 I will make you pay for a false DV petition and for ruining my wife’s life while
28 in chemo.
You will never abuse the law once I’m done with you. No more of these false
DV petitions from [Victim-1].

1 [Victim-3] has fled. [Victim-2] is done and dusted.
2 You are going to pay for your crimes soon!
3 Until next time Spicy!

4 104. On November 1, 2020, SUBJECT ACCOUNT 9 sent an email to Victim-2
5 stating:

6 Old man,
7 You will never file a false petition again.
8 I can't imagine how many others you have tormented.
9 The lives you ruined without realizing the repercussions of false petitions.
10 Lawyers like you should be crucified.

11 The email appeared to use the Mailtrack service.

12 105. On November 1, 2020, SUBJECT ACCOUNT 9 sent emails to Victims 1, 2
13 and 7, claiming to have a sex tape of Victim-1 and threatening to release it.

14 106. On November 1, 2020, SUBJECT ACCOUNT 9 sent an email to Victim-1 and
15 cl[REDACTED]@[REDACTED].gmail.com (SUBJECT ACCOUNT 5), stating, "You didn't come downstairs to
16 meet me last night. I'm hurt." Subsequently, SUBJECT ACCOUNT 9 forwarded the email
17 to Victims 1, 2, and 7 on November 15, 2020.

18 107. As indicated above, Garg was released from custody on approximately
19 November 13, 2020. On November 12, 2020, SUBJECT ACCOUNT 9 sent an email to
20 Victim-1, with the subject line, "I need to go back." The email stated, in pertinent part:

21 I do not deserve to be released.
22 I do not think I can keep the no-contact order.
23 I belong in prison. Please send officers to arrest me again. No one is safe
24 while I am free.

25 On November 15, 2020, SUBJECT ACCOUNT 9 responded to the email with the message,
26 "My cravings have increased 10-fold now."

27 108. Google records indicate that "Sumit Garg" created SUBJECT ACCOUNT 9 on
28 October 11, 2020. IP records indicate that SUBJECT ACCOUNT 9 utilized a wide variety
of VPN services to send harassing messages.

1 **7. Sumitgargied93[@]gmail.com (SUBJECT ACCOUNT 10)**

2 109. On December 2, 2020, SUBJECT ACCOUNT 10 sent an email to Victim-5,
3 copying Victims 1, 2, 3, with the subject line, “Back off old man.” The email contained a
4 picture of Victim-5 and his wife.

5 110. On December 2, 2020, SUBJECT ACCOUNT 10 sent an email to Victim-1,
6 copying Victims 3, 5, 7, and 9. The email contained the statement, “You have no idea who
7 you fucked with.”

8 111. On December 2, 2020, SUBJECT ACCOUNT 10 sent an email to Victims 1,
9 3, 5, and 7, with the question, “You think this Chinese bitch can catch me?” This appears to
10 be a reference to Victim-9, who is an SPD detective. This email indicates that the harasser(s)
11 did not know -- at that point -- that Victim-9 was a Caucasian woman married to another
12 SPD officer, who is Asian American.

13 112. L.A. is a defense attorney who represented Garg. On December 3, 2020,
14 SUBJECT ACCOUNT 10 sent an email to Victim-7, copying Victims 1, 2, and 3, and L.A.,
15 in addition to cl[REDACTED][@]gmail.com (SUBJECT ACCOUNT 5). The emails stated:

16 Old motherfucker,
17 One more insult against [L.A.] and I will literally cut your fucking dick in half
18 and feed it to you. I’m sure your wife will have an “objection” to that!

19 113. On December 9, 2020, SUBJECT ACCOUNT 10 forwarded the prior email to
20 Victims 1-3, 5-6, and 9, along with cl[REDACTED][@]gmail.com (SUBJECT ACCOUNT 5),
21 attaching screenshots which appear to be from the Facebook accounts of Victim-1’s brother
22 in law, a former supervisor of Victim-1, and Victim-3. The email contained the following
23 message:

24 [Victim-1],
25 You fucked with the wrong guy.
26 I’m from India, I can hack into any computer I wanted to.
27 I know SQL very well.
28 I’m certainly not getting caught by a Chinese bitch.
 Best,
 Sumit Garg

1
2 114. On December 10, 2020, SUBJECT ACCOUNT 10 forwarded the email string
3 to Victims 1-3, 5-7, and 10, and cl[REDACTED]@[REDACTED].com (SUBJECT ACCOUNT 5). The
4 email contained the following message, "Hey [Victim-1], I miss fucking you so much."

5 115. On December 11, 2020, SUBJECT ACCOUNT 10 sent an email to Victim-1
6 and others, with the following threats:

7 [Victim-1],
8 You made the biggest mistake of your life.
9 I will not leave the sates before raping you.
10 I will make [Victim-3] watch. I want him to pickup a few things while I am
11 away.

12 Later that day, SUBJECT ACCOUNT 10, replied to the email stating, "I still remember
13 almost every underwear and bra I played with. I liked your lingerie collection . . ."

14 116. On December 11, 2020, SUBJECT ACCOUNT 10 sent an email to Victim-1
15 and Victim-9, with the subject line, "Beauty and the beast!" The email attached pictures of
16 Victim-9 and her husband.

17 117. On December 11, 2020, SUBJECT ACCOUNT 10 sent an email to Victim-9,
18 with the subject line, "Confession." The email contained the following message:

19 Detective [Victim-9],
20 I'm tired of lying. I want to confess everything.
21 I did have sex with [Victim-1] numerous times although I did not rape her. I
22 did not have anal with her (as yet) [Victim-1] wasn't open to the idea.
23 I'm indeed sending all these harassing emails from my pixel 3a phone.
24 I did take pictures of her apartment and of us fucking from my pixel 3a phone.
25 On separate note, I do think you can do better than a Chinese dick.
26 Thank You,
27 Sumit Garg

28 118. On December 11, 2020, SUBJECT ACCOUNT 10 sent an email to Victims 1,
3, 7, 9, and 10, with the subject line, "I can hack any computer." The email contained,
among other things, lines of code that purportedly were designed to locate a user's login
credential from the user's web browser.

1 119. Google records indicate that “Sumit Garg” created SUBJECT ACCOUNT 10
2 on December 3, 2020. IP records show that SUBJECT ACCOUNT 10 used numerous VPN
3 services to send harassing messages.

4 **8. Sumitqarg9o[@]gmail.com (SUBJECT ACCOUNT 11)**

5
6 120. Sumitqarg9o[@]gmail.com (SUBJECT ACCOUNT 11) appears to mimic the
7 name of SUBJECT ACCOUNT 4, except with the substitution of a Q instead of a G and the
8 substitution of the letter o instead of a zero.

9 121. On November 15, 2020, SUBJECT ACCOUNT 11 sent an email to Victims 1,
10 2, 5, and 9, with the subject line, “Don’t be scared.” The email contained the following
11 message:

12 “Spicy”,
13 Do you really think a few days in jail was going to scare me?
14 Don’t be scared. I won’t kill you.
15 It is too easy and not nearly enough punishment for your crimes.
16 I have other ideas to take care of you.
17 Mr. [Victim-2], as for you, you won’t see 2021. I recommend enjoying every
18 day you can from what I’m hearing you are with Ms. [Victim-1].
19 Garg

20 That same day, SUBJECT ACCOUNT 11 forwarded the email to Victim-1’s work account.
21 The email appears to have used the Mailtrack service.

22 122. On November 16, 2020, SUBJECT ACCOUNT 11 replied to the same email,
23 copying Victims 1-3, 5, 7, and 10. The email threatened, “I’m downstairs sweetheart!”

24 123. On December 2, 2020, SUBJECT ACCOUNT 11 sent an email to Victims 1,
25 2,5, 7, 9, and 10, which incorporated the “Don’t be scared” email thread. The email
26 contained two pictures of Victim-1 with work colleagues. Under the first picture, the sender
27 wrote, “PUSSY SWEET PUSSY.” Under the second picture, the sender wrote, “PUSSY I
28 will EAT that pussy.”

124. On December 2, 2020, SUBJECT ACCOUNT 11 sent an email to Victim-1
with the subject line, “You are so fucked cunt.” The email contained pictures of Victim-1’s

1 | sister and brother-in-law. On December 14, 2020, SUBJECT ACCOUNT 11 forwarded the
2 | email to Victims 1, 2, and 3.

3 | 125. On December 3, 2020, SUBJECT ACCOUNT 11 sent an email to Victim-1,
4 | that incorporated an earlier email sent that day with the statement, “India hangs 4 men for
5 | brutal gang rape on Delhi bus in 2012.” The main email contained the following threat,
6 | “You have no idea who all have been paid to play with you to prep you for my dick.”

7 | 126. On December 3, 2020, SUBJECT ACCOUNT 11 sent an email to Victim-2
8 | with the subject line, “Old Motherfucker I’m coming.” The email contained the following
9 | threat: “Old Motherfucker my man would soon end your misery.” SUBJECT ACCOUNT 11
10 | then forwarded the email to Victim-1. The email appears to have used the Mailtrack service.

11 | 127. On December 8, 2020, SUBJECT ACCOUNT 11 sent an email to Victim-1,
12 | with the subject line, “Dana is next.” The email attached images of Victim-1 and Victim-4
13 | together, and a picture of Victim-1’s friend, DM. On December 11, 2020, SUBJECT
14 | ACCOUNT 11 responded to the email chain, copying Victims 1-2. The email stated, in
15 | pertinent part:

16 | Angry sex.
17 | You are wasting your pussy with a nerd
18 | I get you couldn’t get other dudes to stick
19 | But that pussy hasn’t been banged in ages
20 | [Victim-3] is not the answer
21 | I’ll satisfy your cravings and mine at the same time.

22 | 128. On December 8, 2020, SUBJECT ACCOUNT 11 sent an email to Victims 1-3,
23 | 7, and 9, with the subject line, “GUESS WHO?” The email contained pictures of an
24 | unknown female. Victim-1 has advised these are not pictures of herself. SUBJECT
25 | ACCOUNT 11 then responded to the same email, and wrote, “I will release the full video
26 | soon CUNT.”

27 | 129. On December 8, 2020, SUBJECT ACCOUNT 11 sent an email to Victims 1
28 | and 3, with the subject line, “The Danger of Desire: Anal Sex.” The email appears to have
used the Mailtrack service. Subsequently, SUBJECT ACCOUNT 11 responded to the same

1 | email, and stated, "Anal rape has been suggested to be more violent than any other type of
2 | rape." The email appears to have used the Mailtrack service.

3 | 130. On December 8, 2020, SUBJECT ACCOUNT 11 sent an email to Victim-1,
4 | with the subject line, "PUSSY CRAVINGS." The email contained a picture of Victim-1.
5 | On December 14, 2020, SUBJECT ACCOUNT 11 forwarded the email to Victim 1-3, with
6 | the message, "JUST LOVE THAT PUSSYYYYY." The email appears to have used the
7 | Mailtrack service.

8 | 131. On December 8, 2020, SUBJECT ACCOUNT 11 sent an email to Victim-1
9 | and Victim-9, with the subject line, "Revenge Fantasies After Experiencing Traumatic
10 | Events." The email appears to contain excerpts from an article about revenge fantasies. The
11 | email also appears to use the Mailtrack service. On December 9, 2020, SUBJECT
12 | ACCOUNT 11 forwarded the email to Victim-9, who is the SPD detective investigating
13 | Garg. The email contained the message, "Chinese bitch."

14 | 132. On December 9, 2020, SUBJECT ACCOUNT 11 sent an email to Victim-1,
15 | with the subject line, "Good talk." The email contained the following message: "Cravings
16 | for pussy are uncontrollable. Soon. Very soon."

17 | 133. On December 9, 2020, SUBJECT ACCOUNT 11 sent an email to Victim-1
18 | and Victim-3, with the subject line, "I'm 'cumming.'" The email contained the following
19 | message:

20 | Did you honestly believe . .
21 | A few days in Jail will scare me?
22 | I thought you knew me better than that!
23 | I won't stop until..
24 | I fuck your brains out and make [Victim-3] watch how it's done!

25 | 134. On December 9, 2020, SUBJECT ACCOUNT 11 sent an email to Victim-1
26 | and Victim-9, with the subject line, "Next target." The email stated, in pertinent part, "Still
27 | want to file a DV petition? Detective [Victim-9] can help lol."

28 | 135. On December 11, 2020, SUBJECT ACCOUNT 11 sent a message to Victim-1
that referenced a non-public medical condition suffered by Victim-1.

1 136. On December 11, 2020, SUBJECT ACCOUNT 11 sent an email to Victim-1
2 and Victim-7. It contained a screenshot of a message from Twitter indicating that a Twitter
3 account was being set up.

4 137. On December 13, 2020, SUBJECT ACCOUNT 11 sent Victim-1 an email with
5 the subject line, "DIARY LEAKED on cut.com."

6 138. Victim-10 is Person-A's former defense attorney. BM is a prosecutor in the
7 Domestic Violence Unit of the King County Prosecutor's office. On December 14, 2020,
8 SUBJECT ACCOUNT 11 sent an email to Victims 1, 9, 11, and BM, with the subject line,
9 "Told you." The email incorporates prior harassing emails sent that same day. One of the
10 emails read, in pertinent part:

11 Dear Spicy,
12 Next family members who I will be harassing thoroughly are as follows:
13 [names listed]
14 You never learn. I gave you so many chances.
15 You went after my wife.
16 I have no choice but to rape you
17 The more you continue to fuck with me
18 The worse I'll make it for you and your family
19 Good Talk!

18 Another email in the chain stated, in pertinent part:

19 I'm going to remind you what I said a year ago
20 "Don't fuck with me and my wife or else I'll make your life a living hell"
21 I don't take a backwards step. I will destroy your entire family.
22 There is still time.
23 Think long and hard before you make your next move. It'll decide your [sic] if
24 you get raped or not.

23 A later email in the chain bragged:

24 [Victim-10] tried to fuck with [Person-A]
25 I threatened her family. She withdrew next day

26 139. Google records indicate that "Sumit Garg" set up SUBJECT ACCOUNT 11 on
27 November 15, 2020. IP records show that SUBJECT ACCOUNT used a variety of VPN
28 services to send harassing messages.

1 **9. Sumitqarq93[[@](mailto:sumitqarq93@gmail.com)]gmail.com (SUBJECT ACCOUNT 12)**

2 140. On January 11, 2021, sumitqarq93[[@](mailto:sumitqarq93@gmail.com)]gmail.com (SUBJECT ACCOUNT 12)
3 forwarded an email chain to Victim-1 with the subject line, “How might epilepsy affect
4 sex?” The email stated, “[Victim-1’s Sister’s Name] is next.” SUBJECT ACCOUNT 12
5 then forwarded the email to Victim-1’s sister, and then forwarded that message to Victim-1
6 to make certain that Victim-1 was aware that her sister had been sent the email. The email
7 appeared to use the Mailtrack service.

8 **10. Hutcm1143[[@](mailto:Hutcm1143@gmail.com)]gmail.com (SUBJECT ACCOUNT 13) and**
9 **Hutcm143[[@](mailto:Hutcm143@gmail.com)]gmail.com (SUBJECT ACCOUNT 35)**

10 141. It appears that the harasser(s) set up Hutcm1143[[@](mailto:Hutcm1143@gmail.com)]gmail.com (SUBJECT
11 ACCOUNT 13) to impersonate Victim-1’s actual Gmail account. On September 27, 2020,
12 SUBJECT ACCOUNT 13 sent an email to Victim-2, which forwarding an email chain that
13 made it appear that SUBJECT ACCOUNT 7 (sumitgargied90[[@](mailto:sumitgargied90@gmail.com)]gmail.com) had sent
14 Victim-1 a list of Victim-2’s family members, as well as her own. The email stated, “This
15 came. He is after our entire family. He is taking revenge for his wife.” A subsequent email
16 to Victim-2 asked, “What should we do? Who should we subpoena?” The email appeared to
17 use the Mailtrack service. The emails appear to be an attempt to trick Victim-2 into
18 believing that the email had come from his niece/client, and possibly to prompt Victim-2 to
19 reveal confidential information. Notably, SUBJECT ACCOUNT 13 then forwarded the
20 email chain to Victim-1’s actual Gmail account.

21 142. On October 1, 2020, SUBJECT ACCOUNT 13 sent Victim-2 an email stating,
22 “I’m still getting text messages like ‘cravings’ [and] ‘wanna fuck’. I have not told anyone
23 these dreams except in my diary. What if he leaks this diary?” The email appeared to use
24 the Mailtrack service. Approximately 12 minutes later, SUBJECT ACCOUNT 13 forwarded
25 the email to Victim-1 and Victim-2, along with a link to a pornographic website.
26
27
28

1 143. Google records indicate that someone using Victim-1's name set up SUBJECT
2 ACCOUNT 13 on September 9, 2020. IP records indicate that SUBJECT ACCOUNT 13
3 accessed a wide variety of VPN services that were used to send harassing messages.

4 144. It appears that the harasser(s) also set up Hutcm143[[@](mailto:Hutcm143@gmail.com)]gmail.com (SUBJECT
5 ACCOUNT 35) to impersonate Victim-1's actual Gmail account. As previously stated, Garg
6 and Person-A reported to SPD that they received multiple offensive and threatening
7 communications from both SUBJECT ACCOUNT 35 and SUBJECT ACCOUNT 9 on
8 October 31, 2020.

9 **11. Hutcm1761[[@](mailto:Hutcm1761@gmail.com)]gmail.com (SUBJECT ACCOUNT 14)**

10 145. On April 12, 2020, Victim-1 received an email from hutcm1761[[@](mailto:Hutcm1761@gmail.com)]gmail.com
11 (SUBJECT ACCOUNT 14). The account's name mimics Victim-1's actual email address
12 but with a slight variation. The subject line of the email was, "Hello Gorgeous." There was
13 no other text in the email. The email appeared to use the Mailtrack service.

14 146. Google records indicate that the account was created shortly before sending the
15 above-described email, and deleted shortly afterwards.

16 **12. Hutcm1786[[@](mailto:Hutcm1786@gmail.com)]gmail.com (SUBJECT ACCOUNT 15)**

17 147. On September 14, 2020, Victim-1 filed a motion in King County District Court
18 to compel Person-A to produce devices for forensic examination. Hours later, Victim-1's
19 attorneys began receiving harassing emails from hutcm1786[[@](mailto:Hutcm1786@gmail.com)]gmail.com (SUBJECT
20 ACCOUNT 15). SUBJECT ACCOUNT 15 sent an email to Victim-2 and Victim-5
21 indicating that fake profiles had been set up for Victim-5's children. Subsequently,
22 SUBJECT ACCOUNT 15 sent Victim-2 and Victim-5 pictures of Victim-5's children.
23

24 148. On October 11, 2020, SUBJECT ACCOUNT 15 sent an email to Victim-2 and
25 Victim-5, with the subject line, "Fake profiles for" The email contained the following
26 message: "Sumit raped me." The email appears to have used the Mailtrack service.
27 SUBJECT ACCOUNT 15 then forwarded the email to the King County District Court, and
28 then to Victim-1.

1 149. On October 11, 2020, SUBJECT ACCOUNT 15 sent an email to Victim-1 and
2 the King County District Court, with the subject line, "Rape." The email contained the
3 following message, "Sumit Garg raped me 4 times."

4 150. On October 11, 2020, SUBJECT ACCOUNT 15 sent an email to Victim-2 and
5 Victim-5, indicating that Garg had put a member of Victim-5's family on a pornographic
6 website. SUBJECT ACCOUNT 15 later forwarded the email to Victim-1.

7 13. Google records indicate that SUBJECT ACCOUNT 15 was created on
8 approximately September 14, 2020 and subsequently deleted on October 12, 2020.
9 Cg1095563@gmail.com (SUBJECT ACCOUNT 16)

10 151. SUBJECT ACCOUNT 16 was created to appear to be an account used by
11 Victim-3, who is Victim-1's current boyfriend. On July 12, 2020, SUBJECT ACCOUNT 16
12 sent an email to Victim-1's email account stating, in pertinent part, "I took care of your
13 maniac roommates. They won't bother you again!" The email appeared to use the Mailtrack
14 service.

15 152. As part of the King County litigation, Person-A's lawyer filed a declaration
16 that attached an email that had been forwarded from SUBJECT ACCOUNT 5. The
17 forwarded email was sent on July 12, 2020, from SUBJECT ACCOUNT 16 to SUBJECT
18 ACCOUNT 5, with the subject line, "This will go viral." The email appears to contain a
19 screenshot of a Facebook account set up to impersonate Victim-3, and which posted the
20 following message: "Sumit Garg is harassing my girlfriend [Victim-1]. His wife [Person-A]
21 filed false charges against her. He raped my girlfriend!"

22 153. Another email attached to the declaration filed by Person-A's lawyer was an
23 email sent from SUBJECT ACCOUNT 16 to SUBJECT ACCOUNT 5 on July 14, 2020,
24 with the subject line, "Drop charges." The email stated:

25 My name is [Victim-3]. Drop charges against my girlfriend [Victim-1]. I know
26 everything about you and your husband. I know he had sex with my girlfriend.
27 He will go to jail and I will leak your pictures on social media. I will send
28 them to your parents. I will do anything for [Victim-1]. This is my final
warning before I start leaking your pictures. Don't fuck with me.

1 154. Google records indicate that SUBJECT ACCOUNT was created on July 12,
2 2020, and deleted on July 14, 2020.

3 **14. travisbieber96@gmail.com (SUBJECT ACCOUNT 17)**

4
5 155. On March 24, 2020, Victim-1 received an email from
6 travisbieber96@gmail.com (SUBJECT ACCOUNT 17). SUBJECT ACCOUNT 17 was
7 setup to appear to be an account used by Victim-4, a former boyfriend of Victim-1. The
8 email asked, "Did you send me a friend request on FB?" The name on the account
9 identifying the sender and the sender's name in the email address are spelled differently.
10 The email appeared to use the Mailtrack service.

11 156. On April 12, 2020, SUBJECT ACCOUNT 17 forwarded an email to Victim-1
12 that had been sent to Victim-2. The email had the subject line, "Virginity Loss," and
13 included a picture of Victim-1 and Victim-4.

14 157. Victim-1 reports that she contacted Victim-4 and confirmed that he did not sent
15 the email, and way not involved with any of the cyberstalking described herein.

16 158. Google records indicate that SUBJECT ACCOUNT 17 was created on March
17 24, 2020 and deleted on April 13, 2020.

18 **15. Travisbieber61[.]gmail.com (SUBJECT ACCOUNT 18)**

19 159. SUBJECT ACCOUNT 18 was another account set up to create the appearance
20 that it was associated with Victim-1's former boyfriend, Victim-4. On October 29 and 30,
21 2020, the harasser(s) used multiple SUBJECT ACCOUNTS, including SUBJECT
22 ACCOUNT 18, to create a fictional conversation between Victims-4, Victim-8, and Sumit
23 Garg under the subject line, "Past boyfriend to another." In the fictional conversation, the
24 harasser[s] referenced details from Victim-1's diary and made a number of lewd and
25 degrading comments. Among other things, the harasser[s] joked about getting Victim-1
26 pregnant. Victims 1 and 2 were copied on the extensive email thread.

27 160. Similarly, on October 30, 2020, SUBJECT ACCOUNT 18 copied Victim-1,
28 Victim-2, and sumitgarg90[.]gmail.com (SUBJECT ACCOUNT 4) on a fictional

1 conversation between Victim-4 and Victim-8 that referenced details from Victim-1's diary
2 and sexual acts with Victim-1.

3 161. On October 31, 2020, SUBJECT ACCOUNT 18 sent an email to
4 sumitgarg90[[@](mailto:)]gmail.com (SUBJECT ACCOUNT 4), copying Victims 1 and 2, with the
5 subject line, "Did you fuck [Victim-1]?" The email contained the following question: "Hey,
6 you gotta tell me if you nailed [Victim-1]?"

7 162. On November 1, 2020, SUBJECT ACCOUNT 18 sent an email to Victims 1
8 and 2 and victor32b85[[@](mailto:)]gmail.com (SUBJECT ACCOUNT 19), stating that "Garg has her
9 on video taking a shower lol."

10 163. That same day, SUBJECT ACCOUNT 18 sent an email to Victims 1 and 2 and
11 victor32b85[[@](mailto:)]gmail.com (SUBJECT ACCOUNT 19), that asked, "Did you tape us having
12 sex?"

13 164. On December 10, 2020, SUBJECT ACCOUNT 18 sent an email to Victim-2,
14 copying Victim-1 and SUBJECT ACCOUNT 18, with the subject line, "Sumit is threatening
15 to rape you." The email asked, "Man! Are you not satisfying her cravings?"

16 165. Google records indicate that SUBJECT ACCOUNT 18 was created using
17 Victim-4's name on October 27, 2020.

18 **16. victor32b85[[@](mailto:)]gmail.com (SUBJECT ACCOUNT 19)**

19
20 166. On January 9, 2021, victor32b85[[@](mailto:)]gmail.com ("SUBJECT ACCOUNT 19")
21 forwarded an email chain to Victim-1 and Victim-2, with the subject line, "Past boyfriend to
22 another." The email chain was a continuation of the fictional conversation between Victim-
23 3, Victim-4, and Victim-8, contain lewd and salacious comments about Victim-1. The
24 emails in the chain appeared to use the Mailtrack service. That same day, SUBJECT
25 ACCOUNT 19 forwarded a number of prior harassing emails to Victim-1 and others.

26 167. On January 9, 2021, Victim-1 received a notification that SUBJECT
27 ACCOUNT 19 was inviting her to a video meeting.
28

1 168. On January 9, 2021, SUBJECT ACCOUNT 19 forwarded an email chain to
2 Victim-1 with the subject line, "Sumit is threatening to rape you." The email appeared to use
3 the Mailtrack service.

4 169. On January 11, 2021, SUBJECT ACCOUNT 19 sent forwarded an email to
5 Victim-2, that had been sent by travisbieber61[[@](mailto:travisbieber61@gmail.com)]gmail.com (SUBJECT ACCOUNT 18),
6 asking, "Did you tape us having sex?"

7 **17. travisvictor90[[@](mailto:travisvictor90@gmail.com)]gmail.com (SUBJECT ACCOUNT 20)**

8
9 170. Victim-1 reports that, in April 2020, she was informed by a non-profit
10 foundation which she supported that the non-profit had received disparaging emails about
11 Victim-1 from the accounts travisvictor90[[@](mailto:travisvictor90@gmail.com)]gmail.com (SUBJECT ACCOUNT 20) and
12 victor32b85[[@](mailto:victor32b85@gmail.com)]gmail.com (SUBJECT ACCOUNT 19). One of the emails expressed shock
13 that the foundation would list Victim-1 as an influencer on its website and accused Victim-1
14 of having adulterous relationships. The email asked, "this is the kind of person you have as a
15 role model?"

16 171. The foundation also received an email from travisbieber96[[@](mailto:travisbieber96@gmail.com)]gmail.com
17 (SUBJECT ACCOUNT 17) containing similar accusations about Victim-1. The email
18 objected to an interview of Victim-1 that appeared on the foundation's website and
19 threatened to "expose" the foundation if the interview were not removed:

20 Did you ever run a background check on her before publishing this? We had
21 an affair and now she blackmails my wife to tell her about the nature of our
22 sexual relationship. This is the kind of people you have on your fucking
23 website. I have proofs, photos and if this interview is not removed, I would not
24 hesitate to expose your forum.

25 **18. Tbk0848[[@](mailto:Tbk0848@gmail.com)]gmail.com (SUBJECT ACCOUNT 21)**

26 172. On September 15, 2020, Tbk0848[[@](mailto:Tbk0848@gmail.com)]gmail.com (SUBJECT ACCOUNT 21)
27 sent an email to Victim-1, asking, "Miss my cock?" SUBJECT ACCOUNT 21 then
28 responded to the email with the following message: "I miss fucking you so much [Victim-1].
One more night. I know you want it bad."

1 **19. Sumitgargied[[@](mailto:sumitgargied@gmail.com)]gmail.com (SUBJECT ACCOUNT 22)**

2 173. In her petition, Person-A claimed that Victim-1 had set up multiple accounts
3 that were used to impersonate Garg and to send harassing emails. Person-A attached a
4 number of these emails to her petition. One printout shows that sumitgargied[[@](mailto:sumitgargied@gmail.com)]gmail.com
5 (SUBJECT ACCOUNT 22) sent an email to clefton[[@](mailto:clefton@gmail.com)]gmail.com (SUBJECT
6 ACCOUNT 5) on June 27, 2020 that stated, “Sumit fucked me 11 times . . . I haven’t seen
7 you in a while lol. Are you not taking walks to the bay anymore!!” The email appears to
8 have used the Mailtrack service.

9 174. Google records indicate that SUBJECT ACCOUNT 22 was created on June
10 27, 2020, and was deleted on July 21, 2020.

11 **20. Hutcm1765[[@](mailto:hutcm1765@gmail.com)]gmail.com (SUBJECT ACCOUNT 23)**

12 175. Attached to Person-A’s petition was a printout of an email from
13 hutcm1765[[@](mailto:hutcm1765@gmail.com)]gmail.com (SUBJECT ACCOUNT 23) to cl[REDACTED][[@](mailto:cl[REDACTED]@gmail.com)]gmail.com (SUBJECT
14 ACCOUNT 5) that was sent on June 28, 2020. The email stated, “Your husband loved
15 fucking me so much!” The email appears to have used the Mailtrack service.

16 176. Also attached to Person-A’s petition was another email sent from SUBJECT
17 ACCOUNT 23 to SUBJECT ACCOUNT 5 on June 28, 2020. The email stated, “Your
18 husband will spend the rest of his life in jail and probably be deported so I hope you’re
19 happy being alone. I’m going to ruin your lives.” The email appears to have used the
20 Mailtrack service.

21 177. Google records indicate that the account was created shortly before sending the
22 above-referenced emails, and was deleted on July 12, 2020.

23 **22. LinkedIn Account Using Victim-1’s Name (SUBJECT ACCOUNT 24)**

24 178. In February 25, 2020, a co-worker of Victim-1 informed her that a suspicious
25 LinkedIn account (SUBJECT ACCOUNT 24) had been created using Victim-1’s name and
26 likeness, and was making attempts to communicate with Victim-1’s co-workers. Victim-1
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1 reports that the account used a photograph of Victim-1 in a running bra. This photograph
2 was taken by Person-A during the trip that Victim-1 took with Garg and Person-A to
3 Colorado in January 2019.

4 179. Victim-1 noticed that the fake LinkedIn account was used to view Victim-1's
5 actual LinkedIn account.

6 180. On February 25, 2020, sumitgarg90@gmail.com (SUBJECT ACCOUNT 4)
7 sent an email to Victim-2 which contained screenshots of harassing messages that were sent
8 by SUBJECT ACCOUNT 24 to LinkedIn accounts used by Garg and Person-A. The
9 message to Garg's account stated, "Did you ever tell [Person-A] about fucking me?" The
10 message to Person-A's account stated, "Your beloved husband fucked me 11 time! One
11 time he fucked me while you were in the house."

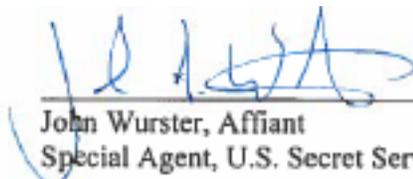
12 181. Victim-1 denies sending the messages. She further denies having any sort of
13 intimate contact with Garg.

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Based on the above facts, I respectfully submit that there is probable cause to believe that SUMIT GARG did, with intent to harass and intimidate numerous victims, commit the crime of Cyberstalking, in violation of Title 18, United States Code, Sections 2, 2261A(2)(A) and (2)(B), and 2261(b)(5) and (6).


John Wurster, Affiant
Special Agent, U.S. Secret Service

Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe the Defendant(s) committed the offenses set forth in the Complaint.

Dated this 5th day of March, 2021.


HON. MARY ALICE THEILER
United States Magistrate Judge