

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

RYAN S. LIN,

Defendant

Crim. No.

18cr10092

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

18 U.S.C. § 2252(a)(2)(Distribution  
of Child Pornography)

18 U.S.C. § 844(e)(Hoax Bomb Threats)

18 U.S.C. § 1030 (Computer Fraud and  
Abuse)

18 U.S.C. § 1028A (Aggravated Identity Theft)

18 U.S.C. §§ 982(a)(2), 1030(i)  
& 2253 (Forfeiture)

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U.S. DISTRICT COURT  
DISTRICT OF MASS.

INFORMATION

The United States Attorney charges:

Background

At all times relevant to this Information:

1. Defendant RYAN S. LIN resided in the District of Massachusetts. LIN has an educational and professional background in computers. He worked as a computer programmer in the District of Massachusetts during a portion of the relevant time period.

2. Jane Doe 1 resided in the District of Massachusetts. She was LIN's housemate in Watertown in April-May 2016 and later moved to Waltham. She worked, during portions of the relevant time period, as a chef at a popular restaurant and as a pet care provider in the Greater Boston area.

3. Jane Doe 2, Jane Doe 1's mother, resided in the District of Maryland. She worked as a scientist for a federal government research institute.

4. John Doe 1, Jane Doe 1's father, resided in the District of New Hampshire. He worked as a surgeon for a medical center.

5. Jane Doe 3 resided in the District of Massachusetts and was Jane Doe 1's supervisor at the restaurant.

6. John Doe 2 resided in the District of Massachusetts and was Jane Doe 1's housemate in Waltham and co-worker at the restaurant.

7. Jane Doe 4 resided in the District of New Jersey and was Jane Doe 1's friend.

8. Jane Doe 5 resided in the District of New York. LIN and Jane Doe 5 were college classmates in New York in 2015.

9. John Doe 3 resided in the District of New York. LIN and John Doe 3 were also college classmate in New York in 2015.

10. Jane Doe 6 resided in the District of Massachusetts and was LIN's housemate in Newton in September 2017.

11. Jane Doe 7 resided in the District of Massachusetts and was also LIN's housemate in Newton in September 2017.

### **Overview**

12. From in or about May 2016 through October 5, 2017, LIN engaged in an extensive cyberstalking campaign targeting Jane Doe 1 and those associated with her. During the same timeframe, LIN also engaged in separate cyberstalking activity aimed at other victims, unaffiliated with Jane Doe 1. LIN used a variety of techniques and methods to harass and

intimidate his victims and others in the community, including making fraudulent bomb threats, distribution of child pornography, and accessing online accounts without authorization (i.e. “hacking”).

13. LIN’s cyberstalking campaigns included:

- obtaining—and then widely distributing—private information from one victim, including a personal journal, medical records, private photographs, and videos of a sexual nature;
- accessing online accounts without authorization;
- creating accounts in the name of his victims and soliciting “gang bang”/rape fantasy sexual encounters at their homes and workplaces;
- posing as his victims and sending hoax threats to shoot people and detonate bombs;
- sending online threats to rape, injure, and/or kill his victims; and
- sending his victims unsolicited images of child pornography, including photos of prepubescent female children.

14. LIN employed a number of techniques to hide his identity online, for example, by accessing the internet using a service that anonymizes IP addresses (“TOR,” an acronym for “The Onion Router”); using Virtual Private Network (“VPN”) services; using anonymous overseas texting services; and using foreign encrypted email providers that do not respond to United States law enforcement and/or do not maintain IP logs or other records.

15. LIN has significant knowledge of and experience with technology, including a computer science degree from a prestigious university and previous employment at a software company.

**JANE DOE 1**

16. LIN became housemates with Jane Doe 1 in approximately late April 2016, after he answered an advertisement on Craigslist advertising a vacant room at a house in Watertown. At the time LIN moved in, Jane Doe 1 was living in the house with two other individuals. She had an Apple MacBook laptop, which she kept in her bedroom. On her laptop, Jane Doe 1 stored a document that contained passwords to all of her online accounts.

17. During the time LIN and Jane Doe 1 were living together, LIN accessed, without authorization, Jane Doe 1's laptop computer and online accounts, including her accounts with Google (on approximately May 15, 2016) and Apple (including her iCloud account on approximately July 28, 2016). Most significantly, on or about May 20-21, 2016, LIN obtained, without authorization, from Jane Doe 1's devices (laptop and/or phone) and online accounts, private photographs. On or about March 2017, LIN also obtained without authorization a sexually suggestive video ("the lingerie video") of Jane Doe 1. LIN used the stolen materials to create a collage of photographs that included photographs of Jane Doe 1's face, Jane Doe 1's buttocks in underwear (her face was not visible), a post-pubescent female's naked breasts, and an up-close photograph of a vagina, spread by fingers ("the photo collage").

18. On or about May 20-21, 2016, LIN obtained, without authorization, from Jane Doe 1's devices and accounts, private information about Jane Doe 1, including her private diary which contained highly sensitive details about Jane Doe 1's medical, psychological, and sexual history. As a result, LIN discovered, among other information, that Jane Doe 1 had recently had an abortion, a closely-guarded fact.

19. LIN also obtained, without authorization, Jane Doe 1's address book/contact list, including email addresses, cell phone numbers, and other personally identifiable information about her friends, family members, and associates.

20. While Jane Doe 1 was unaware that LIN was accessing her devices and accounts, her housemates and she had observed strange behavior by LIN as soon as he moved in. That behavior escalated during May 2016, and, as a result, on or about May 30, 2016, Jane Doe 1 left the shared house and moved in with her father. LIN and Jane Doe 1 never interacted in person after the brief period of time they lived together. But LIN's online harassment of Jane Doe 1 continued until his arrest in October 2017. The conduct included a number of different techniques and methods, some of which are described below.

*Widespread Distribution of Jane Doe 1's Private Information*

21. From in or about July 2016 to October 5, 2017, LIN used various electronic communications services to send the photo collage, lingerie video, diary entries, and other materials obtained from Jane Doe 1 to hundreds of people in Jane Doe 1's address book and others in her community including: her boss, her co-workers, her parents, her grandparents, her parents' work colleagues, staff at educational institutions she attended, employees at the automobile dealership where she leased her car, and staff at the public schools in her town. At times, LIN sent these materials anonymously, so that the recipient did not know who was sending them. At other times, he sent the materials in a manner that made it appear that that Jane Doe 1, or her parents, were sending the material, often including an introductory message purporting to be from Jane Doe 1 or her parents.

22. For example, on about April 23, 2017, LIN, posing as Jane Doe 1, sent messages to staff at two major universities in the Boston area, a cooking school that Jane Doe 1 had attended, a college that Jane Doe 1 had attended, and a private preparatory high school that Jane Doe 1 had attended, as well as to representatives of the Waltham Police Department and Jane Doe 1's workplace, among others. The message stated that Jane Doe 1 wanted to teach the recipients how to "spice up their sex life" by describing her own. It included quoted text from Jane Doe 1's diary, detailing her sexual experiences. LIN attached to these messages a portion of Jane Doe 1's diary, Jane Doe 1's medical records, the photo collage, and the lingerie video.

23. On or about June 14, 2017, LIN sent email messages to Jane Doe 1, Waltham Police officers, and others in Jane Doe 1's contact list. The subject line was "[Jane Doe 1] Health Report." LIN discussed Jane Doe 1's medical and psychological history, medications history, and stated that Jane Doe 1 was raised by an "unstable bi-sexual mother who physically abused and sexually molested her. See attached for [her] medical information and psychotherapy records." LIN attached several of Jane Doe 1's medical records.

*Harassing Messages Sent to Jane Doe 1*

24. In addition to sending materials about her to others, LIN contacted Jane Doe 1 directly. In an attempt to prevent Jane Doe 1 from identifying him, LIN used anonymous online services, including services that allowed him to send anonymous text messages, encrypted email messages, and direct messages through unattributed social media accounts. Many of the text messages were sent from a particular service, based in Canada, which provides free text messaging services to users all over the world. By using its messaging service, a user can select

a different telephone number and then send text messages, as well as photographs, that appeared to originate from any selected (“spoofed”) number.

25. The messages taunted Jane Doe about her sexual history, mental health conditions, and her medical history (including her abortion). They also demanded that she help the sender masturbate, threatened to sexually assault her, and suggested that she commit suicide.

26. For instance, in 2016 and 2017, Jane Doe 1 received the following text messages from LIN, using anonymous telephone numbers that law enforcement could not trace to a sender:

- “why get abortion?”
- “do you consider urself a murderer????”
- “murderers like you are a disgrace to society”
- “why dont u kill yourself”
- “SUCH A DISGUSTING GIRL. KEEP YOUR LEGS CLOSED AND KILL YOURSELF!!!!!!”
- “YOU NEED TO BE PUNISHED FOR WHAT YOU DID TO THAT FETUS YOU STUPID LITTLE BITCH”
- “you should be lobotomized”

27. Further, in December 2016, Jane Doe 1 received the following messages from an Instagram account that LIN created using anonymous services:

- “It would be so nice if you could go back in time further and undo your abortion.”
- “You don’t need to. I’m sure your pussy is already super stretched out.”
- “I bet that is how big your fetus was before you terminated it.” [This message accompanied a photo of a gingerbread man.]

*Solicitation of Sexual Partners in the Name of Jane Doe 1*

28. In or about January 2017, LIN posed as Jane Doe 1 and solicited sexual encounters on the websites Backpage.com and Craigslist.com, in an attempt to direct strangers to Jane Doe 1's home in search of sexual activity.

29. In or about May 2017, LIN posed as Jane Doe 1 and created online profiles and postings on various sex-oriented websites, including FetLife.com and Collarspace.com, in an attempt to direct strangers to Jane Doe 1's home to participate in a rape fantasy, gang bang and/or other violent sexual encounters.

30. In the profiles and advertisements that LIN created for Jane Doe 1 on these websites, LIN provided Jane Doe 1's full name, home address, workplace, and photographs, as well as the cell phone numbers of her friends and family. As the result of one or more of these advertisements, several men showed up at Jane Doe 1's house in search of sexual encounters. Dozens of men called and sent text messages to Jane Doe 1's friends and family, some of whom threatened to rape, injure, and kill Jane Doe 1.

31. For example, on or about May 26, 2017, LIN created a fictitious profile using Jane Doe 1's photograph, name, and hometown on "Collarspace.com." In the profile, LIN stated that "she" was a "submissive," was a "BDSM freak,"<sup>1</sup> had fantasies of being "raped and tied up," and was "actively seeking" various types of sexual partners. Posing as Jane Doe 1, LIN then joined Massachusetts-based groups and posted a series of posts offering sexual activity.

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<sup>1</sup> BDSM is an acronym for Bondage, Discipline/Domination, Sadism, and Masochism (as used to characterize a sexual encounter).



32. Using Jane Doe 1's fictitious FetLife profile, LIN created and published a post he titled, "Would anyone like to tie me up tonight?," and stated "I'm having fantasies about being tied up and penetrated. I want to be surprised. If you have time tonight come over to [Jane Doe 1's] . . . DONT [sic] RESPOND, just come over. SURPRISE ME."

33. Using Jane Doe 1's fictitious FetLife profile, LIN created and published a post he titled, "Thinking of doing a 'Circular Blowjob' gangbang," and stated "I'm thinking of doing a special gangbang where guys come over to my house, surround me in a circle and then blow everyone in a Superwoman costume. What do you guys think? It's happening. PM [private message] for address. TONIGHT—7:30 p.m."

34. Posing as Jane Doe 1, LIN then engaged in a series of communications with various FetLife users who responded to LIN's fictitious advertisements. LIN repeatedly sent private messages to interested FetLife users, with Jane Doe 1's home address.

35. On or about May 24, 2017, as a result of these and other similar postings, at least three adult males, unknown to Jane Doe 1, showed up unannounced at her home, seeking the advertised sexual activity, in turn causing Jane Doe 1 to fear for her safety.

*Hoax Threats Involving Jane Doe 1*

36. On or about July 24, 2017, LIN sent the Waltham police an anonymous electronic tip falsely stating that a bomb had been planted at Jane Doe 1's home address.<sup>2</sup> Several hours later, LIN sent another anonymous tip falsely stating that drug activity was taking place at her home address. LIN's conduct evoked a police response at Jane Doe 1's home.

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<sup>2</sup>The Waltham Police Department, and other university and town police departments that were contacted during the scheme, accepted anonymous "tip" submission via text and the internet.

37. On or about July 26, 2017, LIN hacked into Jane Doe 1's Rover account.

Rover.com is an online service that links pet owners with providers of pet care services in their local area, including pet sitting and pet walking services. At the time, Jane Doe 1 was pet sitting for Rover clients who lived in a Boston suburb and had hired Jane Doe 1 to look after their dog and cat. On or about July 26, 2017, LIN, without authorization, accessed Jane Doe 1's Rover account and sent the clients messages, falsely stating that Jane Doe 1 had smothered their cat and stuffed it in a Ziploc bag. The alarmed pet owners called the local police, who responded to the home.

38. On or about August 18, 2017, LIN contacted the anonymous electronic tip lines of the Lynn Police Department, the Medford Police Department, the Cambridge Police Department, and the Reading Police Department, stating that there was a bomb set to go off at Jane Doe 1's home address and that: "The residents are not going to wake up to see the morning, or they will wake up disfigured. BOOM!"

39. On or about September 16, 2017, LIN sent to the Boston University police an anonymous electronic tip falsely stating that "hitmen" were going to kill everyone present at Jane Doe 1's home address.

*Accessing Online Accounts and Medical/Financial Information of Jane Doe 1*

40. On or about December 21, 2016, LIN, without authorization, logged into Jane Doe 1's Apple account and erased her iPhone. LIN also accessed, without authorization, Jane Doe 1's other online accounts, including her account with the online merchant Amazon.com and her account with the online payment processor Venmo.

41. On or about May 30, 2017, LIN, using Jane Doe 1's name and other identifiers, created an online patient account with a large Massachusetts-based medical center where Jane Doe 1 obtained various medical services. LIN then used the patient account to obtain copies of Jane Doe 1's private medical records, including test results and mental health evaluations.

42. On or about July 25, 2017, LIN accessed, without authorization, Jane Doe 1's online account with TurboTax and obtained copies of her tax returns. On or about August 1, 2017, LIN accessed, without authorization, and obtained information from, Jane Doe 1's online accounts with the financial organizing service Mint.com and with her bank, Bank of America.

*Additional Unauthorized Use of Jane Doe 1's Identity*

43. On or about January 29, 2017, LIN, posing as Jane Doe 1 and using her personally identifiable information (including her social security number and date of birth), filed a fraudulent application for unemployment insurance benefits with the Commonwealth of Massachusetts Department of Unemployment Assistance.

44. On or about February 11, 2017, LIN, posing as Jane Doe 1 and using her personally identifiable information (including her social security number and date of birth), cancelled Jane Doe 1's Massachusetts driver's license registration.

45. On or about February 17, 2017, LIN, posing as Jane Doe 1 and using her personally identifiable information (including her social security number and date of birth), filed a fraudulent application for financial services with Bank of America.

**JANE DOE 2**

46. Jane Doe 2 is Jane Doe 1's mother. LIN harassed and threatened Jane Doe 2 and engaged in conduct targeting her using similar tactics as he used to harass Jane Doe 1.

47. In or about April-September 2017, LIN sent dozens of text and e-mail messages to Jane Doe 1's mother, Jane Doe 2, discussing, among other topics, Jane Doe 1's genitals, Jane Doe 2's genitals, masturbation, incest, and his purported sexual desires for young children. In several messages, LIN threatened to rape and kill Jane Doe 1 and to rape Jane Doe 2. He also falsely accused Jane Doe 2 and other family members of sexually molesting Jane Doe 1 and her younger brother when they were children. LIN sent similar messages to Jane Doe 2's friends, co-workers, bosses, neighbors, and graduate school alumni association. LIN frequently attached Jane Doe 1's stolen diary, medical records, photo collage, and lingerie video to these messages.

48. For example, on or about April 27, 2017, and May 14, 2017, LIN, posing as Jane Doe 1, sent email messages to Jane Doe 2 and several of Jane Doe 2's co-workers and bosses with the subjects: "Special present for all you [government agency] scientists =)" and "[First name of Jane Doe 1]," respectively. The body of the May 14 message contained sexually graphic excerpts from Jane Doe 1's stolen diary. LIN also attached Jane Doe 1's diary and the photo collage.

49. On or about May 24, 2017, LIN, posing as Jane Doe 1, sent similar e-mail messages to Jane Doe 2 and several of Jane Doe 2's friends, with the subject line "For [Jane Doe 2's] friends," and the text, "I'm doing this because my mother told me to. Enjoy!" LIN attached Jane Doe 1's stolen medical records, excerpts of her diary, and the lingerie video.

50. On or about July 19, 2017, LIN sent an email message to Jane Doe 2, threatening to rape Jane Doe 1. The email noted that Jane Doe 1 had to get a new social security number and motor vehicle records, and stating that "if we knew where she lived she would need a new face, vagina, and anus too."

51. On or about October 2, 2017, LIN, posing as Jane Doe 1, sent email messages to Jane Doe 2 and various members of Jane Doe 2's neighborhood homeowner's association, with the subject line "HOAs are awesome! Time to get naked." The email stated that she wanted to introduce herself and her parents to the association "by showing you what I look like without my clothes on!" LIN attached the photo collage.

*Child Pornography, Threats, and Hoaxes Sent to Jane Doe 2*

52. On or about May 25-27, 2017, LIN posed as Jane Doe 2 and created phony online profiles on Collarspace.com, using her husband's cell phone number and the home address of Jane Doe 2 and her husband.

53. On or about May 25, 2017, LIN sent Jane Doe 2's husband a series of text messages threatening to kill and rape Jane Doe 1.

54. On or about July 23, 2017, LIN sent Jane Doe 2 two unsolicited email messages. The emails thanked Jane Doe 2 for her purchase of child pornography and notified her that there would be charges on her American Express account, showing the last four digits of Jane Doe 2's American Express account. LIN attached 16 images. Several were child pornography. These images included the following:

- a. DSCF0429: Image of a prepubescent female, completely nude, on her hands and knees, facing away from the camera, with her genitals exposed to the camera.
- b. DSCF0435: Image of a prepubescent female, completely nude, facing the camera with her legs spread apart, lasciviously exposing her genitals.
- c. LC-6550: Image of a prepubescent female, completely nude, sitting on a toilet, with her legs spread apart, with a pencil inserted into the prepubescent female's genitals.

55. On or about July 31, 2017, LIN created a fake Facebook profile for Jane Doe 2. He posted photographs of two semi-automatic handguns, and a message falsely threatening that Jane Doe 2 and her husband were going to bring guns to a designated nearby high school and kill students. LIN then sent the fake Facebook profile to the principal of the high school and to local police. This evoked a police response.

56. On or about August 21, 2017, LIN sent to the Montgomery County (Maryland) police an anonymous electronic tip falsely stating that a bomb had been planted at either Jane Doe 2's home address or her neighbor's address. As a result, personnel from the local police and fire department, as well as bomb-sniffing dogs, were dispatched to Jane Doe 2's neighborhood to investigate.

**JOHN DOE 1**

57. Jane Doe 1's father, John Doe 1, is a surgeon who lives in New Hampshire. LIN harassed John Doe 1 by sending him threatening and harassing text messages and sending out messages to others that were created to appear as if they were from John Doe 1.

58. In or about April-July 2017, LIN sent dozens of text and e-mail messages to John Doe 1 discussing, among other topics, Jane Doe 1's genitals, Jane Doe 2's genitals, and incest. In several messages, LIN falsely accused John Doe 1 and other family members of sexually molesting Jane Doe 1. LIN sent similar messages to John Doe 1's co-workers, ex-wife, and other associates. LIN frequently attached Jane Doe 1's stolen diary, medical records, the photo collage, and the lingerie video to these messages.

59. For instance, on or about May 23, 2017, LIN, posing as Jane Doe 1, sent email messages to John Doe 1 and alumni members of the medical school he and Jane Doe 2 attended,

with the subject "Daughter of [medical school] alumni." It stated, "Hello—My parents [Jane Doe 2 and John Doe 1] are graduates of [medical school.] I'm so proud of them and what they've accomplished. Enjoy my nudes!" The email contained as attachments Jane Doe 1's stolen medical reports, journal entries, the photo collage, and the lingerie video.

60. On or about June 10, 2017, LIN, posing as John Doe 1, sent an email message to Jane Doe 2. The subject was "Our daughter's pussy is so tight" and read, "I should have loosened it up a bit more when she was young."

61. On or about June 21, 2017, LIN, posing as Jane Doe 1, sent an email message to John Doe 1 and several of his co-workers and bosses. The subject was "Happy (late) Father's Day." The email stated that "I am very proud of my daddy who is a doctor here! He is such a great doctor and part of that is because I let him "operate" on me when I was little! I still am and always will be daddy's little girl, so enjoy all." LIN attached the photo collage.

### **JANE DOE 3**

62. LIN targeted Jane Doe 1's boss at the restaurant where she worked, Jane Doe 3, through a number of methods.

63. On or about May 25-27, 2017, LIN posed as Jane Doe 1 and her boss, Jane Doe 3, and created phony online profiles and postings on various sex-oriented websites, including FetLife.com, Collarspace.com, Backpage.com, and Craigslist, soliciting rape fantasy role play, "gang bangs," and other violent sexual encounters. LIN posted a group photograph that depicted Jane Doe 1, Jane Doe 3, and several of their co-workers, and solicited a "gang bang" with the co-workers from 5-9 p.m. on May 25 and May 26. LIN included the name and address of their workplace and Jane Doe 3's cell phone number.

64. As a result, multiple individuals called and texted Jane Doe 3 and Jane Doe 1, and in some instances threatened to rape and injure Jane Doe 3.

65. LIN sent anonymous text messages to Jane Doe 3. For example, Jane Doe 3 received the following text from a number that could not be traced by law enforcement:

- “Spoons are small and can be used to remove your eyeballs from your sockets. Knives are small too and can be used to cut the flesh from your labia piece by piece.”

66. On or about August 4, 2017, LIN created a fake Facebook page in the name of Jane Doe 3, using Jane Doe 3’s first name and maiden name. LIN posted a photograph of a handgun, and claimed that Jane Doe 3 and her husband had purchased guns and were going to shoot up Chelmsford High School. LIN sent screenshots of the fake Facebook page to school staff members and the Chelmsford Police Department. The report prompted a police interview at Jane Doe 3’s home by her local police department.

67. On or about September 10, 2017, LIN sent several text messages to Jane Doe 3, along with a photograph of Jane Doe 3 and her 11-month-old nephew (obtained from social media). The text read: “Look at this cute little boy. Imagine his nice tight baby ass. How would u like it if I raped him while holding a gun to ur head? Hes so adorable just waiting to be fucked. U gonna let that little boy eat u out? May b put some pastries inside urself to help him. Wow just look at him. He wants u to suck him off. Its ok dont mind the age diff.”

68. On or about September 16, 2017, LIN sent an e-mail message to Jane Doe 3 containing an image of a prepubescent female, completely nude, facing the camera.



**JOHN DOE 2**

69. John Doe 2 lived with Jane Doe 1 in Waltham shortly after she moved out of the house she shared with LIN in Watertown. John Doe 2 also worked with Jane Doe 1 at the restaurant. John Doe 2 eventually became the target of LIN's harassment.

70. In or about May-June 2017, LIN sent John Doe 2 a series of text messages and email messages about Jane Doe 1, including portions of her stolen diary, and the photo collage.

71. As described above, in or about May 25-27, 2017, LIN created fraudulent profiles and posted fraudulent advertisements on various sex-oriented websites, posing as Jane Doe 1 and expressing interest in BDSM, bondage, rape fantasy and other sexual conduct. In some instances, he posted John Doe 2's cell phone number on the fraudulent advertisements, directing interested men to call or text the number and to visit their shared residence. Dozens of men called and texted John Doe 2, seeking sexual encounters with Jane Doe 1. At least three men showed up at the residence that John Doe 2 shared with Jane Doe 1.

72. On or about July 31, 2017, LIN created an image of what appeared to be John Doe 2's Facebook page, with a post showing a photograph of a handgun and bullets and the text: "Me and my housemates are going to shoot up Waltham public schools tomorrow afternoon. There will be blood and corpses everywhere. PM [Private Message] me if you wanna join us asap cause I'm deleting this post tonight. Blood everywhere!" LIN emailed screenshots of the fake Facebook page to others, including to the Waltham Police Department and various school department employees.

73. On or about September 16, 2017, LIN sent John Doe 2 an unsolicited e-mail message with the subject line of "Cute little thing." The text of the e-mail stated "I came bucket

loads!” The message also contained two photographs. One image depicted a prepubescent female, completely nude, facing the camera, with her hands covering her vagina. The other depicted child pornography, specifically a photo named P101054: an image of a prepubescent female, completely nude, sitting on a bed, with her legs spread apart, exposing her genitals.

**JANE DOE 4**

74. Jane Doe 4 is childhood best friends with Jane Doe 1. She never met LIN, but was targeted by him because of her friendship with Jane Doe 1.

75. On or about June 14, 2017, LIN sent a series of text messages to Jane Doe 4, stating “What the fuck is wrong with you [first name of Jane Doe 4]. . . Fucking whore if I lived in NYC I would come hunt you down.”

76. On or about September 16, 2017, LIN sent an email to Jane Doe 4 containing an image of child pornography, specifically an image of a prepubescent female, fully nude, facing the camera with her legs spread open and her fingers spreading her genitals and exposing her genitals to the camera.

**JANE DOE 5**

77. Jane Doe 5 attended the same university as LIN, but they were not friends. She does not know Jane Doe 1, or anyone associated with her. Jane Doe 5 was targeted by LIN in a separate cyberstalking campaign during a portion of the same time period as the conduct described above.

78. On or about July 13, 2017, LIN sent a text message to Jane Doe 5 containing two images of child pornography. The images included the following: (1) image of a prepubescent female, completely nude, with her legs spread apart, facing the camera and (2) image of a

prepubescent female, lying on her back, with her genitals exposed to the camera, and her fingers inserted into her vagina.

79. In or about August-September 2017, LIN sent Jane Doe 5 anonymous and threatening text messages and e-mail messages, in which he repeatedly threatened to rape Jane Doe 5. For example, LIN stated, "I am going to rape u," "God u are so hot I would definitely love to rape u," "Wear something nice when u go to sleep tonight plz,." In the communications, LIN included many details about Jane Doe 5, including her name, where she went to school, and that she was a computer coder. The communications also included various photographs of Jane Doe 5, apparently taken from her social media profiles.

### **JOHN DOE 3**

80. John Doe 3 also attended the same university as LIN. John Doe 3 was friendly with LIN when they attended school together. John Doe 3 is friends with Jane Doe 5.

81. On or about July 13, 2017, LIN sent a text message to John Doe 3 containing two or more images of child pornography. The images included the following: (1) image of a prepubescent female, completely nude, with her legs spread apart, facing the camera, and (2) image of a prepubescent female, lying on her back, with her genitals exposed to the camera, and her fingers inserted into her vagina.

### **JANE DOE 6 and JANE DOE 7**

82. In September 2017, LIN moved into a shared home in Newton, Massachusetts. The home was divided into two apartments. LIN lived in one with male housemates. The other apartment was occupied by four women, including Jane Doe 6 and Jane Doe 7. LIN had never met Jane Doe 6 and Jane Doe 7 before he moved to Newton. Jane Doe 6 and Jane Doe 7 do not

know the other individuals discussed above. However, during the short time they lived in the same house as LIN, they were exposed to similar threats and harassment.

83. Specifically, in September 2017, several days after Jane Doe 6 and Jane Doe 7 moved into a shared house with LIN, LIN—posing as their landlord—began sending a series of harassing and threatening online communications. In those communications, LIN made it clear that he knew detailed personal information about the woman, including where they lived, worked, and had gone to school.

84. For example, on or about September 13, 2017, LIN, posing as the landlord, sent an email message to Jane Doe 6 and Jane Doe 7 with the subject “Sex?.” In the message, LIN stated, “Wow you look so nice, maybe one day I will break into your room when you are sleeping and rape you!”

85. For a period of weeks, LIN sent Jane Doe 6 multiple anonymous text messages a day, making various threats, including threats to rape her, cut her, and dismember her.

#### **HOAX BOMB THREATS**

86. LIN sent a number of hoax bomb threats directed at, or falsely implicating, his victims, as described above. He also made anonymous threats to other locations, many in and around Waltham. By the time of his arrest, LIN had made well over a hundred anonymous bomb threats.

87. LIN was closely tracking the media attention generated by these threats. For instance, on August 30, 2017, LIN retweeted a Boston 25 News article headlined “String of Waltham bomb threats triggers lock-downs and evacuations.” LIN stated “24 bomb threats in a single day? Hopefully @WalthamMAPolice will be able to identify and catch the perpetrator(s)

#waltham.” Similarly, on September 26, 2017, LIN retweeted an article and stated “Wow so many bomb threats in Waltham. Hopefully @WalthamMAPolice will be able to figure out who is doing this.”

88. LIN’s hoax threats included the following:

- On or about July 13, 2017, LIN sent emails to school employees, falsely stating that a bomb had been planted at Waltham High School.
- On or about July 26, 2017, LIN sent to the Waltham police an anonymous electronic tip falsely stating that three bombs had been planted at the Colonial Shopping Center in Waltham. Similar threats were made regarding the Twin City Plaza in Somerville, and the Cambridgeside Galleria in Cambridge, MA.
- On or about August 23, 2017, and September 19-20, 2017, LIN sent anonymous messages, via email and electronic tip lines, stating that there were bombs planted at the Waltham District Court.
- On or about September 22, 2017, LIN sent to the Boston University police an anonymous electronic tip falsely stating that a bomb had been planted at the Waltham District Court.
- On or about August 30, 2017, LIN sent to the Waltham police an anonymous email falsely stating that a bomb had been planted at the Waltham Government Center.
- On or about September 15, 2017, LIN sent to the Bentley University Police Department an anonymous email falsely stating that a bomb had been planted at Bentley University.
- On or about September 30, 2017, LIN sent to the Boston University police an anonymous electronic tip falsely stating there were bombs at multiple addresses that were determined to be residential homes in Waltham.
- On or about September 30, 2017, LIN sent to the Boston University police an anonymous electronic tip falsely stating that there was a bomb at the address of the Westin Hotel in Waltham.
- On or about October 1, 2017, LIN sent to the Boston University police an anonymous electronic tip falsely stating that there was a bomb at the address of the Holiday Inn Express in Waltham.

- On October 2-4, 2017, LIN sent a series of anonymous emails to the principals of the Waltham public schools falsely stating that bombs had been planted at the schools in the district. This caused police responses at the seven elementary schools, two middle schools, and at Waltham High School.

**COUNTS ONE-SEVEN**  
**18 U.S.C § 2261A(2)(B)**  
**(Cyberstalking as to Jane Doe 1, Jane Doe 2, John Doe 1,**  
**Jane Doe 3, John Doe 2, Jane Doe 6, and Jane Doe 7)**

The United States Attorney realleges and incorporates by reference the allegations in paragraphs 1-88 of this Information and charges that:

89. On the dates set forth below, in the District of Massachusetts, and elsewhere, defendant

**RYAN S. LIN,**

with intent to harass and intimidate, used an interactive computer service and an electronic communications service and electronic communication systems of interstate commerce, and any other facility of interstate and foreign commerce, specifically text messages, email messages, online postings, and electronic tip-line submissions, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to the individuals listed below:

<b>Count</b>	<b>Victim</b>	<b>Communication Methods</b>	<b>Dates of course of conduct</b>
1	Jane Doe 1	email, text messages, FetLife, CollarSpace, Backpage, Craigslist, police tip line	May 2016-October 2017
2	Jane Doe 2	email, text messages, CollarSpace, police tip line	April 2017-October 2017
3	John Doe 1	email, text messages	May 2017-September 2017

4	Jane Doe 3	email, text messages, Facebook, police tip line	May 2017-September 2017
5	John Doe 2	email, Facebook	July-September 2017
6	Jane Doe 6	email, text messages	September-October 2017
7	Jane Doe 7	email, text messages	September-October 2017

All in violation of 18 U.S.C. § 2261A(2)(B).



**COUNTS EIGHT-TWELVE**  
**18 USC § 2252(a)(2)**  
**(Distribution of Child Pornography as to Jane Doe 2,**  
**John Doe 2, Jane Doe 4, Jane Doe 5, and John Doe 3)**

The United States Attorney realleges and incorporates by reference the allegations in paragraphs 1-88 of this Information and further charges that:

90. On or about the dates listed below, in the District of Massachusetts and elsewhere, defendant

**RYAN S. LIN,**

did knowingly distribute visual depictions using any means and facility of interstate and foreign commerce, and that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means including by computer, and the producing of such visual depictions involved the use of a minor engaging in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), and such visual depictions were of such conduct, as described below:

<b>Count</b>	<b>Recipient of Image</b>	<b>Approximate Date</b>	<b>Image Description</b>
8	Jane Doe 2	Emailed on July 23, 2017	DSCF0429 DSCF0435 LC-6550 As described in ¶54
9	John Doe 2	Emailed on September 16, 2017	P101054 As described in ¶73
10	Jane Doe 4	Emailed on September 16, 2017	1 image As described in ¶76__
11	Jane Doe 5	Texted on July 13, 2017	2 images As described in ¶78

12	John Doe 3	Texted on July 13, 2017	2 images As described in ¶81
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All in violation of 18 U.S.C. § 2252(a)(2).

**COUNTS THIRTEEN-TWENTY ONE**  
**18 USC § 844(e)**  
**(Hoax Bomb Threats)**

The United States Attorney realleges and incorporates by reference the allegations in paragraphs 1-88 of this Information and further charges that:

91. On the dates set forth below, in the District of Massachusetts and elsewhere, defendant

**RYAN S. LIN,**

through the use of the mail, telephone, telegraph, and other instrument of interstate and foreign commerce, and in and affecting interstate and foreign commerce, willfully made any threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, to kill, injure, and intimidate any individual and unlawfully to damage and destroy any building, vehicle, and other real and personal property by means of an explosive, as set forth below:

<b>Count</b>	<b>Description of Threat(s)</b>	<b>Recipient of Threat(s)</b>	<b>Date of Threat(s)</b>
13	Bomb planted at Waltham Schools	School personnel	July 13, 2017
14	Bomb planted at Colonial Shopping Center	Waltham PD	July 26, 2017
15	Bomb planted at Waltham District Court	Boston University PD	Sept.22, 2017
16	Bomb planted at Waltham Government Center	Waltham PD	August 30, 2017
17	Bomb planted at Bentley University	School personnel and Bentley Police	Sept. 15, 2017

		Department	
18	Bomb planted at Waltham Residential Address	Boston University PD	September 30, 2017
19	Bomb planted at Westin Hotel in Waltham	Boston University PD	September 30, 2017
20	Bomb planted at Holiday Inn Express	Boston University PD	Oct. 1, 2017
21	Bomb at Waltham Schools	10 School Principals	Oct. 2 2017

All in violation of 18 U.S.C. § 844(e).

**COUNTS TWENTY TWO-TWENTY FOUR**  
**18 USC §§ 1030 (a)(2)(C), (c)(2)(B)**  
**(Computer Fraud and Abuse as to Jane Doe 1)**

The United States Attorney realleges and incorporates by reference the allegations in paragraphs 1-88 of this Information and further charges that:

92. On or about the dates set forth below, in the District of Massachusetts and elsewhere, defendant

**RYAN S. LIN,**

intentionally accessed a computer, namely the service provider's computer associated with the accounts set forth below, without authorization, and thereby obtained information from any protected computer, namely the servers of the companies below, and the offense was committed in furtherance of any criminal and tortious act in violation of the laws of the United States, namely cyberstalking, in violation of 18 U.S.C. § 2261A:

<b>Count Number</b>	<b>Account Holder Victim Name</b>	<b>Approximate Date</b>	<b>Account Accessed Without Authorization</b>
22	Jane Doe 1	May 15, 2016	Google account
23	Jane Doe 1	July 28, 2016	Apple iCloud account
24	Jane Doe 1	July 2017	Rover.com account

All in violation of 18 U.S.C. §§ 1030(a)(2)(C), (c)(2)(B).

**COUNT TWENTY FIVE**  
**18 USC § 1028A**  
**(Aggravated Identity Theft as to Jane Doe 1)**

The United States Attorney realleges and incorporates by reference the allegations in paragraphs 1-88 of this Information and further charges that:

93. In or about May 2016, July 2016, and July 2017, in the District of Massachusetts and elsewhere, defendant

**RYAN S. LIN,**

during and in relation to a felony violation enumerated in subsection (c), specifically, 18 U.S.C. § 1030, as charged above in Counts 22-24, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, the account log-in credentials of the individual described as Jane Doe 1.

All in violation of 18 U.S.C. § 1028A.

**DISTRIBUTION OF CHILD PORNOGRAPHY FORFEITURE ALLEGATION**  
(18 U.S.C. § 2253)

The United States Attorney further alleges that:

94. Upon conviction of Distribution of Child Pornography, in violation of 18 U.S.C. § 2252(a)(2), set forth in Counts Eight through Twelve of this Information,

**RYAN S. LIN,**

defendant herein, shall forfeit to the United States of America, pursuant to 18 U.S.C. § 2253, (i) any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense(s); and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s) or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

95. If any of the property described in Paragraph 94, above, as being forfeitable pursuant to 18 U.S.C. § 2253, as a result of any act or omission of the defendant --

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

it is the intention of the United States of America, pursuant to 18 U.S.C. § 2253(b), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 94 above.

All pursuant to 18 U.S.C. § 2253.



**COMPUTER FRAUD AND ABUSE FORFEITURE ALLEGATION**

(18 U.S.C. §§ 982(a)(2) & 1030(i))

The United States Attorney further alleges that:

96. Upon conviction of Computer Fraud and Abuse, in violation of 18 U.S.C. §§ 1030(a)(2)(C) and (c)(2)(B), set forth in Counts Twenty Two through Twenty Four of this Information,

**RYAN S. LIN,**

defendant herein, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2) and 1030(i), any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offenses, and any personal property that was used or intended to be used to commit or facilitate the commission of the offenses. The property to be forfeited includes, but is not limited to, the following:

The assets to be forfeited specifically include, without limitation, the following items seized from defendant's residence, automobile, or person on October 6, 2017:

- a. SILVER IPHONE 6S PLUS WITH BLACK CASE;
- b. GARMIN NUVI 2455LMT S/N 2LM050163;
- c. REXING DASHBOARD CAMERA;
- d. DESKTOP COMPUTER BLACK S/N 1627FD34500500402;
- e. WHITE SPHERICAL CLOCK RADIO WITH USB CONNECTION;
- f. NETGEAR AC1900 SMART WIFI ROUTER WITH POWER CABLE;
- g. BLACK TOSHIBA STORAGE DEVICE S/N 15TWSW21STT1;

97. If any of the property described in Paragraph 96, above, as being forfeitable pursuant to 18 U.S.C. § 982(a)(2), as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

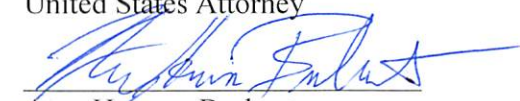
it is the intention of the United States, pursuant to 18 U.S.C. § 982(b), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 96 above.

All pursuant to 18 U.S.C. §§ 982(a)(2) and 1030(i).

Respectfully submitted,

ANDREW E. LELLING  
United States Attorney

By:



Amy Harman Burkart  
Assistant United States Attorney  
Mona Sedky  
Department of Justice Senior Trial Attorney  
Computer Crime & Intellectual Property  
Section

Date: April \_\_, 2018