

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED

Apr 01 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES OF AMERICA,

V.

RAMAJANA HIDIC DEMIROVIC,

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 2261A(2) – Cyberstalking

18 U.S.C. § 371 – Conspiracy to Commit Cyberstalking

A true bill.

/s/ Foreperson of the Grand Jury

Foreman

Filed in open court this 1st day of

April, 2021

Ada Means

Clerk

Ada Means
Jacqueline Scott Corley

Bail, \$ No Bail - Warrant

Hon. Jacqueline Scott Corley

FILED

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

1 STEPHANIE M. HINDS (CABN 154284)
Acting United States Attorney

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,)
12 Plaintiff,) CASE NO. 3:21-cr-00133 VC
13 v.) VIOLATIONS:
14 RAMAJANA HIDIC DEMIROVIC.) Count One: 18 U.S.C. § 2261A(2) – Cyberstalking
15 Defendant.) Count Two: 18 U.S.C. § 371 – Conspiracy to
16) Commit Cyberstalking
SAN FRANCISCO

17 INDICTMENT

18 The Grand Jury charges:

19 **Summary of the Offenses**

20 1. Beginning in 2016, and continuing until at least October 2019, Defendant RAMAJANA
21 HIDIC DEMIROVIC, an adult resident of San Francisco during the period relevant to this indictment,
22 and her co-conspirator (a minor during part of this period), and others known and unknown to the grand
23 jury, engaged in acts of cyberstalking against multiple minor victims and those victims’ family
24 members. The principal targets of the scheme were persons with whom the co-conspirator had or
25 attempted to have romantic relationships. The cyberstalking and related conduct escalated with each
26 victim and involved hundreds of malicious, deceptive, and abusive communications, in DEMIROVIC’s
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1 own name, or in the name of her co-conspirator, or using pseudonymous accounts. The conduct also
2 involved extensive online impersonation of one victim.

3 2. DEMIROVIC's conduct was intended to harass and intimidate the victims by sabotaging
4 their personal relationships, social reputation, academic life, and work prospects. It caused them to fear
5 for their safety. It also attempted to cause, and did cause, substantial emotional distress to victims, and
6 would reasonably be expected to cause such emotional distress to the victims.

7 **Victim A**

8 3. Victim A, aged 14, dated the co-conspirator for a few days in February 2016.

9 4. On or about May 11, 2016, DEMIROVIC came to Victim A's high school and asked
10 students where she could find Victim A. DEMIROVIC located Victim A, accosted him and, in front of
11 other students, threatened to "rip [his] fucking heart out."

12 5. DEMIROVIC also began contacting Victim A's mother with intimidating messages.

13 6. Victim A grew anxious, depressed, and fearful of another confrontation by
14 DEMIROVIC. He began skipping field trips and singing classes when he knew that DEMIROVIC
15 might be present. He sought therapeutic help. His grades slipped so far that his parents considered
16 withdrawing him from school.

17 **Victim B**

18 7. Victim B dated the co-conspirator for about two months in April and May 2016.

19 8. On or about July 7, 2016, DEMIROVIC called and text messaged Victim B, aged 15,
20 while he was in class, asserting in a text message that Victim B should be "condemned."

21 9. On or about August 11, 2016, at 11:02 p.m., DEMIROVIC began sending a series of text
22 messages to a telephone used by Victim B, calling him an "awful human being." When Victim B asked
23 DEMIROVIC not to communicate with him, as a minor, by text message, DEMIROVIC replied by text
24 message: "You're not a child. You're an idiot."

25 10. On or about August 23, 2016, DEMIROVIC once more began sending text messages to a
26 telephone used by Victim B, at 9:38 p.m., telling Victim B that her husband would "find" Victim B and
27 that "it's not going to look pretty." In the text messages, DEMIROVIC also threatened to seek a
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1 restraining order against the minor and suggested that, when she did so, Victim B’s college applications
2 would be prejudiced.

3 11. In or around fall 2016, DEMIROVIC and her co-conspirator called Victim B’s employer
4 to report, falsely, that Victim B was physically abusive, used drugs, and had alcohol problems.

5 12. Around the same time, DEMIROVIC and her co-conspirator contacted administrators at
6 Victim B’s school and repeated these false allegations. Administrators at Victim B’s high school were
7 alarmed by the contact and arranged security measures for Victim B and barred DEMIROVIC from
8 campus.

9 13. Beginning no later than October 2016, DEMIROVIC and her co-conspirator used
10 Instagram anonymously to attack Victim B. Instagram is an American social networking service owned
11 by Facebook that facilitates sharing of photos, videos, and messages. DEMIROVIC’s Instagram
12 communications to Victim B mocked the minor for having divorced parents. Among other messages,
13 DEMIROVIC and her co-conspirator wrote: “Daddy left you so you have to be a fuckup,” “It must feel
14 awful that he left you,” “What a sad piece of shit you are,” and “Do you cry every night because your
15 daddy didn’t want you.” Two screennames were used, each employing Victim B’s name along with a
16 taunting moniker: “[Victim’s B first name] the shit” and “[Victim B’s first name] the small dick.”

17 14. This harassment undermined minor Victim B’s emotional health, leaving him feeling
18 helpless, fearful, and distressed. His mother disallowed him from taking the bus and hired a private driver
19 to transport him to school and soccer practice. Victim B deleted his social-media accounts, curtailed his
20 friendships, and changed his phone number. He could not sleep, saw his grades decline, and began seeing
21 a therapist. At one point, on vacation in Mexico, in December 2016, Victim B thought he saw
22 DEMIROVIC and panicked; he began packing up and demanding a return home. Years later, in
23 November 2020, he panicked when he thought he saw DEMIROVIC at his work. Victim B’s mother
24 found the effect on her son “heartbreaking.”

25 **Victim C**

26 15. Beginning no later than May 2018, Victim C became the subject of a seventeen-month
27 campaign of cyberstalking by DEMIROVIC and her co-conspirator. This course of conduct was
28 intended to humiliate Victim C and destroy his social relationships.

1 16. Victim C and the co-conspirator dated for about ten months, while attending different
2 high schools, beginning around May 2017. They broke up in February or March 2018.

3 17. On or about May 17, 2018, DEMIROVIC contacted the assistant principal of Victim C's
4 school to complain about Victim C. The assistant principal found the contact "strange and worrisome"
5 and alerted the school safety officer and assured Victim C's family that he would call the police if
6 DEMIROVIC came to campus.

7 18. On or about May 17, 2018, DEMIROVIC and her co-conspirator created a Gmail account
8 that used Victim C's first and last name and then using that account sent, to Victim C, an email
9 containing a purported "[a]rticle" that would be "published" about him. The "article" falsely labeled
10 Victim C "emotionally and psychologically abusive" and accused him of "[o]nline bullying and
11 anonymous messages" directed at the co-conspirator.

12 19. On or about May 19, 2018, DEMIROVIC became aware that Victim C was attending a
13 prom event with an individual other than the co-conspirator and began sending text messages to a
14 telephone used by Victim C. One text, sent around 7 p.m., called Victim C a "piece of shit." Another
15 text message, sent around 9:30 p.m., called a female friend of Victim C a "fat ass cow." Victim C
16 panicked, worrying that DEMIROVIC would show up at the prom venue.

17 20. Beginning no later than May 17, 2018, DEMIROVIC and her co-conspirator began using
18 social media accounts systematically to send messages to Victim C's associates and to impersonate Victim
19 C. At least three different Instagram screennames impersonated Victim C. Separately, at least four other
20 Instagram screennames, using pseudonyms, were used to circulate messages about Victim C. In total,
21 DEMIROVIC and her co-conspirator transmitted hundreds of communications about Victim C, reaching
22 thousands of individuals, including Victim C and his family, friends, school officials, and strangers.

23 21. In or about May 2018, Victim's C prom date received a message from an Instagram
24 account bearing a pseudonymous screenname, controlled by DEMIROVIC and her co-conspirator, that
25 said: "You fucking look like a pig and your date was a dwarf. Wtf."

26 22. On or about June 4, 2018, Victim C's prom date received an Instagram message from a
27 pseudonymous account, controlled by DEMIROVIC and her co-conspirator, calling her a "hoe" and
28 stating that Victim C was "really bad at making love."

1 23. On or about June 6, 2018, DEMIROVIC and her co-conspirator used an Instagram
2 account that impersonated Victim C, by using his name and picture, to publish insults against the co-
3 conspirator, calling her a “[c]heating [b]itch.” DEMIROVIC, using an Instagram account bearing her
4 own name, pretended to be outraged by these insults.

5 24. In or around June 2018, DEMIROVIC and her co-conspirator posted an image of Victim
6 C and a friend on Instagram with a caption suggesting that Victim C and the friend were high on drugs.
7 The account that posted the message used Victim C’s name and photo, and identified Victim C by his
8 high school, university, and class year for both.

9 25. By June 2018, dozens of friends had reached out to Victim C in confusion and concern.
10 Victim C’s anxiety was severe enough to interfere with his ability to function.

11 26. On or about January 22, 2019, DEMIROVIC and her co-conspirator insulted Victim C’s
12 associates, impersonating Victim C on Instagram, calling one an “[u]ntalented fat cow.”

13 27. On or about February 4, 2019, after midnight, DEMIROVIC and her co-conspirator sent
14 a barrage of Instagram messages to Victim C, calling him a “[p]iece of shit” and asserting that no one at
15 his university would want to “fuck a dwarf” like him.

16 28. In or around February 2019, DEMIROVIC and her co-conspirator began sending
17 Instagram messages to high school and university associates of Victim C, purporting falsely to be from
18 someone named “Val Trishman,” at Victim C’s university, accusing Victim C of sexual predation.

19 29. On or about March 2, 2019, DEMIROVIC submitted a complaint about Victim C to Title
20 IX officers at his university, alleging that Victim C had “harassed and stalked” girls.

21 30. On or about March 10, 2019, DEMIROVIC and her co-conspirator sent Instagram
22 messages, impersonating Victim C, to at least 21 women among Victim C’s college classmates, high
23 school friends, or acquaintances. Multiple female friends of Victim C received messages, from an
24 account used by DEMIROVIC and her co-conspirator, that invited the women to his home for liaisons
25 (“Do you wanna come over to my place.... Let’s go crazy”), asked for dates (“You’re so hot.... I miss
26 you let’s have lunch together”), made lewd suggestions (“What do you want me to do to you this time”),
27 or described Victim C’s supposed drug abuse (“I’ve been on so many drugs lately”).
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1 40. On or about December 26, 2018, Victim C’s younger brother, then aged 16, began
2 receiving abusive messages from a pseudonymous Instagram account controlled by DEMIROVIC and
3 her co-conspirator, insulting the younger brother and again calling Victim C a “piece of shit.”

4 41. On or about July 19, 2019, Victims D and E each received an email from DEMIROVIC
5 stating that she heard that Victim C was “selling drugs” and had “raped a girl.”

6 42. On or about July 19, 2019, DEMIROVIC came to the front door of the home of Victim
7 C, Victim D, and Victim E, while Victim C’s brother was home alone. Victim D and Victim E were
8 alerted to the visit by their security camera and immediately cut short existing plans and returned home.
9 DEMIROVIC’s visit caused Victim D and Victim E to fear for their physical safety and that of their
10 children.

11 43. Victim D and Victim E suffered substantial emotional distress as a result of the conduct
12 by DEMIROVIC and her co-conspirator. Victim D was devastated by the campaign against her and
13 against her son. The stress, fear, anger, expense, and distraction of the conduct caused Victim E to
14 curtail his work travel and eventually to resign from his job. The trauma inflicted by DEMIROVIC and
15 her co-conspirator contributed to the decision of Victim C’s family to move out of the San Francisco
16 Bay Area.

17 **COUNT ONE: (18 U.S.C. § 2261A(2)) – Cyberstalking**

18 44. The allegations contained above are hereby re-alleged and incorporated by reference.

19 45. Beginning at a date unknown to the Grand Jury, but no later than May 2016, and ending
20 at a date unknown to the Grand Jury, but no earlier than October 2019, in the Northern District of
21 California and elsewhere, the defendant,

22 RAMAJANA HIDIC DEMIROVIC,

23 an adult, with the intent to injure, harass, and intimidate minors Victim A, Victim B, and Victim C, and
24 adults Victim D and Victim E, residents of the Northern District of California, used an interactive
25 computer service, electronic communication service, and electronic communication system of interstate
26 commerce, and other facilities of interstate commerce, namely, email, social media accounts, and the
27 Internet, to engage in a course of conduct that placed those persons in reasonable fear of death or
28 serious bodily injury, and that caused, attempted to cause, and would be reasonably expected to cause

1 substantial emotional distress to those persons, in violation of 18 U.S.C. §§ 2261A(2)(A) and (2)(B) and
2 18 U.S.C. § 2.

3 **COUNT TWO: (18 U.S.C. § 371 – Conspiracy to Commit Cyberstalking)**

4 46. The allegations contained above are hereby re-alleged and incorporated by reference.

5 47. Beginning at a date unknown to the Grand Jury, but no later than May 2016, and ending at
6 a date unknown to the Grand Jury, but no earlier than October 2019, the defendant,

7 RAMAJANA HIDIC DEMIROVIC,

8 and her co-conspirator, knowingly and willfully conspired and agreed with each other to commit offenses
9 against the United States, namely violations of 18 U.S.C. §§ 2261A(2)(A) and (2)(B) by engaging in
10 cyberstalking and a course of conduct that placed the cyberstalking targets in reasonable fear of death or
11 serious bodily injury, and that caused, attempted to cause, and would be reasonably expected to cause
12 substantial emotional distress to those persons.

13 48. DEMIROVIC became a member of the conspiracy knowing of at least one of its objects
14 and intending to help accomplish it. One of the members of the conspiracy performed at least one overt
15 act, beginning at a date unknown to the Grand Jury but no later than May 2016, for the purpose of carrying
16 out the conspiracy, in violation of 18 U.S.C. §§ 2261A(2)(A) and (2)(B), 18 U.S.C. § 2, and 18 U.S.C. §
17 371.

18 49. DEMIROVIC committed overt acts in furtherance of the conspiracy that include:

- 19 a. On or about May 11, 2016, DEMIROVIC came to Victim A’s high school, accosted
20 him and, in front of other students, threatened to “rip [his] fucking heart out.”
- 21 b. On or about August 23, 2016, DEMIROVIC sent text messages to a telephone used
22 by Victim B, at night, telling Victim B that her husband would “find” Victim B and
23 that “it’s not going to look pretty.”
- 24 c. On or about May 19, 2018, DEMIROVIC sent text messages to a telephone used by
25 Victim C, calling Victim C a “piece of shit” and causing Victim to fear that
26 DEMIROVIC would show up at the prom venue where Victim C was.
- 27 d. On or about October 14, 2019, DEMIROVIC sent an email to an official at Victim
28 C’s university that accused Victim C of trying to “frame” her for “online bullying.”

1 DATED: March 31, 2021

A TRUE BILL.

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/s/ Foreperson
FOREPERSON

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5 STEPHANIE M. HINDS
Acting United States Attorney

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7

/s/ Joseph Tartakovsky
8 JOSEPH TARTAKOVSKY
Assistant United States Attorney

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