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FILED 14 FEB '13 09:35 USDC-ORP

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 CYRUS ANDREW SULLIVAN, )  
 )  
 Defendant. )

Case No. CR 13- 00064 - HZ

**INDICTMENT**

[18 U.S.C. §§ 875(b), 2261(b)(5), &  
2261A(2)(A)]

**THE GRAND JURY CHARGES:**

**COUNT 1**

**[MAKING AN EXTORTIONATE THREATENING COMMUNICATION]**

On or about June 4, 2012, in the District of Oregon, with intent to extort money from another person, defendant Cyrus Andrew Sullivan knowingly transmitted in interstate or foreign commerce a communication containing a threat to injure the person of another; to wit, with the intent to extort \$10,000.00 in money from another person, A.K., defendant Cyrus Andrew Sullivan transmitted an email communication via the Internet containing a threat to injure A.K. if defendant Cyrus Andrew Sullivan was not paid \$10,000.00, which a reasonable person would take as a serious expression of an intention to inflict bodily harm upon A.K. if \$10,000.00 was not paid to defendant Cyrus Andrew Sullivan. All the aforementioned conduct was in violation of Title 18, United States Code, Section 875(b).

**COUNT 2**  
**[INTERNET STALKING]**

On or between August 11, 2009 and June 7, 2012, in the District of Oregon, with the intent to cause substantial emotional distress to a person in another State, defendant Cyrus Andrew Sullivan used an interactive computer service or a facility of interstate or foreign commerce to engage in a course of conduct that caused substantial emotional distress to that person in another State; to wit, with the intent to cause substantial emotional distress to persons in other States for the purpose of extorting money from them, defendant Cyrus Andrew Sullivan caused and facilitated the posting of malicious and defamatory information on the Internet about those persons, causing substantial emotional distress to them. All the aforementioned conduct was in violation of Title 18, United States Code, Sections 2261A(2)(A) and 2261(b)(5).

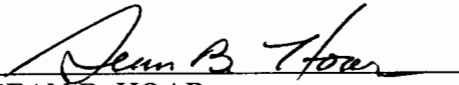
Dated this 3 day of February, 2013.

C A TRUE BILL. ^

~~OFFICIATING FOREPERSON~~ U

Presented by:

S. AMANDA MARSHALL  
United States Attorney

  
SEAN B. HOAR  
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