# UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA ORLANDO DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 6:25-cr- 00005 - 135 - DCI

18 U.S.C. § 1030 18 U.S.C. § 1028A

MICHAEL SCHEUER

## INFORMATION

The United States Attorney charges:

# **COUNT ONE** (Computer Fraud)

On or about August 29, 2024, in the Middle District of Florida, and elsewhere, the defendant,

#### MICHAEL SCHEUER,

did knowingly cause the transmission of a program, information, code, and command, and, as a result of such conduct, intentionally caused damage without authorization to a protected computer, and the offense caused loss to persons during a one-year period from the defendant's course of conduct affecting protected computers aggregating at least \$5,000 in value.

In violation of 18 U.S.C. § 1030(a)(5)(A) and (c)(4)(B)(i).

## **COUNT TWO** (Aggravated Identity Theft)

On or about August 29, 2024, in the Middle District of Florida, and elsewhere, the defendant,

### MICHAEL SCHEUER,

did knowingly possess and use, without lawful authority, a means of identification of another person, specifically, an email address/username of Victim A.G., during and in relation to a felony violation of transmitting a program, information, and code, and, as a result of such conduct, intentionally caused damage without authorization to a protected computer, in violation of 18 U.S.C. § 1030(a)(5)(A), as charged in Count One of this Information, knowing that such means of identification belonged to an actual person.

In violation of 18 U.S.C. § 1028A(a)(1).

## **FORFEITURE**

- 1. The allegations contained in Count One are incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of 18 U.S.C. §§ 982(a)(2)(B) and 1030(i)(1).
- 2. Upon conviction of a violation of 18 U.S.C. § 1030, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B) and 1030(i), any property constituting, or derived from, proceeds the person obtained, directly or indirectly, as a result of such violation and pursuant to 18 U.S.C. § 1030(i)(1)(A), any personal property used or intended to be used to commit, or to facilitate the commission of, the offense.

- 3. The property to be forfeited includes, but is not limited to, the following: Corsair desktop computer tower, Serial No. 030422135716, which was seized from the defendant's residence on or about September 23, 2024.
- 4. If any of the property described above, 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,

ROGER B. HANDBERG United States Attorney

By:

Robert D. Sowell

Assistant United States Attorney

By:

Chauncey A. Bratt

Assistant United States Attorney Deputy Chief, Orlando Division