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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

SIMON AMADEUS MESSING,

Defendant.

Case No. 8:25-cr-00119-TDC
(Stalking, 18 U.S.C. § 2261A(2)(B))

INFORMATION

COUNT ONE
(Cyberstalking)

The United States Attorney for the District of Maryland charges that:

INTRODUCTION

At all times relevant to this Information:

1. Defendant **SIMON AMADEUS MESSING** (“**MESSING**”) was a United States citizen, who resided in Washington, D.C.
2. A.J., a female, resided in Washington, D.C., and was an employee of the United States Department of Agriculture (USDA), with worksites located in the District of Maryland when she became the primary target of a years-long cyberstalking and harassment campaign carried out by **MESSING**.
3. Beginning on or about October 2020 and continuing through at least on or about July 2023, in furtherance of his harassment of A.J., **MESSING** sent anonymous emails to A.J. and to A.J.’s family and colleagues. Many of the emails included allegations that A.J. had engaged in several extramarital affairs, including with a co-worker who was

identified. Some of the emails also contained photographs purportedly depicting A.J., including nude photos of A.J. taken without A.J.'s knowledge or consent. Other emails contained recordings purportedly capturing A.J. engaged in sexual activity.

4. In furtherance of his harassment of A.J., **MESSING** also created adult and dating website accounts using A.J.'s name, likeness, and personally identifiable information. Several adult profiles in the name of A.J. also contained intimate pictures of A.J. The adult profile accounts created by **MESSING** contained solicitations for sexual engagements with A.J. and contained blog posts detailing sexually explicit narratives of A.J.'s purported sexual encounters.

5. Multiple of the emails described were received by A.J.'s colleagues who worked at USDA worksites located in the District of Maryland.

The Charge

6. From in or about October 2020 through in or about July 2023, in the District of Maryland and elsewhere, the defendant,

SIMON AMADEUS MESSING,

with the intent to harass another person, that is, A.J., used interactive computer services, electronic communication services, and other facilities of interstate and foreign commerce, including electronic mail and internet websites, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to A.J.

18 U.S.C. § 2261A(2)(B)

Handwritten signature of Kelly O. Hayes in cursive, with the initials "(pm)" written at the end.

Kelly O. Hayes
United States Attorney