

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

ALY CHERIF,
a/k/a AUSTRALIEN CHOCO,
a/k/a AUSTRALIEN CH'CO,
a/k/a MICHAEL JHONSON,
a/k/a ALI ALY

INDICTMENT

Case No. _____

Violations: 18 U.S.C. §§ 2261A(2)(B),
2261(b)(1), 1343, 1349, 875(d),
2252A(a)(2)(A), 2252A(b)(1), and 2

**The Cyberstalking Sextortion Conspiracy and
General Scheme to Defraud**

(Incorporated into Counts One, Two, Three, Four, and Five of this Indictment)

1. Between in or about 2020 to the date of this Indictment, individuals located in the Republic of Côte d'Ivoire (hereafter "Ivory Coast"), participated, and continue to participate, in a well-organized sextortion scheme that targeted victims located around the world. "Sextortion" is a term used to describe a scheme to defraud where individuals (hereafter "sextortioners") use the threat of releasing photographs or videos which depict people's private, intimate, or sexual acts to fraudulently coerce those people to send money based upon falsehoods, blackmail, and threats, in exchange for the sextortioners' promise to not release these photographs or videos. Additionally, "sextortion" is a portmanteau of two words, namely, "sex" and "extortion," that combines the meanings of these two words. Specifically, sextortioners perpetrating sextortion schemes utilize false claims to induce victims to send photographs or videos of themselves—or to engage in video chats where the sextortioners record victims—nude or engaged in private, intimate, or sexual acts, and then the sextortioners threaten to release these photographs or videos

to friends, family, work colleagues, or threaten to post these photographs or videos on the internet, unless the victim pays money to the sextortioners.

2. In the present case, ALY CHERIF, a/k/a AUSTRALIEN CHOCO, a/k/a AUSTRALIEN CH'CO, a/k/a MICHAEL JHONSON, a/k/a ALI ALY (hereafter "CHERIF"), and other sextortioners located in the Ivory Coast (hereafter "the Sextortion Group") engaged in a sextortion scheme that targeted individuals living in the United States, including individuals who lived in the District of North Dakota. Generally, CHERIF and the Sextortion Group communicated with one another using the French language. A general summary of CHERIF and the Sextortion Group's sextortion scheme and scheme to defraud is listed below:

- a. First, CHERIF and the Sextortion Group obtained photographs of attractive women from internet and social media sites;
- b. Second, CHERIF and the Sextortion Group fraudulently operated social media accounts, which listed false names, personas, and biographical information, and used the photographs of attractive women that they had obtained from internet and social media sites to falsely pose as attractive women who were interested in having sexual chat communications with men;
- c. Next, CHERIF and the Sextortion Group searched social media sites looking for, and sending messages to, sextortion targets. Once a sextortion target communicated with CHERIF and the Sextortion Group, the group would use their fake social media personas to convince the sextortion target to engage in

nude or sexual acts over video chat, which CHERIF and the Sextortion Group would then video record or photograph; and

- d. Thereafter, CHERIF and the Sextortion Group extorted the sextortion target—who then became a sextortion victim—by demanding that the victim send money to CHERIF and the Sextortion Group under the threat of sending the recording or photographs of the sextortion victim’s nude or sexual acts to the victim’s social media contacts.

3. During this sextortion scheme, CHERIF and the Sextortion Group obtained and shared: 1) Facebook and Instagram account usernames and passwords; 2) computer and phone passwords; 3) images and videos to send to sextortion targets; and 4) sextortion “scripts,” or sample dialogues to use with sextortion targets, in multiple different languages, which CHERIF and the Sextortion Group used to communicate with sextortion targets.

4. On or about April 8, 2023, CHERIF and the Sextortion Group participated in a sextortion scheme that targeted MINOR VICTIM, a fourteen (14) year old boy who lived in North Dakota. CHERIF and the Sextortion Group’s scheme against MINOR VICTIM consisted of engaging in Facebook chat messages with MINOR VICTIM; video recording and photographing MINOR VICTIM during a video chat when MINOR VICTIM was engaging in private, intimate, or sexual acts; and threatening to send the recording or photographs of these private, intimate, or sexual acts to MINOR VICTIM’s friends and family unless MINOR VICTIM paid CHERIF and the Sextortion Group money to prevent the release of the recording and photographs. CHERIF and the

Sextortion Group's chat communications with MINOR VICTIM resulted in MINOR VICTIM committing suicide in his North Dakota home.

5. To facilitate this sextortion scheme against MINOR VICTIM, CHERIF and the Sextortion Group:

- a. Obtained publicly available photographs of an attractive woman from the internet, who law enforcement identified as a woman using an active Instagram account with the initials M.M.;
- b. Fraudulently used these photographs to create or modify a Facebook account and falsely posed as a woman named "Emily Thompson";
- c. Contacted MINOR VICTIM through chat on Facebook;
- d. Falsely stated that they were "Emily Thompson" and that "Emily Thompson" was twenty (20) years old and lived in Montana, when in fact, CHERIF and the Sextortion Group were operating this Facebook account, not a woman named "Emily Thompson";
- e. To obtain a video recording and photographs of MINOR VICTIM engaging in a private, intimate, or sexual act, "Emily Thompson" sent the following chat messages to MINOR VICTIM:
 - i. "I am almost naked in my room and I am very hot and now I want to be envied by the camera, but do you promise that it will stay between us [four heart emojis]?"
 - ii. "Let me know as soon as you're in the bathroom"

- iii. “I’m really sorry I can’t do this with photos I prefer it in cam because it is the most real”
 - iv. “[B]ut go to the bathroom for just 3 minutes [I] will get naked for you on cam but [I] want you to turn me on too so just go to the bathroom for 3 minutes kay?”
 - v. “[S]how me yourself on cam”
- f. Next, “Emily Thompson” participated in a video chat with MINOR VICTIM and video recorded and took photographs of MINOR VICTIM engaging in a private, intimate, or sexual act, including a photograph of MINOR VICTIM’s naked penis. Thereafter, “Emily Thompson” sent the following chat messages to MINOR VICTIM to harass, intimidate, and extort MINOR VICTIM:
- i. “Don’t worry I just recorded this naked video of you masturbating in front of the camera on a big website. You’re not trying to escape or even run away from your responsibilities, otherwise I’ll make sure that this naked video of you is on the doorstep of everyone in your current city and on social networks, that’s what you want me to do.” Law enforcement located this exact language in an email in the michaeljhonson020@gmail.com account, referenced below, with subject line, “Formate,” dated April 13, 2023
 - ii. “You see this nude video of you, it’s your nude video where you show your [expletive] to the camera so if you try to run away, play hard to

get, stand up to me or disconnect, you will really see what I am capable of with this nude video of you”

- iii. “Do you want this nude video of you to remain between the two of us confidentially or in public?”
 - iv. “You want me to send this naked video of you to all your family and friends on Facebook?? Is that what you want??”
 - v. “Do you want me to share this naked video of you on the social networks of your current city and also on this most visited site in the world?”
- g. Next, CHERIF and the Sextortion Group began using extortion tactics to attempt to force MINOR VICTIM to pay money so that “Emily Thompson” would not release videos and photographs of MINOR VICTIM engaging in private, intimate, or sexual acts. Specifically, listed below is a summary of the chat communications between “Emily Thompson” and MINOR VICTIM:
- i. EMILY THOMPSON: “I want you to pay a sum of money of 4850 to my sick mother who has cancer, but I give you a chance, a very good opportunity to say how much you paid for my silence and to end this story once and for all. I’m listening?”
 - ii. MINOR VICTIM: “I don’t have money I’m 14”
 - iii. EMILY THOMPSON: “I want you to pay me a sum of money now so that your video is deleted? [L]isten to me very well [I] don’t want to

hurt you so don't make fun of me [I] will never repeat them again how much can you pay me and I will delete the video now?"

- iv. MINOR VICTIM: "No money I don't have any money. Please I'm begging you."
- v. EMILY THOMPSON: "[L]isten to me very well [i]'m going to give you one last chance to pay me 1000\$ and with your family card now."
- vi. MINOR VICTIM: "NO PLEASE IM BEGGING YOU SO BAD RIGHT NOW. PLEASE."
- vii. EMILY THOMPSON: "Ok I'll just give you 4 seconds to tell me how much you can pay my sick mother now."
- viii. MINOR VICTIM: "Don't please. Please don't. Please Emily."
- ix. EMILY THOMPSON: "[L]isten to me very well [i]'m going to give you one last chance to pay me 1000\$ and with your family card now."
- x. MINOR VICTIM: "I can't"
- xi. EMILY THOMPSON: "[y]es or no?"
- xii. MINOR VICTIM: "My parents will kill me. PLEASE. I AM BEGGING YOU. Have mercy please. Don't do this to me please. Don't do this I cant go through this please don't. PLEASE."
- xiii. EMILY THOMPSON: "I don't want to hurt you so don't make me hurt you I'll give you one last chance to tell me how much you can pay me now."

xiv. MINOR VICTIM. “I’m going to kill myself if you do this. Don’t.

Please don’t. Anything other than that I don’t have the money.”

h. At the conclusion of the conversation, “Emily Thompson” opened a group message with MINOR VICTIM’s family members and friends on Facebook and distributed photographs taken of MINOR VICTIM during the video chat, to include photographs of MINOR VICTIM’s naked penis.

6. MINOR VICTIM committed suicide after CHERIF and the Sextortion Group extorted MINOR VICTIM, and MINOR VICTIM’s death was a direct result of CHERIF and the Sextortion Group perpetuating the aforementioned sextortion scheme against MINOR VICTIM.

7. The “Emily Thompson” Facebook account responsible for targeting MINOR VICTIM was operated by someone located in the Ivory Coast, utilizing multiple Instagram handles in the names of “Australien ___ Choco,” or “Australien ___ Ch’Co,” who was later identified as CHERIF by the following methods:

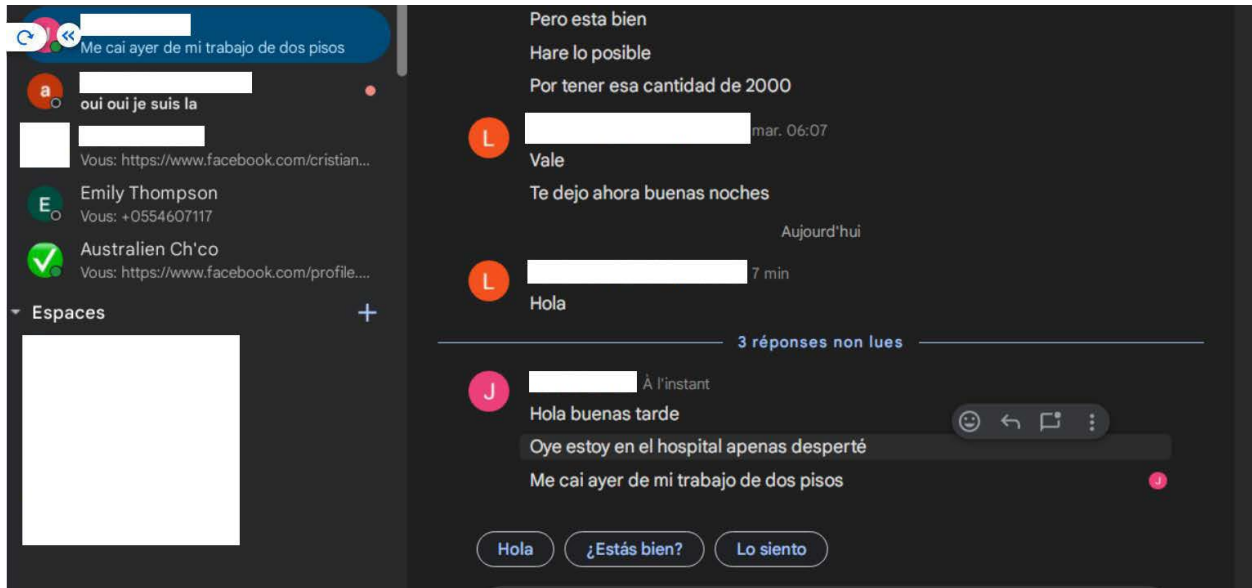
- a. The “Emily Thompson” Facebook account was linked by IP address to an Instagram account, in the name of Australien ___ Choco, with IGID ending in 7012, and during law enforcement’s review of this account, it located evidence that this account was involved in sextortion and located photographs of CHERIF;
- b. The email address michaeljhonson020@gmail.com was historically associated with an Instagram account, in the name of Australien ___ Choco, with IGID ending in 5090;

- c. Google subscriber information for the email address

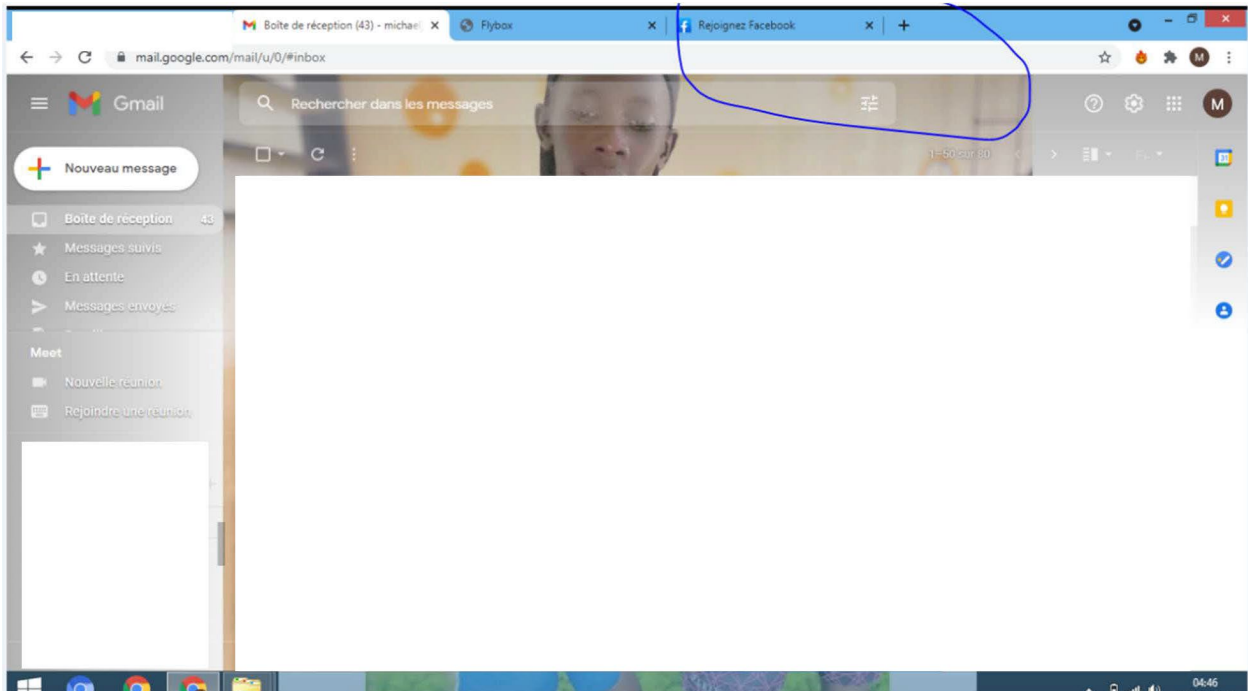
michaeljhonson020@gmail.com showed that it was associated to the name “Australien Ch’co” and created on October 11, 2019, from an IP address based out of the Ivory Coast;

- d. Law enforcement’s review of the images in the

michaeljhonson020@gmail.com email account showed that the user of this account was involved in sextortion based on the number of apparent victim images, screenshots of receipts for payments, and snips of chat messages and scripts showing that the user was attempting extortion. Additional review of the images shows the same individual posing with friends in various locations that appears in Australien ___ Choco Instagram accounts. Additionally, as depicted below (redacted in Indictment), law enforcement located evidence in the michaeljhonson@gmail.com account that showed that the user of michaeljhonson@gmail.com account was also using an Instagram account, or communicating with an Instagram account, in the name of “Emily Thompson,” next to the name “Australien Ch’co;”



e. The below image of CHERIF (redacted in Indictment) was found in michaeljhonson020@gmail.com account:



f. The below image of CHERIF was found in Australien_Choco Instagram Account with Instagram IGID ending in 5090, which strongly resembles the

above photograph of CHERIF found in the michaeljhonson020@gmail.com account:



- g. In the iCloud account australienchoco2001@icloud.com, law enforcement located sextortion scripts in the notes, sextortion victim photographs, and photographs consistent with the “Emily Thompson” Facebook account. Specifically, in this iCloud account, law enforcement located photographs of an attractive woman—who law enforcement identified as a woman using an active Instagram account with the initials M.M.—that appears to be the same woman depicted in the photograph of the Facebook profile “Emily Thompson,” who communicated with MINOR VICTIM. Moreover, the photograph that “Emily Thompson” sent to MINOR VICTIM of a woman in

the hospital during “Emily Thompson’s” statement about her “sick mother” was found in this iCloud account, as depicted (redacted in Indictment) below:



- h. The below image of CHERIF (redacted in Indictment) was found in the bouchrasalaou111@gmail.com account, which was linked to the michaeljhonson020@gmail.com account by cookies:



- i. The above image depicts photographs of CHERIF alongside the name “Australien Ch’co” using a phone number ending in 5765. Law enforcement sent this phone number to Apple Inc. and requested subscriber information. Apple Inc. provided law enforcement with the following response: “Aly Cherif, cherifaly06@icloud.com, 160.154.246.208, DS ID 21565050612;” and
- j. During an open-source lookup for Aly Cherif Instagram accounts, law enforcement found the below photographs (redacted in Indictment) that depicts CHERIF and is associated with Instagram account, aly_cherif41:



In law enforcement's review of that account, they found photographs and videos depicting CHERIF and photographs indicating that CHERIF was involved in Sextortion, including a photograph of six (6) iTunes gift cards amounting to approximately \$1,400 and a photograph of a chat message discussing amounts and gift cards.

COUNT ONE

Cyber Stalking Resulting in Death

The Grand Jury Charges:

1. The Charge. On or about April 8, 2023, in the District of North Dakota,

ALY CHERIF,
a/k/a AUSTRALIEN CHOCO,
a/k/a AUSTRALIEN CH'CO,
a/k/a MICHAEL JHONSON,
a/k/a ALI ALY,

individually, and by aiding and abetting, with the intent to harass and intimidate, did use an interactive computer service, electronic communication service, and electronic communication system of interstate commerce, and any facility of interstate and foreign commerce, namely, the internet and Facebook, to engage in conduct that:

- Caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to MINOR VICTIM by:
 - secretly recording and taking photographs during a video chat of MINOR VICTIM engaged in a private, intimate, or sexual act, including a photograph of MINOR VICTIM's naked penis;
 - threatening to distribute the recording and photographs of MINOR VICTIM engaging in this private, intimate, or sexual act to MINOR VICTIM's contacts on Facebook and over the internet;
 - using the threat of distributing the recording and photographs of MINOR VICTIM engaging in this private, intimate, or sexual act to attempt to extort money from MINOR VICTIM; and

- ultimately distributing the photographs of MINOR VICTIM engaging in a private, intimate, or sexual act, including a photograph of MINOR VICTIM's naked penis, on Facebook.
- MINOR VICTIM committed suicide after CHERIF and the Sextortion Group extorted MINOR VICTIM, and MINOR VICTIM's death was a direct result of CHERIF and the Sextortion Group perpetuating the aforementioned sextortion scheme against MINOR VICTIM. The time between MINOR VICTIM's last message to "Emily Thompson" and the 911 service call to the residence after the MINOR VICTIM committed suicide was approximately twelve (12) minutes.

2. The Scheme. The United States reincorporates into this Count the factual information contained within "The Cyberstalking Sextortion Conspiracy and General Scheme to Defraud" section contained, *supra*, within this Indictment.

In violation of Title 18, United States Code, Sections 2261A(2)(B), 2261(b)(1), and 2

COUNT TWO

Wire Fraud

The Grand Jury Further Charges:

1. The Charge. On or about April 8, 2023, in the District of North Dakota,

ALY CHERIF,
a/k/a AUSTRALIEN CHOCO,
a/k/a AUSTRALIEN CH'CO,
a/k/a MICHAEL JHONSON,
a/k/a ALI ALY,

individually, and by aiding and abetting, with intent to defraud, did:

- a. voluntarily and intentionally devise, intend to devise, and participate in; and
- b. attempt to voluntarily and intentionally devise, intend to devise, and participate in a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing the pretenses, representations, and promises were false and fraudulent when made, and did transmit and cause to be transmitted, by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds;

2. The Scheme. The United States reincorporates into this Count the factual information contained within “The Cyberstalking Sextortion Conspiracy and General Scheme to Defraud” section contained, *supra*, within this Indictment.

On or about April 8, 2023, CHERIF and the Sextortion Group participated in a sextortion scheme that targeted MINOR VICTIM, a fourteen (14) year old boy who lived in North Dakota. CHERIF and the Sextortion Group’s scheme against MINOR VICTIM

consisted of participating in Facebook chat messages with MINOR VICTIM using the name “Emily Thompson,” video recording and taking photographs of MINOR VICTIM during a video chat of MINOR VICTIM engaging in private, intimate, or sexual acts, including of MINOR VICTIM’s naked penis, and threatening to release the video recording and photographs of these private, intimate, or sexual acts to MINOR VICTIM’s friends and family unless MINOR VICTIM paid CHERIF and the Sextortion Group money to prevent the release of the photographs. The time between MINOR VICTIM’s last message to “Emily Thompson” and the 911 service call to the residence after the MINOR VICTIM committed suicide was approximately twelve (12) minutes.

To facilitate this sextortion scheme against MINOR VICTIM, CHERIF and the Sextortion Group:

- a. Obtained publicly available photographs of an attractive woman from the internet and social media sites, who law enforcement identified as a woman using an active Instagram account with the initials M.M.;
- b. Fraudulently used these photographs to create a Facebook account and falsely pose as a woman named “Emily Thompson”;
- c. Contacted MINOR VICTIM through chat on Facebook; and
- d. Falsely stated that they were “Emily Thompson” and that “Emily Thompson” was twenty (20) years old and lived in Montana, when in fact, CHERIF and the Sextortion Group were operating this Facebook account, not a woman named “Emily Thompson”;

- e. Fraudulently obtained a video and photographs of MINOR VICTIM engaging in a private, intimate, or sexual act during a video chat, including a photograph of MINOR VICTIM's naked penis;
- f. Used extortion tactics to attempt to force MINOR VICTIM to pay money so that "Emily Thompson" would not release photographs and videos of MINOR VICTIM engaging in private, intimate, or sexual acts; and
- g. Opened a group Facebook message with MINOR VICTIM's family members and friends on Facebook and distributed photographs of MINOR VICTIM during the video chat, to include a photograph of MINOR VICTIM's naked penis.

MINOR VICTIM committed suicide after CHERIF and the Sextortion Group extorted MINOR VICTIM, and MINOR VICTIM's death was a direct result of CHERIF and the Sextortion Group perpetuating the aforementioned sextortion scheme against MINOR VICTIM.

3. The Wires. CHERIF and the Sextortion Group used Facebook, the internet, and other means to transmit and cause to be transmitted, wire communications in interstate and foreign commerce to and from MINOR VICTIM.

In violation of Title 18, United States Code, Sections 1343, 1349, and 2.

COUNT THREE

Conspiracy to Commit Wire Fraud

The Grand Jury Further Charges:

1. The Charge. On or about April 8, 2023, in the District of North Dakota,

ALY CHERIF,
a/k/a AUSTRALIEN CHOCO,
a/k/a AUSTRALIEN CH'CO,
a/k/a MICHAEL JHONSON,
a/k/a ALI ALY

and others, both known and unknown to the grand jury, did knowingly, willfully, and with intent to defraud, conspire, and agree together, to commit the crime of wire fraud, in violation of Title 18, United States Code, Section 1343, by voluntarily and intentionally devising, intending to devise, and participating in, a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing the pretenses, representations, and promises were false and fraudulent when made, and did transmit and cause to be transmitted, by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds;

2. The Scheme. The United States reincorporates into this Count the factual information contained within “The Cyberstalking Sextortion Conspiracy and General Scheme to Defraud” section contained, *supra*, within this Indictment.

On or about April 8, 2023, CHERIF and the Sextortion Group participated in a sextortion scheme that targeted MINOR VICTIM, a fourteen (14) year old boy who lived in North Dakota. CHERIF and the Sextortion Group’s scheme against MINOR VICTIM

consisted of engaging in Facebook chat messages with MINOR VICTIM using the name “Emily Thompson,” video recording and taking photographs of MINOR VICTIM during a video chat of MINOR VICTIM engaging in private, intimate, or sexual acts, including of MINOR VICTIM’s naked penis, and threatening to release the video recording and photographs of these private, intimate, or sexual acts to MINOR VICTIM’s friends and family unless MINOR VICTIM paid CHERIF and the Sextortion Group money to prevent the release of the recording. The time between MINOR VICTIM’s last message to “Emily Thompson” and the 911 service call to the residence after the MINOR VICTIM committed suicide was approximately twelve (12) minutes.

To facilitate this sextortion scheme against MINOR VICTIM, CHERIF and the Sextortion Group:

- a. Obtained publicly available photographs of an attractive woman from the internet and social media sites, who law enforcement identified as a woman using an active Instagram account with the initials M.M.;
- b. Fraudulently used these photographs to create a Facebook account and falsely pose as a woman named “Emily Thompson”;
- c. Contacted MINOR VICTIM through chat on Facebook;
- d. Falsely stated that they were “Emily Thompson” and that “Emily Thompson” was twenty (20) years old and lived in Montana, when in fact, CHERIF and the Sextortion Group were operating this Facebook account, not a woman named “Emily Thompson”;

e. Fraudulently obtained a video and photographs of MINOR VICTIM engaging in a private, intimate, or sexual act during a video chat, including a photograph of MINOR VICTIM's naked penis;

f. Used extortion tactics to attempt to force MINOR VICTIM to pay money so that "Emily Thompson" would not release photographs and videos of MINOR VICTIM engaging in private, intimate, or sexual acts; and

g. Opened a group Facebook message with MINOR VICTIM's family members and friends on Facebook and distributed photographs of MINOR VICTIM during the video chat, to include a photograph of MINOR VICTIM's naked penis.

MINOR VICTIM committed suicide after CHERIF and the Sextortion Group extorted MINOR VICTIM, and MINOR VICTIM's death was a direct result of CHERIF and the Sextortion Group perpetuating the aforementioned sextortion scheme against MINOR VICTIM.

3. The Wires. CHERIF and the Sextortion Group used Facebook, the internet, and other means to transmit, and cause to be transmitted, wire communications in interstate and foreign commerce to and from MINOR VICTIM

In violation of Title 18, United States Code, Sections 1349 and 2.

COUNT FOUR

Extortion

The Grand Jury Further Charges:

1. The Charge. On or about April 8, 2023, in the District of North Dakota,

ALY CHERIF,
a/k/a AUSTRALIEN CHOCO,
a/k/a AUSTRALIEN CH'CO,
a/k/a MICHAEL JHONSON,
a/k/a ALI ALY,

individually, and by aiding and abetting, with the intent to extort money and other things of value from MINOR VICTIM, did transmit in interstate and foreign commerce, namely through the internet and Facebook, communications containing a threat to injure the property and reputation of MINOR VICTIM, namely, by:

- during a video chat, secretly video recording and taking photographs of MINOR VICTIM engaging in a private, intimate, or sexual act, including a photograph of MINOR VICTIM's naked penis;
- threatening to distribute the video recording and photographs of MINOR VICTIM engaging in this private, intimate, or sexual act to MINOR VICTIM's contacts on Facebook and over the internet;
- using the threat of distributing the video recording and photographs of MINOR VICTIM engaging in this private, intimate, or sexual act to attempt to extort money from MINOR VICTIM; and

- ultimately distributing photographs of MINOR VICTIM engaging in this private, intimate, or sexual act on Facebook, including a photograph of MINOR VICTIM's naked penis.

2. The Scheme. The United States reincorporates into this Count the factual information contained within “The Cyberstalking Sextortion Conspiracy and General Scheme to Defraud” section contained, *supra*, within this Indictment.

In violation of Title 18, United States Code, Sections 875(d) and 2.

COUNT FIVE

Distribution of Child Pornography

The Grand Jury Further Charges:

1. The Charge. On or about April 8, 2023, in the District of North Dakota,

ALY CHERIF,
a/k/a AUSTRALIEN CHOCO,
a/k/a AUSTRALIEN CH'CO,
a/k/a MICHAEL JHONSON,
a/k/a ALI ALY,

individually, and by aiding and abetting, did knowingly distribute any child pornography, as defined in Title 18, United States Code, Section 2256(8), using any means and facility of interstate and foreign commerce, namely, the internet and Facebook, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, by:

- during a video chat, secretly video recording and taking photographs of MINOR VICTIM engaging in a private, intimate, or sexual act, including a photograph of MINOR VICTIM's naked penis; and
- after MINOR VICTIM stated that he was fourteen (14) years old, distributing a photograph of MINOR VICTIM's naked penis on Facebook.

2. The Scheme. The United States reincorporates into this Count the factual information contained within "The Cyberstalking Sextortion Conspiracy and General Scheme to Defraud" section contained, *supra*, within this Indictment.

In violation of Title 18, United States Code, Sections 2252A(a)(2)(A),
2252A(b)(1), and 2.

A TRUE BILL:

/s/ Foreperson

Foreperson

/s/ Mac Schneider

MAC SCHNEIDER

United States Attorney

JJO/js

ATTACHMENT

ALY CHERIF,
A/K/A AUSTRALIEN CHOCO,
A/K/A AUSTRALIEN CH'CO,
A/K/A MICHAEL JHONSON,
A/K/A ALI ALY

