

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
DANIEL DYE,  
Defendant.

Case No. 18cr822-GPC

I N F O R M A T I O N

Title 18, U.S.C., Section  
§ 1037(a)(5) and (b)(2)(E); Title  
18, U.S.C., Sec. 1037(c)(1)(A),  
Title 21, U.S.C., Sec. 853(p), and  
Title 28, U.S.C., Sec. 2461(c)  
(Criminal Forfeiture)

The United States Attorney charges:

COUNT 1  
(CAN-SPAM Act)

Beginning on or about December 27, 2010, and continuing up to and including on or about October 21, 2013, within the Southern District of California and elsewhere, defendant Daniel Dye knowingly and intentionally conspired and agreed with others known and unknown, in a manner affecting interstate and foreign commerce, to knowingly falsely represent oneself to be the registrant or the legitimate successor in interest of the registrant of five or more Internet Protocol addresses, and intentionally initiate the transmission of multiple commercial electronic mail messages from such addresses, and as a result of said

1 conduct, to obtain anything of value aggregating \$5,000 or more during  
2 any 1-year period, in violation of 18 U.S.C. §§ 1037(a)(5) and (b)(2)(E)

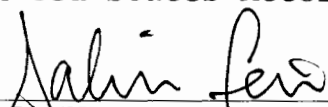
3 FORFEITURE ALLEGATIONS

4 Upon conviction of the felony offense alleged in Count 1 of this  
5 Information and pursuant to Title 18, United States Code, Section  
6 1037(c)(1)(A), Title 28, United States Code, Section 2461(c), and Rule  
7 32.2, Federal Rules of Criminal Procedure, defendant DANIEL DYE shall  
8 forfeit to the United States any property, real or personal, which  
9 constitutes or was derived from proceeds traceable to such violation,  
10 including, but not limited to the sum of no less than \$7,984.00.

11 If any of the above-described forfeited property, as a result of  
12 any act or omission of Defendant DANIEL DYE cannot be located upon the  
13 exercise of due diligence; has been transferred or sold to, or deposited  
14 with, a third person; has been placed beyond the jurisdiction of the  
15 Court; has been substantially diminished in value; or has been commingled  
16 with other property which cannot be subdivided without difficulty, it  
17 is the intent of the United States, pursuant to Title 21, United States  
18 Code, Section 853(p), made applicable herein by Title 28, United States  
19 Code, Section 2461(c), to seek forfeiture of any other property of the  
20 defendant up to the value of the property described above subject to  
21 forfeiture.

22 DATED: February 22, 2018.

23  
24 ADAM L. BRAVERMAN  
United States Attorney

25   
26 \_\_\_\_\_  
SABRINA L. FEVE  
27 MELANIE K. PIERSON  
Assistant U.S. Attorneys  
28