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8 Attorneys for United States of America

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10 **UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

11 UNITED STATES OF AMERICA,  
12  
13 Plaintiff,  
14 v.  
15 JACOB BYCHAK (1)  
MARK MANOOGIAN (2), and  
16 ADBUL MOHAMMED QAYYUM, (3)  
Defendants.

Case No. 18-CR-4683-GPC

I N F O R M A T I O N

(Superseding)

17 The United States Attorney charges that:

18 COUNT 1

19  
20 On or about between December 2010 and September 2014, within  
21 the Southern District of California, defendants JACOB BYCHAK and  
22 MARK MANOOGIAN conspired together and with others to knowingly and  
23 falsely represent themselves to be the registrant and legitimate  
24 successor in interest to the registrant of 5 or more Internet  
25 Protocol addresses, and intentionally initiate the transmission of  
26 multiple commercial electronic mail messages from such addresses,  
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1 in and affecting interstate commerce, in violation of 18 U.S.C.  
2 §1037(a)(5) and (b)(3), a misdemeanor.

3 COUNT 2

4 On or about between December 2010 and September 2014, within  
5 the Southern District of California, defendant ABDUL MOHAMMED  
6 QAYYUM did knowingly and falsely represent himself to be the  
7 registrant and legitimate successor in interest to the registrant  
8 of 5 or more Internet Protocol addresses, and intentionally  
9 initiate the transmission of multiple commercial electronic mail  
10 messages from such addresses, in and affecting interstate  
11 commerce, , in violation of 18 U.S.C. §1037(a)(5) and (b)(3), and  
12 18 U.S.C. §2, a misdemeanor.  
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15 DATED: June 8, 2022

Respectfully submitted,

16 RANDY S. GROSSMAN  
17 United States Attorney

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19 Melanie K. Pierson  
20 Assistant United States Attorney

21 /s/Sabrina L. Fève  
22 Assistant United States Attorney  
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