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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMAJANA HIDIC DEMIROVIC,

Defendant.

CASE NO. 3:21-CR-00133-VC

**GOVERNMENT’S SENTENCING
MEMORANDUM**

Judge: Hon. Vince Chhabria
Sentencing Date: January 5, 2023

I. INTRODUCTION

Ramajana (“Rami”) Demirovic engaged in a 41-month campaign of harassment between 2016 and 2019, with her daughter Ayra Demirovic, an unindicted co-conspirator. Her crime left seven principal victims traumatized, many still suffering today. The principal targets were minors that Demirovic claimed had offended her or Ayra. Between 2016 and 2018, Ayra, now an adult but then in high school, dated a series of teenaged young men—F.H., J.F., and T.V.—and each time, like most high-school romances, the relationship ended in a break-up. Ayra also had a falling out with her female

friend E.F. After each separation, Demirovic, often with Ayra, cyberstalked each victim, usually under the pretense of “protecting” Ayra. The misconduct escalated and became more sophisticated over time. It began with an in-person verbal assault against F.H. She did the same to E.F., though adding direct harassing text messages and calls. When this got her in trouble, she improved her technique by using impersonating or spoof social media accounts, first to torment J.F., and then to persecute T.V.

The cruel campaign against T.V. involved elaborate social-media impersonations and pseudonymous accounts designed to generate hostility and embarrassment in his personal, educational, and job spheres. Demirovic sought to tar T.V.—a kind and polite young man—as a sexual predator. Demirovic, with her daughter, eventually submitted a Title IX complaint to his university based on false accusations and even went to so far as to apply, under oath, for a restraining order in California Superior Court on the basis of fabricated rape allegations. This campaign went on for 17 months—continuing even after a judge ordered Demirovic to cease her conduct against T.V. and his family.

In total, the defendant’s conduct involved hundreds of malicious, deceptive, and abusive communications towards or about the victims, made in Demirovic’s own name, in the name of her daughter, or using pseudonymous accounts. Demirovic succeeded in traumatizing each of the four principal minor victims and their parents. Two families were forced to spend, collectively, tens of thousands of dollars to petition for temporary restraining orders against Demirovic and Ayra. One parent was so overwhelmed that he had to relinquish a job he loved and move his family from their long-time home in California. Several victims suffered severe anxiety, depression, and panic attacks for months or even years after the offense occurred.

Three weeks before trial, Demirovic pleaded guilty to all eight counts in the Second Superseding Indictment: seven counts of Cyberstalking in violation of 18 U.S.C. § 2261A(2)(B) and one count of Conspiracy to Commit Cyberstalking in violation of 18 U.S.C. § 371. The parties signed a C plea, for this Court’s acceptance, with a range of 24-37 months’ imprisonment. The suffering that Demirovic caused, including long-term emotional damage many still suffer from, balanced against her history, and considering all of the factors in 18 U.S.C. § 3553(a), justify a 37-month term of imprisonment.

II. OFFENSE CONDUCT

A. Misconduct against F.H.

In February 2016, F.H., then aged 14 in ninth grade, “dated” Ayra for a few days. PSR ¶ 10. (They went on one date to the movies.) On May 11, 2016, Ayra falsely accused F.H. of ripping a necklace from her neck and punching her in the face at school. PSR ¶ 10. In fact, F.H. did not punch her and Ayra had instigated the incident. Nevertheless, Demirovic came looking for F.H. at school and accosted him in front of other students by threatening to “rip [his] fucking heart out.” PSR ¶ 10.

That same day, Demirovic began texting F.H.’s mother with intimidating text messages that accused F.H. of violence against Ayra, told F.H. never to talk “about” Ayra, and threatened to report F.H. to his school. PSR ¶ 11. As would become her refrain, Demirovic claimed that this conduct was triggered by what she learned from Ayra about F.H.’s supposed conduct. PSR ¶ 11. But Demirovic knew that Ayra’s statements were lies. She texted F.H.’s mother: “I was assured by many classmates who witnessed the entire situation. In fact, one of Ayra’s friends recorded their statements immediately after he had hit her.” There is no evidence of any witness corroborating Ayra’s account. She also threatened legal action should “[F.H.] choose[] to come anywhere close to my child.” PSR ¶ 11. F.H.’s mother shared these distressing text messages with him. *Id.* A school administrator told F.H.’s mother that Demirovic had contacted the school numerous times and threatened to get the administrator fired for not punishing F.H. PSR ¶ 12.

At the time, and into tenth grade, Demirovic served as a “parent liaison” to the school’s vocal department, which Ayra and F.H. both participated in. PSR ¶ 13. This meant that Demirovic was routinely on campus. F.H. said he grew “very anxious” whenever he saw her on campus—at one point, he literally ran to avoid seeing her. *Id.*

Demirovic’s harassment of F.H.—a previously bright and fun-loving child—set the boy onto a dark path. F.H. had been an enthusiastic student but he started skipping vocal rehearsals and school altogether to avoid the Demiroviches. PSR ¶ 13. F.H.’s parents considered withdrawing him from the school altogether. PSR ¶ 11. He grew depressed and eventually dropped out of the vocal program. PSR ¶ 13. F.H. eventually sought therapy as a result of Demirovic’s conduct.

B. Misconduct against E.F.

Beginning in 2015, E.F., then a teenager, was a close friend of Ayra until they had rupture arising from typical high school drama. Ayra badmouthed E.F. to Demirovic, which, in turn, triggered abusive communications by Demirovic. On September 12, 2016, Ramajana called E.F. directly on her cell phone and told E.F. to stay away from Ayra. PSR ¶ 15. Demirovic also accused E.F., falsely, of cyberbullying Ayra. PSR ¶ 15.

As she had with F.H., Demirovic also reached out to E.F.'s mother to continue pursuing E.F. Demirovic left a long, sneering voice message to E.F.'s mother, PSR ¶ 15, in which she said E.F. needed to "leave Ayra alone"; that she had "all kinds" of evidence that she could "take to the police" and "to the courthouse" and could "easily" seek a restraining order; and that she has no problem protecting her daughter. She mentioned children having problems because of "divorced parents" (as she knew E.F.'s mother was). *See* Ex. A (lodged with the Court) (US-DEM-003490). She suggested E.F. was mentally ill. PSR ¶ 15. E.F. listened to this voice message. PSR ¶ 15. Demirovic followed up with texts to E.F.'s mother to say that she had seen "bruises" from when F.H. physically assaulted Ayra. In December 2016, Demirovic texted both E.F. and E.F.'s mother saying E.F. should never say Ayra's name again and, as she had with F.H., threatening to get a restraining order against E.F. PSR ¶ 16.

Again, as with F.H., Demirovic contacted E.F.'s school. In December Demirovic wrote SFUSD administrators to accuse E.F. of "continu[ing] to harass my daughter through friends and online." PSR ¶ 18. Demirovic did so again in February 2017, emailing SFUSD to accuse E.F. of harassing "our family and especially Ayra." PSR ¶ 18. Demirovic said that she was "very clear with her that I would take legal actions if [E.F.] doesn't leave Ayra alone." PSR ¶ 18. E.F., in fact, was leaving Ayra alone.

On December 9, 2017, E.F. went to a concert also attended by Ramajana and Ayra. Afterwards Ayra approached E.F. and told her to "go kill yourself." PSR ¶ 17. Demirovic, standing next to Ayra, laughed at the comments. *Id.* E.F. broke down and cried. *Id.* After this concert, Demirovic sent an email to the concert's organizer expressing concerns about E.F. and stating she was "not sure what else is [E.F.] capable of doing to Ayra." *Id.* In the email, Demirovic repeats the false allegation that F.H. punched Ayra—and accused another, different student of physically attacking Ayra at school. *Id.*

These events left E.F. feeling overwhelmed and suffering from panic attacks. PSR ¶ 19. She developed stomach pains, a racing heart, and anxiety about the possibility of seeing Ayra or Demirovic. *Id.* She feared the Demiroviches and was distraught about the threat of a restraining order. PSR ¶ 16.

C. Misconduct against J.F. and his mother, M.K.

J.F. became Demirovic’s target after J.F. briefly “dated” Ayra in 2016. PSR ¶ 20. They only met twice in person and had a mostly texting relationship for about two months. After the relationship had ended, on July 7, 2016, J.F. received a text from Ayra complaining about his Instagram post with another girl. *Id.* I “just showed this to my friends and my mom,” wrote Ayra, “and we all agree that you are a bigger piece of trash than [F.H.]” *Id.* That same day, Demirovic began calling and texting J.F. directly—then aged 15—saying he should be “condemned.” *Id.*

Demirovic then reached out directly to M.K., J.F.’s mom, over Facebook. In those messages M.K. told Demirovic not to contact her son directly. Despite that request, Demirovic, on August 11, 2016, around 11 p.m., sent another series of text messages to J.F. directly, calling him an “awful human being.” PSR ¶ 21.¹ She wrote J.F.: “In all my life I have never met someone so cruel as you.” When J.F. asked Demirovic not to text with him, as a minor, Demirovic replied: “You’re not a child. You’re an idiot.” *Id.*

On August 23, 2016, Demirovic once more began texting J.F., around 10 p.m., telling him that her husband would “find” J.F. and that “it’s not going to look pretty.” PSR ¶ 22. Consistent with her tactic of threatening legal action over false allegations, Demirovic raised the specter of seeking a restraining order against J.F. and suggested that, when she did so, his college applications would be prejudiced. *Id.* She accused him of “emotional and psychological abuse” of Ayra. US-DEM-003488.

Also on August 23, 2016, Demirovic forwarded a screenshot of a message she had sent to J.F.’s employer—a local retail store—falsely reporting J.F. that was physically abusive, used drugs, and had alcohol problems. PSR ¶ 23. Plainly coordinating this attack with her mother, Ayra then sent J.F. the same screenshot to J.F., stating “you will never, ever threaten me again.” *Id.* Ayra or Demirovic also called J.F.’s employer to further their accusations. J.F. ultimately quit that job out of embarrassment.

¹ The full set of Demirovic’s text message exchanges with J.F. will be attached as Exhibit B. We urge the Court to read them in their entirety.

Around the same time—as she had with both F.H. and E.F.—Demirovic contacted administrators at J.F.’s school and repeated these false allegations. PSR ¶ 23. Administrators at the high school were alarmed by Demirovic’s conduct and moved to bar her from campus. *Id.*

In October 2016, Demirovic escalated her campaign of harassment by using Instagram anonymously to attack J.F. PSR ¶ 24. These communications were sent using three spoof Instagram accounts that used J.F.’s name and images of him. Each used a taunting moniker like “Joe the shit” and “Joe the small dick.” *Id.* Using these accounts, Demirovic mocked J.F. for having divorced parents (a topic she had focused on with E.F.’s mother, too). Demirovic assailed J.F. with messages like: “Daddy left you so you have to be a fuckup,” “It must feel awful that he left you,” “What a sad piece of shit you are,” “Do you cry every night because your daddy didn’t want you,” and “What makes me happy is knowing that you’ll never have a father.” *Id.* (“Piece of shit” is one of Demirovic’s many favored locutions.) Other messages from one of these impersonating accounts included: “I’m a goalie bc I can’t play soccer #daddyissues” and “I also have a small dick and I try to compensate for it by acting superior to everyone 🍷🍷.” US-DEM-INSTA-093516-093552. And this: “Hey you piece of shit. I just wanted to let you know that we laugh at your insecurities. And the fact that she played you makes me really happy.” US-DEM-INSTA-091721.

M.K., J.F.’s mother, learning of these attacks, M.K., sought, on her son’s behalf, temporary restraining orders against both Ayra and Demirovic. PSR ¶ 25. In opposing the TRO, Demirovic filed a declaration dated on March 22, 2017 that falsely accused [J.F.] of “direct[ing] threats of violence to both Ayra and her family” and of “threaten[ing] to kill [Ayra]” during a FaceTime conversation. *Id.*; see Exhibit C. She also accused J.F. of “spreading of false rumors” on social media. *Id.* In her affidavit Demirovic “frankly admit[ted]” that she “texted things in the heat of the moment” that she “wish[ed] [she] had not sent,” but—repeating her refrain—said she was just being a “protective mother.”

The months-long ordeal with Demirovic and Ayra left J.F. fearful and on edge every day. He deleted his social-media accounts, changed his phone number, curtailed his friendships, and began seeing a therapist. PSR ¶ 27. He could not sleep, suffered panic attacks, and his grades declined. *Id.* His mother M.K. hired someone to drive him to and from school and soccer practice to avoid the bus.

Id. J.F.’s promising soccer career, which included Olympic development training, was derailed by his paralyzing fear that the Demiroviches might show up at his practices or games. US-DEM-092485.

M.K. was heartbroken by the abuse of her son. She saw the emotional toll it took on her son and she felt the financial strain from the \$7,500 legal fees they incurred. PSR ¶ 49. M.K.’s chief fear was a false sexual assault claim against her son by Ayra. That would befall the next victim, T.V.

D. Misconduct against T.V. and his parents, W.V. and C.V.

T.V. and his family, including his mother W.V. and father C.V., endured the worst of the Demiroviches’ abuse. The full scope of the harassment—which lasted 17 months—cannot be fully summarized, but what follows are some of the key events and background facts.

Ramajana’s harassment begins shortly after the break-up

T.V. and Ayra dated for about ten months, while at different high schools, beginning around May 2017. PSR ¶ 28. After their separation Demirovic texted T.V.’s mother, W.V., accusing W.V. of “checking” Ayra’s Instagram stories, which Demirovic knew because she had “access to all of [Ayra’s] accounts.” PSR ¶ 41. She also told W.V. that her son had engaged in “psychotic and abusive” behavior and that T.V. had to “publicly apologize” for his behavior. *Id.* She threatened to take “legal steps to stop him from abusing my child.” *Id.* Demirovic emphasized that T.V. was no longer a “minor” (having turned 18 three days before) and that Ayra was still a minor (17 at the time).

On May 17, 2018, as she had with three other students before, Demirovic contacted an administrator at T.V.’s high school. PSR ¶ 29. She demanded that the school remove from its website a student-journalism piece that featured a comment from T.V. about the difficulty of long-distance relationships. *Id.* The innocuous article didn’t mention Ayra by name. *Id.* The administrator found the interaction with Demirovic “strange and worrisome”—so much so, in fact, that he alerted the school safety officer and assured W.V. that he would call the police if Demirovic visited campus. *Id.*

Ramajana begins impersonating T.V.

Then the impersonation began. On May 17, 2018, Demirovic² created a Gmail account using T.V.’s first and last name, PSR ¶ 30, along with “0701” at the end—a name possibly derived from Ayra

² The PSR improperly says Ramajana “and Ayra” created this account. PSR ¶ 30. The government does not doubt that Ramajana conspired with her daughter while creating this account, but the evidence shows that it was Ramajana herself—and not her daughter—who created it. This Gmail

and her brother's years of birth or Ayra's birth month and year. On the day she created it, Demirovic used this account to email an "article" that she had written to T.V.'s actual Gmail account. *See* Exhibit D. Demirovic's article claimed that T.V. was "emotionally and psychologically abusive" (another compulsively used phrase of hers) in his teen relationships. PSR ¶ 31. She also called him "controlling," "manipulative," and "deceptive." The "article" included "possible tags" of T.V., his future college, the words "napoleoncomplex" (intended to disparage T.V.'s height), and named of four of T.V.'s female friends. Using the same impersonating Gmail account, Demirovic emailed T.V., asking him to remove his Facebook profile picture—a picture which depicted only T.V. but that Ayra had *taken*. This email read: "Hey dwarf, remove your Facebook profile picture." US-DEM-043074.

Ramajana sends threatening messages to T.V. and his family

On May 19, 2018, T.V. took another girl to his prom and, *during* the prom, he received hostile text messages from Demirovic about the Facebook picture. PSR ¶ 32. One said: "Hey you piece of shit, remove the picture on your Facebook. You don't deserve to be in any way connected to my daughter." *Id.* Another said: "Do you understand that you're emotionally abusing a minor?" US-DEM-001063. T.V. had a panic attack as a result. That same day, W.V. received a text message from Demirovic's own phone, calling her son a "piece of shit." PSR ¶ 42. W.V. wrote the local police thereafter to report Demirovic's conduct, PSR ¶ 42, and would continue update the police on further events.

Ramajana impersonates T.V., W.V., and C.V. on Instagram

In summer 2018, as T.V. prepared for his orientation at his college, Demirovic created a fake Instagram account using T.V.'s first and last name and image. PSR ¶ 33 and n.3. This account posted snippets of the defamatory article that Demirovic had written and sent to T.V.

At this point the Demirovic inaugurated their technique of using Instagram to generate public opprobrium against T.V. Specifically, on June 6, 2018, the account posted a picture of T.V. at prom with his date side by side with a photo of T.V. and Ayra. PSR ¶ 33; *see* Exhibit E. Fifteen minutes later, Demirovic, using her *own* account, posts: "Stop [T.V.]! This is psychotic behavior." *Id.* Ayra then appeals for help from the public in protecting her from T.V.; several commenters pledge to do so. *Id.* In

account was created using the Demiroviches' home IP address and was linked by the account creator to Ramajana's personal phone.

the same thread, Demirovic, again using her own name, goes after an individual who came to T.V.'s defense: "You just hide behind fake accounts and you're attacking a minor." *Id.* Then Ayra weighs in again, also using her personal account, and tags T.V.'s new college (and thus potentially reaching thousands of classmates or professors online): "Hey @[T.V.'s college and program]! One of your future students, [T.V.], has made a fake account and is posting abusive content to harass me, 3 months after we broke up! Just thought it would be interesting for your institution. I am certain this isn't the type of student you are proud to have in your community!" T.V. was "devastated" to learn that Demirovic and Ayra were trying to broadcast their defamation to future classmates, professors, and administrators.

The impersonating messages continued well into T.V.'s freshman year at college and over the summer. They created a confusing, terrifying, environment for T.V. Several women contacted T.V. after receiving bizarre messages from impersonating accounts that used T.V.'s first and last name. By this point, W.V. had received dozens of calls or emails from parents whose children got messages—or so they thought—from her son. One recipient described how an account, using T.V.'s name, posted a picture of her and T.V. with a caption suggesting that they were on drugs together and warned her, as a female, about him. T.V. tried to reassure the women that the messages were not from him. He grew paranoid that other communications, of which he was unaware, were being sent to women in his college from "him." (The government discovered many communications that he still doesn't know about.)

Demirovic also created impersonating fake accounts of W.V. and T.V. On October 29, 2018, an Instagram account that used W.V.'s name was created. It was registered to an email that used Demirovic's real email address but with a false domain name ("rhidicde@yahoo.com"), as she had done with a previous account. Instagram allows "vanity" or screen names to be changed easily, and at point one Ramajana changed the screenname is "rhidicde" (a variation on her maiden name). (Her IP address and the UUID, a number associated with her phone, further confirm that she created the account.) The account contained pictures of T.V. and references to "little people," a term consistent with Demirovic's "dwarf" insults). (A series of images of pygmy or dwarf animals were found in Demirovic's iCloud account, evidently as part of some further campaign to jeer T.V. and his family's height.) Around this same time, an alleged spoof Instagram account of T.V.'s father, C.V., emerged, using actual photos of him. Demirovic or Ayra created this account, too.

Ramajana and Ayra use pseudonymous and anonymous accounts to harass T.V. and his family

In addition to impersonating accounts, the Demiroviches created several accounts using pseudonyms (e.g., “Lucas Manowitz,” “James Aust”, “Ed Vanderkof,” and “Val Trishman”). Each of these accounts were malicious in unique ways. But they were used to promote common themes: (1) portraying T.V. as a sexual predator (including by reporting he had inappropriately “touched” a woman, stalked and harassed a woman, and had behaved in “creepy” ways); (2) insulting him in the same ways (including criticizing his sexual abilities and mocking his height); and (3) using similar terminology. *See generally* PSR ¶¶ 31, 34, 40.

The Manowitz account, which Demirovic herself created and used, typifies these pseudonym accounts.³ In December 2018, the account targeted T.V.’s family. W.V. received a message referencing “dwarfs,” PSR ¶ 43, calling T.V. a “piece of shit,” and accusing her of “stalk[ing]” his girlfriend at work. (T.V. never stalked Ayra, at work or otherwise.) Demirovic sent a similar message to T.V.’s minor brother. *See* PSR ¶ 44. T.V.’s brother responded by identifying Demirovic as the person behind the keyboard. An antagonized Demirovic let the mask slip in her reply: “You’re fucking laughable. Just tell that piece of shit [that phrase again] to stay away from my girlfriend. We [i.e., Ramajana and Ayra] even have pictures of him following her on [T.V.’s college] campus. And I was with her when your mother liked her pictures on Instagram.... You’re all crazy. Trying to make her look bad while you’re all doing sick things. He needs to leave her alone [that theme again].”

Other messages from Demirovic and Ayra, using this account, insulted or harassed T.V.’s colleagues. On or about January 22, 2019, for instance, one female friend of T.V. was called an

³ To illustrate how the government connected a particular account to Demirovic, the government will mention some of the ways it did so with this account, independent on the *contents* of the account: (1) The account was registered using rhidicghis@hotmail.com, a variant of Demirovic’s real email, although an address that, according to Microsoft, did not actually exist, so was evidently created to evade detection (US-DEM-001515). (2) The screenname was changed multiple times but at one point it went from “rhidicghis” to “lucasmanowitz” and at another from “alskdjbevwjaosldbxfhaffais” to “[T.V.’s name]”. (3) The IP address used to create the account corresponds to Demirovic’s then-home address on Burrows Street in San Francisco (US-DEM-001516); (4) The account was verified using Demirovic’s cell phone (ending in -4655); and (5) Instagram captures universally unique identifier (or UUID) information, which shows which devices (phones, computer, tablets, etc.) accessed a particular account; the same device that accessed this account *also* accessed Demirovic’s two personal Instagram accounts, the three accounts mocking J.F. (e.g., “Joe Thesmalldick”), the account impersonating W.V., two *other* accounts impersonating T.V., the “Ed Vanderkof” account, the “James Aust” account, and so on (US-DEM-001521).

“[u]ntalented fat cow.” US-DEM-001533. Separately, at least three young women contacted T.V. after receiving bizarre messages from an account that bore T.V.’s name. T.V. tried to reassure these women that the messages were not from him. T.V.’s mother would eventually receive dozens of calls or emails from parents whose children got messages—or so they thought—from T.V.

On February 4, 2019, Ramajana used the Manowitz account to send a barrage of furious messages directly to T.V. late one night. *See* PSR ¶ 34. The messages, sent over 40 minutes, included: “You’ll always be an ugly dwarf. Piece of shit. Spineless coward.” “I didn’t know that pikes [a reference to his fraternity] accept dwarfs now,” “You think that being a pike will get you some who would want to fuck a dwarf,” “I mean we’ll always feel sorry for you but secretly laugh at you at the same time,” “Or are you planning on becoming [rapy] like the rest of pikes.”

On March 10, 2019, Demirovic used this account to send messages to at least 21 women who were either classmates of T.V.’s at in college, friends of classmates, or colleagues from high school. PSR ¶ 36. At this point, the Manowitz account shifted back to impersonation, displaying T.V.’s full first and last name as its screenname, so the messages appeared to be coming from T.V. These messages contained statements such as “You’re so hot” or “What do you want me to do to you this time.” *Id.* Demirovic (or possibly Ayra) also repeatedly disparages *Ayra* to these women—while, again, posing as T.V.—saying that he had sexual interest in the woman receiving a message “[e]ven when I was with that crazy bitch,” referring to Ayra. Demirovic also writes, as T.V., to another woman: “I really wanted you when I was with Ayra.”

Once again, many recipients did not initially realize the impersonating accounts were not, in fact, T.V. At least some of these communications were evidently intended to bait the women into saying something about the impropriety of T.V.’s supposed sexual advances toward them. *See* US-DEM-001537-71; 001538; 001539; 001938; 001542; 001551; 001555; 001558; 001937; 001564; 001568; 001977; 001569. Some of these women complained or otherwise communicated directly with T.V. about these messages—thus alerting T.V. to their existence—but most of these women likely remain unaware that the disturbing message they received from T.V. were, in fact, from Ramajana and Ayra.

The harassment continued through the summer 2019. T.V. was *still* hearing from friends concerned about disparagement of him, now emanating from a “James Aust.” For instance, around June

5, 2018, three female friends of T.V.’s received abusive messages from another impersonating account using T.V.’s full name and likeness. On July 23, 2019, another young woman, who had gone with T.V. to a high school prom, received a new round of messages that called T.V. a “dwarf.” She, like others, discovered that Demirovic was following her social-media accounts (including her Venmo account). The young woman also saw, on Demirovic’s *real* Instagram page, a post that she took to convey a threat against the young woman, who attended school in St. Louis, by referencing how there was a “Little Bosnia” in St. Louis, and “not one of these Bosnians are spineless cowards.” US-DEM-098630. (“Spineless coward” is yet another phrase attributable to Demirovic.)

The government has identified as least seven accounts that were used for the misconduct against T.V., many of these accounts themselves containing multiple fake or impersonating screennames. And this memorandum only relates *some* of the hundreds of known communications sent by these accounts. But the government also knows that some accounts were deleted by Demirovic or Ayra before their contents could be obtained, so the government will never have the full catalogue of the communications sent by Demirovic (and Ayra) using T.V.’s name or disparaging T.V. using a pseudonym.

Finally, in February and March 2019, Demirovic had turned to another social media platform—a website called greekrank.com that offer forums to discuss college fraternities—to disparage T.V. The postings feature Demirovic (whose personal email was used to create the account, at the Burrows Street address) posing as an anonymous victim of T.V.’s supposed sexual predations and warning women to protect themselves against him. One post read: “there is a really creepy guy in pike who’s been harassing girls on campus and touching them inappropriately, he’s really short and has blond hair and blue eyes. new recruit.” US-DEM-003339. Another post provides a phone number for women to report him. One of commentator recommended that Demirovic reach out to the university’s Title IX office—which is exactly what Demirovic and Ayra soon did. US-DEM-001110.

Ramajana and Ayra submit false allegations to the Title IX Office

On March 2, 2019, Demirovic sent an email to T.V.’s school’s Title IX office alleging that T.V. had been harassing or touching girls at the college inappropriately. PSR ¶ 35. She also alleged that T.V. had stalked Ayra during a claimed visit to Ayra to campus. A few days later, Ayra had an interview with the Title IX office and followed up with a written “list of concerning behavior” of T.V. in which

Ayra repeated the claim that T.V. stalked her during a campus tour. PSR ¶ 35. On March 13, 2019, Demirovic again emailed the Title IX office stating that T.V. “has been on a mission to destroy my daughter’s reputation in addition to making her feel uncomfortable, threatened and fearing for her life.” She accused T.V. of offering the college “lies and fabricated evidence” but that her effort to “collect[] evidence” against T.V. was difficult because he “very manipulative and hides his identity.” US-DEM-003259. Demirovic also wrote that she and her husband were “in shock at how disgusting of a human being [T.V.] is and we genuinely fear that he might hurt our child.” Demirovic also assured the school: “I will state this again: we have not engaged in or initiated any contact or conversation with him, his friends or his family since April of last year.... Absolutely no contact was made with [T.V.], his relatives and his friends by Ayra or anyone else on her behalf.”

An investigator employed by the university looked into Ayra’s claims. He found that Ayra and Ramajana had visited the college’s public safety department in person and provided “detailed times and locations” where T.V. supposedly “stalked Ayra during Ayra’s visit to the campus.” US-DEM-097960-63. But the investigator found nothing to corroborate their accusations (including by reviewing campus security footage) and determined that T.V. was in fact a victim, not an aggressor. PSR n.4.

Ramajana visits T.V.’s home and foreshadows a fake rape claim

By July 2019, T.V.’s family retained counsel and filed a defamation lawsuit against “Doe” defendants as a means of obtaining proof of the Demiroviches’ conduct. On July 19, 2019, Facebook, which had been subpoenaed for documents, notified Demirovic via email that someone was seeking access to her records. Hours later, Demirovic fired off an email on July 19, 2019 to W.V. and C.V. saying that she was “really in shock” that they had “submitted” a “criminal case” against Ayra. *See* Exhibit F (US-DEM-002275). Demirovic claimed that T.V. had abused and cheated on Ayra that caused Ayra to struggle “emotionally and psychologically.” She claimed that this required Ayra to remain surrounded by family 24 hours a day. *Id.* (Actually, a few days earlier, Demirovic told her Instagram followers that Ayra was traveling in Italy by herself and “having a fabulous time” there.) Demirovic “beg[ged]” T.V.’s family to “leave [Ayra] alone” and suggested that T.V. inflicted “damage” on Ayra such that she had attempted suicide. She writes that she was sending the message “in good faith and in hopes that our kids could try and move on.” Demirovic then goes on to say that she “heard” that

T.V. was selling drugs and had “raped” a girl. PSR ¶ 45. She adds: “We are not spreading rumors. We are relating to you what we know in hopes that you can help him.” T.V.’s family interpreted this as a threat that Demirovic and Ayra would claim T.V. was a rapist. Demirovic concluded: “Our child’s life is in danger and we really need your help to stop [T.V.] in hurting her more.”

In the email, Demirovic noted that she had tried to visit T.V.’s family at their home to speak in person. Nest camera footage showed that she did just that, around 12:30 pm on July 19, 2019. No adults were home, but T.V.’s little brother was. T.V.’s family found Demirovic’s visit to their house terrifying and, as a result, they installed new security measures. PSR ¶ 45.

T.V. and his family receive a TRO, which Demirovic violates

T.V. and his family applied for restraining orders on July 23 and 24, 2019 against Demirovic and Ayra, respectively, seeking protection for T.V., his parents, and his brother. PSR ¶ 37. On July 23, 2019, the court granted the temporary restraining order against Demirovic, until a further hearing, and did the same for the TRO against Ayra the next day. PSR ¶¶ 37-38.⁴ After the court issued the TRO against Demirovic, Demirovic sent further emails to T.V.’s college’s Title IX office. These emails violated the protective order. That order prohibited Demirovic from engaging in acts that (among other things) “[h]arass,” “intimidate,” “molest,” “stalk,” “[c]ontact” directly or indirectly, or “impersonate” those protected. PSR ¶ 37. Yet on October 11, 2019, Demirovic emailed the Title IX office (framed as a follow up to her March 2019 communication to Title IX about T.V.) and said that she and her daughter were “collecting evidence” and working on bringing “criminal charges” and a restraining order against T.V.—but that he had “unfortunately” beat us to the temporary restraining order. US-DEM-003241. On October 14, 2019, Demirovic sent yet another email to a Title IX administrator:

My daughter Ayra and I reported [T.V.] to your office for harassment earlier this year. We have recently learned that [T.V.] is working on a case against my daughter and/or myself, most likely in retaliation to our actions of reporting him for harassment. He is trying to frame both my daughter and myself for online bullying. Both my daughter and I are working on a civil case against him.

⁴ Demirovic tried to evade service but in any event she received formal service no later than October 13, 2019. On October 24, 2019, a San Mateo County Superior Court judge granted the request for a permanent, multi-year restraining order. Demirovic did not appear to contest the proceeding. PSR ¶ 37. A separate domestic violence restraining order was granted against Ayra. PSR ¶ 38.

See PSR ¶ 39. That day Demirovic sent a second email to a Title IX official, calling T.V. an “abuser” and suggesting that T.V. “illegally acquired” information that Demirovic and Ayra sent to the college. She added that she and her husband were “terrified” that T.V. “might do something to [Ayra].”⁵ US-DEM-086964.

Ayra falsely accuses T.V. of a violent rape

After T.V. had filed a TRO against Ayra, on August 23, 2019, Ayra, evidently in retaliation, sought her own TRO against T.V. It was granted *ex parte*, in San Francisco County, on the basis of an affidavit that claimed that T.V. had violently raped her at her home in on February 25, 2019, just before they broke up.⁶ The petition also claimed that T.V. “threatened” the lives of the Demirovic family. Ayra did not show up at the hearing on it on September 6, 2019, so the temporary restraining order soon expired by law. This allegation was perhaps the single most extreme and outrageous attempt to portray T.V. as a sexual predator. It is inconceivable that Demirovic was not fully aware of the petition and the government believes that she helped draft the affidavit in whole or part.

That rape allegation—made under penalty of perjury—was false. The evidence disproving Ayra’s claim is extensive. The government summarizes part of it as follows: (1) Historical phone location data showed T.V. was at his home by 11 p.m. or so on the night of rape that Ayra claimed happened after 3 a.m.; (2) Text messages and phone location data show T.V.’s parents picked him up from Ayra’s home around 10:45 p.m. on February 25, driving from the peninsula and back. (3) T.V. retrieved his keys from Demirovic before leaving through the front door, so Demirovic knew that T.V. was not actually in her home at 3 a.m. (4) The rape allegation was first made *only after* to T.V.’s TRO request and Ayra claimed in her allegation that this was the “first” time she had disclosed the rape, but her mother had already mentioned the rape allegation in a July 19 email to T.V. and W.V. (saying she

⁵ On October 21, 2019, Demirovic sent Ayra a draft email (apparently for Ayra’s review) addressed to a university official and sent it to Ayra, apparently for review. In the draft Demirovic accuses W.V. and T.V. of “launch[ing] an online attack on both [Ayra] and myself” beginning in April 2019. Demirovic writes that T.V. “claims that he’s been impersonated and harassed by us.” Demirovic says that she is working on a case against T.V. for “psychological, emotional, and sexual abuse” and suggests that T.V. obtained Demirovic and Ayra’s statements from his college through “hacking.”

⁶ The government has filed the full TRO application under seal as Exhibit G. As described in the separate motion to seal, it urges the Court to seal the TRO application to not further disseminate the blatant—and harmful—lies contained within it and hence to avoid re-victimizing T.V. and his family.

had “heard” that T.V.” had “raped” a girl). (5) In the allegation, Ayra claims to have incurred \$10,000 of medical and psychiatric expenses at UCSF hospital but subpoenas returns from UCSF, including billing information, do not corroborate that claim. (6) Ayra claimed to have photographic evidence of her injuries, but despite Demirovic’s insistence that the rape occurred, she has never offered that for use at trial or any other purpose. (7) At the beginning of her affidavit, Ayra includes a lengthy narrative of her purported personal accomplishments (presumably to boost her credibility) and subpoena returns prove most of them to be lies; for instance, she was rejected by Princeton, did not get a “perfect score” on her SAT, did not graduate top of her class, did not receive any awards from the National Merit Scholarship Corporation, and did not receive a White House award for “Presidential Gold Recognition of Achievement in Academics and Community Service” (no such award exists). (8) Although the government recognized that credible allegations of sexual abuse must be taken seriously, the testimony about the rape is implausible in its TV-show dialogue and excessive brutality. (9) Ayra received a TRO *ex parte* but then did not even bother showing up to defend her accusation or provide evidence a few weeks later, which was necessary to allow the order’s extension. (10) The Demirovic pattern is to invent shocking allegations, the circulate them, but, curiously, they did not do so with this rape allegation, despite its obvious shock value. This suggests that they thought better about broadcasting Ayra’s perjury. (11) Demirovic drafted an affidavit for her husband in October 2019, apparently for new cyberstalking activity against T.V.’s family, in which Demirovic wrote, discussing Ayra’s supposed rape, that: “My daughter hid from us that [T.V.] raped her until July 2019.” Yet in her post-arrest interview with the FBI, she told investigators that she learned of the rape “days” after it occurred. PSR ¶ 46. (12) Ayra claimed on the night of the rape that she was consoling T.V., who cried for “four hours,” until 2 a.m.—but her Instagram account shows that, in the midst of this drama, she found time to message on Instagram about selling designer dresses. US-DEM-INSTA-070643.

T.V., W.V., and C.V. suffer significant emotional distress

The emotional distress suffered by T.V. and his parents W.V. and C.V. is staggering. In a September 2019 interview with the FBI, T.V. recalled its depth: he spoke about how he had been threatened by Demirovic’s husband, Aladin, one evening, when Aladin suggested he would physically hurt T.V. if T.V. broke Ayra’s heart. He recalled the sense of dread when texted by Demirovic in the

middle of his prom; the sinking feeling of learning that a girl he had been on a date with the night before been contacted from a Demirovic-controlled account. He characterizes his experience as a harrowing ordeal of social sabotage and said that he *still* feels frightened, in danger, and paranoid. He clearly remains damaged—suspicious and unable to form normal relationships. Recently he was contacted by a recruiting company but refused to respond for a time out of fear that it was an attempt to get information about him by Demirovic or Ayra. He believes that the campaign permanently damaged his reputation and friendships. He suffered panic attacks and still remains in therapy. T.V. worries that the Demirovic campaign will resume once the restraining order, or supervised release in this case, expire.

His family suffered immensely, too. In January 2021, W.V. told the FBI that the Demirovic’s campaign “destroyed our family.” C.V. had been a partner at a prominent consulting firm and gave up that job, which involved substantial travel, because of the emotional and other burdens put on him by the Demirovic’s cyberstalking. PSR ¶ 45. He found the angst of waiting in vain for the impersonations to end profoundly distracting and enervating. On multiple occasions, for instance, he had to leave a client’s site and fly home to support a reeling family. He has a new job but makes half of his old salary. C.V. and W.V. spent about \$140,528 litigating to protect themselves against the Demiroviches. PSR ¶ 49. Their financial losses also include therapy expenses, lost work time, and home-security measures. The family also sold their home in San Mateo due to the financial costs and moved to another state. W.V. said that these events are the “hardest thing we have ever gone through.”

III. GUIDELINES CALCULATION

The government and the defendant agreed to the following Guidelines Calculations in the plea:

a.	Base Offense Level, U.S.S.G. § 2A6.2(a):	18
b.	Specific offense characteristics under U.S.S.G. Ch. 2	
	– Pattern of activity involving stalking, threatening, harassing, or assaulting the same victim [§ 2A6.2(b)(1)(E)]	+2
	– Violation of a court protection order [§ 2A6.2(b)(1)(A)]	+2
c.	Acceptance of Responsibility:	-2
d.	Adjusted Offense Level:	20

The parties recognize that they incorrectly grouped the Cyberstalking counts and that, as a result, a multiple count adjustment applies. The government now agrees that, as a matter of law, the PSR's calculation is correct and that a Total Offense Level of 25 applies. PSR ¶ 111. Nevertheless, the government stands by its plea agreement. Under the terms of that plea, the parties agreed that a reasonable and appropriate disposition sentence is imprisonment for a term of no less than 24 months, and no more than 37 months, with the precise term to be determined by the Court from within this range; 3 years of supervised release; \$100 special assessment per count; restitution to be determined by the Court at the time of sentencing; and a fine as determined by the Court.

IV. UNITED STATES' SENTENCING RECOMMENDATION

The government respectfully requests a sentence of 37 months.

Cyberstalking is relatively new crime. The prohibition in 18 U.S.C. § 2261A was enacted only in 2006.⁷ Cyberstalking bears similarities to traditional stalking or to cyberbullying but it is distinguished by a perpetrator's effort to destabilize a victim's life without seeking to physically injure or even interact directly with a victim. Cyberstalking can involve various types of wrongdoing—defamation, impersonation, abuse of process, and spying, for example—but, in the end, it remains focused on (1) harassment and intimidation as the conduct and (2) emotional distress as the harm. Section 2261A(2)(B) effectively establishes a federal offense of criminal infliction of emotional distress.

Congress recognizes the ever-growing devastation inflicted by cyberstalkers by continually fortifying its criminal prohibitions on this antisocial behavior. The original 2006 law was broadened in 2013 to prohibit not only the actual causing of emotional distress but “attempts to cause” or acts that “would be reasonably expected to cause,” this distress. Then in the Combat Online Predators Act—effectively only as of December 22, 2020, and for that reason inapplicable to Demirovic's conduct—Congress added an “[e]nhanced penalty for stalkers of children,” adding increasing the statutory maximum exposure to ten years. As put by Edward J. McAndrew, a former prosecutor who once led U.S. Department of Justice efforts against cyberstalking, the explosion in cyberstalking arises from the “ubiquity of digital technology in daily life, and the ease with which stalkers can weaponize devices,

⁷ For a *New York Times* article that describes the phenomenon at time of section 2261A's enactment, see <https://www.nytimes.com/2006/04/17/technology/17iht-stalk.html>

data and online platforms.”⁸ Cyberstalking is largely underreported by victims (who often don’t know who is behind the keyboard) and underenforced by law enforcement (for whom investigation is usually difficult and often fruitless). Danielle Keats Citron, *Hate Crimes in Cyberspace* (2014), at 30, 85.

Demirovic’s conduct here was not merely irritating, annoying, or offensive. It was obsessive, outrageous, devastating, and criminal. By contrast to what one typically finds in the anti-*stalking* case law, this case does not involve weapons, communications directed only at a single person, or sexual or violent imagery. What this case involves, instead, is something mostly new to the federal case law: an extended campaign of malice, largely carried on through anonymous social media accounts, meant to sabotage the lives of young men and women by undermining their sense of emotional peace and physical safety, their social relations, their jobs, their academic life, and their reputation.

The remainder of this memorandum will highlight some summary themes.

1. Demirovic was always the aggressor—not the protector.

Demirovic has claimed at times that she was merely avenging wrongs.⁹ This is common from cyberstalkers.¹⁰ But it isn’t true here. For one thing, her persistent attacks were outrageously disproportionate to the supposed slights. She did not protect her child; she only damaged other children. Again and again, Demirovic, as shown above, invented some ground to assail her victims.

Nor can she claim that she was fed bad information from her daughter and overreacted as a result. She knew she was acted on the basis of pretexts. Some examples: In May 2016, Demirovic went after F.H. after she claimed that was personally “assured by many classmates who witnessed” F.H. assault Ayra and said she saw “bruises” on Ayra as a result. But these claims, like Ayra’s claim, were fabrications. So, too, in December 2018, she wrote T.V.’s younger brother to say that she had “pictures”

⁸ *United States v. Matusiewicz*, 2017 WL 4950102 (C.A.3) (Brief for Amicus Curiae Victim Services and Advocacy Organizations in Support of the United States and Affirmance of the Judgments of Conviction), at *9.

⁹ The government was found little evidence of the harm to *Ayra* that Demirovic has claimed from time to time. For instance, Ayra, in late December 2019 Instagram post, wrote: “👉 2 0 1 9 👈 i can say with confidence that 2019 was truly the best year of my life thus far!!”

¹⁰ *See, e.g., United States v. Osinger*, 753 F.3d 939, 941 (defendant “would do anything” to reunite with girlfriend); *United States v. Cook*, 542 F. App’x 698, 699 (9th Cir. 2013) (unpublished) (defendant told target that “[y]ou’re going to pay for the pain you’re putting me through”); *United States v. Grob*, 625 F.3d 1209, 1212 (9th Cir. 2010) (“To put it mildly, Grob did not take the end of either the pregnancy or the relationship well”).

of T.V. “following” Ayra on T.V.’s campus, US-DEM-001103, and reported the same thing to T.V.’s university. In fact, security cameras disproved anything of the sort. Similarly, in December 2018, Demirovic wrote W.V., under an invented name, to say: “Hey do me a favor and tell that piece of shit [T.V.] that if he goes to my girlfriend’s work one more time or stalks her anywhere else that he’ll have to deal with me. There are video cameras at her work and people who can testify that he was there.... It’s time for him to stop.” US-DEM-001530. Another lie.

At other times Demirovic generated the pretext. For instance, Demirovic and her daughter posted an Instagram message, posing as T.V., that insulted Ayra, before Demirovic began her own attack: “Stop [T.V.]! This is psychotic behavior.” *See* Exhibit E (US-DEM-092606).

2. Demirovic’s conduct was characterized by deceit and hypocrisy.

Demirovic spent months accusing victims (and others) of doing precisely what she was herself doing: cyberstalking, impersonating, abusing, slandering, threatening, not letting go.

Demirovic told J.F. in a text message in July 2016 that “[t]rolling” Ayra on social media was “unacceptable.” Ex. B (US-DEM-002391). Then she proceeded to troll J.F. mercilessly. She admonished J.F. to “take responsibility” for his “cyber bullying.” Ex. B (US-DEM-002392). They she cyberbullied him anonymously and lied about it to a court. She told J.F. to “[g]et out of our lives.” Ex. B (US-DEM-002395). J.F. would have liked nothing more—but Demirovic wouldn’t let him. And so J.F. and M.K. were forced to spend thousands of dollars to seek a TRO against Demirovic.

In June 2018, using her personal Instagram account, she berated an Instagram user (who was apparently defending T.V. against one of Ayra’s attacks): “You just hide behind fake accounts and you’re attacking a minor.” Which is precisely what Demirovic herself did.

Demirovic liked to fault the parenting of others, even as she abused children in her own daughter’s presence and encouraged her daughter to become an abuser. Stranger yet, she claimed to be protecting Ayra’s reputation, but then badmouthed Ayra *herself* as part of her attacks, calling her a “bitch” who “cheated” on her boyfriend T.V., US-DEM-001559,¹¹ or telling others that Ayra is a

¹¹ This provides a striking contrast to Demirovic’s “Hannah Rose” article, in which she accused T.V. of “accusing her of sleeping with her guy friends.” Ex. D (US-DEM-043076).

“heartless bitch” who “fucked another guy six months into [her] relationship” with T.V. and who, Demirovic said, posing as another person, “trying to expose.” US-DEM-001284-001289.¹²

She texted T.V. directly to write: “Do you understand that you’re emotionally abusing a minor?” Of course, that was one the thing that *she* needed to understand. Or in February 2019, using the Manowitz account, she sent a message to one of T.V.’s friends, whom she evidently accused of maligning Ayra, to say: “You know you can be prosecuted for what you did?” US-DEM-001534.

Later, impersonating T.V. in January 2019, Demirovic got into an abusive exchange with T.V.’s younger brother. Demirovic wrote: “You’re fucking laughable. Just tell that piece of shit to stay away from [Ayra].... You’re all crazy [referring to T.V. and his family]. Trying to make her look bad while you’re all doing sick things. He needs to leave alone.” US-DEM-00153. T.V. wished he had never met Ayra, but it was Demirovic doing the sick things and who just couldn’t leave T.V. alone.

In March 2019, in her effort to get T.V. punished by his university, Demirovic lied to the school, writing that T.V. was on a “mission to destroy my daughter’s reputation,” adding: “I will state this again: we [i.e., Demirovic and Ayra] have not engaged in or initiated contact or conversation with him, his friends, or his family since April of last year,” when they broke up.

In public she posed as a thoughtful activist, eager to support cyberstalking victims. For instance, in December 2019, she promoted on her personal Instagram account a group that helped cyberstalking victims. “Please please please share this information with your students, daughters, relatives or any girl you know. Technology has allowed abusers to continue to abuse their victims long after they leave them.” US-DEM-INSTA-000364. The author of this message had just completed a 17-month campaign of cyberstalking against a boy that broke up with her daughter a year and a half earlier.

Her lies were not just limited to social media posts. She lied to a *court*, repeatedly. In March 2017, Demirovic, opposing J.F.’s TRO request, submitted an affidavit in which she denied sending any “derogatory” messages to J.F. and disclaimed creating “false social media accounts impersonating him.” US-DEM-003500. She swore that the “last time [she] had any communications or contact with [J.F.]

¹² Compare this to her message to J.F. in August 2016: “Please send me screenshots of your posts. I need to make sure that you’re not spreading hateful messages about my daughter.” Ex. B (US-DEM-002393.)

was on or around August 23, 2016 by way of texts.” Ex. C (US-DEM-003497). Yet she used three cruel, taunting Instagram accounts to contact J.F. in *October* 2016. She also “admit[ted]” that she “texted things in the heat of the moment” that she regretted. Ex. C (US-DEM-003495). Yet she sent even more vicious messages months later, after the heat of the moment. She also asserted: “As for social media, I am of an age that I frankly do not understand the subtleties of social media – I do my best to be able to merely log-in and view what is present.” *Id.* In fact, she had mastered Instagram impersonation.

Later she lied to the FBI. She told agents in an August 2021 custodial interview that she had nothing to do with the pseudonymous or spoof Instagram accounts and denied communicating with T.V. in any form after his breakup with Ayra. “We didn’t respond to anything he’s done,” she said. “We moved from San Francisco to Brentwood to escape from him.” Demirovic also said: “I didn’t want to get involved with him, because that family is insane, there’s something wrong with them.” PSR ¶ 46.

The government recognizes Demirovic’s claim that she was a victim of traumatic events when young. But a tragedy like that alone does not make a person into a cyberstalker of children. Demirovic made choices. And she knew from her childhood experience what was right and what was wrong. A few years ago she spoke at a panel discussion after a screening of a documentary that featured her and other victims of genocides (called *Faces of Genocide*). She told that audience that, as a survivor, it was her “responsibility to teach everybody around us compassion and courage.”¹³ Instead she behaved with malice and cowardice. She taught those traits to her daughter, who acted in lockstep with her mother to torment victims. And she taught several minors to fear romantic relationships and female friendships.

3. Ms. Demirovic was conscious of the effect of her conduct and took pride in it.

Demirovic inflicted the specific harm that she intended to cause. Her own expert witness, Dr. Jane Christmas, wrote that Demirovic claimed an “omnipotent, irredeemable and absolute entitlement” to pursue minors who she believed had crossed her daughter—and so “became their judge, juror, and executioner.” She also found a defendant driven by “resentment and hostility towards other people” and with “little empathy for the [victim] boys and no remorse.” Dr. Christmas observed that Demirovic remains convinced that her victims “got what they deserved.” Doc. 76 (United States’ First Motion in

¹³ “Survivors Panel Discussion,” Nov. 17, 2018, *available at* <https://vimeo.com/32064893>, 15:08-15:13.

Limine—To Preclude Testimony by Defense Expert Dr. Jane Christmas) at 10. In this Demirovic only repeated the statements of March 2017 affidavit, where she responded to J.F.’s assertion that her late-night texts to him “stressed [him] out.” Demirovic told the Court that J.F. “should have been ‘stressed out,’” adding that she meant for her texts to make him “uncomfortable and ashamed.” Ex. C (US-DEM-003497).

Demirovic acted to impose maximum damage on T.V.’s life in particular, but in ways calibrated to lend verisimilitude and believability to her efforts. For instance, she limited public allegations of sexual impropriety against T.V. to claims of inappropriate touching, or posed as a woman who didn’t know T.V. by name but who had observed him in action and so sought to warn others about him. In messages to T.V.’s female friends, Demirovic insinuated T.V.’s romantic interest in them—but without coming off so strongly that the communications would be immediately apparent as a hoax.

Demirovic at times seemed to derive a dark joy from her abusive conduct. For instance, in October 2016, she told J.F., using the “joeisshit” account, that “we”—meaning her and Ayra—“laugh at your insecurities.” She said to T.V. in February 2018: “[I]t doesn’t matter how shitty our lives really are when we see you we feel good because it can’t be as shitty as yours.” US-DEM-001536.

4. Ms. Demirovic had multiple opportunities to stop her conduct.

Demirovic felt angered and aggrieved by the typical high-school conduct of several children and, in response, sent four them into therapy. Along the way, Demirovic had multiple occasions in which she was put on unmistakable notice that her conduct was unacceptable and likely illegal.

Being barred from the campuses of two high schools didn’t stop her.

Complaints from angry parents didn’t stop her.

Two court orders against her *in a single year* didn’t stop her. J.F.’s TRO against Demirovic was entered on February 6, 2017. PSR ¶ 25. The judge told Demirovic not to “harass, intimidate...or disturb the peace of [J.F.]” *Id.* Yet on February 24, 2017, Demirovic emailed school officials to say that J.F. had “threaten[ed] to kill” Ayra and “manipulated the evidence for his claims” against Ayra. *Id.* T.V. recalls Demirovic telling him that although she and J.F. had mutual restraining orders against each other, “there are still ways” that Demirovic had to make J.F.’s life “hell.” US-DEM-098695.

M.K. and J.F. wanted their restraining order to be public in the hope that it might help a future Demirovic victim—and it did. W.V. found it online after T.V.’s break-up and contacted M.K.’s lawyer. The lawyer warned W.V. that her son was likely to soon become the victim of a crime. This helped W.V. and C.V. begin documenting the attacks. That critical work helped the government solve the case.

T.V. and his family later obtained their own protective order. Demirovic flouted that one, too.

Demirovic repeatedly took exactly the wrong lessons. The campus bans and school and parent outrage taught her not that her conduct was antisocial, but that it would be wiser for her to take her campaigns online, where she could attack children anonymously, from a distance.

Instead of pausing to weigh the legal consequences, she used legal consequences as a bludgeon against victims. In February 2017, she told E.F. that she would “take legal actions if [E.F.] doesn’t leave Ayra alone.” US-DEM-002805. She told J.F. that you “will get a restraining order because you are engaging in emotional and psychological abuse.” US-DEM-003488. She told T.V. that she was considering “going down to the police station” to “file a report against you.” US-DEM-001945. Then she and her daughter procured a TRO against T.V. on the basis of perjured statements. *See* Ex. G.

Demirovic knew her conduct was wrong. In her March 2017 affidavit she acknowledged: “I should not have been texting a youth under any circumstances. Frankly, I am embarrassed by my texts.” Ex. C (US-DEM-003498). But this was insincere. She went on to do the same thing to T.V. She just refused to get the message. She logged into one of her spoof Instagram accounts to attack T.V. on the *very day* set for the hearing with J.F. on his TRO request. US-DEM-092599, -003494. She created the fake Instagram account using W.V.’s name in October 2018, *two days* after J.F. obtained the TRO against her for engaging in similar conduct.

On many days, it seemed like Demirovic treated cyber-bullying children as her full-time job.

V. CONCLUSION

In the end, perhaps the most important exercise that this Court can engage in is to try to imagine what it must have been like to be a victim like T.V. Only that can begin to convey the horror of Demirovic’s crime. Imagine what it must have been like to suffer the uncertainty of not knowing exactly where these attacks were coming from, when they would stop, who they were reaching, or what line would be crossed next. Certainly T.V. knew that Ayra and Demirovic were behind it all, but the

