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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA           :     Hon. André M. Espinosa  
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  :     Magistrate. No. 22-11228  
  :     :  
GAWARGYOUS SHIND                 :     :  
a/k/a “George”                       :     **CRIMINAL COMPLAINT**  
  :     :

I, Gary W. Cobb, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Federal Bureau of Investigation (“FBI”), and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

*/s/ Gary W. Cobb*

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Gary W. Cobb, Special Agent  
Federal Bureau of Investigation

Special Agent Gary W. Cobb attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 22nd day of August, 2022.

*/s/ Hon. André M. Espinosa*

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Hon. André M. Espinosa  
United States Magistrate Judge

**ATTACHMENT A**

**Count One**  
**(Cyberstalking)**

From at least in or about April 2020 through in or about November 2021, in the District of New Jersey and elsewhere, defendant,

**GAWARGYOUS SHIND,**  
**a/k/a “George,”**

with the intent to kill, injure, harass, intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person, used the mail, interactive computer services and electronic communication services and electronic communication systems of interstate commerce, and other facilities of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person, namely, Victims-1, 2, 3, and 4 (the “Victims”); to wit, SHIND engaged in a campaign of harassment, intimidation, and threats against the Victims, including by sending harassing, threatening, and intimidating text and other electronic messages to the Victims.

In violation of Title 18, United States Code, Section 2261A(2)(B).

## **ATTACHMENT B**

I, Gary W. Cobb, am a Special Agent of the Federal Bureau of Investigation (“FBI”). The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including images of text messages and other electronic communications sent through online messaging systems. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

### **Background**

1. Beginning in or around October 2020, the FBI began investigating a series of incidents involving the harassment of at least four (4) women (collectively, the “Victims”) through various means, including telephone text messages, electronic messages, and computer messages, also known as cyberstalking.

2. The investigation has revealed that since in or about April 2020 through at least in or about November 2021, the Victims have been targeted by an individual identified by law enforcement as the Defendant, GAWARGYOUS SHIND (a/k/a “George”) (“SHIND”). The investigation has revealed that SHIND engaged in a campaign of harassment and threats of grievous physical injury or death towards the Victims with whom he was previously acquainted through their mutual employment at an international investment bank with an office located in Jersey City, New Jersey (the “Bank”). SHIND was employed by the Bank until May 2019, when he was terminated for violating the Bank’s Code of Conduct.

### **Specific Activity with Respect to Victim-1**

3. On or about August 29, 2020, Victim-1 received a text message from a phone number saved in Victim-1’s phone as “George New Number 2,” a prepaid telephone (“Prepaid Phone 1”),<sup>1</sup> which stated:

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<sup>1</sup> Based on my training and experience, prepaid cell phones, also known as burner phones, can be purchased anonymously, by paying with cash or a prepaid credit card in a store. The activation and use of a prepaid cell phone

*Ur prey and I'm the predator. Don't ever forget I know where u sleep. I know what train line u take, and I know where u work. Just ask ur lil friend there's nothing anyone can do to help. I'll be the last person u ever cooperated against. They used u and left u for me. I swear ur done for. If I have to touch ur family to get at u then so be it. That includes ur niece.*

4. Law enforcement identified SHIND as the user of Prepaid Phone 1 because it was saved in Victim 1's phone as "George New Number 2," and because of the contents of the message, namely the belief that Victim 1 "cooperated" against him by reporting his inappropriate workplace conduct to the Bank.

5. On or about September 24, 2020, Victim-1 received the following text message from a second prepaid telephone ("Prepaid Phone 2"), which stated:

*I swear that everyday I'm going to wait outside for you the path train and I will fucking split your skull open. Ur fucking dead cunt. Show [the Bank] and let them know the same is true for [other employees from the Bank]. I threatened [Victim-2] with her life and the prosecutor just dropped the charges. Each of u are dead. Luckily for me I had 99% of the floor on my side. And I exposed u to be the crazy slut.*

6. Law enforcement identified SHIND as the user of Prepaid Phone 2 based on the contents of the message, which refers to three other former Bank colleagues who SHIND also threatened in connection with his termination from the Bank (including Victim-2) and because it references the fact that Victim-2, as discussed below, reported SHIND's threatening conduct to law enforcement.

### **Specific Activity with Respect to Victim-2**

7. In or around April 2020, Victim-2 received the following text message from a third prepaid telephone ("Prepaid Phone 3"), which SHIND also used to harass and threaten Victim-1:

*I hope your mom catches COVID-19 and your siblings get orphaned. Hope you got a two for one deal on Urns to stick her ashes in. Oh and please tell [Victim-3] I hope her dad gets deployed to Iraq or Afghanistan and one of my distant cousins blows him up. Do us all*

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does not require a user to provide subscriber information to activate the cell phone. Additionally, based on my experience, users who are trying to obscure their identity and/or thwart law enforcement identification, employ prepaid cell phones and will often employ multiple prepaid cell phones to anonymize their location and or identity.

*a favor and grab a razor blade and run it across your wrist like a scratch off lotto ticket.*

*I think the fact that your father died almost immediately after I got terminated was the best karma anyone at [the Bank] or I've seen. I know the doctors told you it was cancer but I think he honestly couldn't come to bare with the fact his daughter was a lying cunt and that's what did him in. Then to make it sweeter I got another job and since then just an AVP position where I took a \$47k raise not even a full year after.*

8. Law enforcement identified SHIND as the sender of this message because it refers to both the Bank and SHIND's former colleagues, including the Victims, who SHIND suspected "lied" about his inappropriate conduct leading to his termination from the Bank.

9. In or about June 2020, Victim-2 received the following text message from a fourth prepaid phone used by SHIND ("Prepaid Phone 4"):

*[Address]. I'm never letting this go. The day will come where I'm catching you walking by your lonesome ... I'm going to beat you with my belt buckle like your sorry ass father should've before he got tired of your shit and called it quits. Show [the Bank] this and see if I care, my arrest record speaks for itself and they know I don't. If they gave two shits about you then you would have an escort to and from the PATH station but they used you and left you as prey for me. I swear I'm going to leave you a bloody mess then we can call it even. I want you to show [another employee from the Bank and Victim-3] this and have them know the same applies for them. A few [ ] women who meToo'd the wrong person.*

10. Based on a review of real estate records, law enforcement determined that the redacted address referenced in this message was, at the time, registered to the mother and late father of Victim-2, and continues to be registered to Victim-2's mother.

11. Law enforcement determined SHIND to be the user of Prepaid Phone 4 because of the contents of the message, as it references SHIND's former colleagues at the Bank and the circumstances of his termination.

12. During the course of this investigation, in or around June 2020, Victim-2 reported SHIND's threatening behavior to law enforcement in Bergen County, New Jersey. On or about June 10, 2020, SHIND was arrested for his conduct involving Victim-2 and thereafter, on or about September 30, 2020, was admitted to the Pretrial Intervention Program ("PTI") in Bergen County Superior Court for a period of two years for the crimes of terroristic threats and cyber harassment involving Victim-2.

### **Specific Activity with Respect to Victim-3**

13. Shortly after entering PTI, on or about November 5, 2020, another employee of the Bank (“Victim-3”) received the following message on an online platform from a user whose profile name is “George Shind,” the name SHIND used professionally at the Bank, and which depicts a profile picture of SHIND (the “SHIND Profile”):

*You’re smart to stare at the ground when you see me. I know you threw me under the bus in some way shape or form, exactly how I have no clue, I would advise you to continue doing so in case we ever cross paths, if I even get the hint you are looking at me then I’ll make sure where you are standing is the same spot your friends & family will lay down wreaths and throw flowers in memory of. And yes, I know the Prosecutors Office called you and [another victim from the Bank] asking about me and yes – I beat the allegations so [Victim-2] and each of you have even more reason to fear me now.*

### **Specific Activity with Respect to Victim-4**

14. While SHIND was on PTI, on or about November 9, 2021, Victim-4 received a message from the SHIND Profile, which stated:

*You and I will be seeing each other soon. Let’s see how quick you are to frame me for anything then. I bet your eyes stay glued to the ground and the feeling of fear overwhelms you.*

15. On or about the same day, the SHIND Profile sent threatening messages to Victim-4’s spouse referring to Victim-4 “framing him” and further advising Victim-4’s spouse he, SHIND, now worked in the same building as Victim-4 and would see her “in the lobby, cafeteria, maybe in the elevator.”