

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Delaware

United States of America)

v.)

JUSTIN DYNLACHT)

Case No.)

24 -)

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 17, 2023 - April 24, 2024 in the county of New Castle in the District of Delaware, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2261A(2)(b) and 18 U.S.C. § 2261(b)	Cyber Stalking as to A.B.

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

/s/ Stephen M. Powell

Complainant's signature

Stephen M. Powell, Special Agent, FBI

Printed name and title

Sworn to before me over the telephone and signed by me pursuant to Fed R. Crim. P.4.1 and 4(d).

Date: 05/08/2024



Judge's signature

City and state: Wilmington, DE

Honorable Sherry R. Fallon, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT**

I, Special Agent Stephen Powell of the Federal Bureau of Investigation (FBI), being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. Since September 2023, Your Affiant has been investigating the defendant, **JUSTIN MICHAEL DYNLACHT**, for the crimes of true threats, mailing threatening communications through the postal service, and cyberstalking.

2. DYNLACHT is a former employee of AstraZeneca, whose North American headquarters are based in Wilmington, Delaware. On November 13, 2022; December 22, 2022; and January 6, 2023, DYNLACHT sent graphic and vulgar written communications to representatives from Aetna/CVS Health (“Aetna”)—AstraZeneca’s health insurance provider—after certain of DYNLACHT’s health insurance claims were denied, including multiple communications to an Aetna employee who resides in Delaware.

3. DYNLACHT was terminated from AstraZeneca as a result of these communications.

4. In March 2023, approximately two (2) months after DYNLACHT’s termination, AstraZeneca and Aetna employees began receiving a series of graphic and threatening emails, facsimiles (faxes), and letters from a variety of email addresses. The messages were signed using various pseudonyms.

AGENT BACKGROUND

5. I am a duly sworn Special Agent of the Federal Bureau of Investigation (“FBI”) and have been so employed since February 2004. I am currently assigned to the Baltimore Field Office of the FBI, in Wilmington, Delaware. While employed by the FBI, I have investigated

federal criminal violations related to gangs, bank robbery, drug trafficking, prescription drug diversion, firearms trafficking, kidnapping, fugitives, threatening communications, threats against a federal agent, Hobbs Act robberies, health care fraud, domestic terrorism and international terrorism.

6. Since June 2021, I have been assigned to the FBI's Delaware Violent Crimes/Safe Streets Task Force ("DVCSSTF"), which investigates violations of federal laws, specifically those laws related to violent crimes including gangs, illegal drugs, firearms, bank robberies, threatening communications and Hobbs Act robberies. I am responsible for investigations involving unlawful activities to include bank robberies, Hobbs Act robberies, threatening communications, drug smuggling/trafficking, firearms offenses and violent crime occurring in the District of Delaware.

7. I have actively participated in investigations of criminal activity, including but not limited to the investigation of threatening communications. During these investigations, I have also participated in the execution of search warrants and the seizure of evidence relating to threats and threatening communications. As a Special Agent of the FBI, I have testified under oath, affirmed applications of search and arrest warrants, and participated in and gained experience in Title III wire intercept investigations for the enforcement of federal laws. As a Special Agent of the FBI, I have personally conducted, supervised, and participated in investigations which have resulted in the arrest and convictions of numerous individuals responsible for committing violent crimes.

8. I am an "investigative or law enforcement officer of the United States" within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.

9. The facts in this affidavit come from my personal observations, my review of subpoenaed and other records, my training and experience, knowledge obtained from other individuals, including law enforcement personnel, and communications with others who have personal knowledge of the events and circumstances described herein. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of an arrest warrant, this affidavit does not set forth each and every fact learned by me or by other agents during the course of this investigation.

THE SPECIFIED FEDERAL OFFENSE

10. Pursuant to Title 18 United States Code, Section 2261A(2)(A) and (B) it is unlawful to commit cyberstalking which places a person in reasonable fear of the death of or serious bodily injury to a person and causes or attempts to cause, or would be reasonably expected to cause substantial emotional distress to a person.

FACTS IN SUPPORT OF PROBABLE CAUSE

Pre-Termination Communications

11. On Wednesday, January 18, 2023, Executives and Human Resource specialists from AstraZeneca held an opportunity to respond (OTR) meeting with DYNLACHT. The individuals present for the meeting were A.S.¹ (AstraZeneca second level supervisor to DYLACHT), V.K. (AstraZeneca Human Resources / Employee Relations), and M.C. (AstraZeneca Human Resources / Employee Relations). This OTR was to review allegations of policy violations, including AstraZeneca's Code of Ethics and Standards of Employee Conduct. This OTR was conducted specifically due to information that was provided to AstraZeneca from Aetna regarding DYNLACHT's written communications from November 13, 2022; December 22,

¹ Victim names have been abbreviated to protect their identities.

2022; and January 6, 2023, and a recorded phone call on December 16, 2022 during which DYNLACHT yelled expletives at an Aetna representative, all of which contained components of offensive, unprofessional, and vulgar language, according to AstraZeneca.

12. During the OTR meeting, DYNLACHT confirmed he sent the various communications, and that he believed them to be justified and a “reaction in kind” to the way he felt he was being treated by Aetna employees. DYNLACHT also shared that he was frustrated, and that events escalated to the point of “having to write strongly worded messages.” According to AstraZeneca, Dynlacht was not apologetic, nor did he believe he acted unprofessionally. Human Resources concluded, however, that Dynlacht’s communications violated AstraZeneca’s Code of Ethics and DYNLACHT was fired on January 23, 2023.

***Post-Termination Communications Establishing a
Pattern of Threatening Communications to AstraZeneca and Aetna Employees***

13. Beginning on March 16, 2023, Aetna and AstraZeneca Executives, Human Resource specialists, and employees began receiving graphically violent threatening emails, physical letters, and faxes from an anonymous sender utilizing various email addresses and envelopes addressed with various return addresses. These graphically violent communications were all addressed to, and mentioned by name, numerous Aetna and AstraZeneca Executives, Human Resource specialists, and employees, as well as several of their minor age children. One of the threatening letters was sent to the home address of an AstraZeneca executive.

14. Between March 16, 2023, and April 24, 2024, a total of fifteen (15) emails, twelve (12) physical letters, and two (2) faxes containing escalating levels of graphic and threatening statements were received by Aetna and AstraZeneca Executives, Human Resource Specialists, and employees.

15. After careful research by security specialists from AstraZeneca and Aetna, it has been determined that all of the targeted victims in this investigation, aside from the President and CEOs of the companies, were in DYNLACHT's direct supervisory chain at AstraZeneca; were directly involved in the process of terminating DYNLACHT's employment at AstraZeneca; or were directly involved in handling DYNLACHT's health insurance claims and appeals at Aetna.

16. The threatening emails sent to AstraZeneca employees from various email addresses on April 10, 2023; April 29, 2023; and May 26, 2023, as well as the threatening faxes which were sent to Aetna employees on April 17, 2023, and May 18, 2023, all utilized IP Address, 108.56.64.141. Per information received on March 7, 2024, from Verizon Communications, IP Address 108.56.64.141 is affiliated with Wentworth House Apartments, 5411 McGrath Boulevard, Rockville, MD 20852. DYNLACHT resides in Apartment # 920 in the Wentworth House Apartments building.

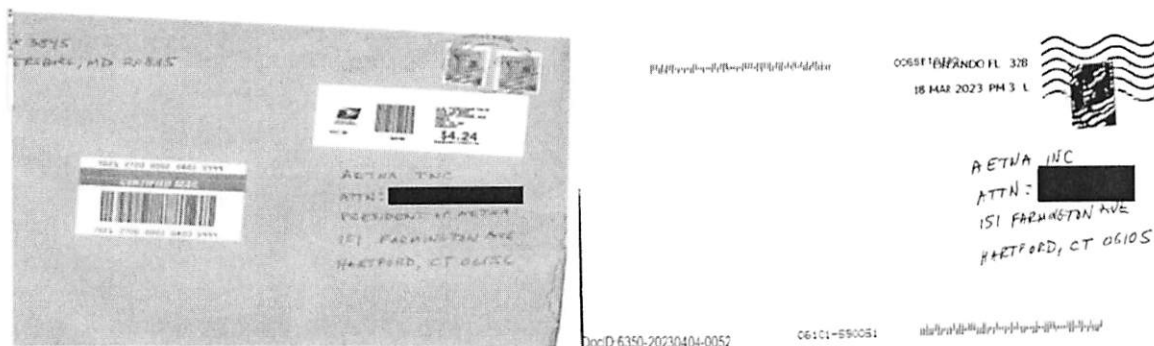
17. On April 10, 2023, your affiant corresponded via email with the building manager of the Wentworth House Apartments, who informed your affiant that residents living in the Wentworth House Apartments each have to establish their own internet and WiFi service connections through either Verizon or Comcast; however, according to the manager, the building has a publicly accessible WiFi system to which residents can connect both in the building's business center and also in the 18th floor rooftop amenity space. On April 16, 2024, your affiant corresponded via email with the IT Specialist who manages the computer network in the Wentworth House Apartments building. The Specialist confirmed the IP Address, 108.56.64.141, is the IP Address for the Wentworth House Apartments' publicly accessible WiFi system.

18. In addition, the handwriting on the envelopes of the physical letters appears to be extremely similar and was likely written by the same individual. In samples of DYNLACHT's

handwriting received by AstraZeneca and Aetna from DYNLACHT's previous correspondence with them, the handwriting from the known examples of DYNLACHT's handwriting appears to be significantly similar in style and form. For example, the handwriting is printed in all caps, and on almost all the handwritten envelopes he writes "ATTN: [NAME OF INTENDED RECIPIENT]." One example is the handwriting on the envelope of a letter DYNLACHT sent to President of Aetna, D.F., on November 15, 2022—which DYNLACHT admitted at the OTR meeting he wrote—which very closely resembles the handwriting on the envelope of the first post-termination graphic letter, which was also sent to Finke at his office on April 18, 2023:

November 25, 2022, letter to D.F.

April 18, 2023, letter to D.F.



The letters also resemble the handwriting on the cover of, *inter alia*, a June 5, 2023, letter to AstraZeneca Chief Human Resources Officer, J.P.; a November 27, 2023, letter to an attorney for AstraZeneca, C.L.; a November 27, 2023, letter to Aetna CEO, K.L.; and a December 3, 2023, letter to Aetna Senior Benefits Specialist, A.B..

June 5, 2023, letter to J.P.

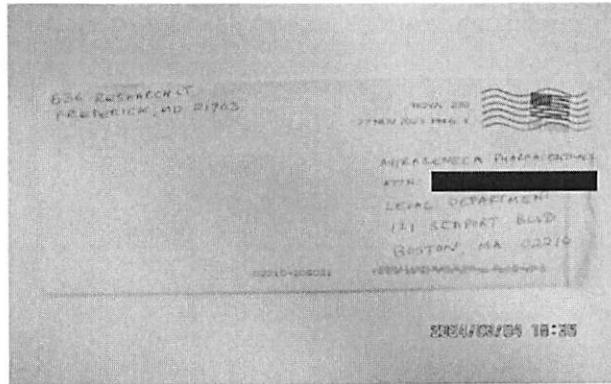
SARA EXECUTIVE NETWORK
1140 DUKE ST
ALEXANDRIA, VA 22314



ASTRAZENECA PHARMACEUTICALS
ATTN: [REDACTED]
1800 CINCINNATI PIKE
WILMINGTON, D.E. 19803

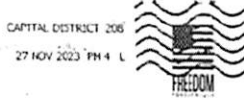
15003-281099

Nov. 27, 2023, letter to C.L.



Nov. 27, 2023, letter to K.L.

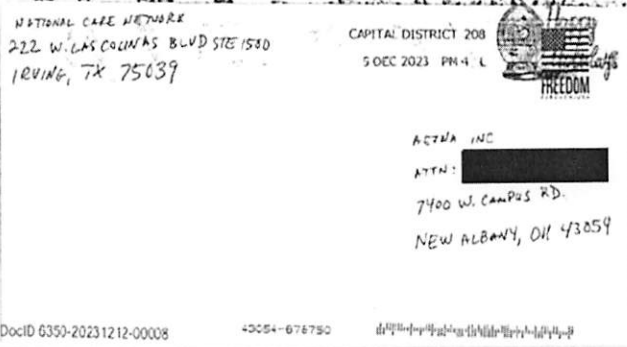
PO BOX 71768
PHILADELPHIA, PA 19176



AETNA INC
ATTN: [REDACTED]
151 FALMINGTON AVE
HARTFORD, CT 06156

06156

December 3, 2023, letter to A.B.



DocID 6350-20231212-00008

40054-676750

19. A United States Postal Service (USPS) sectional center facility (SCF) is a processing and distribution center (P&DC) of the USPS that serves a designated geographical area defined by one or more three-digit ZIP Code prefixes. A SCF routes mail between local post offices and to and from network distribution centers (NDCs) and Surface Transfer Centers (STCs), which form the backbone of the U.S. Postal Service network. Letters mailed within the geographic zone serviced by a SCF are marked by the mail processing machines with the SCF's code. Except for the first threatening letter, which was postmarked from the SCF code "ORLANDO FL 328," the

rest of the threatening letters were postmarked from SCF code “CAPITAL DISTRICT 208” in Suburban Maryland, which includes Rockville, MD where DYNLACHT resides and “NOVA 220” in Northern Virginia which is also near Rockville, MD.

20. The most graphically violent and threatening letter was dated March 20, 2024, and postmarked March 22, 2024, from “Capital District 208.” The letter was addressed to Aetna Complaint and Appeals Analyst Resolution Team Member, K.S., and Aetna Executive Analyst, L.B. Notably, in this letter, the sender changes their wording from “wishing” and “hoping” that graphic and horrific violent actions “should” be taken against the previous victims, to instead using more explicit threats. The letter reads as follows:

I would like the two of you white fucking racist cunts to know how much the two of you are hated by Aetna plan members across the United States. You two goddamn fucking cunts along with the dishonest pieces of human excrement who Aetna calls “Claims Processors” and “Senior Management” have stolen billions of dollars in coinsurance benefits from Aetna Life Insurance members for many of years and have gotten away with it because all sectors of the US Government at both the state and federal levels are equally corrupt, greedy and dishonest and have actively worked to protect fucking company like Aetna and CVS Health from Justice. If these fucking pieces of shit — the US Regulators are not going to hold you motherfuckers accountable and bring you and Aetna employees to justice than Aetna policy holders, patients and families must act accordingly and take matters into their own hands to seek the justice that they deserve.

In China and the Middle Eastern countries, you two fucking cunts, the Aetna claims processors and the entire Aetna executive team would be swiftly executed on live tv for your serious financial crimes which have substantially harmed millions of people in the United States. Since the US government is also run by the most corrupt, greedy and dishonest fucking scumbags who won't lift a fucking finger to prosecute you fuckers then ordinary citizens must do so on their own.

Here's what you two fuckers can expect for payback for your crimes. K.S. and L.B., you both along with your families will be victims of horrific home invasion robberies in the very near future. These home invasion robberies will be made to appear to be 100% random in nature. However, only you will know otherwise. You two fucking cunts will be abducted, brutally raped, tortured and then have your bodies hacked up into small pieces with machetes or guillotine like devices. Finally, after this occurs, your dismembered body parts will be scattered throughout the

Aetna campuses in OH, FL and CT to send a message to your management that Aetna is not above the law and you fucking human scum must pay with your lives for all of the pain and suffering and crimes you both have personally committed on behalf of Aetna Life Insurance Company.

Sincerely

Someone Whose Family Was Severely Harmed by the Goddamn Greedy Aetna Management

21. On April 11, 2024, the sender sent an email from “Alex Stevens” (alex.stevens@gmx.com) to the “zzAetna DOI Response” email address. The email stated:

*I hope that the mechanics that work on the Aetna and CVS Health Corporate Jets deliberately tamper with the jets so that they crash one day soon and the three of you f*cking greedy corrupt dishonest pieces of human excr*ment are all killed in a fiery plane crash. You three pieces of filth do not deserve to live for all of the pain and suffering you have caused to Aetna policy holders*

May you and your families suffer dearly for what you have done to people.

22. On April 12, 2024, the sender sent an email from “Christopher Thomas” (christopher.thomas@gmx.com) to zzAetna DOI response (AetnaDOI@aetna.com), directing the message to K.S., L.B., K.L., and B.K.. The text of the email was as follows:

*The four of you executives at CVS Health and Aetna are really horrible, evil sc@m and I hope that karma catches up with the four of you f**kers very soon and you four lose your lives from it. I lost my stepdaughter recently because Aetna refused to pay for her reconstructive surgeries that she required from 3rd degree burns and she ended up killing herself as a result. I hope that the four of you are burned alive in plane crashes as you all travel very much. Hopefully the mechanics tamper with the CVS Aetna corporate planes and this causes fatal crashes for the four of you greedy, dishonest, evil rotten f**kers- then you and your families will experience pain and suffering like you have caused to many families across the United States.*

23. On April 18, 2024, the sender sent an email from “Greg Clark” (Greg.Clark.SR@gmx.com) to the Aetna Executive Response Team (ExecutiveResponseTeam@aetna.com) and the zzAetna DOI response (AetnaDOI@aetna.com), directing the letter to L.B. and K.S. (PO Box 818048, Cleveland, OH 44181); as well as K.L. (“President and CEO of CVS Health and Aetna”); and B.K. (“President, Aetna”). Similar to the

March 20, 2024, threatening letter, this email stated the recipients would be victims of “very violent and gruesome home invasion robberies.” In a departure from the previously sent threatening messages, the sender claims to be part of a group. The text of the email was as follows:

*I sincerely hope and pray that the four of you f**king pieces of human filth pay dearly for your crimes against millions of Aetna policyholders. You have stolen more than 5 billion dollars over the years in coinsurance reimbursements from Aetna Life Insurance Company through various health insurance plans through the unauthorized use of MultiPlan and many different employers who have made the terrible choice of having Aetna for their health insurance provider. You enjoy stealing from people very much this is very apparent. What is also apparent is that the US Government at the highest level has assisted you in this theft. Therefore citizens must take the law into their own hands and not depend on the Biden administration to prosecute you filthy, greedy, dishonest, corrupt a**holes.*

*Both D.W., former MultiPlan CEO and T.D., current CEO at MultiPlan will also be appropriately dealt with for their crimes against Aetna policy members and millions of other insurance plan members. It is our group's hope that you four f**kers will be taught a lesson you will never forget along with the others at Aetna, CVS Health and MultiPlan.*

*Let's suppose the four of you are abducted one day soon from your homes during very violent and gruesome home invasion robberies. Then you four f**Kers are defec*ted on, tort*red and finally your kidnappers will place very small quantities of demolition expl*sives, (Gelignite) in your orifices including your mouths, vaginas and rectums not to k*ll you but to give you four f**kers third degree burns and then you four will all commit suicide yourselves!*

*Aetna, CVS Health and MultiPlan are three of the greediest, most dishonest f**king companies on earth and all three companies must be demolished and employees of these companies will be held accountable for the extensive destruction you have caused to millions of American families.*

Threatening Communications to Victim in Delaware

24. As part of the course of threatening conduct against AstraZeneca and Aetna employees, DYNLACHT sent multiple threatening communications to A.B., a victim who resides in Delaware. Those threatening communications include the following.

25. On April 17, 2023, at 8:37 p.m., a fax was sent from the free fax service, www.faxZERO.com, to Aetna Plan Sponsor Liaison, A.B., at Aetna fax number, 860-975-3206. The sender used the name, “Syed Hussain,” with return fax number, 859-425-3379, and

email address syedhussain_20@outlook.com. That email address utilized IP address, 108.56.64.141. The return fax number the sender used is the fax number for Aetna's Complaint & Appeals Department. The message in the fax stated:

I am writing to you this letter to express my concern about you, You are a goddamn fucking thief and eventually you, Aetna middle management and Aetna executive management will be caught as you are stealing billions of dollars each year from Aetna policy members and out of network doctors by paying Aetna policy members and doctors only a small fraction of their 60% coinsurance for out of network coverage. You have used the Data iSight website as the justification for not paying anywhere near 60% and in some cases as low as 5% for coinsurance reimbursements. This is a felony and you, the Aetna Resolution Team, Aetna Medical Directors and Aetna Senior Management are guilty of the crimes of RICO violations. You need to do serious prison time for your criminal activities in a maximum security facility where you will be constantly raped in the asshole and defecated on by both your cell mates and the prison guards.

In my home country -The Kingdom of Saudi Arabi- they would have already cut off your tits and sliced up your little tight cunt. Additionally, they would definitively behead a fucking corrupt bitch like you. You will not evade justice for much longer [A.B.] one way or the other you must pay for your crimes.

26. On May 18, 2023, at 9:19 p.m., a fax was sent from www.faxZERO.com to A.B. at Aetna fax number, 860-975-3206. The sender used the name, "Steve Hardi"; the same Aetna return fax number, 859-425-3379, as the April 17, 2023, fax; and the email address, steve.hardi_2900@hotmail.com. The sender also utilized the same IP address, 108.56.64.141, as the April 17 fax. The message in the fax stated in part:

Since the criminal justice system in the US is also extremely corrupt and fucked up, this means that citizens must take justice into their own hands. You really need to have your fucking brains blown out while you are walking to your car in the Aetna parking lot one day. This will teach you fucking thieves to steal hundreds of millions of dollars. May you and Aetna executive management suffer much worse than your policy members.

27. On April 24, 2024, the sender sent a violent message threatening home invasion robberies from the email address, Irving.Schwinner@gmx.com (associated with the name "Irving

Schwinner”) to the same Aetna Executive Response Team and zzAetna DOI Response email addresses. The email was directed to Aetna Plan Sponsor Liaison, A.B., and read as follows:

Dear [A.B.],

*We know how Aetna and many different employers have conspired to steal many billions of dollars in coinsurance claims from Aetna policy members over the past 6 years and we have sufficient evidence to prosecute you and Aetna Inc. including yourself and Aetna executive analysts, the claims processors, Regulatory Resolution Team members and executive management for Aetna and CVS Health. It is only a matter of time before we get convictions. However, in the interim, we will be sharing with the American public exactly how you accomplish this level of insurance fraud and theft. It is our hope that taxpayers will be saved costly and timely trials of Aetna Inc personnel as there are many people who would gladly prosecute and execute for no charge at all. Hopefully, you and the Aetna middle and senior management are executed for your crimes and this would involve home invasion robberies whereby the home invaders use power drills such as these below with 6 inch drill bits to drill multiple holes through your skulls but not before brutally t*rturing and r*ping you in every orifice like you have t*rtured and r*ped your policy holders for many years.*

Sincerely,

Irving Schwinner

May 8, 2024, Execution of Search Warrant

28. On May 7, 2024, the Honorable Gina L. Simms, United States Magistrate Judge for the District of Maryland, authorized a search warrant for DYNLACHT’s residence, located 5411 McGrath Boulevard, Apartment #920, Rockville, MD; as well as for DYNLACHT’s fingerprints, DNA, and handwriting exemplars.

29. On May 8, 2024, members of the FBI violent crimes safe street task force, and agents from the Rockville, Maryland Resident Agent (RA) executed the search warrant on DYNLACHT’s residence at 6:00 a.m.

30. From a closet inside DYNLACHT’s apartment, they recovered a letter, dated March 12, 2023, addressed to “[A.B.], Aetna-AstraZeneca Plan Liaison” and “[L.B.], Aetna Executive Analyst.” The letter, which was dated after DYNLACHT had been terminated by AstraZeneca on

January 23, 2023, but before the first graphic communication on March 16, 2023, was signed

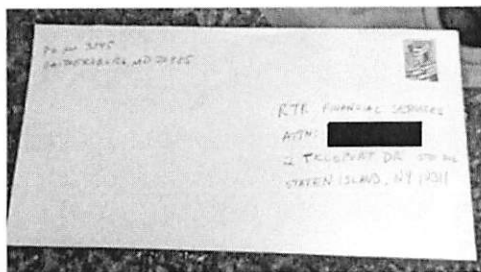
“Justin Dynlacht,” and stated in part:

Once again, I hope that the both of you pieces of filth, Aetna and AstraZeneca senior management and Human Resources burn in hell you greedy, corrupt fucking thieves! You two fucking thieves need to do some serious time in prison for your roles in knowingly committing financial and white collar crimes as I am certain that you have bilked AstaZeneca employees-Aetna plan members out of many millions of dollars over the years. Then you two will learn about loss, getting raped in the asshole and shit on much like you have been doing to Aetna policy holders and AstraZeneca employees for quite some time now.

*Sincerely,
Justin Dynlacht*

31. Agents also recovered from inside DYNLACHT’s closet a sealed enveloped addressed to “RTR FINANCIAL SERVICES” with “ATTN: [R.R.]” As noted above, each of the hard copy letters sent to victims included handwriting in all caps and “ATTN [NAME OF INTENDED RECIPIENT.” In addition, the three three-flag stamp was placed upside down on the letter recovered from DYNLACHT’s closet. On all the letters sent to victims with three-flag stamps, the stamps were affixed to the envelopes upside down.

***Envelope recovered from Dynlacht’s home
AstraZeneca during 5/8/2024 search warrant***



***Envelope of 6/5/2024 letter sent to
AstraZeneca Chief Human
Resources Officer, J.P.***



CONCLUSION

32. Based on the foregoing factual information, I submit that there is probable cause to believe that the Defendant, JUSTIN MICHAEL DYNLACHT, has violated the SPECIFIED FEDERAL OFFENSE indicated above – that is, Cyber Stalking in violation of Title 18 United States Code, Section 2261A(2)(A) and (B). Due to the violent nature and increasing specificity of the threatened graphic violence against the victims in this investigation, which your affiant believes have all been made by DYNLACHT, and due to the concern for the safety, security and well-being of the victims and their families in this investigation, I respectfully request that the Court issue a Criminal Complaint charging DYNLACHT with a violation of Title 18 United States Code, Section 2261A(2)(A) and (B).

Respectfully Submitted,

/s/ Stephen Powell
Special Agent Stephen Powell
Federal Bureau of Investigation

This affidavit was sworn to by the Affiant by telephone after a PDF was transmitted by email, per Fed. R. Crim. P. 4.1, 41(d)(3), this 8th day of May 2024



HONORABLE SHERRY R. FALLON
UNITED STATES MAGISTRATE JUDGE