

UNITED STATES DISTRICT COURT

for the
District of Maryland

United States of America
v.

WILLIAM LAWRENCE CASSIDY
29720 Cove Road
Lucerne Valley, California 92356

Case No. 11-501 CBD

Defendant(s)

CRIMINAL COMPLAINT

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 January 2009 in the county of Montgomery in the
District of Maryland, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Row 1: 18 U.S.C. §§ 2261A(2) (A) and 2261A(2) (B), Stalking

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT of Special Agent Jessica A. Nye, FBI

Continued on the attached sheet.

Jessica A. Nye
Complainant's signature

JESSICA A. NYE, Special Agent, FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: Feb 2, 2011

Charles B. Day
Judge's signature

City and state: Greenbelt, MD

CHARLES B. DAY, Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MARYLAND

IN THE MATTER OF THE CRIMINAL )  
COMPLAINT FOR )  
WILLIAM LAWRENCE CASSIDY ) Misc No. 11-501CB10  
29720 Cove Road )  
Lucerne Valley, California 92356 ) UNDER SEAL

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jessica A. Nye, ("Your affiant"), a Special Agent (SA) with the Federal Bureau of Investigation (FBI), Baltimore Division, Baltimore, Maryland, being duly sworn, depose and state as follows:

1. I have been a Special Agent with the FBI since March 19, 2006. During this time, I have been assigned investigations involving computer crimes and crimes against children on the Internet. I am currently assigned to the FBI Baltimore Division Cyber Crime Squad and am responsible for investigations involving computer-related offenses to include violations involving child pornography and the sexual exploitation of children on the Internet. I have expertise in conducting such investigations through training in seminars, classes, and everyday work related to these types of investigations. Also, I have participated in the execution of numerous search warrants involving the search and seizure of computers, computer equipment, software, and electronically stored information.

2. I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with other law-enforcement officers and agents, my interviews of witnesses, and my examination of documents, reports and other records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. As a federal agent, your affiant is authorized to investigate violations of laws of the United States and is a law enforcement officer with the authority to execute warrants issued under the authority of the United States.

4. This affidavit is made in support of an application for

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*CA*

a Criminal Complaint for **WILLIAM LAWRENCE CASSIDY**, 29720 Cove Road, Lucerne Valley, California, 92356, charging him with Stalking, in violation of 18 U.S.C. Sections 2261A(2) (A) and 2261A(2) (B).

5. This investigation concerns alleged violations of Title 18, United States Code, Sections 2261A(2) (A) and 2261A(2) (B). Title 18, United States Code Section 2261A(2) (A) states:

Whoever, with the intent to kill, injure, harass, or place under surveillance with intent to kill, injure harass, or intimidate, or cause substantial emotional distress to a person in another State,... uses any interactive computer service, or facility of interstate commerce to engage in a course of conduct that causes substantial emotional distress to that person or places that person in reasonable fear of the death of that person [is guilty of a crime].

Title 18, United States Code Section 2261A(2) (B) states:

Whoever with intent to kill, injure, and harass, and place under surveillance with intent to place a person in another State in reasonable fear of death or serious bodily injury ... uses any interactive computer service, or facility of interstate commerce to engage in a course of conduct that causes substantial emotional distress to that person or places that person in reasonable fear of the death of or serious bodily injury to, that person [is guilty of a crime].

#### BACKGROUND OF INVESTIGATION

6. According to the website, [www.tara.org](http://www.tara.org), Victim 1, a woman now 61 years of age is an enthroned tulku, or reincarnate master, within the Palyul lineage of the Nyingma tradition of Tibetan Buddhism. She was enthroned as a reincarnate llama in 1988. Following her enthronement ceremony, the Supreme Head of the Palyul lineage renamed the center where Victim 1 taught, Kunzang Odsal Palyou Changchub Choling ("KPC"), or "Fully Awakened Dharma Continent of Excellent Clear Light" and designated it as his seat in the West.<sup>1</sup> Victim 1 is believed by members of KPC to be the only American-born female tulku. Based on my conversation with Victim 1, as well as members of KPC, I learned the following, among other things:

Victim 1 and  
KPC are  
located in  
Poolesville,  
MD.

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a) In or about September 2007, defendant **WILLIAM LAWRENCE CASSIDY** ("CASSIDY"), who was using the name William

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<sup>1</sup> [www.tara.org](http://www.tara.org)

CBN Jan

Sanderson became friendly with one of the monks of KPC. **CASSIDY** spoke highly of Victim 1 and said he wanted to meet her. **CASSIDY** was self proclaimed as a Buddhist American tulku. Over the course of the next month, those close with Victim 1 encouraged her to meet **CASSIDY**.

b) Victim 1, invited **CASSIDY** to join her at her place of retreat in Arizona. Cassidy requested to ride alone with Victim 1 in her vehicle. Upon meeting Victim 1 for the first time, and while along her vehicle, **CASSIDY** grabbed her arm and stated "I want you to know one thing. I will never hit you. I will never leave you." After knowing Victim 1 for only a short period of time, **CASSIDY** asked her to marry him. Victim 1 declined. **CASSIDY** still asked for them to pretend that they were married. **CASSIDY** would text Victim 1 "Honey I'm home" and sent her a ring. During one-on-one conversations with **CASSIDY**, Victim 1 confided in **CASSIDY** and shared intimate details about her life, including sexual abuse as a child and failed relationship with her ex-husband. **CASSIDY** asked Victim 1 if she wanted him to kill her ex-husband. Victim 1 was stunned by this statement and told him not to harm her ex-husband.

c) **CASSIDY** claimed to have Stage IV Lung Cancer so members of KPC took care of him as if these were **CASSIDY's** final days. At that time, it came to light that his name was not William Sanderson but **CASSIDY**. **CASSIDY** admitted that his name was in fact **CASSIDY**. Victim 1 and other KPC members noticed strange things about **CASSIDY's** behavior that appeared inconsistent with Buddhist teachings, including gossiping about others. Gossiping is offensive to a Buddhist. At this time, Victim 1 began to request confirmation through channels in her lineage to determine if **CASSIDY** was in fact a recognized tulku.

d) In late February 2008, **CASSIDY** offered to assist with various financial and legal challenges and was promoted to Chief Operating Officer within KPC. **CASSIDY** held this position for two weeks, and during that time, made every effort to gather information about KPC.

e) On February 23, 2008, Victim 1 heard there was no indication that **CASSIDY** had ever been recognized for the title he was claiming to hold. Victim 1 contacted **CASSIDY** informing him of what she had just learned and almost immediately **CASSIDY** left the retreat taking with him KPC Buddhist nun Nydia Alexandra, a/k/a "Julie Greene", a/k/a "Jewel Lilly Annabella" whom he apparently seduced.

7. Members of KPC later found out **CASSIDY** is a convicted felon.



KPC estimates they spent approximately \$10,000 of their personal resources and countless man hours caring for CASSIDY in what they thought were his final days.

8. The nexus for CASSIDY's harassment is via his blogs and his Twitter Accounts.

#### TWITTER

9. Twitter is a website, owned and operated by Twitter Inc., which offers a social networking and microblogging service, enabling its users to send and read messages called tweets. Tweets are text-based posts of up to 140 characters displayed on the user's profile page. Tweets are publicly visible by default, however senders can restrict message delivery to their friends list. Users may subscribe to other users' tweets. This is known as *following* and subscribers are known as *followers*. All users can send and receive tweets via the Twitter website.

10. Twitter Account "vajragurl" frequently posts tweets on his Twitter account. In one day for example, "vajragurl" may have twenty to forty tweets directed towards Victim 1 and KPC. On July 5, 2010, there were over 350 tweets directed towards Victim 1 and KPC. At present time, the account "vajragurl" has tweeted over 8,000 tweets. It is KPC's belief that all of those tweets, except a few hundred, pertain to Victim 1 and KPC.

11. The following are a small portion of the tweets that came from Twitter Account "vajragurl":

a) Sunday, May 30, 2010 "ya like haiku? Here's one for ya: "Long, Limb, Sharp Saw, Hard Drop" ROFLMAO."<sup>2</sup>

b) Sunday, May 30, 2010 "(Victim 1) is a demonic force who tries to destroy Buddhism".

c) Friday, June 4, 2010 "(Victim 1): somebody throw a couple shots of gin in the bitch & get her back on twitter: shes fun 2 play with."<sup>3</sup>

d) Monday, ~~June~~<sup>July</sup> 5, 2010 "and that sound that keeps buzzing in the back of your head (Victim 1) is my hand touching the ground".

e) Monday, June 7, 2010 "may the legion of dakinis

<sup>2</sup> ROFLMAO is Internet slang meaning Rolling on Floor Laughing My Ass Off

<sup>3</sup> This tweet occurred immediately after Victim 1 closed her Twitter account and deleted her name.

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draw

CAF  
draw

trample on the false guide (Victim 1)'s head and bring her to her knees in submission to pure lineage".

f) Monday, June 7, 2010 "if she leaves rainbow i'll recant my words but all she'll ever leave isa shit stain onthe sheets & another lying coverup byher cult of fools".<sup>4</sup>

g) Tuesday, June 22, 2010 "want it to all be over soon sweetie?"

h) Friday, June 25, 2010 "(Victim 1) you are a liar & a fraud & you corrupt Buddhism by your very presence: go kill yourself".

i) Monday, July 5, 2010 "Dedicate the merit & so forth... & a hearty fuck you in the general direction of Maryland."

j) Friday, July 9, 2010 "(Victim 1) is no dakini: shes a grossly overweight 61 yr old burnt out freak with bad bowels & a lousy outlook: her "crown" is a joke."

k) Tuesday, July 13, 2010 "attendees at NY Palyul annual retreat being told to avoid (Victim 1): being warned that she is "delusional!" Just finding that out?"

l) Wednesday, July 14, 2010 "ho bitch (Victim 1) so ugly that when she was born the doctor slapped her mother #hobitch(Victim1)".

m) Wednesday, July 14, 2010 "that ho bitch (Victim 1) so fat if she falls & breaks her leg gravy will spill out".

n) Wednesday, July 14, 2010 "that ho bitch (Victim 1) so nasty her mama took her out on the stroll so she wouldnt have to kiss her goodbye."

o) Sunday, July 25, 2010 "I have just one thing I want to say to (Victim 1), and its from the heart: do the world a favor and go kill yourself. P.S. Have a nice day."

p) Sunday, July 25, 2010 "(Victim 1) you called me a "sick low life pig" oh great Mandarava? Go kill yourself."

q) Thursday, August 19, 2010 "hey! great idea! Go save the dogs in Maryland! I know where there are some bitches that

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<sup>4</sup> In the Tibetan Buddhist tradition, miraculous signs, such as rainbows may follow an accomplished Master's death.

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desperately need mental health care....."

r) Saturday, September 25, 2010 "Enough is enough. The final bit of magic begins now. Within 90 days, you will know. Owl and raven feathers separate... permanently."<sup>5</sup>

s) Tuesday, October 19, 2010 "One name rings inside her head.. over and over again... she can't get it out of her mind... it comes to her every "practice" session....."

t) Tuesday, October 19, 2010 "That name rings in her head a thousand times each day....."

u) Tuesday, October 19, 2010 "hey! who left the light on in the barn!"

v) Tuesday, October 19, 2010 "owl and raven feathers separate.... tick tock tick tock tick tock....tick...tock...tick.....tock.....  
....."

w) Tuesday, October 19, 2010 "all for you... all for you..."

x) Tuesday, October 19, 2010 "owl and raven feathers separate.... tick tock tick tock tick tock".

y) Tuesday, October 19, 2010 "just for you...."

z) Wednesday, October 20, 2010 "The memory of Penor Rinpoche in America has been DISGRACED by (Victim 1) and Steven Seagal. All the spin in the world cannot change that."

aa) Wednesday, October 20, 2010 "(Victim 1) I will sign off a bit early. Tomorrow is a big day, I'd like to be rested and well. I will break retreat temporarily for important meetings".

bb) Sunday, October 24, 2010 "But for tonight? Was that a noise in the trees? Is that a light? No, not there.. over there!"

cc) Sunday, October 24, 2010 "Rain tomorrow should cover the tracks.."

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5 "Owl and raven feathers separate" refers to a specific tantric magical invocation to "separate" (i.e., remove) the defenses of the enemy so that the enemy is then left defenseless against attack. This probably stems from the ancient belief in many aboriginal cultures that owls and ravens represent the two poles of "good" and "evil", based on white owl feathers and black raven feathers seen as symbols of polar opposites. Owl and raven feathers are also symbols of various protector deities in Vajrayana Buddhism. <http://protectingnyingma2.wordpress.com/page/2/>

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dd) Monday, October 25, 2010 "city girls use Vaseline, country girls use lard, fat (Victim 1) don't use nothin', she gets it twice as....."

ee) Monday, October 25, 2010 "(Victim 1) is OBSESSED with Tenpa Rinpoche because he knows ALL her dirty little secrets. she lives in fear of being outed by him".

ff) Monday, October 25, 2010 "(Victim 1)'s livelihood:" uneducated bitch makes her living off suckers who need to believe in fairy tales."

gg) Wednesday, November 11, 2010 "(Victim 1) IS A SATANIC CORRUPTER OF DHARMA: A SHE-DEMON WHO MASQUERADES AS A "TEACHER" <http://tinyurl.com/2fy2lnd>".

hh) Tuesday, November 30, 2010 "@(Victim 1) sure hope you weren't referring to me as a felon, bitch, because as I'm sure your lawyer has informed you that could cost U money".

ii) Thursday, December 2, 2010 "(Victim 1), if you don't like the results of your actions, try a new approach: stop your hate, fear, insecurity, and greed: STFU&STFD)."

jj) Thursday, December 2, 2010 "yet still the bitch maintains hate sites, uses anonymous avatars to do her dirty work and pretends to herself we don't see right through her".

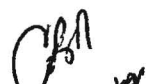
kk) Thursday, December 2, 2010 "because that delusive belief set of hers forms the rationale for all her craziness: wow! one name must ring in her ears nite & day".

ll) Sunday, December 5, 2010 "I do not believe (Victim 1) was a prostitute. I think that story is a made-up lie. Prostitutes are professionals."

mm) Sunday, December 5, 2010 "Can reputed ex-prostitute (Victim 1) weather the storm she has created for herself by obsessive online bullying & cyberstalking?"

nn) Sunday, December 5, 2010 "To call an overweight whore "mother of palyul" insults whores & palyul."

oo) Sunday, December 5, 2010 "Watch (Victim 1) and KPC decompose".





pp) Tuesday, December 7, 2010 "Got a wonderful Pearl Harbor Day surprise for KPC... wait for it."

qq) Wednesday, December 8, 2010 "A LA LA HO! so keep on shoutin & sweatin (Victim 1) & showin us all yer credentials & tellin us how very fucking high you are".

rr) Wednesday, December 8, 2010 "because everybody knows that grabbing nickels tossed by crowds into your tambourine is what you do best....."

ss) Wednesday, December 8, 2010 "it ain't cause yer a woman (Victim 1) & it sure aint jealousy. you got that all wrong. its because yer a fucking hypocrite from way down the road".

tt) Wednesday, December 8, 2010 "@WuTangTulku "(Victim 1)" sees Tenpa Rinpoche every time she closes her eyes. He is everywhere."

uu) Wednesday, December 8, 2010 "which pretty much makes Tenpa the Baddest Motherfucker With Blue Eyes on the face of the planet... because if what they say is true...."

vv) Thursday, December 9, 2010 "(Victim 1) is over 60, in extremely bad health, and about to get worse: karma will be very rough on her due to conditions she has created".

ww) Thursday, December 9, 2010 "A strong wind @ryderjaphy will blow down the KPC house of cards once and for all. They live by extortion now, and they live hand to mouth."

xx) Thursday, December 9, 2010 "Terrors in the night disturb Fat (Victim 1)'s sleep: she cannot sleep with taking something, and anxiety rules her body like a slavemaster".

yy) Thursday, December 9, 2010 "A thousand voices call out to (Victim 1) and she cannot shut off the silent scream".

zz) Thursday, December 16, 2010 "@ryderjaphy @waylonlewis @elephantjournal first off, these KPC punks got nothing, so fuck their "legal" threats."

aaa) Thursday, December 16, 2010 "So my unsolicited advice which I claim the right 2 give on grounds of being an obnoxious bitch is pop the fucking weasel & full speed ahead."

bbb) Monday, December 20, 2010 "I have this

CAN  
how

\*amazing\* present for a group of people who really, really deserve something \*amazing\*. Long time in preparation. Wait for it."

ccc) Monday, December 20, 2010 "I have a really \*special\* eclipse present for somebody who really, really deserves something \*special.\* Full circle karma. Wait for it."

ddd) Monday, December 20, 2010 "RT @religionnews: Former cult member murdered in Texas: <http://bit.ly/h2P6S8#religion#cults.6>"

eee) Monday, December 20, 2010 "Some people really react badly 2 the screams of their victims So annoying Such people are called sociopaths A group of them is called "KPC"".

fff) Tuesday, December 28, 2010 "DOWN WITH KPC! The fascist insect that preys on the life of Buddhism in the West! DOWN WITH (Victim 1)! The corrupt poser who has nothing."

ggg) Thursday, December 30, 2010 "Warning to KPC cult followers: your leader has become even more unstable. #dontdrinkthekoolaid She is clearly in psychic distress."

hhh) Thursday, December 30, 2010 "2011 looks cursed for (Victim 1) & KPC :( (Victim 1) May all beings benefit! <http://bit.ly/fSCcoa>".

12. The following are tweets that came from Twitter Account "aconlamho":

a) Thursday, May 13, 2010, "late at night at the edge o da farm, somethin creepin in the woods gonna do ya harm all ya gots 2 do 2 make it go away is pay pay pay pay".

13. The following are tweets that came from Twitter Account "kpc\_watch":

a) Sunday, May 23, 2010 "what do you expect from the unwanted daughter of a weekend prostitute?"

b) Sunday, May 23, 2010 "(Victim 1) is like a waterfront whore: her price goes down as the night wears on".

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<sup>6</sup>The website is linked to a story entitled "2 Charged with murdering former Oregon cult member." The story highlights a story of a man shot to death in Lubbock, Texas.

Ch 11 new

c) Sunday, May 23, 2010 "(Victim 1)'s attendants say she shits the bed regularly and pisses it when she's drunk: at the moment of death such events are quite telling".

d) Friday, May 28, 2010 "Last night I had a dream about (Victim 1). Seems something sudden..".

e) Friday, May 28, 2010 "...something suddenly happened."

f) Friday, May 28, 2010 "The woods have eyes".

g) Friday, May 28, 2010 "Damn! I just heard more screams coming from the compound! Hope everything is OK! Worried!"

14. On November 12, 2010 and December 11, 2010, Twitter was served a grand jury subpoena for IP addresses accessing the following accounts: "vajragurl", "kpc\_watch", "Vajrawarrior", "alicezeoli", "zeolialyce", "alycezeoli", "aconlamho", "MaliceZeholi", "tenparinpoche", "karmaKuchen", "PenorRinpoche", "femnikki", "ahkonnorbu". On November 16, 2010 and December 16, 2010, Twitter advised that those accounts were accessed from IP Address 174.32.77.242.

15. IP Address 174.32.77.242 is registered to Hughes Network Systems. On December 2, 2010 and January 5, 2011, Hughes Network Systems responded to a subpoena requesting subscriber information associated with that IP Address. Hughes Network Systems returned information identifying the subscriber and site contact name as William Cassidy, 29720 Cove Road, Lucerne Valley, California 92356, telephone number (928) 301-0636, site contact email: [jewelpig8@gmail.com](mailto:jewelpig8@gmail.com), billing information: Jewel Annabella, billing address: PO Box 1883, Lucerne Valley, CA 92356.

16. Some of the above Twitter account names are slight variations to Victim 1's name.

17. According to the Twitter subpoena results, Twitter Account "alicezeoli" was registered under email address: [alyce@malyce.com](mailto:alyce@malyce.com). Twitter Account "alycezeoli" was registered under email address: [phatalyce@peckerhead.edu](mailto:phatalyce@peckerhead.edu). Twitter Account "MaliceZeholi" was registered under email address: [malicezeholi@fuggedaboutit.com](mailto:malicezeholi@fuggedaboutit.com). All of these account names and email addresses have Victim 1's name or variations of Victim 1's name in them. Twitter Account "PenorRinpoche" was registered under email address: [what@meworry1.com](mailto:what@meworry1.com).

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now

## BLOGS


18. According to Wikipedia, a blog (a blend of the term web log) is a type of website. Blogs are usually maintained by an individual with regular entries of commentary, descriptions of events, or other material such as graphics or video.

19. KPC runs a website entitled "TibetanBuddhistAltar". A blog was created entitled: "DigitalTibetanBuddhistAltar", <http://tibetanaltar.blogspot.com>. The email address cited in the "DigitalTibetanBuddhistAltar" is the same email address CASSIDY used when he corresponded with members of the KPC Community, [rinpoche2006@gmail.com](mailto:rinpoche2006@gmail.com). Once CASSIDY left the retreat site, some of the financial information of KPC went missing and was never recovered. Later that information was posted on DigitalTibetanBuddhistAltar. The blog claimed the financial information "proved" unlawful activity on the part of KPC, however it only showed information pertaining to donors and their donation amounts. CASSIDY continued to post defamatory information on the Digital Tibetan Buddhist Altar and continues to the present.

20. Blog "DigitalTibetanBuddhistAltar" posted the following: "Yes...beauty. A silver hammer on a hard head is beautiful, particularly if it is administered before one's funeral pyre catches blaze. Otherwise, one's head swells and explodes."

21. Blog "DigitalTibetanBuddhistAltar" posted the following: "This would be funny if it weren't so tragic. Back a couple of months ago, (Victim 1) (she calls herself "(Victim 1)," and claims she is a "living Buddha") called police near her Barnesville, Maryland home to report that, a "team of intruders" were observed "stalking the perimeter." Nothing wrong with that -- can't be too careful these days."

22. Blog "DigitalTibetanBuddhistAltar" posted the following: "Whenever I hear about a Buddhist cult, I immediately want to investigate. It is like watching hookers on the stroll. You never know when you'll find a really saucy one. Speaking personally, one whistled at me a while back, and she came right over to the car. I made the mistake of rolling down the window far enough for her to jump in. That led to my brief tenure as Chief Operating Office of KPC in all its farflung permutations and front operations. So, while I may not be an expert on Buddhist cults, at least I am entitled to an opinion, having examined one from the inside out, so to speak."



23. Blog "DigitalTibetanBuddhistAltar", posted the following: "Just for sake of example, lets pretend that once upon a time, you dreamed that somebody came clump, clump, clumping up the stairs to your bedroom and did you an injury... Maybe it was somebody you knew... The time, the body, and the circumstance no longer exist. This is to say that the body which was injured in the dream no longer exists, the apparent attack itself no longer exists, and the apparent attacker no longer exists... The body which was attacked may with equal validity only be claimed as extant for the precise moment of the attack. We may also say that was the younger body, whereas now there is the older body." Victim 1 revealed personal information to **CASSIDY** including sexual abuse by her step-father as a child. The above post pertains to those personal stories told to **CASSIDY**.

24. Subpoena results received from Google on January 25, 2011 provided the following information pertaining to <http://tibetanaltar.blogspot.com>: the blog name is Digital Tibetan Buddhist Altar, the description of the blog is: Buddhist Polemics Where Others Fear to Tread and it was created on September 4, 2006. The Username associated with this blog is [rinpoche2006@gmail.com](mailto:rinpoche2006@gmail.com). The first and last name of the User are: Urgyan Tenpa.<sup>7</sup> The IP address associated with this account is 67.142.162.30. That IP address is registered to Hughes Network Systems. On January 5, 2011, Hughes Network Systems responded to a subpoena for subscriber information pertaining to IP Address 67.142.162.30. Hughes Network System advised that IP Address is a HTTP web proxy used by many hundreds of customers at one time. Hughes Network Systems advised IP Address 174.32.77.242, registered to **CASSIDY**, would use IP Address 67.142.162.30 as their HTTP web proxy from Hughes Network System.

25. These continual communications, particularly when viewed in the context of the history of **CASSIDY's** actions towards Victim 1 and KPC, have caused Victim 1 substantial emotional distress, and have caused Victim 1 to fear for her own safety and the safety of KPC members. The consequences of this harassment has forced Victim 1 not to leave her home in a year and a half except going to meet with her psychiatrist. Victim 1 has also not taught to her students since June 2009. Victim 1 is fearful to leave her residence for fear that **CASSIDY** or someone hired by **CASSIDY** may kill her. Victim 1 has experienced numerous physical ailments from the ongoing harassment. In October 2010, Victim 1 wanted to go on retreat but was unable to for fear that she would not be safe after recent tweets from **CASSIDY's** avatar regarding Victim 1's motor home and her intent to travel. Victim 1 does not believe that she has long to live and believes her

<sup>7</sup> Urgyan Tenpa is a known alias used by William Cassidy.

has the 7  
sided her  
to meet her  
see her  
my

professional career is ruined. Victim 1 has on occasion hired armed security guards to protect her residence for fear of her life.

*OK course he reads it every day. The whole thing is about him.*

26. A blog run by KPC students, but not affiliated with KPC, entitled <http://protectingnyingma2.wordpress.com>, is a website used to defend Victim 1. Logs showing IP addresses accessing this website indicate IP Address 174.32.77.242 on average accessed this website every day. That IP address is registered to **CASSIDY**. That same IP address has also accessed Victim 1's teaching blog website. This website was also created to track **CASSIDY's** whereabouts. KPC believed IP Address 174.32.77.242 belonged to **CASSIDY** and they had the sense of security that **CASSIDY** was in California when that IP Address accessed their website and could not harm Victim 1.

27. Based on my conversations with Victim 1, your affiant learned the following, among other things:

a) Victim 1 and members of KPC have brought their concerns to numerous Police Departments in the past. Court Records indicate in November 2007, a Nevada state court judge issued a bench warrant for **CASSIDY** for a probation violation in Las Vegas, Nevada. Cassidy was sentenced to 36 months due to health concerns.

b) In January 2009, prior to **CASSIDY's** release from prison, Victim 1 sought an "injunction against workforce harassment" for **CASSIDY** in Payson, Arizona. Victim 1 subsequently renewed the order in 2010 and 2011.

c) As part of the campaign of harassment, NYDIA ALEXANDRA, sought a temporary restraining order <sup>on</sup> Victim 1. As a result, Victim 1 hired a lawyer and traveled to California to defend herself. **CASSIDY** did not appear in court, but was named on the document. At the hearing on September 30, 2009, there was insufficient evidence to support the claim, and the restraining order was dismissed. *see CSM*

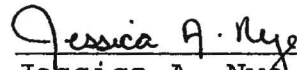
d) As the harassment of Victim 1 continued, in the beginning of 2010, a "task force" was established of originally 8 or 9 KPC members to address the concerns of **CASSIDY's** harassment. This task force communicates on a daily basis and sends morning and evening reports surrounding Twitter Account updates and blog posts.

28. The defendant, **CASSIDY**, has a criminal history including Transporting a Dangerous Weapon aboard an Aircraft on September 20, 1993, Corporal Injury on a Spouse, Cohabitant, or Fellow Parent

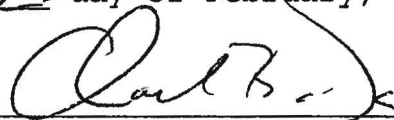
*did not*

Resulting in a Traumatic Condition on March 1, 1996, Possession of a Firearm on December 18, 1996, Arson 1<sup>st</sup> degree and Battery/Domestic Violence on March 14, 2003.

29. Wherefore, your affiant respectfully requests that an arrest warrant be issued for the defendant **WILLIAM LAWRENCE CASSIDY**.

  
\_\_\_\_\_  
Jessica A. Nye  
Special Agent, FBI

Sworn to before me this  
2<sup>nd</sup> day of February, 2011

  
\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF MARYLAND