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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2019 Grand Jury

19CR00071-ODW

UNITED STATES OF AMERICA,

CR No. 19

Plaintiff,

I N D I C T M E N T

v.

[18 U.S.C. § 371: Conspiracy; 18 U.S.C. § 875(c): Threats to Injure in Interstate Commerce; 18 U.S.C. § 844(e): Interstate Threats Involving Explosives; 18 U.S.C. § 1030(a)(5)(A), (c)(4)(B)(i), (c)(4)(A)(i)(I): Intentionally Damaging a Computer by Knowing Transmission; 18 U.S.C. § 1030(a)(7)(A), (c)(3)(A): Interstate Threat to Damage a Protected Computer with Intent to Extort; 18 U.S.C. § 2(a): Aiding and Abetting]

TIMOTHY DALTON VAUGHN,
aka "wantedbyfeds,"
aka "Wanted,"
aka "Hacker_R_US,"
aka "HDGZero,"
aka "Xavier Farbel,"
GEORGE DUKE-COHAN,
aka "7R1D3N7,"
aka "Opt1cz,"
aka "Pl3xl3t,"
aka "DigitalCrimes,"

Defendants.

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 371]

A. INTRODUCTORY ALLEGATIONS

1. At all times relevant to this Indictment:

a. Apophis Squad was a collective of computer hackers and swatters and other individuals located throughout the world,

1 including the United States ("U.S."), that conducted cyber and
2 swatting attacks against individuals and entities including school
3 districts in the U.S. and the United Kingdom ("U.K."). These attacks
4 included, among other things, the dissemination of bomb and school-
5 shooting threats designed to cause fear of imminent danger and did
6 cause the closure of hundreds of schools on two continents on
7 multiple occasions.

8 b. Defendant TIMOTHY DALTON VAUGHN, also known as ("aka")
9 "wantedbyfeds," aka "Wanted," aka "Hacker_R_US," aka "HDGZero," aka
10 "Xavier Farbel" ("VAUGHN") resided in, and was located in Winston-
11 Salem, North Carolina. Defendant VAUGHN was a member of Apophis
12 Squad who used the Twitter handles @wantedbyfeds and @Hacker_R_US,
13 and also shared the Twitter handles @ApophisSquad and @apophissquadv2
14 with the other members of Apophis Squad, including defendant GEORGE
15 DUKE-COHAN.

16 c. Defendant GEORGE DUKE-COHAN, aka "7R1D3N7," aka
17 "Opt1cz," aka "Pl3xl3t," aka "DigitalCrimes" ("DUKE-COHAN") resided
18 in, and was located in Hertfordshire, U.K. Defendant DUKE-COHAN was
19 a member of Apophis Squad who used the Twitter handles @7R1D3N7,
20 @DigitalCrimes, @opt1cz, and @Pl3xl3t, and also shared the Twitter
21 handles @ApophisSquad and @apophissquadv2 with the other members of
22 Apophis Squad, including defendant VAUGHN.

23 d. Unindicted Co-Conspirator 1, aka "PartialDuplex,"
24 resided in, and was located in Hampshire, U.K. Unindicted Co-
25 Conspirator 1 was a member of Apophis Squad who used the Twitter
26 handle @PartialDuplex.

27 e. Twitter was an online social networking service on
28 which users publicly post and interact with messages known as tweets.

1 Twitter users could also send private messages (called "Direct
2 Messages" or "DMs") to one another.

3 i. A Twitter "handle" was the name a user selected
4 to use on Twitter, preceded by the "@" symbol.

5 ii. When publishing a tweet, the user had an option
6 to "tag" another user by inserting the user's Twitter handle, which
7 would alert the tagged user to the existence of the tweet.

8 f. ProtonMail was a Switzerland-based email provider
9 which offered secure encrypted email accounts.

10 2. The following definitions apply to this Indictment:

11 a. A "Distributed Denial of Service attack" or "DDoS
12 attack" was a type of malicious computer activity by which an
13 attacker causes a network of computers to "flood" a victim computer
14 with large amounts of data or specific commands. As a result, the
15 victim computer is unable to handle legitimate network traffic and
16 legitimate users are denied the services of the computer. Depending
17 on the type and strength of the DDoS attack, the victim computer and
18 its network may become completely disabled and unable to perform
19 their intended functions without significant repair.

20 b. "Swatting" was the action or practice of harassing a
21 victim by deceiving the victim or an emergency service into sending
22 or causing to be sent police and emergency service response teams to
23 the victim's location, often by making a false report of a serious
24 law enforcement emergency such as a murder or bomb situation at the
25 victim's location to trigger the deployment of the response teams.

26 c. "Spoofing" was the creation of email messages with a
27 forged, faked, or otherwise inauthentic sender address.

28

1 d. "Catfishing" was a type of deceptive activity whereby
2 a person would create a fake identity and/or social media presence on
3 the internet in order to target a specific victim or victims for
4 deception.

5 e. "Doxing" or "doxxing" was the publication of a
6 person's personal information, usually including their true name and
7 contact information.

8 B. OBJECTS OF THE CONSPIRACY

9 3. Beginning on a date unknown to the Grand Jury but no later
10 than January 2018, and continuing through on or about August 31,
11 2018, in Los Angeles, Orange, and Riverside Counties, within the
12 Central District of California, and elsewhere, defendants VAUGHN and
13 DUKE-COHAN, together with Unindicted Co-Conspirator 1 and others
14 known and unknown to the Grand Jury, knowingly combined, conspired,
15 and agreed to commit the following crimes:

16 a. threats to injure in interstate commerce, in violation
17 of Title 18, United States Code, Section 875(c);

18 b. conveying false information concerning the use of an
19 explosive device, in violation of Title 18, United States Code,
20 Section 844(e); and

21 c. intentionally damaging a computer by knowing
22 transmission, in violation of Title 18, United States Code, Section
23 1030(a)(5)(A).

24 C. MANNER AND MEANS OF THE CONSPIRACY

25 4. The objects of the conspiracy were carried out, and to be
26 carried out, in substance, as follows:

27 a. Using Internet communication applications such as
28 Discord and Internet Relay Chat ("IRC") rooms, defendants VAUGHN and

1 DUKE-COHAN and the other members of Apophis Squad, including
2 Unindicted Co-Conspirator 1, would plan to and would send emails
3 containing bomb and school-shooting threats to hundreds of school
4 districts in the U.S. and the U.K., knowing that those threats were
5 false and with knowledge that the emails would be viewed as threats.

6 b. For some of the threats, defendants VAUGHN and DUKE-
7 COHAN and the other members of Apophis Squad, including Unindicted
8 Co-Conspirator 1, would spoof email addresses to make it appear as if
9 the bomb and school-shooting threats were sent by other entities such
10 as the mayor of London, VeltPVP, and Zonix.

11 c. Defendants VAUGHN and DUKE-COHAN and the other members
12 of Apophis Squad, including Unindicted Co-Conspirator 1, would DDoS
13 or deface the websites of entities with which they were displeased.

14 D. OVERT ACTS

15 5. On or about the following dates, in furtherance of the
16 conspiracy, and to accomplish its objects, defendants VAUGHN and
17 DUKE-COHAN, as well as Unindicted Co-Conspirator 1 and others known
18 and unknown to the Grand Jury, committed and caused others to commit
19 the following overt acts, among others, in the Central District of
20 California, and elsewhere:

21 Overt Act No. 1: In or about January 2018, defendants VAUGHN
22 and DUKE-COHAN and the other members of Apophis Squad defaced the
23 website of Colombian university Colegio Nueva Granada ("CNG"),
24 www.cng.edu.

25 Overt Act No. 2: On or about January 14, 2018, defendant
26 VAUGHN DDoSed the website belonging to Hoonigan Industries, located
27 in Long Beach, California (hoonigan.com), for approximately three
28 days during which the website was rendered inoperable.

1 Overt Act No. 3: On or about January 15, 2018, defendant
2 VAUGHN bragged in an IRC chat room that he had DDoSed hoonigan.com.

3 Overt Act No. 4: On or about January 28, 2018, defendant
4 DUKE-COHAN called the Federal Bureau of Investigation's ("FBI's")
5 Omaha, Nebraska Field Office ("FBI Omaha") and asked the operator if
6 defendant DUKE-COHAN should pack an Ebola or anthrax dispersal weapon
7 to deploy in the lobby of the FBI, and when the operator did not
8 respond, defendant DUKE-COHAN threatened to rape and kill the
9 operator's wife.

10 Overt Act No. 5: A few hours later, on or about January 28,
11 2018, defendant DUKE-COHAN called FBI Omaha again and claimed he was
12 going to set off a pipe bomb at Los Angeles International Airport
13 ("LAX") on July 4, 2018; was going to set off a bomb at his school on
14 January 29, 2018, because he was too excited to wait; claimed
15 responsibility for hacking a Colombian university; and said he was
16 going to go stab his mother.

17 Overt Act No. 6: On or about January 29, 2018, defendant
18 DUKE-COHAN, through a public posting using the Twitter handle
19 @7R1D3N7, took credit for the defacement of CNG's website.

20 Overt Act No. 7: On or about January 29, 2018, defendant
21 DUKE-COHAN, through a public posting using the Twitter handle
22 @7R1D3N7, posted a screenshot of cng.edu with a picture of Adolf
23 Hitler holding a sign with the words "YOU ARE HACKED" with the text
24 that CNG's website had been "Hacked by APOPHIS SQUAD - OFFICIAL
25 APOPHIS SQUAD HACK" and "KEEP THIS UP OR PEOPLE DIE! HAHA LAX 4TH
26 July BOMB!"

27 Overt Act No. 8: On or about January 29, 2018, defendant
28 DUKE-COHAN, through a public posting using the Twitter handle

1 @7R1D3N7, stated: "Will they ever learn good SEC[URITY]....I am a
2 skid.... do not hak me! Cng.edu < PWN DB leaked.

3 (Jake_DAVIS_LEFT_EYE) @briankrebs @FBIomaha told you I hacked them!"

4 Overt Act No. 9: On or about January 30, 2018, defendant
5 VAUGHN, using the Twitter handle @wantedbyfeds, stated to another
6 Twitter user that he was catfishing a man in Cottondale, Florida.

7 Overt Act No. 10: On or about January 30, 2018, defendant
8 DUKE-COHAN, assisted by defendant VAUGHN (who was communicating with
9 defendant DUKE-COHAN during the call), and posing as "Jake Davis"
10 from Cottondale, Florida, called FBI Omaha and took credit on behalf
11 of Apophis Squad for the CNG defacement.

12 Overt Act No. 11: Between on or about March 16 and 19, 2018,
13 defendants VAUGHN and DUKE-COHAN, together with Co-Conspirator 1 and
14 the other members of Apophis Squad, sent emails appearing to be sent
15 by VeltPVP, a company that hosts player versus player Minecraft game
16 servers, to hundreds of schools in the U.K. in both English and
17 Arabic threatening that a student had been sent to the school with a
18 bomb that would detonate in three hours unless \$5,000 USD was sent to
19 VeltPVP.

20 Overt Act No. 12: On or about March 19, 2018, defendant DUKE-
21 COHAN, through a public posting using the Twitter handle
22 @ApophisSquad, stated: "We hope everyone in the UK enjoyed our email.
23 Thanks to all who participated in this event," and signed it with his
24 moniker, Pl3xl3t.

25 Overt Act No. 13: On or about March 28, 2018, defendant DUKE-
26 COHAN, together with the other members of Apophis Squad, sent emails
27 on behalf of Apophis Squad signed with defendant DUKE-COHAN's
28 moniker, Pl3xl3t, threatening that a car would drive into as many

1 students as possible as they exited the school, and if the school
2 tried to evacuate the driver would shoot.

3 Overt Act No. 14: On or about March 28, 2018, defendant DUKE-
4 COHAN, through a public posting using the Twitter handle
5 @ApophisSquad, stated: "Schools out for the DAY! Hope all you HARD
6 working students get our emails. Do not panic... they are fake... we
7 think," and signed it with his moniker, Pl3xl3t.

8 Overt Act No. 15: In or about April 2018, defendant VAUGHN
9 compiled a list of U.S. school districts and their email addresses
10 and sent the list to defendant DUKE-COHAN.

11 Overt Act No. 16: On or about April 8, 2018, defendant DUKE-
12 COHAN, through a public posting using the Twitter handle
13 @ApophisSquad, stated: "We are holding off on UK schools till they
14 are ALL back from holiday. We are still on track for the US."

15 Overt Act No. 17: On or about April 8, 2018, defendant DUKE-
16 COHAN, through a public posting using the Twitter handle
17 @ApophisSquad, stated: "Shit, we sent the emails to early. Our bad
18 on that one we were testing and we used the wrong list for the
19 test..... We would like to say sorry for the small amount of evacs
20 this has caused. We will aim to fix this soon!"

21 Overt Act No. 18: On or about April 8, 2018, defendant DUKE-
22 COHAN, through a public posting using the Twitter handle
23 @ApophisSquad, stated: "The CEO of @ZonixUS and the developers took
24 the option to make fun of us. All players + staff will now be the
25 target of Doxing & Swatting. All email fallout is now pointed at
26 Zonix and will soon not be a server," and tagged the Twitter user
27 with the handle @cbrady350.

28

1 Overt Act No. 19: On or about April 8 and 9, 2018, defendant
2 DUKE-COHAN, together with the other members of Apophis Squad, sent
3 emails appearing to be sent by Apophis Squad with a reply email
4 address to Zonix, a company that hosts player versus player Minecraft
5 video game servers, to school districts in the U.S. -- including
6 school districts in El Segundo, Mission Viejo, Tustin, Garden Grove,
7 Santa Ana, Redlands, Jurupa Valley, Riverside, Chino, and Lompoc,
8 within the Central District of California -- threatening that a
9 bullied student was coming to school with three bombs and a .22-
10 caliber handgun to shoot any staff or student member.

11 Overt Act No. 20: On or about April 10, 2018, defendant VAUGHN
12 created an IRC chat room with the description "feds.apophissquad.xyz
13 Powered by School Shootings and Bomb Threats," in which he
14 communicated with defendant DUKE-COHAN and Unindicted Co-Conspirator
15 1.

16 Overt Act No. 21: On or about April 10, 2018, defendant DUKE-
17 COHAN participated in an interview moderated by the individual using
18 the email cbrady350@gmail.com and stated that he uses the monikers
19 Pl3xl3t and 7R1D3N7; gave a "shout-out" for the @apophissquadv2
20 Twitter handle; stated that he and the other members of Apophis Squad
21 had accidentally sent the threat emails from April 8 and 9, 2018,
22 early to a small number of schools; and stated that Apophis Squad was
23 planning on "leaking the U.S. military database."

24 Overt Act No. 22: On or about April 11, 2018, defendant VAUGHN
25 bragged to an individual named Jason in an IRC chat room: "[W]e have
26 hit more then 2k schools. 400+ in uk. 2k+ in us. more stuff coming
27 Friday."
28

1 Overt Act No. 23: On or about April 12 and 13, 2018,
2 defendants VAUGHN and DUKE-COHAN, together with Co-Conspirator 1 and
3 the other members of Apophis Squad, sent emails appearing to be sent
4 by Apophis Squad from Mineplex, a company that hosts player versus
5 player Minecraft video game servers, to school districts in the U.S.
6 and the U.K. -- including school districts in Burbank, El Segundo, La
7 Verne, Anaheim, La Habra, Huntington Beach, Fullerton, Tustin,
8 Riverside, Fillmore, Santa Maria, and Lompoc, within the Central
9 District of California -- threatening that a student with two bombs
10 made of ammonium nitrate/fuel oil ("ANFO") would go to school and set
11 off the bombs, and included a photograph of a plastic bottle ANFO
12 bomb.

13 Overt Act No. 24: On or about April 12, 2018, defendant DUKE-
14 COHAN, through a public posting using the Twitter handle
15 @apophissquadv2, retweeted a tweet about the school bomb threat,
16 which included the photograph of the plastic bottle ANFO bomb.

17 Overt Act No. 25: On or about April 12, 2018, defendant DUKE-
18 COHAN, through a public posting using the Twitter handle
19 @apophissquadv2, stated: "Email scraping has just hit 52k emails
20 found, UK & U.S! We got our servers ready but do you? Just think
21 24k to the UK clear 400 schools, 1k to the U.S closed like 30... 52k is
22 just going to be MEMES. . . ."

23 Overt Act No. 26: On or about April 12, 2018, defendant DUKE-
24 COHAN, through a public posting using the Twitter handle
25 @apophissquadv2, stated: "We take request for school clear outs /
26 lockdowns. If you want to SKIP a lesson? Maybe not do that exam?
27 Email us your school: apophissquad@tuta.io we do it free & easy."
28

1 Overt Act No. 27: On or about April 12, 2018, defendant DUKE-
2 COHAN, through a public posting using the Twitter handle
3 @apophissquadv2, stated: "Tango down ~ U.S + UK Schools We are
4 Apophis Squad and we are HERE to stay! We 100% going dark now.. Hope
5 the U.S and UK enjoy it, if we get arrested then oops we must of
6 messed up at some point."

7 Overt Act No. 28: On or about April 12, 2018, defendant DUKE-
8 COHAN told defendant VAUGHN to "go get a fuck ton of US school
9 emails! ONLY US schools this time. nothing else. UNDERSTAND THAT.
10 NOTHING ELSE," to which defendant VAUGHN replied, "will do."

11 Overt Act No. 29: On or about April 13, 2018, defendant DUKE-
12 COHAN called FBI Omaha, identified himself as the caller who had
13 previously threatened to rape the operator's wife, reiterated his
14 bomb threat on LAX, and asked questions about the bomb threats made
15 on U.S. schools.

16 Overt Act No. 30: On or about April 13, 2018, defendant DUKE-
17 COHAN, through a public posting using the Twitter handle
18 @apophissquadv2, stated: "We are OPEN for request for school
19 lockdowns / evacs. Send us your request to apophissquad@tuta.io
20 (FREE)."

21 Overt Act No. 31: On or about April 15, 2018, defendant DUKE-
22 COHAN, through a public posting using the Twitter handle
23 @apophissquadv2, posted a screenshot of a live web chat between him
24 and the Hertfordshire Police in the U.K., in which he stated: "You
25 have not caught any of us and we plan on hitting the UK & US schools
26 today *Tmr*," and clarified that "we" meant Apophis Squad.

27 Overt Act No. 32: On or about April 15, 2018, defendant DUKE-
28 COHAN, through a public posting using the Twitter handle

1 @apophissquadv2, stated: "We plan on hitting as many schools as we
2 can on Monday! We hope anyone that just wants to have a day off or
3 maybe get out of the math test you have! Will email us any schools
4 we are working hard on getting 100k emails!"

5 Overt Act No. 33: On or about April 15, 2018, defendant DUKE-
6 COHAN, through a public posting using the Twitter handle

7 @apophissquadv2, stated: "This is how we get in the mood before we
8 build our bombs & send the emails," and included a link to the song
9 labeled "Foster The People Pumped Up Kicks columbine ..."

10 Overt Act No. 34: On or about April 17, 2018, defendant VAUGHN
11 possessed a copy of the image of the plastic bottle ANFO bomb on his
12 computer.

13 Overt Act No. 35: On or about May 5, 2018, defendant DUKE-
14 COHAN, through a public posting using the Twitter handle
15 @apophissquadv2, stated: "Request open for schools! Email us or DM
16 us. Send in dem emails! WE BACK BOIS!"

17 Overt Act No. 36: On or about May 7, 2018, defendant DUKE-
18 COHAN, through a public posting using the Twitter handle
19 @apophissquadv2, stated: "Little hint in the email '\`APS\`' is used,
20 stand for Apophis Squad if the media did not know."

21 Overt Act No. 37: On or about May 7 and 8, 2018, defendants
22 VAUGHN and DUKE-COHAN, together with the other members of Apophis
23 Squad, sent emails to school districts in the U.S. and the U.K. --
24 including school districts in Beverly Hills, Redondo Beach, Glendora,
25 La Verne, Mission Viejo, and Thermal, within the Central District of
26 California -- appearing to be sent by either the Director-General of
27 the U.K.'s National Crime Agency ("NCA") or the Chief Executive
28 Officer of the U.K.'s Marz Media, and threatening that three bombs

1 placed under school transport vehicles and one in the school would
2 explode unless \$5,000 USD was paid to cbrady350@gmail.com.

3 Overt Act No. 38: On or about May 8, 2018, defendant DUKE-
4 COHAN, through a public posting using the Twitter handle
5 @apophissquadv2, stated: "Oops @cbrady350 you about to get \$5,000 USD
6 in ur paypal! HEHEHE Better pay up bois or school could go BOOM!"

7 Overt Act No. 39: On or about May 8, 2018, defendant DUKE-
8 COHAN, through a public posting using the Twitter handle
9 @apophissquadv2, stated: "First Email work. Now we wait for the
10 second to work its magic."

11 Overt Act No. 40: On or about June 26, 2018, defendants VAUGHN
12 and DUKE-COHAN, and the other members of Apophis Squad, sent emails
13 signed "APS" to school districts in the U.S. and the U.K. --
14 including school districts in Buena Park and Santa Paula, within the
15 Central District of California -- appearing to be sent from the mayor
16 of London threatening that two rocket-propelled grenade ("RPG") heads
17 placed under two school buses and four land mines placed on the
18 sports field and around its entrance would detonate unless school was
19 cancelled because they are "not happy" with the way that the schools
20 "let these boys and girls dress and not worship Alah the God" and
21 allow girls to be educated.

22 Overt Act No. 41: On or about June 26, 2018, defendant DUKE-
23 COHAN, through a public posting using the Twitter handle
24 @apophissquadv2, tweeted at the mayor of London: "Hit us up when you
25 wish to comment on why you sent bomb threats? Apophis Team is BACK,"
26 and tagged defendant VAUGHN's Twitter handle @Hacker_R_US.

1 Overt Act No. 42: On or about June 27, 2018, defendants VAUGHN
2 and DUKE-COHAN, on behalf of Apophis Squad, began a week-long DDoS
3 attack on the computer servers of ProtonMail.

4 Overt Act No. 43: On or about June 27, 2018, defendant DUKE-
5 COHAN, through a public posting using the Twitter handle
6 @apophissquadv2, tweeted at @ProtonMail: "SHIT DDOS PROT[ECTION]!!!
7 @ProtonMailHelp your website is DOWN!!! Can't take 200gbps SSDP
8 attack. LOL!!!!"

9 Overt Act No. 44: On or about June 27, 2018, defendant DUKE-
10 COHAN, through a public posting using the Twitter handle
11 @apophissquadv2, tweeted at the Chief Technology Officer of
12 ProtonMail: "Say sorry for calling us clowns and we will allow your
13 network backup!"

14 Overt Act No. 45: On or about June 28, 2018, defendant DUKE-
15 COHAN, through a public posting using the Twitter handle
16 @apophissquadv2, tweeted at ProtonMail: "We will down your network no
17 matter who your with. . . . [W]ait till you leave and then we will
18 strike and it will HURT!!!"

19 Overt Act No. 46: On or about August 9, 2018, defendant DUKE-
20 COHAN, through a public posting using the Twitter handle
21 @apophissquadv2: "LOOOL 7 US Marshalls just tried to Raid
22 @Hacker_R_US [defendant VAUGHN] bitch did not have a search warrent!
23 Come back later N[****]. You aint got SHIT! Feds can't touch us!"

24 Overt Act No. 47: On or about August 9, 2018, defendant DUKE-
25 COHAN, assisted by defendant VAUGHN, called San Francisco
26 International Airport ("SFO") Operations while United Airlines flight
27 949 ("UAL 949") from London Heathrow to SFO was in the air, claiming
28 to be the father of a passenger on that flight who had communicated

1 to him mid-flight that the plane had been hijacked by four men with
2 weapons and explosives.

3 Overt Act No. 48: On or about August 9, 2018, defendant DUKE-
4 COHAN, through a public posting using the Twitter handle
5 @apophissquadv2: "One thing to say! UAL949 Grounded bitch! Don't
6 try and raid our members next time! HAHAAAAHA.... 4 guys 1 bomb back
7 of the plane?.... 9/11 remake! ~Wanted & Opt1cz."

8 Overt Act No. 49: On or about August 9, 2018, defendant DUKE-
9 COHAN, assisted by defendant VAUGHN, called San Francisco Police
10 Department's Airport Bureau continuing to claim to be the father of a
11 passenger on UAL 949, adding that the passengers were being forced to
12 the back of the airplane, and providing his phone number and the
13 email address opt1cz@apophissquad.ru as his contact information,
14 causing the plane to be sent to a quarantined area upon landing in
15 San Francisco where it remained for hours until security checks could
16 be conducted.

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COUNT TWO

[18 U.S.C. §§ 875(c); 2(a)]

On or about April 8 and 9, 2018, defendants TIMOTHY DALTON VAUGHN, also known as ("aka") "wantedbyfeds," aka "Wanted," aka "Hacker_R_US," aka "HDGZero," aka "Xavier Farbel" and GEORGE DUKE-COHAN, aka "7R1D3N7," aka "Opt1cz," aka "Pl3xl3t," aka "DigitalCrimes," each aiding and abetting the other, with the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, knowingly transmitted in interstate commerce to school districts in El Segundo, Mission Viejo, Tustin, Garden Grove, Santa Ana, Redlands, Jurupa Valley, Riverside, Chino, and Lompoc, in Los Angeles, Orange, Santa Barbara, and Riverside Counties, within the Central District of California, the following communication containing true threats to injure the person of another:

Hello, you have made a choice to not listen to us. I got bullied at this school and you did nothing. Now you will understand the true mean of pain. I am coming into school with 3 bombs, and a .22 hand gun. If I see any staff or student I will shoot them and kill them. When I run out of bullets, I will slit there throats and watch them bleed out on the floor. If I see any police at the school I will blowup the bombs.

COUNT THREE

[18 U.S.C. §§ 875(c); 2(a)]

On or about April 12 and 13, 2018, defendants TIMOTHY DALTON VAUGHN, also known as ("aka") "wantedbyfeds," aka "Wanted," aka "Hacker_R_US," aka "HDGZero," aka "Xavier Farbel" and GEORGE DUKE-COHAN, aka "7R1D3N7," aka "Opt1cz," aka "Pl3xl3t," aka "DigitalCrimes," each aiding and abetting the other, with the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, knowingly transmitted in interstate commerce to school districts in Burbank, El Segundo, La Verne, Anaheim, La Habra, Huntington Beach, Fullerton, Tustin, Riverside, Fillmore, Santa Maria, and Lompoc, in Los Angeles, Orange, Santa Barbara, and Riverside Counties, within the Central District of California, the following communication containing true threats to injure the person of another:

Hello, a male student will be sent into your campus as you start the day, he will look normal but what is in his bag is a bomb. The explosive that is in the two plastic bottles is called ANFO it is a very powerful explosive. The point is that when you put the school on lockdown this student will set off the bomb, and will kill EVERY student in the room and maybe the rooms next to it. It has an LDR which is used to stop bag searches. It will exploded if any light hits the sensor. We follow in the foot steps of our two heros who died in the Columbine High School shooting. Natural selection is coming and we plan on being the onse to start it off. We understand that you may want to contact the FBI or Law enforcement but note, that we have pick 5 schools to do this to, your school could be the one to be hit or it could be a lucky one and gets to be picked at a different time. The point is nobody but us will know which school is to be hit. We also have pressure plated pvc pipes at the exists with 12 gauge shot guns shells so if anyone steps on them it will shot through the student. We will have a sniper watching the exits with concreate with a ruger 10/22.

COUNT FOUR

[18 U.S.C. §§ 875(c); 2(a)]

On or about May 7 and 8, 2018, defendants TIMOTHY DALTON VAUGHN, also known as ("aka") "wantedbyfeds," aka "Wanted," aka "Hacker_R_US," aka "HDGZero," aka "Xavier Farbel" and GEORGE DUKE-COHAN, aka "7R1D3N7," aka "Opt1cz," aka "Pl3xl3t," aka "DigitalCrimes," each aiding and abetting the other, with the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, knowingly transmitted in interstate commerce to school districts in Beverly Hills, Redondo Beach, Glendora, La Verne, Mission Viejo, and Thermal, in Los Angeles, Orange, and Riverside Counties, within the Central District of California, the following communication containing true threats to injure the person of another:

I will make this simple. Tuesday 05/08/2018 9:30AM, 3 PVC pipe bombs placed under school transport will explode. I will then set off the main pipe bomb hidden in the school. This is what you get for not listening to me. See you all in HELL. Or pay us \$5,000 USD Via paypal to cbrady350@gmail.com.

COUNT FIVE

[18 U.S.C. §§ 875(c); 2(a)]

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3 On or about June 26, 2018, defendants TIMOTHY DALTON VAUGHN,
4 also known as ("aka") "wantedbyfeds," aka "Wanted," aka
5 "Hacker_R_US," aka "HDGZero," aka "Xavier Farbel" and GEORGE DUKE-
6 COHAN, aka "7R1D3N7," aka "Opt1cz," aka "Pl3xl3t," aka
7 "DigitalCrimes," each aiding and abetting the other, with the purpose
8 of issuing a threat and with knowledge that the communication would
9 be viewed as a threat, knowingly transmitted in interstate commerce
10 to school districts in Buena Park and Santa Paula, in Los Angeles and
11 Ventura Counties, within the Central District of California, the
12 following communication containing true threats to injure the person
13 of another:

14 We are not happy with the way you let these boys and girls
15 dress and not worship Alah the God. We have planted 2 RPG
16 heads under 2 school busses and 4 land mines on the sports
17 field and around the entrance... If you cancel the school
18 we will not blow it up, if you keep school on and allow
19 girls to be educated we will blow up the bomb and come in
20 school every girl in the school including teachers. Any
21 sign of POLICE we will kill each student one by one. We
22 have members in the school who are students they have
23 orders to SHOOT if you try and evacuate the school. Simple.
24 Follow the rules or be killed. ~APS.
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27
28

COUNT SIX

[18 U.S.C. §§ 844(e), 2(a)]

On or about April 8 and 9, 2018, defendants TIMOTHY DALTON VAUGHN, also known as ("aka") "wantedbyfeds," aka "Wanted," aka "Hacker_R_US," aka "HDGZero," aka "Xavier Farbel" and GEORGE DUKE-COHAN, aka "7R1D3N7," aka "Opt1cz," aka "Pl3xl3t," aka "DigitalCrimes," each aiding and abetting the other, by email and other instrument of commerce, willfully made a threat, and maliciously conveyed false information knowing the information to be false, to the school districts in El Segundo, Mission Viejo, Tustin, Garden Grove, Santa Ana, Redlands, Jurupa Valley, Riverside, Chino, and Lompoc, in Los Angeles, Orange, Santa Barbara, and Riverside Counties, within the Central District of California, concerning an alleged attempt being made, or to be made, to kill, injure, and intimidate an individual and to damage and destroy property by means of fire and an explosive, namely:

Hello, you have made a choice to not listen to us. I got bullied at this school and you did nothing. Now you will understand the true mean of pain. I am coming into school with 3 bombs, and a .22 hand gun. If I see any staff or student I will shoot them and kill them. When I run out of bullets, I will slit there throats and watch them bleed out on the floor. If I see any police at the school I will blowup the bombs.

COUNT SEVEN

[18 U.S.C. §§ 844(e), 2(a)]

On or about April 12 and 13, 2018, defendants TIMOTHY DALTON VAUGHN, also known as ("aka") "wantedbyfeds," aka "Wanted," aka "Hacker_R_US," aka "HDGZero," aka "Xavier Farbel" and GEORGE DUKE-COHAN, aka "7R1D3N7," aka "Opt1cz," aka "Pl3xl3t," aka "DigitalCrimes," each aiding and abetting the other, by email and other instrument of commerce, willfully made a threat, and maliciously conveyed false information knowing the information to be false, to the school districts in Burbank, El Segundo, La Verne, Anaheim, La Habra, Huntington Beach, Fullerton, Tustin, Riverside, Fillmore, Santa Maria, and Lompoc, in Los Angeles, Orange, Santa Barbara, and Riverside Counties, within the Central District of California, concerning an alleged attempt being made, or to be made, to kill, injure, and intimidate an individual and to damage and destroy property by means of fire and an explosive, namely:

Hello, a male student will be sent into your campus as you start the day, he will look normal but what is in his bag is a bomb. The explosive that is in the two plastic bottles is called ANFO it is a very powerful explosive. The point is that when you put the school on lockdown this student will set off the bomb, and will kill EVERY student in the room and maybe the rooms next to it. It has an LDR which is used to stop bag searches. It will exploded if any light hits the sensor. We follow in the foot steps of our two heros who died in the Columbine High School shooting. Natural selection is coming and we plan on being the onse to start it off. We understand that you may want to contact the FBI or Law enforcement but note, that we have pick 5 schools to do this to, your school could be the one to be hit or it could be a lucky one and gets to be picked at a different time. The point is nobody but us will know which school is to be hit. We also have pressure plated pvc pipes at the exists with 12 gauge shot guns shells so if anyone steps on them it will shot through the student. We will have a sniper watching the exits with concreate with a ruger 10/22.

COUNT EIGHT

[18 U.S.C. §§ 844(e), 2(a)]

On or about May 7 and 8, 2018, defendants TIMOTHY DALTON VAUGHN, also known as ("aka") "wantedbyfeds," aka "Wanted," aka "Hacker_R_US," aka "HDGZero," aka "Xavier Farbel" and GEORGE DUKE-COHAN, aka "7R1D3N7," aka "Optc1z," aka "Pl3xl3t," aka "DigitalCrimes," each aiding and abetting the other, by email and other instrument of commerce, willfully made a threat, and maliciously conveyed false information knowing the information to be false, to the school districts in Beverly Hills, Redondo Beach, Glendora, La Verne, Mission Viejo, and Thermal, in Los Angeles, Orange, and Riverside Counties, within the Central District of California, concerning an alleged attempt being made, or to be made, to kill, injure, and intimidate an individual and to damage and destroy property by means of fire and an explosive, namely:

I will make this simple. Tuesday 05/08/2018 9:30AM, 3 PVC pipe bombs placed under school transport will explode. I will then set off the main pipe bomb hidden in the school. This is what you get for not listening to me. See you all in HELL. Or pay us \$5,000 USD Via paypal to cbrady350@gmail.com.

COUNT NINE

[18 U.S.C. §§ 844(e), 2(a)]

On or about June 26, 2018, defendants TIMOTHY DALTON VAUGHN, also known as ("aka") "wantedbyfeds," aka "Wanted," aka "Hacker_R_US," aka "HDGZero," aka "Xavier Farbel" and GEORGE DUKE-COHAN, aka "7R1D3N7," aka "Optclz," aka "Pl3xl3t," aka "DigitalCrimes," each aiding and abetting the other, by email and other instrument of commerce, willfully made a threat, and maliciously conveyed false information knowing the information to be false, to the school districts in Buena Park and Santa Paula, in Los Angeles and Ventura Counties, within the Central District of California, concerning an alleged attempt being made, or to be made, to kill, injure, and intimidate an individual and to damage and destroy property by means of fire and an explosive, namely:

We are not happy with the way you let these boys and girls dress and not worship Alah the God. We have planted 2 RPG heads under 2 school busses and 4 land mines on the sports field and around the entrance... If you cancel the school we will not blow it up, if you keep school on and allow girls to be educated we will blow up the bomb and come in school every girl in the school including teachers. Any sign of POLICE we will kill each student one by one. We have members in the school who are students they have orders to SHOOT if you try and evacuate the school. Simple. Follow the rules or be killed. ~APS.

COUNT TEN

[18 U.S.C. § 1030(a)(5)(A), (c)(4)(B)(i), (c)(4)(A)(i)(I)]

On or about January 14, 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendant TIMOTHY DALTON VAUGHN, also known as ("aka") "wantedbyfeds," aka "Wanted," aka "Hacker_R_US," aka "HDGZero," aka "Xavier Farbel" ("VAUGHN") knowingly caused the transmission of a program, information, code, and command, and as a result of such conduct, intentionally and without authorization impaired the integrity and availability of data, a program, a system, and information on a protected computer, as that term is defined in Title 18, United States Code, Section 1030(e)(2)(B), that is, the computer servers of Cogeco Peer 1, which hosted the website hoonigan.com belonging to Hoonigan Industries ("Hoonigan"), thereby causing a loss to Hoonigan, aggregating at least \$5,000 in value during a one-year period beginning on or about January 14, 2018.

COUNT ELEVEN

[18 U.S.C. § 1030(a)(7), (c)(3)(A)]

On or about January 14, 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendant TIMOTHY DALTON VAUGHN, also known as ("aka") "wantedbyfeds," aka "Wanted," aka "Hacker_R_US," aka "HDGZero," aka "Xavier Farbel" ("VAUGHN"), with intent to extort from any person any money or thing of value, transmitted in interstate and foreign commerce the following communication containing a threat to impair the integrity and availability of data, a program, a system, and information on a protected computer, as that term is defined in Title 18, United States Code, Section 1030(e)(2)(B), that is, the computer servers of Cogeco Peer 1, which hosted the website hoonigan.com belonging to Hoonigan Industries:

You have 24 hours to pay 1.5 BTC to [the Bitcoin wallet address ending in G1xg] to stop the attacks on you website. If you do not pay within the 24 hours the payment to stop the attacks will be 2 btc. This is not a joke and this is to be taken seriously. You can Proudly Direct Message me When you have paid on twitter @Wantedbyfeds

Or When i completely receive the payment i will see it and stop the attacks. We have the ability to avoid any DDOS mitigation tactics you might pay to be deployed. We have dumped your clients database and if u try to avoid paying

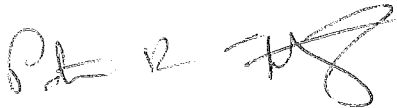
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1 we will release all your customers information. We have
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NICOLA T. HANNA
United States Attorney



PATRICK R. FITZGERALD
Assistant United States Attorney
Chief, National Security Division

RYAN WHITE
Assistant United States Attorney
Chief, Cyber & Intellectual
Property Crimes Section

JENNIE L. WANG
Assistant United States Attorney
Deputy Chief, Cyber & Intellectual
Property Crimes Section