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Victim Witness Unit*

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January 18, 2018

U.S. Department of Justice
Northern District of California
450 Golden Gate Ave.
Box 36055
San Francisco, CA 94102
Phone: (844) 527-5299
Email: USAEO.MCAP@usdoj.gov

Re: United States v. Defendants Dmitry Dokuchaev, Igor Sushchin, Alexsey Belan,
and **Karim Baratov**, Case Number 2016R01571 and Court Docket Number 17-
CR-00103

Dear Email Account User:

The enclosed information is provided by the United States Department of Justice. As a victim witness professional, my role is to assist you with information and services during the prosecution of this case. I am contacting you because you were identified by law enforcement as a victim or potential victim during the investigation of the above criminal case.

If you would like to receive direct notification from the United States Department of Justice please provide your name and a mailing address or e-mail to the Mega Victim Case Assistance Program at USAEO.MCAP@usdoj.gov.

Summary and Status of the Criminal Case

Charges have been filed against the defendants Dmitry Dokuchaev, Igor Sushchin, Alexsey Belan, and **Karim Baratov**. The lead prosecutors for this case are Assistant U.S. Attorneys John H. Hemann and Jeffrey Shih. The primary charges are categorized as

Computer Fraud and Abuse, and Aggravated Identity Theft. The charges relate to the hacking of Yahoo's network and of webmail accounts there and at other internet service providers.

On November 28, 2017, Defendant Baratov pleaded guilty and admitted to his role in the conspiracy. Specifically, Defendant Dokuchaev asked Defendant Baratov to hack at least 80 webmail accounts (including at least 50 at Google) in exchange for money; and Defendant Baratov agreed and subsequently attempted to complete his request. Additionally, as part of Defendant Baratov's plea agreement, Defendant Baratov admitted that he operated an illegal hacking business through which he advertised his services to mostly Russian language speakers throughout the world and hacked webmail accounts for other clients, including a total of more than 11,000 webmail accounts from 2010 through March 2017. Defendant Baratov hacked into webmail accounts maintained by various webmail providers (e.g., Google, Hotmail, and Yahoo, and Russian webmail providers bk.ru, Inbox.ru, List.ru, Mail.ru, Rambler.ru, ya.ru, and Yandex) by spearphishing his victims to harvest their passwords. In particular, Defendant Baratov impersonated a webmail provider by sending an email with a link to a "spoofed" website that would appear to be from the webmail provider and that would ask the victims to enter their passwords to their webmail accounts. For example, Defendant Baratov sent emails to his victims from accounts including those listed below to hack into webmail accounts at Google: gm.tech.contact@gmail.com, s2.noreply@gmail.com, ru.gm.contact@gmail.com, tverdov14@gmail.com, and fogetenfirst@gmail.com.

Defendant Baratov pleaded guilty to one count of conspiracy to commit computer fraud and abuse, and eight counts of aggravated identity theft. As a result of Defendant Baratov's guilty plea, there will be no trial involving this defendant and any remaining counts will be disposed of at the time of sentencing.

Information Available to You About the Criminal Case

Based on the large number of potential victims in this case, there is a **Department of Justice Large Case website** at <https://www.justice.gov/largecases> available to you with information about the case, including information about how you may have been affected. The website contains information about this case that can be accessed by **clicking on the name of the case, specifically, United States v. Defendants Dmitry Dokuchaev, Igor Sushchin, Alexsey Belan, and Karim Baratov.**

Information You Can Provide (Including to Claim Restitution)

It is helpful for the Court to know the impact of this crime on its victims. In an effort to provide this information to the Court, the Department of Justice Large Case website for this case contains a **Victim Impact Statement**.

The Victim Impact Statement is one way the Court can hear your concerns as they relate to the crime. If you believe that you were a victim or potential victim of the crimes charged in this case, you can complete and submit a Victim Impact Statement. If you choose to do so, please submit it **by January 26, 2018, via email to our Mega Victim Case Assistance Program at USAEO.MCAP@usdoj.gov or via mail to the following address:**

United States Attorneys Office
Attn: Victim Witness Unit
Northern District of California
450 Golden Gate Ave.
Box 36055
San Francisco, CA 94102

If you are requesting restitution, please submit proof of your loss along with all supporting documents. This may be your final opportunity to submit proof of loss to substantiate an Order of Restitution.

PLEASE NOTE THAT if you are an international email account user who is located outside of the United States, please notify our office as soon as possible before submitting a Victim Impact Statement. Please include your name and country of residence in your correspondence and email it to USAEO.MCAP@usdoj.gov.

Victim impact information is generally not public information; however, under criminal law and procedures, all information contained in your questionnaire will be disclosed to the United States Probation Office, the defendant, and the defendant's attorney.

A United States Probation Officer may contact you in an effort to obtain additional victim impact information and to discuss the impact the crime had on you financially, physically, and/or emotionally. If you are contacted, please make every effort to provide accurate and detailed information.

Sentencing Hearing

The sentencing hearing for Defendant Karim Baratov has been set for **March 27, 2018, at 10:30 AM at Courtroom 4, 17th Floor, 450 Golden Gate Avenue, San Francisco, CA before Judge Vince Chhabria.** You are welcome to attend this proceeding; however, unless you have received a subpoena, your attendance is not required by the Court.

If you are a victim of the crimes charged, you have the right to be reasonably heard at this proceeding. This can be done in writing and/or in person. If you wish to address the Court during this proceeding, please contact our office well in advance of the scheduled hearing date via phone at (844) 527-5299, or email at USAEO.MCAP@usdoj.gov.

Hearing dates can change on very short notice. Therefore, if you plan on attending, you may want to verify the date and time of the hearing by contacting our office.

Rights of Victims of the Criminal Case

Victims of all crimes under federal investigation are entitled to services under the Victims' Rights and Restitution Act (VRRRA), including notification of court events. For further details, please refer to Title 34 United States Code section 20141 or the VRRRA link posted at <https://www.notify.usdoj.gov>. Now that charges have been filed in federal court, victims of the charges filed are, in addition, entitled to the following rights, according to the Crime Victims' Rights Act, Title 18 United States Code section 3771: (1) The right to be reasonably protected from the accused; (2) The right to reasonable, accurate, and timely notice of any public court proceeding, or any parole proceeding, involving the crime or of any release or escape of the accused; (3) The right not to be excluded from any such public court proceeding, unless the court, after receiving clear and convincing evidence, determines that testimony by the victim would be materially altered if the victim heard other testimony at that proceeding; (4) The right to be reasonably heard at any public proceeding in the district court involving release, plea, sentencing, or any parole proceeding; (5) The reasonable right to confer with the attorney for the Government in the case; (6) The right to full and timely restitution as provided in law; (7) The right to proceedings free from unreasonable delay; (8) The right to be treated with fairness and with respect for the victim's dignity and privacy; (9) The right to be informed in a timely manner of any plea bargain or deferred prosecution agreement; and (10) The right to be informed of the rights under this section and the services described in section 503(c) of the Victims' Rights and Restitution Act of 1990 (34 U.S.C. 20141(c)) and provided contact information for the Office of the Victims' Rights Ombudsman of the Department of Justice.

Please understand that these rights apply only to victims of the counts charged in federal court, and thus you may not be able to exercise all of these rights if the crime of which you are a

victim was not charged. In any event, we will continue to provide you with notifications and services unless you tell us not to. We will make our best efforts to ensure you are provided the rights and services to which you are entitled. You may contact the Victim/Witness Coordinator at the office listed above if you have questions about the progress of your case, your rights or the services to which you are entitled, or how you can assert them during the proceedings.

If you believe that a Justice Department employee has not provided you with these rights, you may file a complaint with the Justice Department's Victims' Rights Ombudsman. For more information, go to <http://www.justice.gov/usao/resources/crime-victims-rights-ombudsman>. If you have questions about filing a complaint against an employee, you may contact the Ombudsman by email at usao.VictimOmbudsman@usdoj.gov. Questions concerning this case should be directed to office listed above.

It is important to keep in mind that the defendant(s) are presumed innocent until proven guilty and that presumption requires both the Court and our office to take certain steps to ensure that justice is served. While our office cannot act as your attorney or provide you with legal advice, you can seek the advice of an attorney with respect to the rights above or other related legal matters.

Sincerely,

Victim Witness Unit
U.S. Attorney's Office
Northern District of California