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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,) No. 3:18-cr-00154-TMB-DMS
Plaintiff,) PLEA AGREEMENT
vs.)
DAVID BUKOSKI,)
Defendant.)

Unless the parties jointly inform the Court in writing of any additional agreements, this document in its entirety contains the terms of the plea agreement between the defendant and the United States. This agreement is limited to the District of Alaska; it does not bind other federal, state, or local prosecuting authorities.

I. SUMMARY OF AGREEMENT, FEDERAL RULE OF CRIMINAL PROCEDURE 11

A. Summary of Agreement

The defendant agrees to plead guilty to the sole count of the Indictment in this case: Count: 1 - Aiding and Abetting Computer Intrusions, in violation of 18 U.S.C. §§ 1030 and 2. The United States agrees to recommend a sentence at the low end of the guideline range as calculated and adopted by the court. The United States agrees not to prosecute the defendant further for any other offense related to the events that resulted in the charge contained in the Indictment.

The defendant will waive all rights to appeal the conviction and sentence imposed under this agreement. The defendant will also waive all rights to collaterally attack the conviction and sentence, except on the grounds of ineffective assistance of counsel or the voluntariness of the plea.

B. Federal Rule of Criminal Procedure 11

Unless the parties otherwise inform the Court in writing, Federal Rule of Criminal Procedure 11(c)(1)(A) and (B) will control this plea agreement. Thus, the defendant may not withdraw from this agreement or the guilty plea if the Court rejects the parties' sentencing recommendations at the sentencing hearing.

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II. CHARGES, ELEMENTS, FACTUAL BASIS, STATUTORY PENALTIES AND OTHER MATTERS AFFECTING SENTENCE

A. Charges

 The defendant agrees to plead guilty to the sole count of the Indictment:

Count 1: Aiding and Abetting Computer Intrusions, a violation of 18 U.S.C. §§ 1030(a)(5)(A) and 2.

B. Elements

The elements of the charge in Count 1 to which the defendant is pleading guilty are as follows:

- First, the crime of fraud and related activity in connection with a computer was committed in violation of 18 U.S.C. § 1030(a)(5)(A), the elements of which are:
 - i) a person knowingly caused the transmission of a program,
 code, command or information to a computer without
 authorization; and
 - ii) as a result of the transmission, the person intentionally impaired the integrity or availability of data, a program, system, or information; and
 - iii) the computer was used in or affected interstate or foreign commerce or communication.

- Second, the defendant knowingly and intentionally aided, counseled, commanded, induced, or procured a violation of 18 U.S.C. § 1030(a)(5)(A); and
- 3. Third, the defendant acted before the crime was completed with the knowledge and intention of helping a person commit a violation of 18 U.S.C. § 1030(a)(5)(A).

C. Factual Basis

The defendant admits the truth of the allegations in Count 1 of the Indictment and the truth of the following statement, and the parties stipulate that the Court may rely upon this statement to support the factual basis for the guilty plea(s) and for the imposition of the sentence:

The United States and the defendant, DAVID BUKOSKI ("BUKOSKI"), agree that the following facts are true and correct, and that had this matter proceeded to trial, the United States would have proven them beyond a reasonable doubt with admissible and credible evidence.

1. From at least on or about March 2011, and continuing through November 29, 2018, in the District of Alaska and elsewhere, BUKOSKI knowingly and intentionally aided and abetted unlawful computer attacks and attempted unlawful computer attacks, in violation of Title 18, United States Code, Section 1030(a)(5)(A) and (b), that is, BUKOSKI knowingly caused the transmission of a program, information, code, and command, and knowingly aided and abetted others in doing the same and in attempting to do the same, and as a result of such conduct, intentionally caused damage

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and attempted to cause damage without authorization to a protected computer, and resulting in a loss of \$5,000 or more and damage affecting ten or more protected computers during a one-year period, specifically from November 29, 2017 through November 28, 2018.

- 2. Distributed denial of service ("DDoS") attacks occur when multiple computers acting in unison flood the Internet connection of a targeted computer or computers. The amount of traffic generated by such an attack quickly overwhelms the capacity of the target computer, resulting in the target computer being unable to send, receive or respond to commands. DDoS attacks are often directed at servers that host websites, with the intent of rendering those websites unavailable to the public. They may also be directed at personal computers or corporate networks.
- 3. "Booter" or "Stresser" services are a category of distributed denial of service (DDoS) attack tools, characterized by their accessibility and affordability. These services are designed to allow users to attack unwitting victim computers for the express purpose of preventing them from properly accessing and using the Internet.
- 4. There are many types of Internet attack tools and methodologies employed in conducting DDoS attacks. Many of these methodologies make use of common computer communications protocols, including Network Time Protocol (NTP), a networking protocol for clock synchronization; Character Generator Protocol (chargen); and Lightweight Directory Access Protocol (LDAP), a protocol for accessing directory services. Another common attack methodology, SYN flood, involves repeatedly sending synchronization requests that is, the first step to establish communication between two

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systems over a common communication protocol – to a victim's system in order to consume enough resources to make the system unresponsive to legitimate traffic.

- 5. From at least on or about March 2011, and continuing through November 29, 2018, BUKOSKI developed and operated a DDoS-for-hire service called "Quantum Stresser." Through BUKOSKI's efforts, Quantum Stresser was used to launch powerful DDoS attacks, which caused damage to computers targeted in the attacks by rendering them unable to properly communicate and function.
- 6. The purpose of Quantum Stresser, and BUKOSKI's intent in designing and operating Quantum Stresser, was to aid and abet DDoS attacks, which by their nature cause the transmission of code and commands that cause damage to the victim computers by rendering them inaccessible. At all relevant times, BUKOSKI knew and understood that Quantum Stresser was designed to be used, and was in fact being used, to commit illegal and unauthorized DDoS attacks against computers in the United States and elsewhere. BUKOSKI acted with the intent and goal of aiding, abetting, and furthering these illegal DDoS attacks and causing them to occur.
- 7. BUKOSKI marketed Quantum Stresser to prospective attackers using a website that was accessible at various times at the domain "QuantumStress.net," "QuantumStresser.net," and "QuantumBooter.net." These sites enabled co-conspirators worldwide to set up accounts at Quantum Stresser and, for a fee, use Quantum Stresser's resources to direct attacks at computers across the globe.
- BUKOSKI allowed users to select from a range of attack methodologies,
 maximizing their likely impact on victim computer systems.

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- 9. BUKOSKI created and maintained a sophisticated technical infrastructure to support the Quantum Stresser website and service. BUKOSKI maintained a publicly accessible website, utilizing domains as described in paragraph 7, above. BUKOSKI utilized a U.S.-based content-delivery network provider to provide sophisticated DDoS defense for his website. Because for-profit DDoS services such as Quantum Stresser are often the target of retaliatory DDoS attacks themselves, BUKOSKI took steps to mitigate the effects of such attacks on his service. BUKOSKI also purchased an additional server through a third party to serve as an "attack server," responding to the commands of his customers in order to deliver DDoS attacks. This server was specially configured to allow "spoofed" requests, meaning the server was purchased from a provider that allowed the server to manually manipulate IP header data for the purpose of conducting more efficient and powerful DDoS attacks.
- 10. Users made payments to Quantum Stresser in order to access its DDoS capabilities. These payments were made in the form of Bitcoin, PayPal, Amazon Pay, and credit card transactions. Generally, during the relevant time period, BUKOSKI operated the Quantum Stresser website in such a manner that customers signed up for a specific DDoS plan, as listed and described on the website. The customer would then transfer funds to BUKOSKI via a third-party payment service. One such service utilized by BUKOSKI was FastSpring. During the period in which BUKOSKI was utilizing FastSpring as the third-party payment processor for Quantum Stresser, BUKOSKI received approximately \$1,500 to \$2,500 each month in net proceeds.
- The Quantum Stresser site offered a support ticket system to allow users to
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readily communicate with BUKOSKI.

- 12. BUKOSKI employed the moniker "maniac" to converse with coconspirators, respond to customer support queries, and process payments. That activity was logged in a database later recovered by the FBI, which also revealed that BUKOSKI received at least \$101,273 in payments for the criminal service during the period in question.
- 13. BUKOSKI routinely made changes to Quantum Stresser's configuration in order to modify Quantum Stresser's DDoS accessibility and utility. BUKOSKI repeatedly revoked and subsequently invoked "booting ability" for all users, including during site maintenance, and modified the "stress configuration."
- 14. To maximize the impact of Quantum Stresser's attacks, BUKOSKI developed the capability to launch DNS Amplification attacks. DNS amplification is a DDoS attack methodology in which the attacker repeatedly sends domain name look-up requests to a domain name system (DNS) server while "spoofing" the victim's IP address, causing the victim's system to be inundated with responses from DNS servers.
- 15. BUKOSKI also directly advised Quantum Stresser users on ways to maximize the impact of their DDoS attacks. For example, on June 28, 2018, BUKOSKI explained to a user, "If you are using LDAP primarily, you could get better results with NTP or CHARGEN. Right now the most effective Layer 4 UDP is CHARGEN." On June 21, 2018, BUKOSKI counseled a user that, "Any port will work for LDAP, but CHARGEN may be more successful at this point." In another message, BUKOSKI inquired, "Can you provide more detail regarding this? Have you tried an alternative

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method?"

- 16. Through the actions of BUKOSKI, Quantum Stresser attracted over 84,000 users and grew to become the longest-running booter service in operation. Quantum Stresser was used to conduct significant attacks, including those targeting gaming companies, schools, business networks, and personal computers.
- 17. Quantum Stresser aided and abetted attacks and attempted attacks on a broad range of corporate and individual victims, including but not limited to U.S. universities, U.S. municipalities, foreign government networks, government-owned utilities, hosting companies, cloud providers, residential Internet users, and Alaskan Internet Service Providers. BUKOSKI himself utilized Quantum Stresser to perform DDoS attacks against targets located in Alaska.
- 18. In or about May 2018, FBI agents in the District of Alaska created an account on Quantum Stresser. In May and June 2018, agents in the District of Alaska directed Quantum Stresser to attack IP addresses under the control of the cooperating entities in Alaska and elsewhere.
- 19. In addition to the FBI-directed attacks and throughout the course of Quantum Stresser's operation, the service was used by individuals in the District of Alaska to launch DDoS attacks, and was used by individuals in the District of Alaska and elsewhere to launch attacks against IP addresses contained within the District of Alaska.
- 20. At all relevant times, BUKOSKI acted with the intent of aiding and abetting these attacks and causing them to occur.
- This Statement of Facts includes those facts necessary to support the
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defendant's guilty plea. It does not include each and every fact known to the defendant or to the government and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

29. The actions of the defendant, as recounted above, were in all respects knowing, voluntary, and intentional, and were not committed by mistake, accident or other innocent reason.

D. Statutory Penalties and Other Matters Affecting Sentence

1. **Statutory Penalties**

The maximum statutory penalties applicable to the charges to which the defendant is pleading guilty, based on the facts to which the defendant will admit in support of the guilty plea(s), are as follows:

Count 1: 18 U.S.C. § 1030 (Aiding and Abetting Computer Intrusions)

- 1) Imprisonment for not more than 10 years;
- 2) A fine not exceeding \$250,000; and
- 3) Not more than three years of supervised release.

2. Other Matters Affecting Sentence

a. Conditions Affecting the Defendant's Sentence

The following conditions may also apply and affect the defendant's sentence: 1) pursuant to Comment 7 of U.S.S.G. § 5E1.2, the Court may impose an additional fine to pay the costs to the government of any imprisonment and supervised release term; 2) pursuant to 18 U.S.C.§ 3612(f), unless otherwise ordered, if the Court imposes a fine of more than \$2,500, interest will be charged on the balance not paid within 15 days after U.S. v. David Bukoski 3:18-cr-00154-TMB-DMS

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the judgment date; 3) upon violating any condition of supervised release, a further term of imprisonment equal to the period of the supervised release may be imposed, with no credit for the time already spent on supervised release; 4) the Court may order the defendant to pay restitution pursuant to 18 U.S.C. § 3663 and U.S.S.G. § 5E1.1, and if 18 U.S.C. § 3663A (mandatory restitution for certain crimes) applies, the Court shall order the defendant to pay restitution.

b. Payment of Special Assessment

The defendant agrees to pay the entire special assessment in this case on the day the Court imposes the sentence. All payments will be by check or money order, and are to be delivered to the Clerk of Court, United States District Court, 222 W. 7th Ave. Box 4, Rm. 229, Anchorage, AK 99513-7564.

c. Consequences of Felony Conviction

Any person convicted of a federal felony offense may lose or be denied federal benefits including any grants, loans, licenses, food stamps, welfare or other forms of public assistance, as well as the right to own or possess any firearms, the right to vote, the right to hold public office, and the right to sit on a jury. If applicable, any defendant who is not a United States citizen may be subject to deportation from the United States following conviction for a criminal offense, be denied citizenship, and not permitted to return to the United States unless the defendant specifically receives the prior approval of the United States Attorney General. In some circumstances, upon conviction for a criminal offense, any defendant who is a naturalized United States citizen may suffer adverse immigration consequences, including but not limited to possible denaturalization.

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E. Restitution

The U.S. Government has not presently identified a specific restitution amount owed for the offense of conviction. The Court will have sole discretion ultimately to determine if the defendant has liability for any restitution.

F. Forfeiture

Defendant admits that Defendant's interest, if any, in any property subject to forfeiture to the United States as any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the offense(s) of conviction, pursuant to 18 U.S.C. § 982(a)(2)(A).

Defendant agrees not to file a claim or withdraw any claim already filed to any of the above-described property in any forfeiture proceeding, administrative or judicial, which has been or may be initiated by the United States. Defendant further waives the right to notice of any forfeiture proceeding involving this property, agrees not to assist others in filing a claim to said property in any forfeiture proceeding, and will take all steps as requested by the United States to pass clear title to the above-described property to the United States, including but not limited to, executing documents and testifying truthfully in any forfeiture proceeding. Defendant further agrees to cooperate to ensure that assets subject to forfeiture are not sold, disbursed, wasted, hidden, or otherwise made unavailable for forfeiture.

Defendant understands and acknowledges that the United States is relying upon the Defendant's truthful asset forfeiture disclosure and cooperation in entering into this

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plea agreement. If Defendant fails to cooperate or is untruthful in this regard, the United States may declare a material breach of this plea agreement.

III. ADVISORY UNITED STATES SENTENCING GUIDELINES, GUIDELINE APPLICATION AGREEMENTS, SENTENCING RECOMMENDATIONS

A. Advisory United States Sentencing Guidelines

The Court must consult the advisory United States Sentencing Commission Guidelines [U.S.S.G.] as well as the factors set forth in 18 U.S.C. § 3553(a) when considering the sentence to impose. The U.S.S.G. do not establish the statutory maximum or minimum sentence applicable to the offense(s) to which the defendant is pleading guilty. The U.S.S.G. are not mandatory and the Court is not bound to impose a sentence recommended by the U.S.S.G.

B. Guideline Application Agreements

The parties have no agreements on any guideline applications unless set forth below in this section.

1. Acceptance of Responsibility

If the United States concludes that the defendant has satisfied the criteria set out in U.S.S.G. § 3E1.1 and the applicable application notes, the United States agrees to recommend the defendant for a two level downward adjustment for acceptance of responsibility and, if U.S.S.G. § 3E1.1(b) applies, to move for the additional one level adjustment for acceptance of responsibility. If, at any time prior to imposition of the sentence, the United States concludes that the defendant has failed to fully satisfy the criteria set out in U.S.S.G. § 3E1.1, or has acted in a manner inconsistent with acceptance

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of responsibility, the United States will not make or, if already made, will withdraw this recommendation and motion.

C. Sentencing Recommendations

The United States Probation Office will prepare the defendant's pre-sentence report in which it will include a recommended calculation of the defendant's sentence range under the U.S.S.G. Both the United States and the defendant will have the opportunity to argue in support of or in opposition to the guideline sentence range calculation the U.S.P.O. recommends, as well as present evidence in support of their respective sentencing arguments.

The parties are free to recommend to the Court their respective positions on the appropriate sentence to be imposed in this case based on the stipulated facts set forth in Section II.C, any additional facts established at the imposition of sentence hearing, the applicable statutory penalty sections, the advisory U.S.S.G., and the sentencing factors set forth in 18 U.S.C. § 3553.

IV. ADDITIONAL AGREEMENTS BY UNITED STATES

In exchange for the defendant's guilty plea and the Court's acceptance of the defendant's plea and the terms of this agreement, the United States agrees that it will not prosecute the defendant further for any other offense – now known – arising out of the subject of the investigation related to the charges brought in the Indictment in this case and the defendant's admissions set forth in Section II.C.

Provided, however, if the defendant's guilty plea or sentence is/are rejected, withdrawn, vacated, reversed, set aside, or modified, at any time, in any proceeding, for

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any reason, the United States will be free to prosecute the defendant on all charges arising out of the investigation of this case including any charges dismissed pursuant to the terms of this agreement, which charges will be automatically reinstated as well as for perjury and false statements. The defendant hereby agrees that he/she waives any defense that the statute of limitations bars the prosecution of such a reinstated charge.

V. WAIVER OF TRIAL RIGHTS, APPELLATE RIGHTS, COLLATERAL ATTACK RIGHTS, CLAIM FOR ATTORNEY FEES AND COSTS, AND RULE 410

A. Trial Rights

Being aware of the following, the defendant waives these trial rights:

- If pleading to an Information, the right to have the charges presented to the grand jury prior to entering the guilty plea;
- The right to a speedy and public trial by jury on the factual issues
 establishing guilt or any fact affecting the mandatory minimum and
 statutory penalties, and any issue affecting any interest in any assets
 subject to forfeiture;
- The right to object to the composition of the grand or trial jury;
- The right to plead not guilty or to persist in that plea if it has already been made;
- The right to be presumed innocent and not to suffer any criminal penalty unless and until the defendant's guilt is established beyond a reasonable doubt;

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- The right to be represented by counsel at trial and if necessary to have a
 counsel appointed at public expense to represent the defendant at trial –
 the defendant is not waiving the right to have counsel continue to
 represent the defendant during the sentencing phase of this case;
- The right to confront and cross examine witnesses against the defendant,
 and the right to subpoena witnesses to appear in the defendant's behalf;
- The right to remain silent at trial, with such silence not to be used against the defendant, and the right to testify in the defendant's own behalf; and
- The right to contest the validity of any searches conducted on the defendant's property or person.

B. Appellate Rights

The defendant waives the right to appeal the conviction(s) resulting from the entry of guilty plea(s) to the charges set forth in this agreement. The defendant further agrees that if the Court imposes a sentence that does not exceed the statutory maximum penalties – as set forth in Section II.D above in this agreement, the defendant waives without exception the right to appeal on all grounds contained in 18 U.S.C. § 3742 the sentence the Court imposes. The defendant understands that this waiver includes, but is not limited to, forfeiture (if applicable), terms or conditions of probation (if applicable) or supervised release, any fines or restitution, and any and all constitutional (or legal) challenges to defendant's conviction(s) and guilty plea[s], including arguments that the statute(s) to which defendant is pleading guilty (is/are) unconstitutional, and any and all U.S. v. David Bukoski

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claims that the statement of facts provided herein is insufficient to support defendant's plea[s] of guilty.

The defendant agrees that the appellate and collateral attack waivers contained within this agreement will apply to any 18 U.S.C. § 3582(c) modifications, as well as the district court's decision to deny any such modification.

Should the defendant file a notice of appeal in violation of this agreement, it will constitute a material breach of the agreement. The government is free to reinstate any dismissed charges, and withdraw any motions for downward departures, or sentences below the mandatory minimum made pursuant to 18 U.S.C. § 3553(e).

C. Collateral Attack Rights

The defendant agrees to waive all rights to collaterally attack the resulting conviction(s) and/or sentence – including forfeiture (if applicable) or terms or conditions of probation (if applicable) or supervised release, and any fines or restitution – the Court imposes. The only exceptions to this collateral attack waiver are as follows: 1) any challenge to the conviction or sentence alleging ineffective assistance of counsel – based on information not now known to the defendant and which, in the exercise of reasonable diligence, could not be known by the defendant at the time the Court imposes sentence; and 2) a challenge to the voluntariness of the defendant's guilty plea(s).

D. Claim for Attorney Fees and Costs

Because this is a negotiated resolution of the case, the parties waive any claim for the award of attorney fees and costs from the other party.

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E. Evidence Rule 410 and Fed. R. Crim. P. 11(f)

By signing this agreement, the defendant admits the truth of the facts in the Factual Basis portion of this agreement set forth in Section II.C. The defendant agrees that the statements made by him in signing this agreement shall be deemed usable and admissible against the defendant as stipulations in any hearing, trial or sentencing that may follow. The foregoing provision acts as a modification, and express waiver, of Federal Rule of Evidence 410 and Federal Rule of Criminal Procedure 11(f), and is effective upon the defendant's in-court admission to the factual basis supporting the plea(s). This provision applies regardless of whether the court accepts this plea agreement.

VI. ADEQUACY OF THE AGREEMENT

Pursuant to Local Criminal Rule 11.2(d)(7) and (8), this plea agreement is appropriate in that it conforms with the sentencing goals that would otherwise be applicable to the defendant's case if the defendant had gone to trial and had been convicted on all counts in the charging instrument.

VII. THE DEFENDANT'S ACCEPTANCE OF THE TERMS OF THIS PLEA AGREEMENT

I, David Bukoski, the defendant, affirm this document contains all of the agreements made between me – with the assistance of my attorney – and the United States regarding my plea(s). There are no other promises, assurances, or agreements the United States has made or entered into with me that have affected my decision to enter any plea of guilty or to enter into this agreement. If there are any additional promises,

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assurances, or agreements, United States and I will jointly inform the Court in writing before I enter my guilty plea.

I understand that no one, including my attorney, can guarantee the outcome of my case or what sentence the Court may impose if I plead guilty. If anyone, including my attorney, has done or said anything other than what is contained in this agreement, I will inform the Court when I stand before it to enter my plea.

I enter into this agreement understanding and agreeing that the conditions set forth herein are obligatory and material to this agreement and that any failure on my part to fulfill these obligations will constitute a material breach of this agreement. If I breach this agreement, I agree the United States, in its sole discretion, may withdraw from this agreement and may reinstate prosecution against me on any charges arising out of the investigation in this matter. If my compliance with the terms of this plea agreement becomes an issue, at an appropriate hearing, during which I agree any of my disclosures will be admissible, the Court will determine whether or not I have violated the terms of this agreement. I understand the government's burden to prove a breach will be by a preponderance of the evidence.

I understand the Court will ask me under an oath to answer questions about the offense to which I am pleading guilty and my understanding of this plea agreement. I understand that I may be prosecuted if I make false statements or give false answers and may suffer other consequences set forth in this agreement.

I have read this plea agreement carefully and understand it thoroughly. I know of no reason why the Court should find me incompetent to enter into this agreement or to

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enter my plea. I enter into this agreement knowingly and voluntarily. I understand that anything that I discuss with my attorney is privileged and confidential, and cannot be revealed without my permission. Knowing this, I agree that this document will be filed with the Court.

I am fully satisfied with the representation given me by my attorney and am prepared to repeat this statement at the time I stand before the Court and enter my guilty plea. My attorney and I have discussed all possible defenses to the charge to which I am pleading guilty. My attorney has investigated my case and followed up on any information and issues I have raised to my satisfaction. My attorney has taken the time to fully explain the legal and factual issues involved in my case to my satisfaction. We have discussed the statute applicable to my offense and sentence as well as the possible effect the U.S.S.G. may have on my sentence.

Based on my complete understanding of this plea agreement, I therefore admit that I am guilty of Count 1 of the Indictment - Aiding and Abetting Computer Intrusions, in violation of 18 U.S.C. § 1030, and admit the forfeiture allegation of the Indictment in their entirety.

DATED: 7-16-2019

DAVID BUKOSKI

Defendant

As counsel for the defendant, I have conveyed all formal plea offers. I have discussed the terms of this plea agreement with the defendant, have fully explained the charge(s) to which the defendant is pleading guilty, the necessary elements thereto, all possible defenses, and the consequences of a guilty plea to a felony. Based on these discussions, I have no reason to doubt that the defendant is knowingly and voluntarily entering into this agreement and entering a plea of guilty. I know of no reason to question the defendant's competence to make these decisions. If, prior to the imposition of sentence, I become aware of any reason to question the defendant's competency to enter into this plea agreement or to enter a plea of guilty, I will immediately inform the

DATED: 7/17/19

MICHELLE NESBETT ESO

Attorney for David Bukoski

On behalf of the United States, the following accepts the defendant's offer to plead guilty under the terms of this plea agreement.

DATED: 7/18/19

BRYAN SCHRODER United States of America United States Attorney