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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,) No.
)
Plaintiff,) <u>COUNT 1:</u>
) AIDING AND ABETTING
vs.) COMPUTER INTRUSIONS
) Vio. of 18 U.S.C. §§ 1030(a)(5)(A)
DAVID BUKOSKI,) and 2
)
D.B.A. "QUANTUM STRESSER",) <u>CRIMINAL FORFEITURE</u>
) <u>ALLEGATION:</u>
Defendant.) 18 U.S.C. §§ 981, 982, 1030;
) 21 U.S.C. § 853; and 28 U.S.C. §
) 2461.

INDICTMENT

The Grand Jury Charges that:

COUNT 1

1. From at least on or about March 2011 through at least on or about November 29, 2018, in the District of Alaska and elsewhere, the defendant, DAVID BUKOSKI, operating a service called “Quantum Stresser,” knowingly caused and knowingly and intentionally aided and abetted unlawful computer intrusions and attempted unlawful computer intrusions, 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 and attempted to cause damage without authorization to a protected computer, and the offense caused damage affecting ten or more protected computers during a one-year period, specifically from November 29, 2017 through November 28, 2018.

All of which is in violation of Title 18, United States Code, Sections 1030(a)(5)(A) and 2.

NOTICE OF FORFEITURE

18 U.S.C. §§ 981, 982, 1030; 21 U.S.C. § 853; and 28 U.S.C. § 2461.

2. The allegations contained in Count 1 of this Indictment are realleged and incorporated by reference for the purpose of alleging forfeiture.

The Grand Jury hereby finds that:

3. There is probable cause that the property described in this NOTICE OF FORFEITURE is subject to forfeiture pursuant to the statutes described herein.

4. Pursuant to Federal Rule of Criminal Procedure 32.2(a), the United States of America gives notice to the defendant, DAVID BUKOSKI, that, in the event of the defendant's conviction of the offense charged in Count 1 of this Indictment, the United States intends to forfeit the defendant's property as further described in this NOTICE OF FORFEITURE.

5. Upon conviction of 18 U.S.C. § 1030, as set forth in Count 1 of this Indictment, the defendants shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to the violations, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

SUBSTITUTE ASSETS

6. If any of the property described above, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;

- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been comingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to and intends to seek forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. §§ 982(b)(1), 1030(i)(2), and 28 U.S.C. § 2461(c).

All pursuant to 18 U.S.C. §§ 981, 982, 1030; 21 U.S.C. § 853; and 28 U.S.C. § 2461.

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Adam Alexander
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United States of America
Assistant U.S. Attorney

s/ Adam Alexander for
C. ALDEN PELKER
United States of America
Trial Attorney

s/ Bryan Schroder
BRYAN SCHRODER
United States of America
United States Attorney

DATE: 12/12/18