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

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8 UNITED STATES DISTRICT COURT  
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10 January 2019 Grand Jury

T9CR00071-ODW

11 UNITED STATES OF AMERICA,

CR No. 19-

12 Plaintiff,

I N D I C T M E N T

13 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]

14 TIMOTHY DALTON VAUGHN,  
15 aka "wantedbyfeds,"  
16 aka "Wanted,"  
17 aka "Hacker\_R\_US,"  
18 aka "HDGZero,"  
19 aka "Xavier Farbel,"  
20 GEORGE DUKE-COHAN,  
21 aka "7R1D3N7,"  
22 aka "Opt1cz,"  
23 aka "Pl3xl3t,"  
24 aka "DigitalCrimes,"

25 Defendants.

26 The Grand Jury charges:

27 COUNT ONE

28 [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.

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.



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! HAHAHAHA.... 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.

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 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.



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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 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 "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 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 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  
2 Emails, Name, address, and full details on the payment  
methods and payment details!

3 A TRUE BILL

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6 Foreperson

7 NICOLA T. HANNA  
8 United States Attorney

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

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

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