

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 1028A

v.

18 U.S.C. § 1030(a)(2)(C)

18 U.S.C. § 1030(a)(5)(A)

18 U.S.C. § 1030(i)

CAMERON THOMAS CROWLEY,
a/k/a Vigilance,

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Intentional Access to a Protected Computer)

Beginning on or about June 3, 2017 and continuing through on or about June 5, 2017, in the State and District of Minnesota, the defendant,

CAMERON THOMAS CROWLEY,
a/k/a Vigilance,

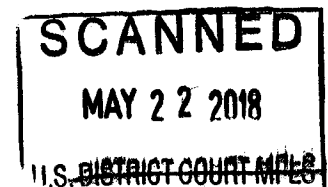
did intentionally access a computer without authorization, namely the computer of University 1, and thereby obtain information from a protected computer, all in violation of Title 18, United States Code, Section 1030(a)(5)(A).

COUNT 2

(Intentional Damage to a Protected Computer)

Beginning on or about June 16, 2017 and continuing through on or about June 17, 2017, in the State and District of Minnesota, the defendant,

CAMERON THOMAS CROWLEY,
a/k/a Vigilance,



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did knowingly and without authorization cause the transmission of programs, code, and commands, and as a result of such conduct, intentionally caused damage to protected computers, and as a result of such conduct, the defendant caused loss to the State of Minnesota during a one-year period beginning on or about June 16, 2017 of an aggregate value of more than \$5,000.00, all in violation of Title 18, United States Code, Section 1030(a)(5)(A).

COUNT 3

(Aggravated Identity Theft)

On or about June 17, 2017, in the State and District of Minnesota, the defendant,

CAMERON THOMAS CROWLEY,
a/k/a Vigilance,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit: the name of Victim 1, which is a means of identification of another person within the meaning of Title 18, United States Code, Section 1028(d)(7), during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), specifically, the violation of Title 18, United States Code, Section 1030(a)(5)(A) as charged in Count 2 of this Indictment, all in violation of Title 18, United States Code, Section 1028A.

COUNT 4

(Intentional Access to a Protected Computer)

On or about May 29, 2017, in the State and District of Minnesota, the defendant,

CAMERON THOMAS CROWLEY,
a/k/a Vigilance,

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did intentionally access a computer without authorization, namely the computer of School District 1, and thereby obtain information from a protected computer, all in violation of Title 18, United States Code, Section 1030(a)(5)(A).

COUNT 5

(Intentional Access to a Protected Computer)

On or about May 29, 2017, in the State and District of Minnesota, the defendant,

CAMERON THOMAS CROWLEY,
a/k/a Vigilance,

did intentionally access a computer without authorization, namely the computer of University 2, and thereby obtain information from a protected computer, all in violation of Title 18, United States Code, Section 1030(a)(5)(A).

FORFEITURE ALLEGATIONS

Counts 1-2 and 4-5 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1030(i).

Upon conviction of any of Counts 1-2 and 4-5 of this Indictment, the defendants shall forfeit to the United States any property real or personal constituting, or derived from, proceeds obtained directly or indirectly as a result of such violations, and any personal property that was used or intended to be used to commit or to facilitate the commission of such violations. The property subject to forfeiture includes, but is not limited to, a Dell Inspiron laptop computer, with serial number 3W8QB12.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title

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21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and 1030(i)(2).

All in violation of Title 18, United States Code, Sections 982(a)(2)(B), 1030(i), and 1030(a)(5)(A).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON