

<input checked="" type="checkbox"/> FILED	<input type="checkbox"/> LODGED
<input type="checkbox"/> RECEIVED	<input type="checkbox"/> COPY
AUG 31 2016	
CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
BY <i>[Signature]</i>	DEPUTY

REDACTED FOR PUBLIC DISCLOSURE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

Randall Charles Tucker,
aka "Bitcoin Baron,"
Defendant.

CR-16-01065-PHX-DLR(BSB)

INDICTMENT

VIO: 18 U.S.C. § 1030(a)(5)(A), (c)(4)(B)
(Intentional Damage to Protected
Computer)
Counts 1-3

18 U.S.C. § 1030(a)(7)(A), (c)(3)(A)
(Threatening Damage to Protected
Computer)
Count 4

18 U.S.C. §§ 982(a)(2)(B), 1030(i)
(Criminal Forfeiture)

THE GRAND JURY CHARGES:

At all times relevant to this Indictment:

1. RANDALL CHARLES TUCKER, who was also known by his online moniker "Bitcoin Baron," lived in Apache Junction, Arizona.

2. A "distributed denial of service" attack, or "DDoS" attack, is a malicious attack wherein the perpetrator bombards the targeted server with network traffic, flooding its bandwidth and causing it to slow down or crash altogether, and thereby denying service to some or all legitimate users of the server.

1 3. Between March 9, 2015, and March 19, 2015, TUCKER engaged in a series
2 of DDoS attacks against government websites that threatened public health and safety and
3 caused an aggregate loss of more than \$5,000.

4 *DDoS Attack of City of Madison, Wisconsin*

5 4. The City of Madison, Wisconsin, located within Dane County, owned and
6 operated computer servers that hosted the City and County's information technology
7 infrastructure, to include the City of Madison's website (www.cityofmadison.com), city
8 intranet and email, and critical police and emergency response communication systems.

9 5. On or about and between March 9, 2015, and March 14, 2015, TUCKER
10 executed multiple DDoS attacks against the City of Madison's computer servers. The
11 DDoS traffic passed through the firewall router, causing it to become overloaded and fail
12 to function. TUCKER's DDoS attacks, in addition to disabling access to the City of
13 Madison's website, caused the Internet-connected communications systems used by the
14 City of Madison's emergency responders to become inaccessible or degraded. For
15 example, the system used to automatically dispatch the closest unit to a medical, fire, or
16 other emergency was crippled. Additionally, emergency responders experienced
17 connectivity issues in connecting to the 911 center.

18 *DDoS Attack of City of Chandler, Arizona*

19 6. The City of Chandler, Arizona, operated the website www.chandleraz.gov.

20 7. On or about March 12, 2015, TUCKER executed a DDoS attack against the
21 City of Chandler's website. As a result of the attack, the website was inaccessible by
22 legitimate users for a period of approximately one and a half hours.

23 *DDoS Attack of City of Mesa, Arizona*

24 8. The City of Mesa, Arizona, operated the website www.mesaaz.gov. Among
25 other things, the City of Mesa's website offered visitors the ability to pay utility bills and
26 court fines online.

27 9. On or about March 19, 2015, TUCKER executed a DDoS attack against the
28 City of Mesa's website. As a result of the attack, the website was inaccessible by legitimate

1 users for a period of approximately six hours.

2 *Extortion of News2Share*

3 10. News2Share is an online media outlet based in Washington, D.C., which
4 operates the website news2share.com.

5 11. On or about October 8, 2014, TUCKER sent an email to News2Share
6 demanding that the site report on a video he provided related to a DDoS attack on the
7 Arizona Department of Economic Security. Later that day, TUCKER emailed again,
8 threatening to “shut down” the website unless News2Share reported on the video he had
9 previously provided.

10 12. When News2Share failed to report on the video, TUCKER executed a DDoS
11 attack, which resulted in the news2share.com website being temporarily inaccessible to
12 legitimate users.

13 13. On or about December 25, 2014, TUCKER sent another email to
14 News2Share, again threatening to shut down the website unless News2Share uploaded
15 another video he had provided.

16 **COUNT ONE**

17 **Intentional Damage to Protected Computer**
18 **(18 U.S.C. § 1030(a)(5)(A) & (c)(4)(B))**

19 14. The factual allegations in paragraphs 1 through 13 are re-alleged and
20 incorporated as if fully set forth here.

21 15. Beginning on or about March 9, 2015, and continuing through on or about
22 March 15, 2015, within the District of Arizona and elsewhere, the defendant, RANDALL
23 CHARLES TUCKER, knowingly caused the transmission of a program, information, code,
24 and command, and, as a result of such conduct, intentionally caused damage without
25 authorization to a protected computer belonging to the City of Madison, Wisconsin, which
26 caused a threat to public health and safety, and which caused a loss to persons during a
27 one-year period resulting from the defendant’s course of conduct affecting protected
28 computers aggregating at least \$5,000 in value, in violation of 18 U.S.C. § 1030(a)(5)(A)

1 and (c)(4)(B).

2 **COUNT TWO**

3 **Intentional Damage to Protected Computer**
4 **(18 U.S.C. § 1030(a)(5)(A) & (c)(4)(B))**

5 16. The factual allegations in paragraphs 1 through 13 are re-alleged and
6 incorporated as if fully set forth here.

7 17. On or about March 12, 2015, within the District of Arizona and elsewhere,
8 the defendant, RANDALL CHARLES TUCKER, knowingly caused the transmission of a
9 program, information, code, and command, and, as a result of such conduct, intentionally
10 caused damage without authorization to a protected computer belonging to the City of
11 Chandler, Arizona, which caused a loss to persons during a one-year period resulting from
12 the defendant's course of conduct affecting protected computers aggregating at least
13 \$5,000 in value, in violation of 18 U.S.C. § 1030(a)(5)(A) and (c)(4)(B).

14 **COUNT THREE**

15 **Intentional Damage to Protected Computer**
16 **(18 U.S.C. § 1030(a)(5)(A) & (c)(4)(B))**

17 18. The factual allegations in paragraphs 1 through 13 are re-alleged and
18 incorporated as if fully set forth here.

19 19. On or about March 19, 2015, within the District of Arizona and elsewhere,
20 the defendant, RANDALL CHARLES TUCKER, knowingly caused the transmission of a
21 program, information, code, and command, and, as a result of such conduct, intentionally
22 caused damage without authorization to a protected computer belonging to the City of
23 Mesa, Arizona, which caused a loss to persons during a one-year period resulting from the
24 defendant's course of conduct affecting protected computers aggregating at least \$5,000 in
25 value, in violation of 18 U.S.C. § 1030(a)(5)(A) and (c)(4)(B).

26 **COUNT FOUR**

27 **Threatening to Damage Protected Computer**
28 **(18 U.S.C. § 1030(a)(7)(A) & (c)(3)(A))**

20. The factual allegations in paragraphs 1 through 13 are re-alleged and
incorporated as if fully set forth here.

