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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
October 2024 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

VICTORIA EDUARDOVNA DUBRANOVA,
aka "Vika,"
aka "Tory,"
aka "Sovasonya,"

[REDACTED]

2:25-578 (A) -SRM

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy; 18
U.S.C. § 1030: Criminal
Forfeiture]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 Defendants.
9

10 The Grand Jury charges:

11 [18 U.S.C. § 371]

12 [ALL DEFENDANTS]

13 A. INTRODUCTORY ALLEGATIONS & DEFINITIONS

14 At all times relevant to this Indictment:

15 The Conspiracy and Defendants

16 1. NoName057(16) (also known as "NoName" and "Noname057") was
17 a group that conducted cyberattacks, including distributed denial of
18 service attacks, or "DDoS," against critical infrastructure and other
19 victims around the world, in support of Russia's geopolitical
20 interests.

21 2. The Center for the Study and Network Monitoring of the
22 Youth Environment ("CISM") (in Cyrillic, "Центр изучения и сетевого
23 мониторинга молодёжной среды," abbreviated to "Цисм"), was an
24 information technology organization established by order of the
25 President of Russia in October 2018 that purported to, among other
26 things, monitor the safety of the internet for Russian youth. CISM
27 undertook overt projects, such a studying risks to youth safety
28 online, as well as covert projects, like administrating and

1 coordinating NoName057(16)'s cybercampaign.

2 3. Defendants VICTORIA EDUARDOVNA DUBRANOVA, also known as
3 ("aka") "Vika," aka "Tory," aka "Sovasonya," ("DUBRANOVA"); [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED] were members of

17 NoName057(16).

18 4. [REDACTED]

19 [REDACTED]

20 5. [REDACTED]

21 [REDACTED]

22 6. Defendants [REDACTED] and [REDACTED] were employees of
23 CISM.

24 7. All defendants, except defendant DUBRANOVA, were residents
25 of Russia. Defendant DUBRANOVA was a resident of Ukraine.

26 8. At times, NoName057(16)'s Telegram public channels
27 collectively had between 10,000 and 52,000 followers, including
28 followers in the United States.

1 Definitions

2 9. A DDoS attack is a type of computer-based attack in which
3 an internet-connected victim computer is flooded with data and/or
4 queries in such a manner to render it unable to communicate with
5 other devices on the Internet or to perform the services which it is
6 intended to perform.

7 10. Telegram is a cloud-based encrypted messaging service that
8 allows users to post messages in public channels and message other
9 users directly.

10 11. GitHub is a host of software repositories, both open source
11 and private, using the Git version control system. The primary
12 purpose of this system is to allow large teams of coders to edit each
13 other's submissions in a controlled and well-organized fashion. The
14 information contained in these repositories can include the code
15 itself, previous versions of the code, information about
16 collaborators, contributors and repository members, logs of Git
17 operations, and other information about the project and network of
18 contributors.

19 B. OBJECTS OF THE CONSPIRACY

20 Beginning no later than March 2022, and continuing to the
21 present, in Los Angeles County, within the Central District of
22 California, and elsewhere, defendants DUBRANOVA, [REDACTED]

23 [REDACTED],
24 and others known and unknown to the Grand Jury, knowingly conspired
25 and agreed with each other to knowingly cause the transmission of
26 programs, information, codes, and commands, and as a result of such
27 conduct, intentionally cause damage without authorization to
28 protected computers, and specifically:

1 a. to cause loss to one or more persons during a one-year
2 period, and resulting from a related course of conduct affecting one
3 or more protected computers, aggregating at least \$5,000 in value, in
4 violation of Title 18, United States Code, Section 1030(a)(5)(A),
5 (c)(4)(B)(i), (c)(4)(A)(i)(I); and

6 b. to cause damage affecting ten or more protected
7 computers during a one-year period, in violation of Title 18, United
8 States Code, Section 1030(a)(5)(A), (c)(4)(B)(i), (c)(4)(A)(i)(VI).

9 C. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
10 ACCOMPLISHED

11 The objects of the conspiracy were to be accomplished, in
12 substance, as follows:

13 1. Defendants [REDACTED] and [REDACTED] who were CISM
14 employees, defendant [REDACTED] and co-conspirators would develop and
15 customize NoName057(16)'s proprietary DDoS program, DDoSia, using
16 GitHub and other types of software repository project management
17 systems;

18 2. Using cryptocurrency payments, defendant [REDACTED] and co-
19 conspirators would pay hosting companies around the world that hosted
20 servers used for NoName057(16)'s network infrastructure;

21 3. Co-conspirators would use Virtual Private Networks
22 ("VPNs"), including a VPN with servers in the Central District of
23 California, to conduct cyberattacks.

24 4. Defendants [REDACTED] and [REDACTED] would monitor co-
25 conspirators, who would research and identify potential victims for
26 NoName057(16) cyberattacks, including by probing for network
27 vulnerabilities and examining potential websites for future attacks;

28 5. Using private Telegram chats and other means of

1 communication, defendants, including defendant [REDACTED] would
2 coordinate cyberattacks against victims around the world, including
3 victims allied with the United States;

4 6. Defendants [REDACTED] [REDACTED] DUBRANOVA, and co-
5 conspirators would serve as administrators for various private
6 Telegram chats and public Telegram channels associated with
7 NoName057(16), including English- and Russian-language Telegram
8 channels, controlling the membership in the chats and moderating
9 posts in the channels;

10 7. Defendant [REDACTED] would serve as a moderator of the public
11 Telegram channels associated with NoName057(16), and moderating posts
12 and access privileges in the channels;

13 8. Defendant [REDACTED] and other co-conspirators from around
14 the world would affirm they had read the NoName057(16) "Manifesto" in
15 order to join NoName057(16)'s public Telegram channels;

16 9. Defendant [REDACTED] and co-conspirators would instruct
17 NoName057(16) members in the public Telegram channels on how to
18 download the DDoSia script from a GitHub repository onto their own
19 computers;

20 10. Co-conspirators would post a list of targets on the
21 Telegram channels for followers to launch coordinated DDoS attacks
22 using DDoSia against hundreds of victims around the world, including
23 websites of government institutions, financial institutions, and
24 critical infrastructure;

25 11. Co-conspirators would post on the public NoName057(16)
26 Telegram channels purported explanations for why NoName057(16) had
27 targeted those victims, including in support of Russian geopolitical
28 interests;

1 12. NoName057(16) members, including defendant [REDACTED] would
2 launch multiple DDoS attacks against the chosen targets from their
3 own computers around the world;

4 13. NoName057(16) would publish a daily leaderboard of
5 volunteers who launched the most DDoS attacks on its Telegram
6 channel;

7 14. NoName057(16) would pay the top-ranking members in
8 cryptocurrency through a wallet server within the DDoSia
9 infrastructure;

10 15. On NoName057(16)'s public Telegram channels, co-
11 conspirators, including Telegram administrators, would post a link to
12 a network monitoring tool that indicated that the DDoS victim website
13 had been taken offline (i.e., that the cyberattack was successful);

14 16. Defendants [REDACTED] [REDACTED] and co-conspirators would
15 search the internet for press coverage of NoName057(16)'s DDoSia
16 attacks in the days and weeks that followed the attacks to gauge
17 their impact and notoriety.

18 17. Defendant [REDACTED] and co-conspirators would use web-
19 based tools to monitor NoName057(16)'s Telegram presence and user
20 engagement.

21 18. Defendant [REDACTED] and co-conspirators would share links
22 to the DDoSia download page in the public Telegram channel and
23 private Telegram messages to recruit new members to join
24 NoName057(16).

25 19. Defendants [REDACTED] and DUBRANOVA, and co-conspirators,
26 would create promotional media to increase NoName057(16)'s notoriety
27 and recruit new members.

28 20. Co-conspirators would repost and promote the cyberattacks

1 by other hacktivist groups either formally or informally allied with
2 NoName057(16).

3 D. OVERT ACTS

4 In furtherance of the conspiracy and to accomplish its objects,
5 on or about the following dates, defendants DUBRANOVA, [REDACTED],
6 [REDACTED],
7 and others, committed various overt acts within the Central District
8 of California, and elsewhere, including but not limited to the
9 following:

10 Development of DDoSia Malware

11 Overt Act No. 1: On an unknown date, defendant [REDACTED]
12 edited the DDoSia programming code in a GitHub repository called
13 "ddos_config."

14 Overt Act No. 2: On an unknown date, but no later than
15 January 16, 2023, defendant [REDACTED] joined the NoName Telegram
16 channel.

17 Overt Act No. 3: On January 16, 2023, defendant [REDACTED]
18 edited the programming code for DDoSia in the DDoSia GitHub
19 repository to add a "targets dropdown."

20 Overt Act No. 4: On January 25, 2023, defendant [REDACTED]
21 edited the programming code for DDoSia in the DDoSia GitHub
22 repository to add a domain checker function, which is a tool that
23 checks the availability and security of a domain name and can be used
24 to gauge the vulnerability to or success of a DDoS attack.

25 Overt Act No. 5: On February 17, 2023, defendant [REDACTED]
26 edited the DDoSia programming code in a GitHub repository called
27 "ddos_config."

28 Overt Act No. 6: On February 22, 2023, defendant [REDACTED]

1 edited the programming code in a GitHub repository for the backend
2 administration of the DDoSia network called "dosia_administration."

3 Overt Act No. 7: On April 13, 2023, defendant [REDACTED]
4 using an official CISM email address, directed defendant [REDACTED]
5 to contact him about a job opening for a "web analyst" at CISM.

6 Overt Act No. 8: On an unknown date, but no earlier than June
7 28, 2023, defendant [REDACTED] joined CISM as a program developer.

8 Overt Act No. 9: On June 28, 2023, defendant [REDACTED]
9 edited the DDoSia programming code in a GitHub repository called
10 "ddos_config."

11 Overt Act No. 10: On October 6, 2023, defendant [REDACTED]
12 edited the DDoSia programming code in a repository called
13 "ddos_config" using a GitHub account registered a CISM email address.

14 **Administration, Promotion, and Coordination of NoName**

15 Overt Act No. 11: On July 7, 2022, defendant [REDACTED] joined
16 one of NoName's Telegram bots.

17 Overt Act No. 12: Between no later than July 7, 2022 and June
18 8, 2024, defendant [REDACTED] logged into a server that NoName used to
19 probe potential DDoSia targets, including websites for European Union
20 and Polish critical infrastructure for vulnerabilities, at least
21 1,772 times.

22 Overt Act No. 13: On an unknown date, defendant [REDACTED] joined
23 the NoName public Telegram channel.

24 Overt Act No. 14: On an unknown date, defendant [REDACTED] joined
25 the NoName Telegram channel.

26 Overt Act No. 15: On December 28, 2022, defendant [REDACTED]
27 sent 1.13762 Litecoin ("LTC"), a cryptocurrency, to a NoName
28 cryptocurrency wallet used to pay a hosting service provider, which

1 hosted a known DDoSia command and control ("C2") server.

2 Overt Act No. 16: On February 10, 2023, defendant [REDACTED]
3 sent 1.485451 LTC to a NoName cryptocurrency wallet used to pay a
4 proxy hosting service that hosted NoName proxy servers.

5 Overt Act No. 17: On May 10, 2023, defendant [REDACTED] logged into
6 the server that NoName used to probe potential DDoSia targets.

7 Overt Act No. 18: On July 26, 2023, defendant [REDACTED]
8 searched the internet for information about the "DDosia project" and
9 "noname057" on Wikipedia and a Russian hacker publication.

10 Overt Act No. 19: On August 7, 2023, defendant [REDACTED] sent
11 3.99737 LTC, to a NoName cryptocurrency wallet used to pay the
12 hosting service provider which had previously hosted a DDoSia C2
13 server.

14 Overt Act No. 20: No later than May 9, 2024, defendant
15 DUBRANOVA assisted in the creation of a NoName promotional video
16 later posted to NoName's Telegram channels.

17 Overt Act No. 21: On August 26, 2024, defendant [REDACTED] in
18 a private Telegram chat, shared a link with co-conspirators,
19 including user "DDoSia Project," to an online document titled
20 "Instructions on Security for the Volunteer Project DDoSia Project 7-
21 22."

22 Overt Act No. 22: On August 26, 2024, defendant [REDACTED]
23 searched the internet for information about Spain's arrest of NoName
24 members, which occurred on July 20, 2024.

25 Overt Act No. 23: On September 11, 2024, in a private Telegram
26 chat, defendant [REDACTED] circulated the NoName Telegram channel,
27 introducing it as a "group for our volunteer project," DDoSia
28 Project.

1 Overt Act No. 24: On September 11, 2024, in a private Telegram
2 chat with defendant DUBRANOVA, defendant [REDACTED] shared a script
3 directing DUBRANOVA to create an animated recruitment video showing
4 that "anyone can become a volunteer for DDoSia Project."

5 Overt Act No. 25: On September 27, 2024, defendant [REDACTED]
6 sent unknown co-conspirators via a private Telegram chat six Austrian
7 websites to launch DDoS attacks against, explaining that "elections
8 [w]ere coming in Austria" and "We want to rip them off." These
9 targets included a bank and various railway websites.

10 Overt Act No. 26: Between approximately October 15, 2024, and
11 November 3, 2024, defendant [REDACTED] participated in a private Telegram
12 chat that included [REDACTED] discussing a "deserved[] ban" on a
13 member that [REDACTED] imposed in his capacity as a moderator.

14 Overt Act No. 27: On October 31, 2024, defendant [REDACTED] in a
15 private Telegram chat requested the cryptocurrency wallet for an
16 unnamed co-conspirator to "send them a coin."

17 Overt Act No. 28: On December 10, 2024, defendant [REDACTED]
18 logged into a project management web service to view a page called
19 "NN+Shadow+personal."

20 Overt Act No. 29: On January 17, 2025, defendant [REDACTED]
21 tracked NoName's Telegram presence, including the channel's profile
22 analytics and statistics, through the tool TGStat.

23 Overt Act No. 30: On February 15, 2025, defendant [REDACTED]
24 researched on the internet how to use the computer program, Nmap, to
25 scan "all ports" of a computer network for open ports and/or
26 vulnerabilities.

27 Overt Act No. 31: On an unknown date, but no later than April
28 8, 2025, defendant [REDACTED] possessed a GitHub repository for a DDoS

script called "DDoS-PHP-Script."

DDoS Targeting and Attacks

Overt Act No. 32: On June 12, 2023, co-conspirators launched DDoS attacks against several Swiss governmental websites and interrupted their services.

Overt Act No. 33: On July 7, 2023, a co-conspirator claimed credit for DDoS attacks against various Polish websites, including the website for a railway management company, in the public NoName Telegram channel.

Overt Act No. 34: On a date unknown, defendant [REDACTED] joined the NoName057(16) Telegram channel.

Overt Act No. 35: On May 21 and 22, 2024, defendant [REDACTED] operated infrastructure that was the source of the highest DDoS attack load against at least multiple German victim websites.

Overt Act No. 36: On June 14, 2024, defendant [REDACTED] ordered VPS services which he used to launch DDoSia attacks.

Overt Act No. 37: On June 19, 2024, defendant [REDACTED] ordered VPS services which he used to launch DDoSia attacks.

Overt Act No. 38: On August 21, 2024, defendant [REDACTED] provided an individual from the NoName Telegram channel with a copy of DDoSia.

Overt Act No. 39: On August 21, 2024, defendant [REDACTED] instructed the individual how to run DDoSia, and the individual successfully completed a DDoS attack against a Latvian victim website.

Overt Act No. 40: On September 18, 2024, co-conspirators launched DDoSia attacks against various Austrian victims, including financial institutions.

1 Overt Act No. 41: On September 25, 2024, a co-conspirator
2 posted in the public NoName Telegram channel, "We continue sending
3 DDoS-missiles to the sites of critical infrastructure in Austria 🐼,"
4 claiming credit for several days of cyber attacks against Austrian
5 municipalities and governmental institutions, among other victims,
6 ahead of the September 29, 2024 Austrian parliamentary election.

7 Overt Act No. 42: On October 7, 2024, a co-conspirator posted
8 in the public NoName Telegram channel that "We have decided to pay a
9 visit to Russophobic Belgium to show them how initiatives in support
10 of the criminal regime in Kyiv end."

11 Overt Act No. 43: On October 8, 2024, a co-conspirator posted
12 a list of Belgian municipalities and ports to target for DDoS
13 attacks, including the websites of the ports of two port cities,
14 approximately one week before Belgian local elections.

15 Overt Act No. 44: On October 10, 2024, a co-conspirator posted
16 on the NoName public Telegram channel "Check Host" links to numerous
17 Belgian websites, including those of the targeted ports publicized on
18 October 8, 2024, showing that those websites, were, in fact, attacked
19 between October 7 and 10, 2024.

20 Overt Act No. 45: On June 23, 2025, a NoName co-conspirator
21 claimed credit for DDoS attacks against 10 Dutch victims ahead of the
22 2025 North Atlantic Treaty Organization ("NATO") Summit at the Hague.

23 Overt Act No. 46: On June 25, 2025, the second day of the NATO
24 Summit, a NoName co-conspirator claimed credit for DDoS attacks
25 against several Dutch transportation organizations.
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1 FORFEITURE ALLEGATION

2 [18 U.S.C. § 1030]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States will seek
5 forfeiture as part of any sentence, pursuant to Title 18, United
6 States Code 1030, in the event any defendant's conviction of the
7 offense set forth in this Indictment.

8 2. Any defendant so convicted shall forfeit to the United
9 States of America the following:

10 a. All right, title, and interest in any and all
11 property, real or personal, constituting, or derived from, any
12 proceeds obtained, directly or indirectly, as a result of the
13 offense;

14 b. Any property used or intended to be used to commit the
15 offense; and

16 c. To the extent such property is not available for
17 forfeiture, a sum of money equal to the total value of the property
18 described in subparagraphs (a) and (b).

19 3. Pursuant to Title 21, United States Code, Section 853(p),
20 as incorporated by Title 18, United States Code 1030(i), any
21 defendant so convicted shall forfeit substitute property, up to the
22 total value of the property described in the preceding paragraph if,
23 as the result of any act or omission of said defendant, the property
24 described in the preceding paragraph, or any portion thereof: (a)
25 cannot be located upon the exercise of due diligence;

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1 (b) has been transferred, sold to or deposited with a third party;
2 (c) has been placed beyond the jurisdiction of the court; (d) has
3 been substantially diminished in value; or (e) has been commingled
4 with other property that cannot be divided without difficulty.

5 A TRUE BILL

6
7 /s/
8 _____
Foreperson

9 BILAL A. ESSAYLI
10 United States Attorney

11 

12 DAVID T. RYAN
13 Assistant United States Attorney
Chief, National Security Division

14 IAN V. YANNIELLO
15 Assistant United States Attorney
16 Chief, Terrorism & Export Crimes
Section

17 ANGELA C. MAKABALI
18 Assistant United States Attorney
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