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BRIAN J. STRETCH (CABN 163973)
United States Attorney

10ms 24 FILED
DEC 11 2016
SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**SEALED
BY COURT ORDER**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CRB

CR 16 484

UNITED STATES OF AMERICA,
Plaintiff,
v.
SEAN KRISHANMAKOTO SHARMA,
Defendant.

CASE NO.)
VIOLATION: 18 U.S.C. §§ 1030(a)(5)(A) &)
(c)(4)(A)(i)(I) - Transmission of a Program,)
Information, Code, and Command to Cause Damage)
to a Protected Computer)
SAN FRANCISCO VENUE)
UNDER SEAL

INDICTMENT

The Grand Jury charges:

BACKGROUND

1. At all times relevant to this Indictment:

a. Chatango, LLC ("Chatango") was a company headquartered in San Francisco that provides online chat services to third party web sites.

b. The computer servers of Chatango were used in and affecting interstate and foreign commerce and communication and were "protected computers" pursuant to 18 U.S.C. § 1030(e)(2)(B).

INDICTMENT

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c. Defendant SEAN KRISHANMAKOTO SHARMA ("SHARMA") resided in La Canada, California.

d. A Distributed Denial of Service ("DDoS") attack was a type of malicious computer activity where an attacker sends a large number of requests to the victim computer with the intent to render the victim computer unable to handle legitimate network traffic. The victim computer becomes unable to perform its intended function and legitimate users are denied the service of the computer.

2. Xtreme Fire was described on the "Xtreme.cc" as, "basically a Linux Botnet Ddos Tool."
COUNT ONE: (18 U.S.C. § 1030(a)(5)(A), (c)(4)(A)(i)(I) - Transmission of a Program, Information, Code, and Command to Cause Damage to a Protected Computer)

3. The factual allegations at Paragraphs One and Two are re-alleged as if set forth fully therein.

4. On or about November 6, 2014, through January 20, 2015, in the Northern District of California and elsewhere, the defendant,

SEAN KRISHANMAKOTO SHARMA,

did knowingly cause the transmission of a program, information, code, and command, and as a result of such conduct, intentionally caused damage without authorization to a protected computer, to wit, the defendant caused the transmission of the Xtreme Fire DDoS tool to Chatango's web servers, a computer used in interstate and foreign commerce and communication, and, by such conduct caused loss to 1 or more persons during a 1-year period from the defendant's course of conduct affecting protected

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INDICTMENT

1 computers aggregating at least \$5,000 in value.

2 All in violation of Title 18, United States Code, Sections 1030(a)(5)(A) & (c)(4)(A)(i)(I).

3 Dated: 12/1/16


A TRUE BILL.

Karen Williams
FOREPERSON

6 BRIAN J. STRETCH
United States Attorney

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8 MATTHEW A. PARRELLA
9 Chief, CHIP Unit

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11 (Approved as to form: 
12 AUSA CYNTHIA FREY

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INDICTMENT