DAVID HERNANDEZ
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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	**HON. CATHY L. WALDOR**
	:	
v.	:	**Magistrate No. 12-7245**
	:	
ADAM JORDAN NAFA	:	**COMPLAINT**

I, Carie Jeleniewski, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From in or about June 2012 through in or about September 2012, in the District of New Jersey and elsewhere, the defendant, ADAM JORDAN NAFA, did:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

Carie Jeleniewski, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
September 24, 2012, at Newark, New Jersey,

Honorable Cathy L. Waldor
United States Magistrate Judge

ATTACHMENT A

From in or about June 2012 through in or about September 2012, in the District of New Jersey and elsewhere, the defendant,

ADAM JORDAN NAFA,

knowingly and intentionally conspired with others to commit an offense against the United States, that is, to knowingly cause the transmission of a program, information, code, and command, and as a result of such conduct, intentionally cause damage without authorization to a protected computer, contrary to Title 18, United States Code, Sections 1030(a)(5)(A), 1030(b) and 1030(c)(4)(B)(I) and (ii).

In violation of Title 18, United States Code, Section 371.

ATTACHMENT B

I, Caric Jeleniewski, am a Special Agent of the Federal Bureau of Investigation ("FBI"). I have knowledge of the facts set forth below from a review of reports and discussions with other law enforcement personnel. Because this Complaint is being submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of the investigation. Where the content of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Introduction

1. Since in or about August 2012, the FBI has been investigation a threatened cyber attack against the computer servers of two companies with offices and substantial assets in New Jersey, Verizon Wireless and AT&T Communications, Inc. This cyber attack, also known as a distributed denial of service or "DDoS" attack, was conceived and planned by Adam Jordan Nafa.

Background

2. Definitions:

a. **Distributed Denial of Service ("DDoS") attack**: A DDoS attack is an attempt to interrupt or disable a computer or network of computers connected to the internet. One common form of DDoS attack involves overwhelming the targeted computer or computer network with external communication requests so that it cannot respond to legitimate communications. In recent years, computer hackers have used DDoS attacks to effectively shut down the computer networks of banks, credit card companies and other entities.

b. **"Anonymous"**: Anonymous is a loosely associated group of computer hackers. Anonymous originated in or about 2003, and persons claiming to be members of Anonymous have taken credit for numerous large-scale computer hacks and DDoS attacks, including cyber attacks on websites belonging to the Department of Justice, the FBI, and industry trade groups.

c. **Internet Relay Chat ("IRC")**: IRC permits users to text-message or "chat" with other users via the Internet in real-time. Most commonly, IRC is used to conduct group chats in forums called "channels."

d. **IP Address**: An Internet Protocol address (or "IP" address) is a unique numeric address used by computers on the Internet. An IP address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178), which is assigned to a particular Internet connection. Every computer attached to the Internet must use an internet connection, such as a cable modem, which is assigned an IP address so that Internet traffic sent from and directed to that

computer may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses, which they assign to their subscribers. No two Internet connections can have the same IP address at the same time. Thus, at any given moment, an IP address is unique to the Internet connection to which it has been assigned.

e. **Twitter.com ("Twitter):** Twitter is a free-access social-networking website. Twitter allows its users to create their own profile pages, which can include a short biography, a photo of themselves, and location information. Twitter also permits users create and read 140-character messages called "Tweets," and to restrict their "Tweets" to individuals whom they approve. Each Tweet includes a timestamp that displays when the Tweet was posted to Twitter. Twitter usernames are often preceded by the @ symbol.

3. At various times relevant to this Complaint, defendant ADAM JORDAN NAFA resided in Forth Worth, Texas. Nafa posted messages on internet forums and websites using the aliases "LulzDog" and "Anonymous of America." Using these (and other) aliases, Nafa posted messages on internet forums (1) claiming an association with the group Anonymous, and (2) espousing extreme, anti-establishment views, including, for example, recently suggesting the assassination of various conservative political figures and corporate executives.

The Planned Cyber Attack

4. On or about June 6, 2012, defendant ADAM JORDAN NAFA, using the alias "LulzDog," posted the following message on an IRC channel: "Anybody up for a ddos of verizon?"

5. On or about July 30, 2012, defendant ADAM JORDAN NAFA, again using the alias "LulzDog," posted the following messages on an IRC channel: "We should ddos the telecos;" "I still thinj someone should ddos the telecos';" and "VZW and AT&T in particular." These posts prompted the following IRC conversation between defendant NAFA and the IRC users "xLyRa," "Gatsby," and "markerP":

xLyRa: its possible...
xLyRa: we have social media sites to spread info
LulzDog: Somebody send me a script and ill make a video
Gatsby: u would need to take down four
xLyRa: I have my own website as well to help spread tools and info
markerP: serious you can make videos LulzDog?
Gatsby: name servers
Gatsby: xxxxxxx.att.net
Gatsby: xxxxxxx.att.net
Gatsby: xxxxxxx.att.net
Gatsby: xxxxxxx.att.net

LulzDog Yea no problrm
xLyRa: lets do this
markerP: LulzDog: give me a fe hours
xLyRa: lulzdog, make a video and I will upload a version of it on my youtube account as well and we will spread the same video everywhere

AT&T Communications, Inc. ("AT&T") has confirmed that the computer servers referenced by "Gatsby" in the IRC conversation excerpted above are the names of actual AT&T computer servers.

6. Less than a week after the IRC conversation excerpted in paragraph 5 above, on or about August 3, 2012, defendant ADAM JORDAN NAFA, using the alias "AnonymousofAmerica," posted a video on YouTube. The video, which was entitled "Anonymous: #Operation Telecom" (hereinafter, the "Operation Telecom YouTube Video"), called on Anonymous members to engage in a DDoS attack against Verizon Wireless and AT&T. Specifically, in the Operation Telecom YouTube Video, a digitally-altered voice stated, in substance and in part:

> Greetings citizens of the United States, we are Anonymous. This message is regarding the United States telecommunications industry's increasingly corrupt behavior. AT&T and Verizon Wireless in specific have taken corporate greed and corruption to an unprecedented level. These providers continue to increase prices while decreasing the quality and stability of the services they provide. In addition, Verizon Wireless is attempting to have the FCC's Network Neutrality Act overturned citing that due to the Supreme Court's ruling on Citizens United the law infringes upon their right to free speech. If they succeed in this it would allow all internet service providers to censor any website they do not agree with as well as allow them to edit search engine results and prioritize them in order to make a profit. This could put an end to the internet as we know it and cannot be allowed to occur. These two providers make no attempt to safeguard their user's privacy and willingly hand it over to organizations like the NSA and the RIAA. During the month of October 2012, Anonymous will be using distributed denial of service attacks to cripple Verizon's networks as well as AT&T's mailing servers.

7. The Operation Telecom YouTube Video included a link to a document that contained a list of Verizon Wireless and AT&T IP addresses and computer servers which are to be targeted in the DDoS attack, including the four AT&T computer servers listed by "Gatsby" in the IRC conversation excerpted in paragraph 5 above.

8. The Operation Telecom YouTube Video also contained the following message: "Follow us on twitter @anonofamerica for news and updates." On or about August 4, 2012, a tweet was sent from the @anonofamerica Twitter account containing a link to the Operation Telecom YouTube Video and the document listing Verizon Wireless's and AT&T's IP addresses and computer servers.

9. On or about August 14, 2012, defendant ADAM JORDAN NAFA (as "LulzDog") posted on an IRC channel both a reference to the Anonofamerica Twitter account and a link to the Operation Telecom YouTube Video.