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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

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

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

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

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

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

15 SEAN KRISHANMAKOTO SHARMA,

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

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28 INDICTMENT

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

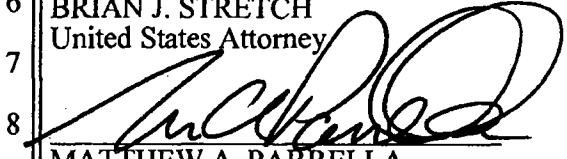
2 All in violation of Title 18, United States Code, Sections 1030(a)(5)(A) & (c)(4)(A)(i)(I).

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