IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

FILED IN OPEN COURT

CLERK, U.S. DISTRICT COURT
ALEXANDRIA, VA.

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	Criminal No. 1:04cr485
RAYMOND STEIGERWALT	)	
	)	
Defendant.	)	

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

Count One

Between in or about October 2002, and March 7, 2003, in the Eastern District of Virginia, and elsewhere, Raymond Steigerwalt, defendant herein, did knowingly combine, conspire, confederate, and agree with others to commit an offense against the United States, to wit: fraud and other related activity in connection with a computer, in violation of Title 18, United States Code, Section 1030(A)(5)(a)(i), by knowingly causing the transmission of information to computers connected to the Internet and intentionally causing damage without authorization to such computers, by impairing the integrity of data or systems.

Manner and Means

1. It was a part of the conspiracy that the defendant was a member of the THR34T KREW ("TK"), an Internet group devoted to hacking, i.e., gaining unauthorized access to computers.

2. It was a part of the conspiracy that conspirators would create a computer "worm" to spread across the Internet and install "trojan software", i.e. software that masqueraded as legitimate software, but allowed the defendant and other co-conspirators to remotely control infected computers.

3. It was a part of the conspiracy that conspirators created the worm to self propagate, that is, once the worm infected a computer it would cause the computer to scan the Internet for other computers that could be similarly infected.

4. It was a part of the conspiracy that the conspirators would use computers connected to the Internet to command and control the computers infected by the "worm" with the "trojan software."

Overt Acts

5. In furtherance of the conspiracy and to effect the objects of the conspiracy, the defendant and other co-conspirators committed and caused to be committed the following acts within the Eastern District of Virginia and elswhere:

6. On or about October 31, 2002, in the Eastern District of Virginia, the conspirators caused the worm that they created to infect a computer belonging to the Defense Information Systems Agency, Falls Church, Virginia, and intentionally caused damage to said computer by impairing the integrity of data on the computer.

7. On or about February 5, 2003, in the Eastern District of Virginia, the conspirators caused the worm that they created to infect a computer belonging to the Defense Logistics Agency, Fort Belvoir, Virginia, and intentionally caused damage to said computer by impairing the integrity of data on the computer.

8. Between October 2002 and March 7, 2003, the defendant commanded computers infected by the worm with the trojan software to disconnect other computers connected to the Internet.

(All in violation of Title 18, United States Code, Section 371).

Paul J. McNulty
United States Attorney

By: _____
Scott J. Stein
Assistant United States Attorney