

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	
	:	Hon.
	:	
v.	:	Criminal No. 09-
	:	
	:	18 U.S.C. §§ 1030 and 2
BRUCE RAISLEY	:	
	:	

INDICTMENT

The Grand Jury in and for the District of New Jersey,
sitting in Newark, charges:

COUNT 1 to 3

1. At all times relevant to this Indictment, the following
definitions applied:

a. Bot: A bot is an automated computer program that performs specific functions. Bots can perform useful tasks, such as regularly updating weather and traffic conditions on local news websites or scanning the Internet to update comparison shopping websites. Bots also can perform destructive tasks such as scanning the Internet for unsecured computers for the purpose of identifying and sometimes installing computer viruses or other destructive programs. These compromised or "zombie" computers can then be used to repeatedly attack a domain or IP address on behalf of the bot originator or "bot herder."

b. Botnet: A collection of bots is a "robot network" or botnet. A botnet is typically remotely controlled by the bot

herder using a "command and control" server which is connected to the Internet. A botnet is generally comprised of thousands, sometimes hundreds of thousands, of computers.

c. Distributed Denial of Service (DDOS) Attack: A DDOS attack involves using a large network of computers, commonly a botnet, to flood a victim website with repeated requests for information or "junk" data, which could effectively cripple the site by overloading it with too much information simultaneously. The perpetrators of DDOS attacks gain control of large numbers of computers to use in this type of attack, commonly by assembling a botnet. Once the botnet is in place, when used for a DDOS attack, it is either programmed to attack specific sites or it awaits further instructions from the command and control server.

2. At various times relevant to this Indictment:

a. Defendant Bruce Raisley resided in Searcy, Arkansas and subsequently moved to Monaca, Pennsylvania.

b. The Rick A. Ross Institute of New Jersey (the "Rick Ross Institute") maintained a website, www.rickross.com, entitled the "Rick Ross Institute Internet Archive for the Study of Destructive Cults, Controversial Groups and Movements." The Rick Ross Institute was based in Hudson County, New Jersey.

c. Perverted Justice was a Portland, Oregon based organization operated by X.E., which, using the Internet, sought to identify and expose pedophiles and sexual predators targeting

minors.

d. Corrupted Justice was an organization whose stated purpose was to educate the public by providing details and information regarding the actions of various groups in operation on the Internet, including Perverted Justice. In or about 2006, defendant Raisley was a volunteer member of Corrupted Justice.

DEFENDANT RAISLEY AND PERVERTED JUSTICE

3. In or about September 2006, Radar Magazine published an article by John Cook entitled "Strange Bedfellows." In or about July 2007, Rolling Stone published an article entitled, "To Catch a Predator: The New American Witch Hunt for Dangerous Pedophiles" (the "New American Witch Hunt"). The New American Witch Hunt was featured in an August 2007 edition of the Rolling Stone magazine. Both articles described an episode which was embarrassing to Raisley.

4. In or about 2007, Strange Bedfellows was reprinted on numerous websites, including Corrupted Justice's website, www.corrupted-justice.com; Radar Magazine's website, www.radaronline.com; and the Rick Ross Institute's website, www.rickross.com. The New American Witch Hunt was likewise reprinted on numerous websites and remained on the Rolling Stone's website, www.rollingstone.com.

DDOS ATTACKS

5. Between in or about July 2007 and in or about September

2007, defendant Raisley operated command and control servers and controlled a botnet that was responsible for the following DDOS attacks:

a. On or about July 5, 2007, Corrupted Justice's website, www.corrupted-justice.com, was the victim of a DDOS attack that shut down the website for four days. At that time, the website contained a copy of both "Strange Bedfellows" and "New American Witch Hunt."

6. In or about July 2007, Rolling Stone's website was the victim of a DDOS attack that limited availability to data and was directed specifically at the web page hosting "New American Witch Hunt."

7. On or about September 25, 2007, the Rick Ross Institute's was the victim of a DDOS attack which limited availability to data and was directed at the URL hosting "Strange Bedfellows," http://rickross.com/reference/perverted_justice26.html.

8. On or about the dates set forth below, in the District of New Jersey and elsewhere, defendant

BRUCE RAISLEY

knowingly caused the transmission of a program, information, code, and command, and as a result of such conduct, intentionally caused damage without authorization, to protected computers, as described below, which were used in interstate commerce, and by

such conduct caused loss to one or more persons during a 1-year period aggregating at least \$5,000 in value:

Count	Approximate Date	Protected Computers
1	July 5, 2007	Corrupted Justice
2	July 2007	Rolling Stone
3	September 25, 2007	Rick Ross Institute

In violation of Title 18, United States Code, Sections 1030(a)(5)(A)(i), 1030(a)(5)(B)(i), 1030(c)(4)(A) and 2.

A TRUE BILL

FOREPERSON

PAUL J. FISHMAN
United States Attorney