

BRYAN D. SCHRODER  
United States Attorney

ADAM ALEXANDER  
Assistant U.S. Attorney  
Federal Building & U.S. Courthouse  
222 West 7th Ave., #9, Rm. 253  
Anchorage, AK 99513-7567  
Phone: 907-271-5071  
Email: adam.alexander@usdoj.gov

KENNETH A. BLANCO  
Acting Assistant Attorney General

CATHERINE ALDEN PELKER  
Trial Attorney  
Computer Crime & Intellectual Property Section  
1301 New York Avenue, NW, Suite 600  
Washington, DC 20005  
Telephone: (202) 514-1026  
Facsimile: (202) 514-6113  
Email: Catherine.Pelker@usdoj.gov

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	) No.
	)
Plaintiff,	) <u>COUNT 1:</u>
	) CONSPIRACY TO COMMIT A
vs.	) VIOLATION OF 18 U.S.C. §
	) 1030(a)(5) Vio. Of 18 U.S.C. § 371
JOSIAH WHITE	)
a.k.a. Lightspeed	)
a.k.a. thegenius	)
	)
Defendant.	)

INFORMATION

The United States Attorney charges that:

## INTRODUCTION

1. The “Internet” is a global network connecting millions of computers and computer networks to each other, allowing them to communicate and transfer information. Using, among other things, a system of wires, cables, routers and circuits, the Internet allows the communication and transfer of information in interstate and foreign commerce. Computers that are connected to the Internet may come in different forms, from personal computers, laptops and smartphones, to large scale servers that host websites and online services, to more minimal devices such as Internet-connected cameras, digital video recorders (“DVR”) and routers.

2. “Malware” is malicious software designed to damage or disable a computer, or provide control of the computer to a third party.

3. A “botnet” is a collection of computers infected with malware that are controlled as a group, typically without the owners’ knowledge. The individual computers within a botnet, known as “bots,” respond to commands from one or more master computers. These master computers are commonly known as “command and control” (“C2”) computers.

4. “DDOS attacks” occur when multiple computers acting in unison flood the Internet connection of a targeted computer or computers. The overwhelming amount of traffic generated by such an attack quickly overwhelms the capacity of the target computer, resulting in the target computer being unable to send, receive or respond to commands. DDOS attacks are often directed at servers that host websites, with the intent of rendering those websites unavailable to the public.

5. A “proxy” is an intermediary computer server that relays traffic from one computer to another. Proxies are used to obfuscate the Internet Protocol address of the originating computer, which makes online attribution more difficult.

6. Mirai is the name of a malware variant utilized to create botnets. Unlike most malware, Mirai targets the “Internet of Things” (“IoT”) – non-traditional computing devices that have been connected to the Internet, including wireless cameras, routers and digital video recorders.

#### COUNT 1 (Conspiracy)

7. The allegations set forth in paragraphs one through six of this Information are re-alleged as if fully stated herein.

8. Between on or about August 2016, and continuing thereafter to on or about October 4, 2016, in the District of Alaska and elsewhere, defendant JOSIAH WHITE, and other persons, did knowingly and intentionally conspire and agree with one another 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, and to cause loss during a one-year period aggregating at least \$5,000 in value and to cause damage affecting 10 or more protected computers during a 1-year period in violation of 18 U.S.C. § 1030(a)(5)(A) and (c)(4)(A).

#### THE OBJECT OF THE CONSPIRACY

9. The object of the unlawful conspiracy was to infect computers with Mirai for the purpose of enlisting those devices into a botnet that could be used to conduct powerful denial of service attacks.

## MANNER AND MEANS OF THE CONSPIRACY

10. It was a part of the conspiracy that the defendant JOSIAH WHITE and his co-conspirators would scan the internet for IoT devices and, without authorization, attempt to gain administrative access to those devices through the use of credentials that they were not authorized to employ.

11. It was further part of the conspiracy that the defendant JOSIAH WHITE and his co-conspirators would, without authorization, infect with Mirai the IoT devices they were able to access, which afforded the defendant JOSIAH WHITE and his co-conspirators complete control over the devices and enlisted the devices into a botnet.

12. It was further part of the conspiracy that the defendant JOSIAH WHITE and his co-conspirators would use their Mirai botnet to conduct powerful DDOS attacks, which caused damage to the servers targeted in the attacks.

13. It was further part of the conspiracy that the defendant JOSIAH WHITE and his co-conspirators would rent access to their Mirai botnet, which enabled other criminals to use the botnet to conduct powerful DDOS attacks. These attacks caused damage to the targeted servers.

## OVERT ACTS

14. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the District of Alaska and elsewhere:

(a) In or about August 2016, the defendant, JOSIAH WHITE, scanned the internet for IoT devices and, without authorization, attempted to gain administrative access to those devices, including numerous devices located within the District of Alaska;

(b) In or about September 2016, the defendant, JOSIAH WHITE, directed and oversaw the repositioning of the Mirai C2 server to the hosting provider BackConnect;

(c) In or about September 2016, the defendant JOSIAH WHITE, acting without authorization, compromised a computer located in France for the purpose of providing his co-conspirators with a proxy that could be used to conduct Mirai-related activity.

All of which is in violation of Title 18, United States Code, Section 371.

RESPECTFULLY SUBMITTED December 5, 2017, in Anchorage, Alaska.

BRYAN D. SCHRODER  
United States Attorney

*s/ Adam Alexander*  
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ADAM ALEXANDER  
Assistant U.S. Attorney  
United States of America