

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

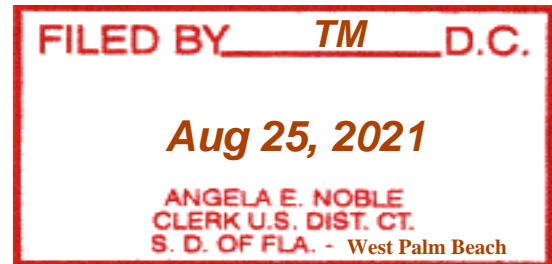
Case No. 21-80119-Cr-Rosenberg/Reinhart
18 U.S.C. § 1030(b)
18 U.S.C. §§ 981(a)(1)(C) and 1030(i)

UNITED STATES OF AMERICA

vs.

JONATHAN DONOHUE,

Defendant.



INFORMATION

The United States charges that:

Beginning no later than on or about March 10, 2015 and continuing through no earlier than on or about June 22, 2017, in Palm Beach and Miami-Dade Counties, in the Southern District of Florida, and elsewhere, the defendant,

JONATHAN DONOHUE,

did knowingly attempt to cause the transmission of a program, information, code, and command, and as a result of such conduct, to intentionally cause damage without authorization to a protected computer, in violation of Title 18, United States Code, Section 1030(b) and (a)(5)(A).

Pursuant to Title 18, United States Code, Section 1030(c)(4)(A)(i)(VI) and (c)(4)(B)(i), it is further alleged that such conduct caused and, if completed, would have caused, damage to ten or more protected computers during a one-year period.

Forfeiture Allegations

1. The allegations of this Information are re-alleged and by this reference fully incorporated herein for the purpose of alleging criminal forfeiture to the United States of America of certain property in which the defendant, JONATHAN DONOHUE, has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1030, as alleged in this Information, the defendant shall forfeit to the United States of America: (a) any personal property used or intended to be used to commit such violations, pursuant to Title 18, United States Code, Section 1030(i)(l); and (b) any property constituting, or derived from, proceeds obtained, directly or indirectly, as the result of such violations, pursuant to Title 18, United States Code, Section 1030(i)(1). Such property includes, but is not limited to, all funds on deposit with or held by PayPal in accounts identified by the following account numbers or receiver IDs:

1161988089305223229	1363694263120855963	1635960191531531532
1162860025012054373	1368274962268739600	1641562738422484018
1183770244118762604	1378136975450090968	1648378016452275051
1189025575875745523	1410969509752911946	1651039687705587941
1202093777839662943	1426578925271964468	1653123583220175522
1204682582829432290	1428696860637592966	1653684350570051086
1209316787158765738	1431856347948847290	1655840602218690848
1227882284629920617	1431971572009943309	1657095255193811780
1270938868756990666	1432403058344327851	1665530548128920600
1275373609627306443	1434947168601306249	1672628849710030032
1275727811340637905	1438705953046836265	1675649853069353330
1284475832100283717	1450258411127818700	1679752025377688206
1286800308668329652	1451254412513067542	1689268294941285737
1294579849381657318	1462283914865575647	1693563249597922374
1303165080983337838	1489806838330092453	1702111340431403138
1306042901931579951	1494949081639049949	1709766997012567813
1315953860417053513	1503890942986300342	1710047453558646165
1336441223056434713	1558243183899604879	1730023452898427322
1336800978045975682	1564796337899173594	1751001065247542760
1344126973023454788	1588910128609945364	1752468914688441643
1352629208866953522	1590540947885944830	1758454274894624409
1354217505143424057	1606264183245076123	1759166481372153869
1361804338406600326	1634490572367484207	1760846550939234787

1774489389400695786	1980847508475040732	2145014709018695037
1804361164756432853	1981409507095952531	2145769703990259520
1830307728983031561	1981562918788299072	2179290235926011576
1838624546329323194	2011313897243854606	2180740580375823099
1848765804816363722	2017243774743236360	2190152863710705437
1853892681205832009	2019655388017910169	2201826654759023073
1878874338905700221	2033763728406238727	2208676413917242262
1882709829869060300	2036394429403271293	2210338763950209982
1896474933554272429	2046801302264744478	2215400526976572861
1912201416118828917	2048672535132124297	2218243462589816356
1914545257847186233	2078717134262162597	2235775353258860686
1928196384626174373	2080088030718363920	2253166479181434508
1941312486644681268	2085264599358786078	2279184209639693476
1941385719399930388	2094060663939077985	2285216882920330292
1950502700198596502	2096389575064521083	2294388960151769919
1959662773263923992	2101101313812759833;	2302680539826846428
1965343390408646079	2101318897334427392	
1979514153073492425	2103960497334888850	

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 1030(i), and the procedures set forth in Title 21, United States Code, Section 853, as made applicable by Title 28, United States Code, Section 2461(c) and by Title 18, United States Code, Section 1030(i)(2).



JUAN ANTONIO GONZALEZ
ACTING UNITED STATES ATTORNEY



MARC OSBORNE
ASSISTANT UNITED STATES ATTORNEY



GREGORY SCHILLER
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. _____

v.

JONATHAN DONOHUE

CERTIFICATE OF TRIAL ATTORNEY***Superseding Case Information:**

Defendant. _____/

Court Division: (Select One)
☐ Miami ☐ Key West ☐ FTL
☒ WPB ☐ FTP
New defendant(s) ☐ Yes ☐ No

Number of new defendants _____

Total number of counts _____

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

- Interpreter: (Yes or No) **No** _____

List language and/or dialect _____

- This case will take 7 days for the parties to try.

- Please check appropriate category and type of offense listed below:

(Check only one)

I 0 to 5 days ☐
 II 6 to 10 days ☒
 III 11 to 20 days ☐
 IV 21 to 60 days ☐
 V 61 days and over ☐

(Check only one)

Petty ☐
 Minor ☐
 Misdemeanor ☐
 Felony ☒

- Has this case previously been filed in this District Court? (Yes or No) **No** _____

If yes: Judge _____ Case No. _____

(Attach copy of dispositive order)

Has a complaint been filed in this matter? (Yes or No) **No** _____

If yes: Magistrate Case No. _____

Related miscellaneous numbers: _____

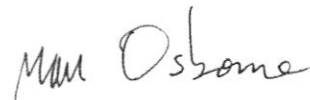
Defendant(s) in federal custody as of _____

Defendant(s) in state custody as of _____

Rule 20 from the District of _____

Is this a potential death penalty case? (Yes or No) **No** _____

- Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia O. Valle)? (Yes or No) **No** _____
- Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? (Yes or No) **No** _____
- Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? (Yes or No) **No** _____

**MARC OSBORNE**

Assistant United States Attorney

Court ID No. A5500796

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JONATHAN DONOHUE

Case No:

Count #: 1

Computer Fraud

18 U.S.C. § 1030(b), (a)(5)(A), and (c)(4)(B)

* **Max.Penalty:** 10 years' incarceration, three years' supervised release, \$250,000 fine,
mandatory \$100 special assessment

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NUMBER: _____

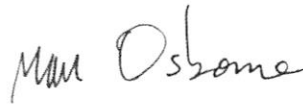
BOND RECOMMENDATION

DEFENDANT: JONATHAN DONOHUE

\$50,000 PSB

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: _____


AUSA: Marc Osborne

Last Known Address: _____

What Facility: _____

Agent(s): Gary Rudd, DCIS

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (OTHER)