

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

IZZET MERT OZEK

Case No.

Violations: Title 18, United States  
Code, Sections 1030(a)(5)(A),  
(c)(4)(A)(i)(I), (c)(4)(A)(i)(VI), (c)(4)(B)

The SPECIAL MAY 2021 GRAND JURY charges:

1. At times material to this indictment:
  - a. Company A was headquartered in Chicago, Illinois.
  - b. Company A was an American multinational hospitality company that managed and franchised luxury and business hotels, resorts, and vacation properties.
  - c. Company A offered customers the ability to book hotel rooms at its hotels through an online booking service at its website. The servers for Company A's website and online booking service were located in the Northern District of Illinois.
  - d. In August 2017, the servers of Company A were the target of a distributed denial-of-service (DDoS) attack.
  - e. As part of the DDoS attack, the attacker directed large amounts of computer network traffic to Company A's servers that hosted Company A's website and online booking service, causing available resources to be consumed by the attack and resulting in no or few resources left to accommodate legitimate users.

f. The DDoS attack used the WireX botnet, which consisted of compromised Google Android devices, to direct large amounts of network traffic to Company A's website, which included its website and online booking system.

g. In August 2017, during the DDoS attack, some legitimate users were unable to complete bookings on Company A's online booking system.

2. In or around August 2017, at Chicago, in the Northern District of Illinois and elsewhere,

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defendant herein, knowingly caused the transmission of a program, information, code, and command, and as a result of such conduct, intentionally caused damage without authorization to a protected computer, belonging to Company A, and the offense caused loss to 1 or more persons during a one-year period from the defendant's course of conduct affecting protected computers aggregating at least \$5,000 in value, and also caused damage affecting 10 or more protected computers during any one-year period;

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

## FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1030(i).

2. Upon conviction of the computer fraud offense in violation of Title 18, United States Code, Section 1030, set forth in this Indictment, defendant

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shall forfeit to the United States of America:

a. pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1030(i), any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense; and

b. pursuant to Title 18, United States Code, Section 1030(i), any personal property that was used or intended to be used to commit or to facilitate the commission of such offense. The property to be forfeited includes, but is not limited to: A sum of money equal to the proceeds derived from or obtained as a result of such offense.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b) and 1030(i).

All pursuant to Title 18, United States Code, Sections 982(a)(2)(B), 982(b) and 1030(i), and Title 21, United States Code, Section 853.

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY