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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY \_\_\_\_\_

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

February 2011 Grand Jury

11 UNITED STATES OF AMERICA, )  
12 Plaintiff, )  
13 v. )  
14 CHRISTOPHER CHANEY, )  
15 aka "trainreqsuckswhat", )  
16 aka "anonygrrl", )  
17 aka "jaxjaguars911", )  
18 Defendant. )

CR No. **CR 11 00958**

I N D I C T M E N T

[18 U.S.C. §§ 1030(a)(2)(C),  
(c)(2)(B)(ii): Unauthorized  
Access to a Protected Computer;  
18 U.S.C. §§ 1030(a)(5)(A),  
(c)(4)(B)(i), (c)(4)(A)(i)(I),  
(c)(4)(A)(i)(III): Unauthorized  
Damage to a Protected Computer;  
18 U.S.C. § 1028A(a)(1):  
Aggravated Identity Theft; 18  
U.S.C. § 2511(1)(a):  
Wiretapping]

The Grand Jury charges:

I. INTRODUCTORY ALLEGATIONS

1. At all times relevant to this Indictment:

a. Defendant CHRISTOPHER CHANEY, also known as  
("aka") "trainreqsuckswhat", aka "anonygrrl", aka "jaxjaguars911"  
("defendant CHANEY"), resided in Jacksonville, Florida.

b. Yahoo! Inc. ("Yahoo!") provided electronic mail  
("e-mail") services to users all over the world.

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LEF:WLH

1 c. Apple provided e-mail services to users all over  
2 the world.

3 d. Google provided e-mail services to users all over  
4 the world.

5 e. Defendant CHANEY obtained personal information of  
6 numerous individuals related to the entertainment industry, some  
7 of whom resided in Los Angeles, California.

8 f. Defendant CHANEY gained unauthorized access to the  
9 e-mail accounts of over 50 individuals, some of whom resided in  
10 Los Angeles, California.

11 g. After defendant CHANEY gained unauthorized access  
12 into an e-mail account, he would obtain information from the  
13 account, specifically, e-mails and attachments.

14 h. In most instances, after gaining unauthorized  
15 access into the e-mail account of a celebrity, defendant CHANEY  
16 set the e-mail forwarding feature of the e-mail account to send  
17 virtually instantaneously a copy of every e-mail received in the  
18 celebrity's account to a different e-mail account that he  
19 controlled.

20 i. Defendant CHANEY thereafter distributed to others  
21 some of the information that he obtained by his unauthorized  
22 access.

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COUNTS ONE THROUGH SIX

[18 U.S.C. §§ 1030(a)(2)(C), (c)(2)(B)(ii)]

2. The Grand Jury re-alleges paragraph one of this Indictment, including all subparagraphs, as if fully set forth herein.

3. On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, defendant CHANEY knowingly and intentionally accessed without authorization and in excess of authorization, and thereby obtained information, namely, the contents of the subscriber's e-mail inbox and the subscriber's e-mail settings webpage, from a protected computer, as that term is defined in Title 18, United States Code, Section 1030(e)(2)(B), namely, an e-mail server of the entity described below, in furtherance of a criminal act in violation of the laws of the United States, namely, wiretapping, in violation of Title 18, United States Code, Section 2511(1)(a):

<u>COUNT:</u>	<u>DATE:</u>	<u>ACCOUNT HOLDER VICTIM:</u>	<u>SERVICE PROVIDER:</u>
ONE	11-13-10	Simone Harouche	Apple
TWO	11-20-10	B.P.	Apple
THREE	12-18-10	Mila Kunis	Apple
FOUR	12-27-10	J.A.	Google
FIVE	12-27-10	L.B.	Apple
SIX	12-31-10	L.S.	Apple

COUNTS SEVEN AND EIGHT

[18 U.S.C. §§ 1030(a)(5)(A), (c)(4)(B)(i), (c)(4)(A)(i)(I)]

4. The Grand Jury re-alleges paragraph one of this Indictment, including all subparagraphs, as if fully set forth herein.

5. Beginning on or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, defendant CHANEY knowingly caused the transmission of programs, information, codes, and commands, and as a result of such conduct, intentionally caused damage without authorization by impairing the integrity and availability of data, programs, systems, and information on a protected computer, as that term is defined in Title 18, United States Code, Section 1030(e)(2)(B), namely, an e-mail server operated by the respective company set forth below, thereby causing a loss aggregating at least \$5,000 in value during a one-year period to the victims described below:

<u>COUNT:</u>	<u>BEGINNING OF ONE-YEAR PERIOD:</u>	<u>SERVER:</u>	<u>VICTIM(S):</u>
SEVEN	11-13-10	Apple	Simone Harouche and Christina Aguilera
EIGHT	12-14-10	Yahoo!	Scarlett Johansson

COUNT NINE

[18 U.S.C. §§ 1030(a)(5)(A), (c)(4)(B)(i), (c)(4)(A)(i)(III)]

6. The Grand Jury re-alleges paragraph one of this Indictment, including all subparagraphs, as if fully set forth herein.

7. On or about February 8, 2011, in Los Angeles County, within the Central District of California, and elsewhere, defendant CHANEY knowingly caused the transmission of programs, information, codes, and commands, and as a result of such conduct, intentionally caused damage without authorization by impairing the integrity and availability of data, programs, systems, and information on a protected computer, as that term is defined in Title 18, United States Code, Section 1030(e)(2)(B), namely, an e-mail server operated by Apple, thereby causing physical harm and a loss aggregating at least \$5,000 in value during a one-year period beginning on or about March 14, 2011, to Renee Olstead and her insurance provider.

COUNTS TEN THROUGH SEVENTEEN

[18 U.S.C. § 1028A(a)(1)]

8. The Grand Jury re-alleges paragraph one of this Indictment, including all subparagraphs, as if fully set forth herein.

9. On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, defendant CHANEY knowingly and without lawful authority possessed and used a means of identification of another person, that is, the e-mail user ID of the below-described individuals, during and in relation to the below-described offenses as described in the below-listed Counts of this Indictment.

<u>COUNT:</u>	<u>DATE:</u>	<u>VICTIM:</u>	<u>TITLE 18 OFFENSE:</u>	<u>RELATED COUNT:</u>
TEN	11-20-10	B.P.	1030(a)(2)(C)	TWO
ELEVEN	12-18-10	Mila Kunis	1030(a)(2)(C)	THREE
TWELVE	12-27-10	J.A.	1030(a)(2)(C)	FOUR
THIRTEEN	12-27-10	L.B.	1030(a)(2)(C)	FIVE
FOURTEEN	12-31-10	L.S.	1030(a)(2)(C)	SIX
FIFTEEN	11-13-10	Simone Harouche	1030(a)(5)(A)	SEVEN
SIXTEEN	1-13-11	Scarlett Johansson	1030(a)(5)(A)	EIGHT
SEVENTEEN	2-8-11	Renee Olstead	1030(a)(5)(A)	NINE

COUNTS EIGHTEEN THROUGH TWENTY-SIX

[18 U.S.C. § 2511(1)(a)]

10. The Grand Jury re-alleges paragraph one of this Indictment, including all subparagraphs, as if fully set forth herein.

11. Beginning on or about the dates set forth below, and continuing until at least on or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, defendant CHANEY intentionally intercepted and endeavored to intercept wire communications, namely, e-mails, including any e-mail attachments, of the below-described victims:

<u>COUNT:</u>	<u>BEGINNING DATE:</u>	<u>ENDING DATE:</u>	<u>VICTIM:</u>
EIGHTEEN	11-13-10	1-10-11	Simone Harouche
NINETEEN	12-24-10	1-28-11	B.P.
TWENTY	12-24-10	1-21-11	Mila Kunis
TWENTY-ONE	12-27-10	2-10-11	J.A.
TWENTY-TWO	12-27-10	1-20-11	L.B.
TWENTY-THREE	1-11-11	1-20-11	L.S.
TWENTY-FOUR	1-11-11	1-20-11	D.F.
TWENTY-FIVE	1-11-11	2-10-11	B.G.

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1 COUNT:                      BEGINNING DATE:                      ENDING DATE:                      VICTIM:  
2 TWENTY-SIX                      1-16-11                      2-10-11                      Renee Olstead

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4 A TRUE BILL

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6 \_\_\_\_\_  
7 Foreperson

8  
9 ANDRÉ BIROTTE JR.  
United States Attorney

10 *Down*

11 *Dowdny C. Kim*  
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