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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SCOTT RAUL ESPARZA,
aka "Hazard,"

Defendant.

No. CR 2:24-cr-00092-JWH

I N F O R M A T I O N

[18 U.S.C. § 371: Conspiracy; 18 U.S.C. § 1030(a)(5)(A), (b), (c)(4)(B)(i), (c)(4)(A)(i)(VI): Unauthorized Impairment of a Protected Computer]

The United States Attorney charges:

COUNT ONE

[18 U.S.C. § 371]

A. OBJECT OF THE CONSPIRACY

Beginning on an unknown date in 2019 and continuing to on or about September 13, 2022, in Los Angeles County, within the Central District of California, and elsewhere, defendant SCOTT RAUL ESPARZA, also known as "Hazard" ("ESPARZA"), and others known and unknown to the United States Attorney, knowingly conspired and agreed with each other to knowingly cause the transmission of programs, information,

1 codes, and commands, and as a result of such conduct, intentionally
2 cause damage without authorization to protected computers, and
3 specifically to cause such damage affecting ten or more protected
4 computers during a one-year period, in violation of Title 18, United
5 States Code, Section 1030(a)(5)(A), (c)(4)(B)(i), (c)(4)(A)(i)(VI).

6 B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE
7 ACCOMPLISHED

8 The object of the conspiracy was to be accomplished, in
9 substance, as follows:

10 1. Defendant ESPARZA would offer services via the website
11 Astrostress.com that would allow his subscribers, for a fee, to cause
12 floods of Internet traffic to be directed to victim computers, an
13 online attack technique known as "Distributed Denial of Service" or
14 "DDoS," for the purpose of degrading or disrupting the victim
15 computers' access to the Internet.

16 2. Defendant ESPARZA would construct these DDoS attacks to use
17 a practice known as "amplification," meaning that brief commands sent
18 to third-party computers and devices would cause much longer strings
19 of data to be sent to the victim in response.

20 3. Defendant ESPARZA would construct the attacks in such a
21 manner as to disguise the true origin of the electronic queries sent
22 to such computers and devices, so that the computers and devices
23 sending the floods of Internet traffic perceived the queries to be
24 coming from the victim computers rather than ESPARZA or his
25 subscribers, a practice known as "spoofing."

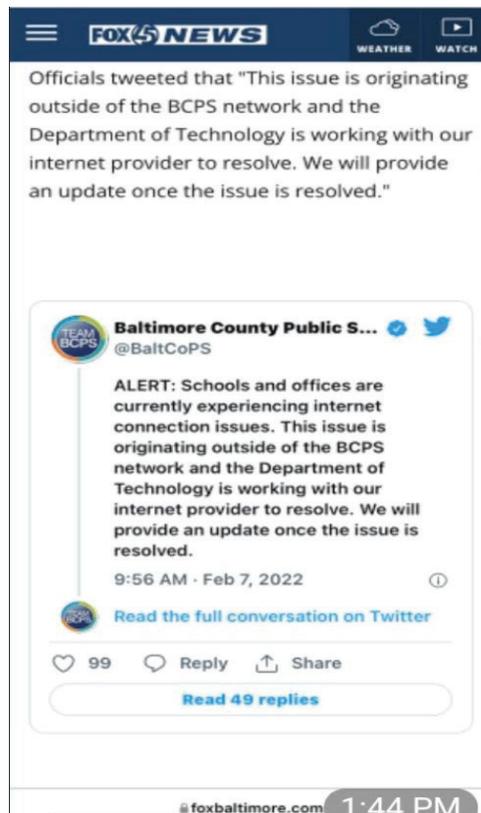
26 4. Defendant ESPARZA would maintain and improve the
27 Astrostress.com website and services, respond to requests for
28 attacks, subscriptions, or assistance from potential or current

1 customers, and market the Astrostress.com website in an attempt to
2 draw subscribers to Astrostress.com and away from other competitor
3 websites.

4 C. OVERT ACTS

5 In furtherance of the conspiracy and to accomplish its object,
6 defendant ESPARZA and others committed various overt acts within the
7 Central District of California, and elsewhere, including but not
8 limited to the following:

9 Overt Act No. 1: On or about February 7, 2022, defendant
10 ESPARZA helped a customer perform a successful DDoS attack against
11 schools and offices in the Baltimore County Public Schools network,
12 asking the customer "are you sure that IP is the only one the school
13 has?" After defendant ESPARZA had provided assistance, the customer
14 sent the below image, to which defendant ESPARZA responded, "so it is
15 working."



1 Overt Act No. 2: On or about February 8, 2022, defendant
2 ESPARZA recorded a video demonstrating an attack being conducted
3 using Astrostress.com.

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COUNT TWO

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

Beginning on an unknown date in 2019 and continuing to on or about September 13, 2022, in Los Angeles County, within the Central District of California, and elsewhere, defendant SCOTT RAUL ESPARZA, also known as "Hazard," knowingly caused the transmission of programs, information, codes, and commands, and as a result of such conduct, intentionally and without authorization caused damage and attempted to cause damage by impairing the integrity and availability of data, programs, systems, and information on protected computers, as that term is defined in Title 18 United States Code, Section 1030(e) (2) (B), thereby causing and attempting to cause damage affecting ten or more protected computers during a one-year period beginning on or about September 13, 2021.

FORFEITURE ALLEGATION

[18 U.S.C. § 1030]

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3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States will seek
5 forfeiture as part of any sentence, pursuant to Title 18, United
6 States Code, Section 1030, in the event of the defendant's conviction
7 of the offenses set forth in any of Counts One and Two of this
8 Information.

9 2. The defendant so convicted shall forfeit to the United
10 States of America the following:

11 a. All right, title, and interest in any and all
12 property, real or personal, constituting, or derived from, any
13 proceeds obtained, directly or indirectly, as a result of the
14 offense;

15 b. Any property used or intended to be used to commit the
16 offense; and

17 c. To the extent such property is not available for
18 forfeiture, a sum of money equal to the total value of the property
19 described in subparagraphs (a) and (b).

20 3. Pursuant to Title 21, United States Code, Section 853(p),
21 as incorporated by Title 18, United States Code, Section 1030(i), the
22 defendant, if so convicted, shall forfeit substitute property, up to
23 the total value of the property described in the preceding paragraph
24 if, as the result of any act or omission of said defendant, the
25 property described in the preceding paragraph, or any portion
26 thereof: (a) cannot be located upon the exercise of due diligence;
27 (b) has been transferred, sold to or deposited with a third party;
28 (c) has been placed beyond the jurisdiction of the court; (d) has

1 been substantially diminished in value; or (e) has been commingled
2 with other property that cannot be divided without difficulty.

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4 E. MARTIN ESTRADA
5 United States Attorney

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7 CAMERON L. SCHROEDER
8 Assistant United States Attorney
9 Chief, National Security Division

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