

FILED

February 4, 2026

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: VI Deputy

Case No: SA:26-CR-00040-FB

UNITED STATES OF AMERICA

Plaintiff

v

MARK ANTHONY CADENA

Defendant

INDICTMENT

**COUNT 1: 42 U.S.C. § 300i-1(a) –
Tampering with public water systems**

**COUNT 2: 42 U.S.C. § 300i-1(b) –
Attempted tampering with public water
systems**

**COUNT 3: 18 U.S.C. §§ 1030(a)(5)(A) &
(c)(4)(B)(i) – Fraud and related activity in
connection with computers**

Notice of Forfeiture

THE GRAND JURY CHARGES:

COUNT ONE

[42 U.S.C. § 300i-1(a)]

On or about February 2, 2025, in the Western District of Texas, Defendant,

MARK ANTHONY CADENA,

knowingly tampered with a public water system, in violation of Title 42, United States Code,
Section 300i-1(a).

COUNT TWO

[42 U.S.C. § 300i-1(b)]

On or about February 2, 2025, in the Western District of Texas, Defendant,

MARK ANTHONY CADENA,

knowingly attempted to tamper with a public drinking water system, in violation of Title 42, United States Code, Section 300i-1(b).

COUNT THREE
[18 U.S.C. §§ 1030(a)(5)(A) & (c)(4)(B)(i)]

On or about February 2, 2025, in the Western District of Texas, Defendant,

MARK ANTHONY CADENA,

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, and the offense caused loss to a person or persons during a 1-year period from the defendant's course of conduct affecting protected computers aggregating at least \$5,000 in value, and a threat to public health and safety, all in violation of Title 18, United States Code, Sections 1030(a)(5)(A) and (c)(4)(B)(i).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE
[See Fed. R. Crim. P. 32.2]

Computer Fraud Violation and Forfeiture Statute
[Title 18 U.S.C. § 1030(a)(5)(B) & (c)(4)(A)(i) subject to forfeiture pursuant to
Title 18 U.S.C. §§ 982(a)(2)(B) and 1030(i)]

As a result of the foregoing criminal violation set forth above, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of the property described below upon conviction pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. §§ 982(a)(2)(B) and 1030(i), which state:

Title 18 U.S.C. § 982. Criminal forfeiture

* * *

(a)(2) The court, in imposing sentence on a person convicted of a violation of, or a conspiracy to violate—

* * *

(B) section . . . 1030 . . . of this title,
shall order that the person forfeit to the United States any property constituting, or derived from, proceeds the person obtained directly or indirectly, as the result of

such violation.

Title 18 U.S.C. § 1030i.

* * *

(i)

(1) The court, in imposing sentence on any person convicted of a violation of this section, or convicted of conspiracy to violate this section, shall order, in addition to any other sentence imposed and irrespective of any provision of State law, that such person forfeit to the United States—

(A) such person's interest in any personal property that was used or intended to be used to commit or to facilitate the commission of such violation; and

(B) any property, real or personal, constituting or derived from, any proceeds that such person obtained, directly or indirectly, as a result of such violation.

This Notice of Demand for Forfeiture includes, but is not limited to, the following property:

- Apple iPhone 13 Pro Max, S/N: R9Q9V6WTKX, IMEI: 356985728618614.

A TRUE BILL

FOREPERSON OF THE GRAND JURY

JUSTIN R. SIMMONS
UNITED STATES ATTORNEY

BY:



FOR CHRISTOPHER K. MANGELS
Assistant United States Attorney