
UNITED STATES DISTRICT COURT
District of Kansas

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASE NO. 18- -01

BRADLEY A. PISTOTNIK, and
DAVID DORSETT,

Defendants.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

Fraud in connection with Computers
18 U.S.C. §§ 1030(a)(7)(A) and 2

On or about September 25, 2014, in the District of Kansas, the defendants,

BRADLEY A. PISTOTNIK and DAVID DORSETT,

with intent to extort from any person anything of value, transmitted in interstate commerce any communication containing any threat to cause damage to a protected

computer, that is: email messages stating “Remove this page and we stop” and “if you dont remove it we will begin targeting your advertisers and explain that this will stop happening to them once they pull their ads from leagle.com or leagle.com kills this page” sent to Leagle.com; in violation of 18 U.S.C. §§ 1030(a)(7)(A) and 2.

COUNT 2

**Fraud in connection with Computers
18 U.S.C. §§ 1030(a)(7)(A) and 2**

On or about September 25, 2014, in the District of Kansas, the defendants,

BRADLEY A. PISTOTNIK and DAVID DORSETT,

with intent to extort from any person anything of value, transmitted in interstate commerce any communication containing any threat to cause damage to a protected computer, that is: email messages stating “Remove this page and we stop” and “if you dont remove it we will begin targeting your advertisers and explain that this will stop happening to them once they pull their ads from ripoffreport.com or ripoffreport.com kills this page” sent to Ripoffreport.com; in violation of 18 U.S.C. §§ 1030(a)(7)(A) and 2.

COUNT 3

**Fraud in connection with Computers
18 U.S.C. §§ 1030(a)(7)(A) and 2**

On or about September 25, 2014, in the District of Kansas, the defendants,

BRADLEY A. PISTOTNIK and DAVID DORSETT,

with intent to extort from any person anything of value, transmitted in interstate commerce any communication containing any threat to cause damage to a protected computer, that is: email messages stating “Remove this page and we stop” and “if you dont remove it we will begin targeting your advertisers and explain that this will stop happening to them once they pull their ads from ripoffreport.com or ripoffreport.com kills this page” sent to Jaburgwilk.com; in violation of 18 U.S.C. §§ 1030(a)(7)(A) and 2.

COUNT 4

Fraud in connection with Computers 18 U.S.C. §§ 1030(a)(7)(A) and 2

On or about July 2, 2015, in the District of Kansas, the defendants,

BRADLEY A. PISTOTNIK and DAVID DORSETT,

with intent to extort from any person anything of value, transmitted in interstate commerce any communication containing any threat to cause damage to a protected computer, that is: email messages stating “Remove this page and we stop” and “if you dont remove it we will begin targeting your advertisers and explain that this will stop happening to them once they pull their ads from ripoffreport.com or ripoffreport.com kills this page” sent to Ripoffreport.com; in violation of 18 U.S.C. §§ 1030(a)(7)(A) and 2.

COUNT 5

**Fraud in connection with Computers
18 U.S.C. §§ 1030(a)(7)(A) and 2**

On or about July 2, 2015, in the District of Kansas, the defendants,

BRADLEY A. PISTOTNIK and DAVID DORSETT,

with intent to extort from any person anything of value, transmitted in interstate commerce any communication containing any threat to cause damage to a protected computer, that is: email messages stating “Remove this page and we stop” and “if you dont remove it we will begin targeting your advertisers and explain that this will stop happening to them once they pull their ads from ripoffreport.com or ripoffreport.com kills this page” sent to Jaburgwilk.com; in violation of 18 U.S.C. §§ 1030(a)(7)(A) and 2.

COUNT 6

**Conspiracy to commit Fraud in connection with Computers
18 U.S.C. §§ 1030(a)(5)(A) and 1030(b)**

Between September 15, 2014 and July 2, 2015, in the District of Kansas, the defendants,

BRADLEY A. PISTOTNIK and DAVID DORSETT,

conspired to knowingly cause the transmission of information to a protected computer, that is: computers used by Leagle.com, RipoffReport.com, and Jabergwilk.com, which were used in or affecting interstate commerce and communication; and as a result of such conduct, intentionally caused damage without authorization, and such damage resulted in a loss aggregating to at least \$5,000 in value, in violation of 18 U.S.C. §§ 1030(a)(5)(A)

and 1030(b).

COUNT 7

**Conspiracy to commit Fraud in connection with Computers
18 U.S.C. §§ 1030(a)(7)(A) and 1030(b)**

Between September 15, 2014 and July 2, 2015, in the District of Kansas, the
defendants,

BRADLEY A. PISTOTNIK and DAVID DORSETT,

conspired to transmit in interstate commerce any communication containing any threat to cause damage to a protected computer with intent to extort from any person anything of value, that is: email messages stating “Remove this page and we stop” and “if you dont remove it we will begin targeting your advertisers,” sent to Leagle.com, RipoffReport.com, and Jaburgwilk.com; in violation of 18 U.S.C. §§ 1030(a)(7)(A) and 2.

COUNT 8

**False Statements
18 U.S.C. § 1001**

On or about September 8, 2015, in the District of Kansas, the defendant,

BRADLEY A. PISTOTNIK,

knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by telling FBI Special Agent Tom Ensz that Dorsett informed him of the negative posting on RipoffReport.com and that Dorsett offered to

remove it. The statements and representations were false because, as Bradley Pistotnik then and there knew, Bradley Pistotnik had informed Dorsett about the negative posting and asked Dorsett to “tell me how we get rid of it;” in violation of 18 U.S.C. § 1001.

COUNT 9

**False Statements
18 U.S.C. § 1001**

On or about September 8, 2015, in the District of Kansas, the defendant,

BRADLEY A. PISTOTNIK,

knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by telling FBI Special Agent Tom Ensz that approximately a week after Dorsett informed Pistotnik that the negative posting had been removed, an attorney for RipoffReport contacted Pistotnik about the attack. The statements and representations were false because, as Bradley Pistotnik then and there knew, Bradley Pistotnik had been contacted by the attorneys for RipoffReport during the attack and prior to his payment to Dorsett for the attack; in violation of 18 U.S.C. § 1001.

COUNT 10

**False Statements
18 U.S.C. § 1001**

On or about September 10, 2015, in the District of Kansas, the defendant,

BRADLEY A. PISTOTNIK,

knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by telling FBI Special Agent Tom Ensz that Dorsett had recently forwarded two emails related to the first attack on RipoffReport. The statements and representations were false because, as Bradley Pistotnik then and there knew, Bradley Pistotnik had received four (rather than two) emails from Dorsett relating to the first attack on RipoffReport, with the additional two emails including an invoice for the attack and another that referenced the invoice as well as the method used; in violation of 18 U.S.C. § 1001.

A TRUE BILL.

July 17, 2018
DATE

/s/ Foreperson
FOREPERSON OF THE GRAND JURY

/s/Stephen R. McAllister
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[It is requested that jury trial be held in Wichita, Kansas.]