

SEALED BY ORDER OF THE COURT

AO 108 (Rev. 06/09) Application for a Warrant to Seize Property Subject to Forfeiture

UNITED STATES DISTRICT COURT

for the

Northern District of California

FILED

SEP 16 2024

In the Matter of the Seizure of )  
(Briefly describe the property to be seized) )  
Application by the United States for a Seizure )  
Warrant for 41 Domain Names For Investigation Of )  
18 U.S.C. § 1956(A)(2)(A) And Other Offenses )

Case No.

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

4 24 71375 DMR

APPLICATION FOR A WARRANT  
TO SEIZE PROPERTY SUBJECT TO FORFEITURE

I, a federal law enforcement officer or attorney for the government, request a seizure warrant and state under penalty of perjury that I have reason to believe that the following property in the Eastern District of Virginia is subject to forfeiture to the United States of America under 18 U.S.C. § 981(a)(1)(C) (describe the property):

See attached affidavit of FBI Special Agent [REDACTED]

The application is based on these facts:

See attached affidavit of FBI Special Agent [REDACTED]

Continued on the attached sheet.

Approved as to form: /S/  
AUSA Michelle J. Kane

/s/ [REDACTED]  
Applicant's signature  
[REDACTED] FBI Special Agent  
Printed name and title

"Sworn to before me over the telephone and signed by me pursuant to Fed.R.Crim.P 4.1 and 4(d) on this 13th day of September, 2024".

Date: 09/13/2024

[Signature]  
Judge's signature

City and state: Oakland, CA

Honorable Donna M. Ryu, Chief Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR SEIZURE WARRANT**

I, [REDACTED], Special Agent of the Federal Bureau of Investigation (“FBI”), being first duly sworn, hereby declare as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since [REDACTED]. I am currently assigned to the San Francisco Division of the FBI in Oakland, California since [REDACTED]. In this capacity, I am tasked with investigating possible violations of federal criminal law, specifically those involved with cybercrimes. By virtue of my FBI employment, I perform and have performed a variety of investigative tasks, including functioning as a case agent on computer crime cases. I have received training in computer crime investigations. I have also received training and gained experience in interviewing and interrogation techniques, the execution of federal search warrants and seizures, and the identification and collection of computer-related evidence. In addition, I have personally participated in the execution of federal search warrants involving the search and seizure of computer equipment.

2. I am an “investigative or law enforcement officer of the United States” within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated against the United States.

3. While employed by the FBI, I have investigated federal criminal violations related to malicious cyber activity by state-sponsored actors and agents of foreign governments. I have gained relevant experience through training at the FBI and conducting these types of investigations. As a

federal agent, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States, including the below-described offenses.

4. The facts in this affidavit are based on my personal participation in this investigation, my training and experience, the work of other agents and investigators, and documents, records, emails, and other types of information obtained during the investigation from other sources and witnesses. The FBI has, thus far, conducted open-source research, received information from other government agencies, conducted interviews, and served legal process.

5. This affidavit is intended to show that there is sufficient probable cause for the requested seizure warrant and does not purport to set forth all of my knowledge of the investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only. All figures, times, and calculations set forth herein are approximate.

6. I make this affidavit, pursuant to the provisions and procedures described in Title 18, United States Code, Sections 981(a)(1)(A) and (b), for issuance of a warrant (the "Seizure Warrant") to seize the following domain names:

accutanebb[.]com	("SUBJECT DOMAIN NAME 1")
albuteroltab[.]com	("SUBJECT DOMAIN NAME 2")
allowdoorinto[.]com	("SUBJECT DOMAIN NAME 3")
baijiapaintbrush[.]com	("SUBJECT DOMAIN NAME 4")
baricitinc[.]com	("SUBJECT DOMAIN NAME 5")
cbdhempoilww[.]com	("SUBJECT DOMAIN NAME 6")
cbdonlineww[.]com	("SUBJECT DOMAIN NAME 7")
cenforcep[.]com	("SUBJECT DOMAIN NAME 8")
cialismgz[.]com	("SUBJECT DOMAIN NAME 9")
delitky[.]com	("SUBJECT DOMAIN NAME 10")
divisionintro[.]com	("SUBJECT DOMAIN NAME 11")
dompurifycheerio[.]com	("SUBJECT DOMAIN NAME 12")
fastloginway[.]com	("SUBJECT DOMAIN NAME 13")
fasttruncatedoor[.]com	("SUBJECT DOMAIN NAME 14")

finduscore[.]com	("SUBJECT DOMAIN NAME 15")
gateallowsearch[.]com	("SUBJECT DOMAIN NAME 16")
ghxsjyk[.]com	("SUBJECT DOMAIN NAME 17")
gnfamotidine[.]com	("SUBJECT DOMAIN NAME 18")
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hempcbwww[.]com	("SUBJECT DOMAIN NAME 21")
inthetrustview[.]com	("SUBJECT DOMAIN NAME 22")
ithostprotocol[.]com	("SUBJECT DOMAIN NAME 23")
ivermectint[.]com	("SUBJECT DOMAIN NAME 24")
londonshowcorp[.]com	("SUBJECT DOMAIN NAME 25")
maxlliance[.]com	("SUBJECT DOMAIN NAME 26")
myavtsim[.]com	("SUBJECT DOMAIN NAME 27")
newtransfersearch[.]com	("SUBJECT DOMAIN NAME 28")
outviewmachine[.]com	("SUBJECT DOMAIN NAME 29")
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smartloginbreak[.]com	("SUBJECT DOMAIN NAME 31")
smartscontract[.]com	("SUBJECT DOMAIN NAME 32")
tipstoway[.]com	("SUBJECT DOMAIN NAME 33")
toolpointtrim[.]com	("SUBJECT DOMAIN NAME 34")
trustvaluespath[.]com	("SUBJECT DOMAIN NAME 35")
verificationtrim[.]com	("SUBJECT DOMAIN NAME 36")
viewwaypath[.]com	("SUBJECT DOMAIN NAME 37")
waylogintexas[.]com	("SUBJECT DOMAIN NAME 38")
webgovview[.]com	("SUBJECT DOMAIN NAME 39")
wingscainein[.]com	("SUBJECT DOMAIN NAME 40")
incomcorporate[.]com	("SUBJECT DOMAIN NAME 41")

(the "SUBJECT DOMAIN NAMES").

7. As set forth below, there is probable cause to believe that the **SUBJECT DOMAIN NAMES** are property involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956(a)(2)(A) (international promotional money laundering) and 1956(h) (conspiracy to commit the same). In particular, the investigation to date has revealed that the **SUBJECT DOMAIN NAMES** have been used by individuals abroad who are affiliated with the "Callisto Group," an operational unit within Center 18 of the Russian Federal Security Service (the "FSB"), to commit violations of 18 U.S.C. § 1030(a)(2)(B), 1030(a)(2)(C) and 1030(a)(5)(A) and (B) (collectively, the "SUBJECT OFFENSES").

8. Specifically, the **SUBJECT DOMAIN NAMES** were used or intended to be used by members of the Callisto Group in an ongoing and sophisticated spear phishing campaign<sup>1</sup> with the goal of gaining unauthorized access to the computers and email accounts of victims, to then steal valuable information and sensitive United States government intelligence.<sup>2</sup> The targeted victims thus far have included United States-based companies, former employees of the United States Intelligence Community (“USIC”), former and current Department of Defense (“DOD”) and Department of State (“DOS”) employees, United States military defense contractors, and staff at the Department of Energy (“DOE”).

9. The perpetrators also used information contained in the compromised email accounts to make their spear phishing email accounts appear more authentic and convincing to victims, thereby continuing and improving upon their criminal scheme. Additionally, the perpetrators had the ability to reuse the stolen credentials to gain access to other personal and corporate accounts, as well as government portals, where the victim used the same credentials.

10. The information targeted by the FSB and illegally accessed during the criminal conspiracy included sensitive information related to the identity of United States employees, defense, foreign affairs, and security policies, as well as nuclear energy related technology, research, and

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<sup>1</sup> “A spear phishing attack is an attempt to acquire sensitive information or access to a computer system by sending counterfeit messages that appear to be legitimate. ‘Spear phishing’ is a type of phishing campaign that targets a specific person or group and often will include information known to be of interest to the target, such as current events or financial documents. [ . . . ] These messages are delivered via email and are designed to convince the user to open a malicious link or attachment, exposing the target to malicious software.” Department of National Intelligence (DNI), *Counterintelligence Tips, Spear Phishing And Common Cyber Attacks*, DNI (last accessed June 10, 2024, 1:47 PM), [https://www.dni.gov/files/NCSC/documents/campaign/Counterintelligence\\_Tips\\_Spearphishing.pdf](https://www.dni.gov/files/NCSC/documents/campaign/Counterintelligence_Tips_Spearphishing.pdf)

<sup>2</sup> “Intelligence is secret, state activity to understand or influence foreign entities.” Michael Warner, *Wanted: A Definition of “Intelligence,”* Central Intelligence Agency (2002, last accessed June 7, 2024, 2:39 PM), <https://www.cia.gov/resources/csi/static/Wanted-Definition-of-Intel.pdf>

development, all of which is particularly valuable to the Russian government's efforts to engage in malign foreign influence operations within the United States.

11. In December 2023, in the Northern District of California, the United States indicted a member of the Callisto Group that engaged in these spear phishing attacks, Ruslan Aleksandrovich PERETYATKO ("PERETYATKO"), and an associate who assisted the Callisto Group in creating the infrastructure used in the attacks, Russian national Andrey Stanislavovich KORINETTS ("KORINETTS"), in a conspiracy to commit computer fraud in violation of Title 18, United States Code, Sections 371, 1030(a)(2)(B) and (C), 1030(a)(5)(A) and 3559(g)(1).<sup>3</sup>

12. PERETYATKO is a Russian national and an FSB officer believed to be located in Syktyvkar, Komi Republic, Russia. KORINETTS, is a Russian national, believed to be located in the Komi Republic, Russia.

13. This indictment detailed how PERETYATKO and KORINETTS, with other Callisto Group actors, conducted the Russia-based global spear phishing campaign. I have reviewed evidence supporting the indictment of PERETYATKO and KORINETTS and discussed the evidence with the FBI personnel responsible for that investigation. Based on that review, I believe the allegations in the indictment are supported by fact and are therefore reliable for the purpose of setting forth probable cause in this affidavit.

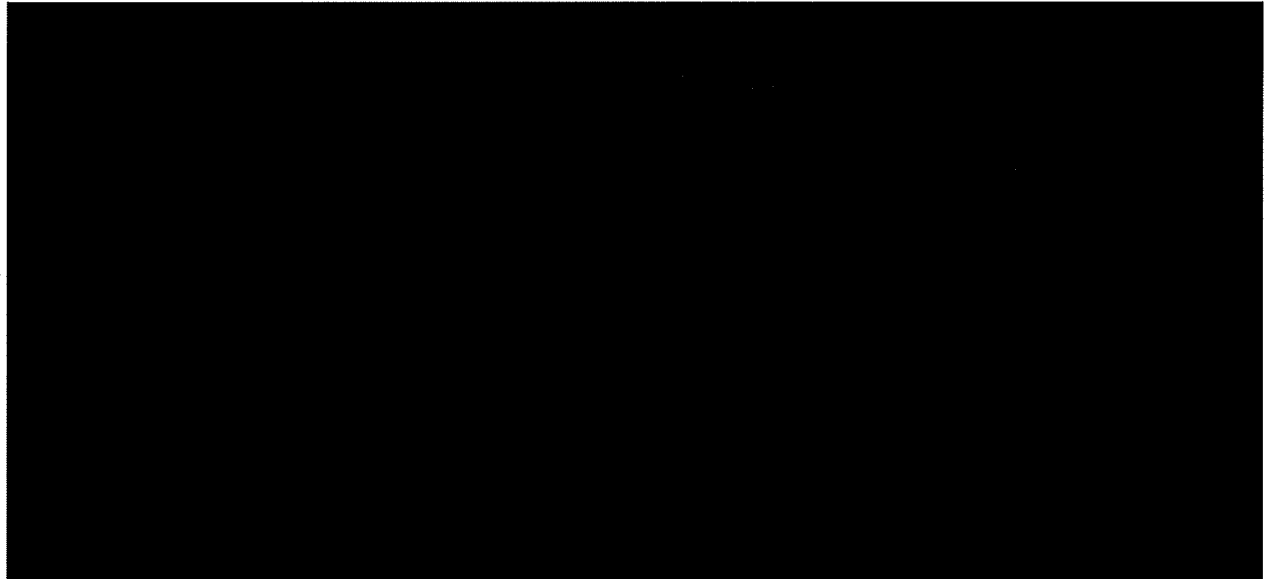
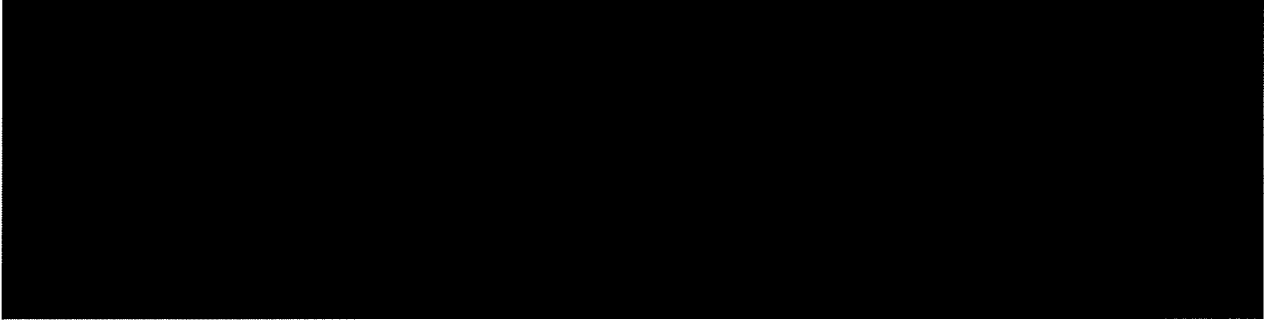
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<sup>3</sup> This indictment was unsealed and made publicly available by the Department of Justice, Office of Public Affairs as part of a press release on December 7, 2023, *Two Russian Nationals Working with Russia's Federal Security Service Charged with Global Computer Intrusion Campaign*, located at <https://www.justice.gov/opa/pr/two-russian-nationals-working-russias-federal-security-service-charged-global-computer> (last accessed June 11, 2024, 12:10 PM). The PDF of the indictment, entitled "peretyatko\_korinets\_indictment.pdf" can also be accessed via [www.justice.gov](http://www.justice.gov) at <https://www.justice.gov/opa/media/1327601/dl?inline>, entitled (last accessed June 11, 2024, 12:07 PM).

Pages 6-49 Fully Redacted



THE SUBJECT DOMAIN NAMES

109. As described above, the SUBJECT DOMAIN NAMES were used or intended to be used by the Callisto Group to commit or to facilitate the commission of conspiracy to commit unauthorized access of a computer to obtain information and to damage a protected computer, and to traffic in passwords or similar information through which a computer may be accessed, without authorization, in violation of Title 18, United States Code, Sections 1030(a)(2)(B), 1030(a)(2)(C), 1030(a)(5)(A) and (B), 1030(c)(2)(B), 1030(c)(4)(A) and (B), 1030(a)(6) (A) and (B). Based upon this investigation, the purpose of these criminal acts, and the perpetrators' goal, was to obtain Information of value to the



Russian government, especially in its efforts to engage in malign foreign influence operations within the United States. To accomplish this criminal goal, the perpetrators are suspected of [REDACTED]

[REDACTED] in violation of Title 18, United States Code, Sections 1956(a)(2). Accordingly, the domains were property involved in transactions or attempted transactions that violated Title 18, United States Code, Section 1956.

110. A search of publicly available WHOIS domain name registration records revealed that the SUBJECT DOMAIN NAMES were created and registered on or about the following dates, expire on the following dates, and have the following domain registrar(s) (all of which have Verisign, Inc. as the top-level domain registry):

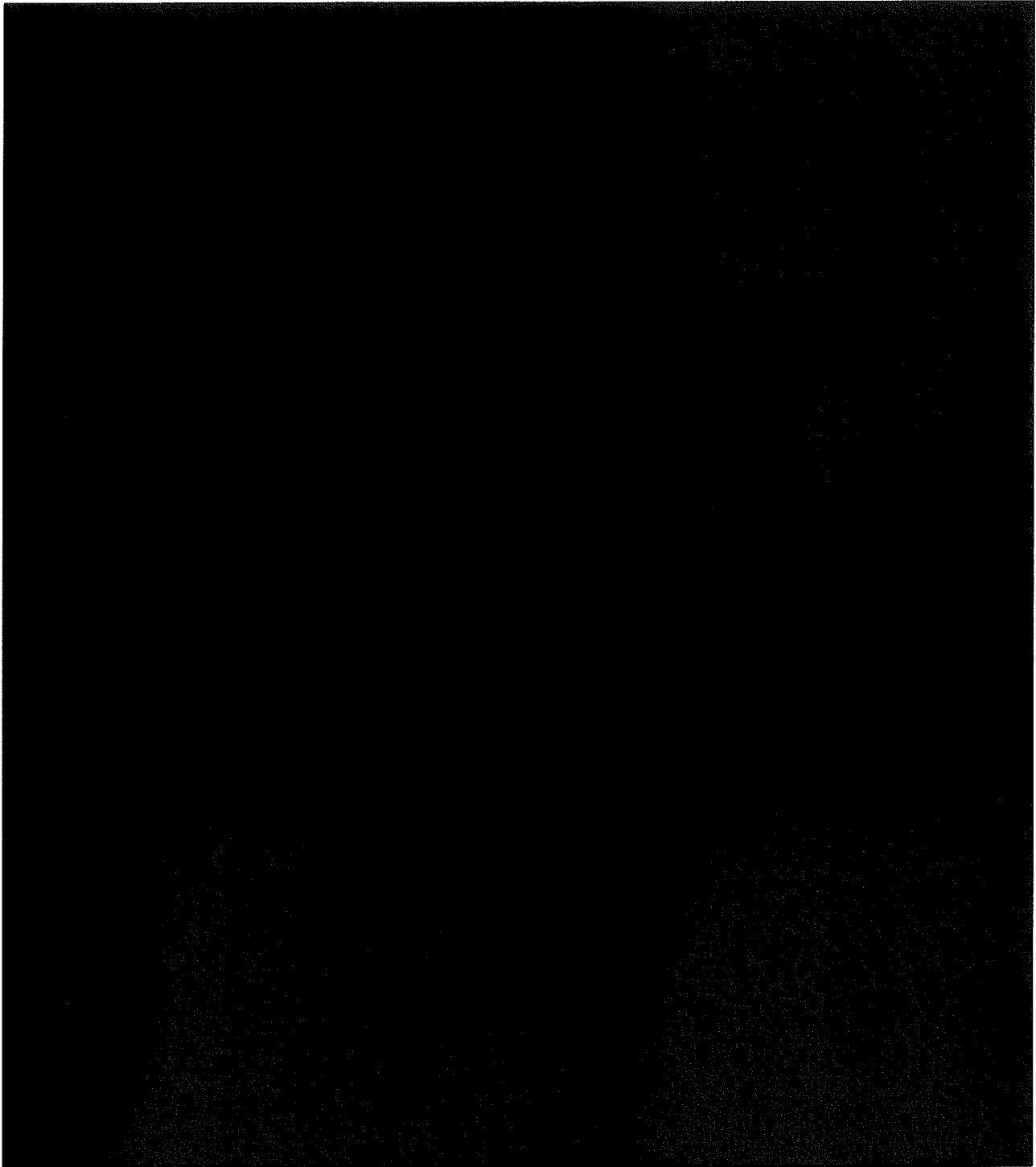
No.	Domain Name	Created Date	Expiration Date	Registrar Name	TLD Registry
1	accutanebb.com	1/22/2024	1/22/2025	NameCheap Inc.	Verisign, Inc.
2	albuteroltab.com	2/22/2024	2/22/2025	NameCheap Inc.	Verisign, Inc.
3	allowdoorinto.com	1/18/2024	1/18/2025	NameCheap Inc.	Verisign, Inc.
4	baijiapaintbrush.com	2/23/2024	12/9/2024	NameCheap Inc.	Verisign, Inc.
5	baricitinc.com	2/22/2024	2/22/2025	NameCheap Inc.	Verisign, Inc.
6	cbdhempoilww.com	1/23/2024	1/23/2025	NameCheap Inc.	Verisign, Inc.
7	cbdonlineww.com	1/31/2024	1/31/2025	NameCheap Inc.	Verisign, Inc.
8	cenforcep.com	2/17/2024	1/26/2025	NameCheap Inc.	Verisign, Inc.
9	cialismgz.com	2/17/2024	2/7/2025	NameCheap Inc.	Verisign, Inc.
10	delitky.com	2/16/2024	11/25/2024	NameCheap Inc.	Verisign, Inc.
11	divisionintro.com	1/17/2024	1/17/2025	NameCheap Inc.	Verisign, Inc.
12	dompurifycheerio.com	2/7/2024	2/7/2025	NameCheap Inc.	Verisign, Inc.
13	fastloginway.com	2/1/2024	2/1/2025	NameCheap Inc.	Verisign, Inc.
14	fasttruncatedoor.com	1/17/2024	1/17/2025	NameCheap Inc.	Verisign, Inc.
15	finduscore.com	12/28/2023	12/28/2024	NameCheap Inc.	Verisign, Inc.
16	gateallowsearch.com	1/18/2024	1/18/2025	NameCheap Inc.	Verisign, Inc.
17	ghxsjyk.com	2/23/2024	2/23/2025	NameCheap Inc.	Verisign, Inc.
18	gnfamotidine.com	2/17/2024	2/17/2025	NameCheap Inc.	Verisign, Inc.
19	gnibuprofen.com	2/16/2024	2/16/2025	NameCheap Inc.	Verisign, Inc.

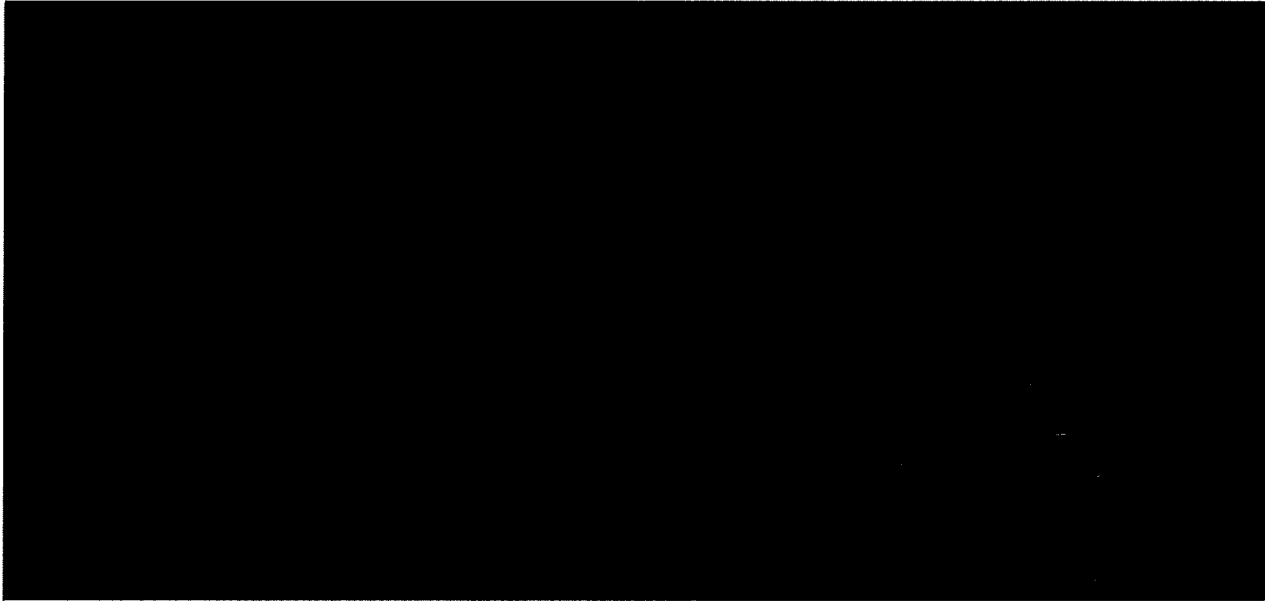
20	govdoorsec.com	12/18/2023	12/18/2024	NameCheap Inc.	Verisign, Inc.
21	hempcbwww.com	1/23/2024	1/23/2025	NameCheap Inc.	Verisign, Inc.
22	inthetrustview.com	1/17/2024	1/17/2025	NameCheap Inc.	Verisign, Inc.
23	ithostprotocol.com	1/16/2024	1/16/2025	NameCheap Inc.	Verisign, Inc.
24	ivermectint.com	1/31/2024	1/31/2025	NameCheap Inc.	Verisign, Inc.
25	londonshowcorp.com	12/18/2023	12/18/2024	NameCheap Inc.	Verisign, Inc.
26	maxlliance.com	2/16/2024	11/15/2024	NameCheap Inc.	Verisign, Inc.
27	myavtsim.com	2/17/2024	2/17/2025	NameCheap Inc.	Verisign, Inc.
28	newtransfersearch.com	1/22/2024	1/22/2025	NameCheap Inc.	Verisign, Inc.
29	outviewmachine.com	1/16/2024	1/16/2025	NameCheap Inc.	Verisign, Inc.
30	setitcloud.com	1/16/2024	1/16/2025	NameCheap Inc.	Verisign, Inc.
31	smartloginbreak.com	1/16/2024	1/16/2025	NameCheap Inc.	Verisign, Inc.
32	smartscontract.com	1/16/2024	1/16/2025	NameCheap Inc.	Verisign, Inc.
33	tipstoway.com	12/18/2023	12/18/2024	NameCheap Inc.	Verisign, Inc.
34	toolpointtrim.com	1/15/2024	1/15/2025	NameCheap Inc.	Verisign, Inc.
35	trustvaluespath.com	1/17/2024	1/17/2025	NameCheap Inc.	Verisign, Inc.
36	verificationtrim.com	2/1/2024	2/1/2025	NameCheap Inc.	Verisign, Inc.
37	viewwaypath.com	1/16/2024	1/16/2025	NameCheap Inc.	Verisign, Inc.
38	waylogintexas.com	1/15/2024	1/15/2025	NameCheap Inc.	Verisign, Inc.
39	webgovview.com	12/19/2023	12/19/2024	NameCheap Inc.	Verisign, Inc.
40	wingscamein.com	1/18/2024	1/18/2025	NameCheap Inc.	Verisign, Inc.
41	incomcorporate.com	12/18/2023	12/18/2024	PSI-USA, Inc. dba Domain Robot	Verisign, Inc.

111. As shown above, the two domain registrars for the SUBJECT DOMAIN NAMES were **NameCheap, Incorporated**, website address NameCheap.com, located at 4600 East Washington Street Suite 305, Phoenix, Arizona, 85034, and **PSI-USA, Incorporated**, located at 3960 Howard Hughes Parkway, Suite 500, Las Vegas, NV 89169

112. The top-level domain for the SUBJECT DOMAIN NAME is Verisign, Inc., which currently manages all of these “.com” domains.







CONCLUSION

117. For the foregoing reasons, I submit that there is probable cause to believe that the **SUBJECT DOMAIN NAMES** are used and/or intended to be used in facilitating the commission of a conspiracy to violate the **SUBJECT OFFENSES**. Accordingly, the **SUBJECT DOMAIN NAMES** are subject to forfeiture to the United States pursuant to Title 18, United States Code, Sections 981(a)(1)(A) and 981(b), and I respectfully request that the Court issue a seizure warrant for the **SUBJECT DOMAIN NAMES**.



119. Finally, and in order to protect the ongoing investigation and in consideration that much of the information set forth above is not otherwise publicly available, I respectfully request that this Affidavit be filed and kept under seal until further order of this Court and that notice of the seizure warrant be delayed until 30 days from the issuance of this warrant.

Respectfully submitted,

/s/ [REDACTED]  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to me via telephone this 13th day of September 2024.

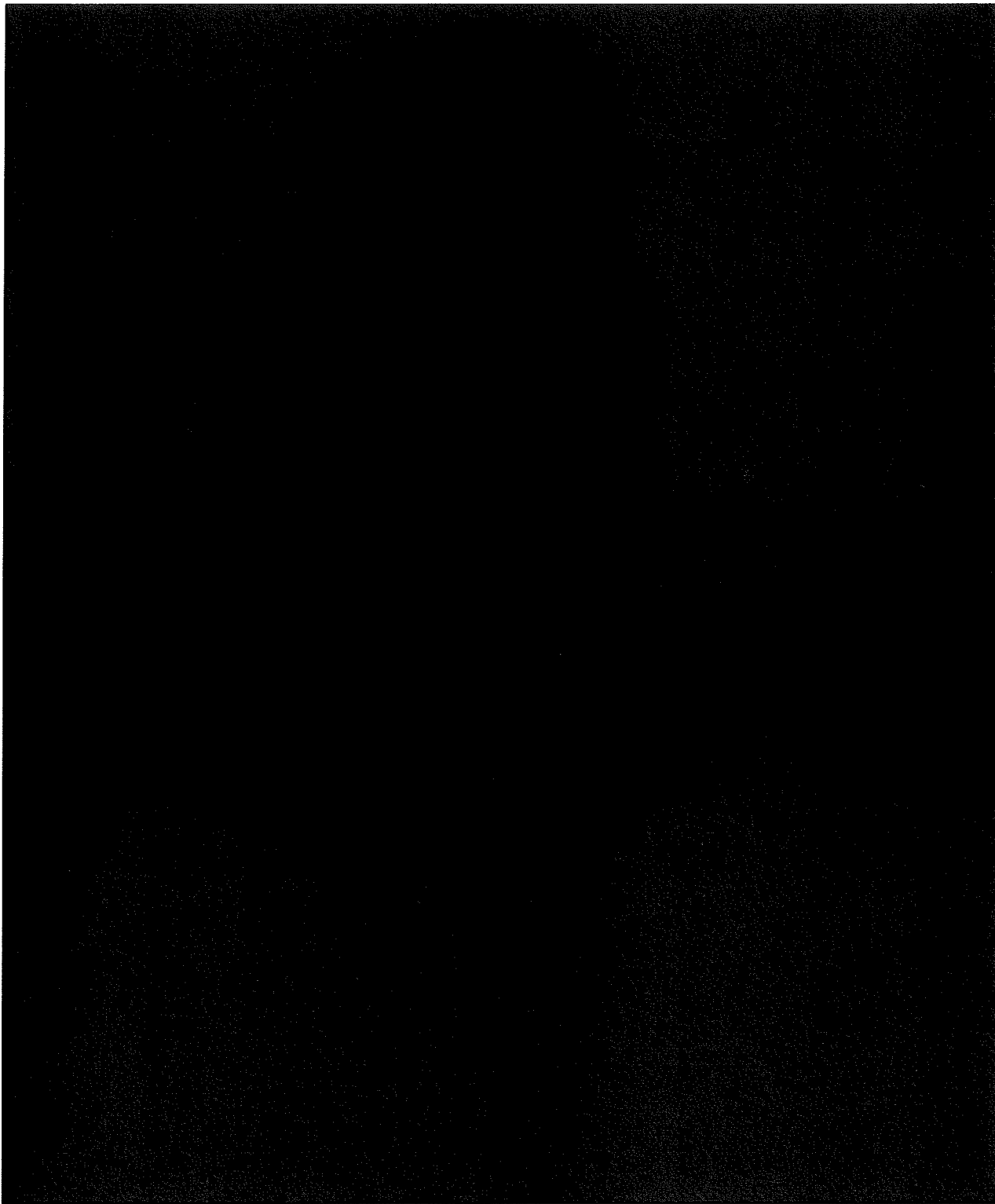


HONORABLE JUDGE DONNA M. RYU  
United States Chief Magistrate Judge  
Northern District of California

ATTACHMENT A

With respect to SUBJECT DOMAIN NAMES:

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wingscamein[.]com	("SUBJECT DOMAIN NAME 40")
incomcorporate[.]com	("SUBJECT DOMAIN NAME 41")



SEALED BY ORDER OF THE COURT

AO 109 (Rev. 11/13) Warrant to Seize Property Subject to Forfeiture

FILED

UNITED STATES DISTRICT COURT

SEP 16 2024

for the

Northern District of California

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

In the Matter of the Seizure of  
(Briefly describe the property to be seized)  
Application by the United States for a Seizure  
Warrant for 41 Domain Names For Investigation Of  
18 U.S.C. § 1956(A)(2)(A) And Other Offenses

Case No.

4 24 71375

DMR

WARRANT TO SEIZE PROPERTY SUBJECT TO FORFEITURE

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests that certain property located in the Eastern District of Virginia be seized as being subject to forfeiture to the United States of America. The property is described as follows:

See attached affidavit of FBI Special Agent [REDACTED]

I find that the affidavit(s) and any recorded testimony establish probable cause to seize the property.

YOU ARE COMMANDED to execute this warrant and seize the property on or before 09/27/2024 (not to exceed 14 days)

[X] in the daytime 6:00 a.m. to 10:00 p.m. [ ] at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must also give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

An officer present during the execution of the warrant must prepare, as required by law, an inventory of any property seized and the officer executing the warrant must promptly return this warrant and a copy of the inventory to

Honorable Donna M. Ryu, Chief Magistrate Judge  
(United States Magistrate Judge)

[ ] Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)

[ ] for days (not to exceed 30) [ ] until, the facts justifying, the later specific date of

Date and time issued: 09/13/2024 11:09 am

Judge's signature

City and state: Oakland, CA

Honorable Donna M. Ryu, Chief Magistrate Judge

Printed name and title



AO 109 (Rev. 11/13) Warrant to Seize Property Subject to Forfeiture (Page 2)

<b>Return</b>		
Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
Inventory made in the presence of:		
Inventory of the property taken:		
<b>Certification</b>		
I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.		
Date: _____	_____	
	<i>Executing officer's signature</i>	
	_____	
	<i>Printed name and title</i>	

ATTACHMENT A

With respect to SUBJECT DOMAIN NAMES:

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webgovview[.]com	("SUBJECT DOMAIN NAME 39")
wingscamein[.]com	("SUBJECT DOMAIN NAME 40")
incomporate[.]com	("SUBJECT DOMAIN NAME 41")

