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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. CR 03-_____
)
Plaintiff,) I N F O R M A T I O N
)
v.) [18 U.S.C. 1343: Wire Fraud; 18
) U.S.C. § 2511(1)(a): Unlawful
JOHN WILLIAM RACINE II,) Interception of an Electronic
aka John Buffo,) Communication]
)
Defendant.)
_____)

The United States Attorney charges:

INTRODUCTION

At all times pertinent to this information:

1. Network Solutions, Inc. ("Network Solutions") was a wholly-owned subsidiary of Verisign, Inc., and was based in Dulles, Virginia. Among other services, Network Solutions provided the ability to register domain names for use on the Internet for a specific period of time. In addition, Network Solutions provided website forwarding services and electronic mail services to its customers. Network Solutions' customers were provided access to their accounts through the use of a username and password.

1 2. Al Jazeera Space Channel ("Al Jazeera") was an Arabic-
2 language media organization based in Doha, Qatar. Al Jazeera had
3 purchased services from Network Solutions including the
4 registration of the Internet domain name "Aljazeera.net,"
5 electronic mail services and website forwarding. In addition to
6 its satellite television service, Al Jazeera provided English and
7 Arabic-language news websites on the Internet.

8 3. MSN Hotmail was a free web-based e-mail service based in
9 Mountain View, California.

10 4. Networld Connections, Inc. ("Networld") was a web service
11 provider that provided free web pages for Internet users.

12 5. MyDomain.Com was an Internet domain name management
13 service in Vancouver, Washington that provided free domain name
14 forwarding services for Internet users.

15 6. Defendant JOHN WILLIAM RACINE II, aka John Buffo, was a
16 website designer residing in the Central District of California.

17 7. Mohammed Jasim AlAli was the administrative contact for
18 Al Jazeera's Network Solutions account.

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COUNT ONE

[18 U.S.C. § 1343]

THE SCHEME TO DEFRAUD

1. Beginning on an unknown date and continuing through on or about March 27, 2003, in Riverside County, within the Central District of California and elsewhere, defendant JOHN WILLIAM RACINE II, aka John Buffo, knowingly devised and executed a scheme to defraud Network Solutions and Al Jazeera by making materially false and fraudulent pretenses and representations to obtain the Internet domain name of Aljazeera.net and obtain e-mail messages sent to the Aljazeera.net account.

2. Defendant carried out the fraudulent scheme as follows:

a. On or about March 24, 2003, defendant contacted Network Solutions several times by e-mail and telephone to gather information regarding the Al Jazeera account.

b. On or about March 24, 2003, defendant created an MSN Hotmail account with the username "mj_alali@hotmail.com."

c. On or about March 24, 2003, defendant created a domain name management account on Mydomain.com.

d. On or about March 24, 2003, defendant created a web page and subsequently uploaded the page to an account on Networld.com. The web page contained the American flag in the shape of the continental United States and the words "Let Freedom Ring . . ."

e. On or about March 25, 2003, defendant contacted Network Solutions by telephone and falsely represented that his name was "Mohammed AlAli" and that he needed to reset the Al

1 Jazeera account password. Defendant, however, was unable to answer
2 a challenge question posed by the Network Solutions employee.

3 f. On or about March 25, 2003, defendant used his
4 personal computer to create a false photo identification card
5 bearing the name "Mohammed Jasim AlAli."

6 g. On or about March 25, 2003, defendant created a
7 fraudulent fax cover page from Al Jazeera and completed a
8 "Statement of Authorization" form provided by Network Solutions.
9 The Statement of Authorization Form falsely stated that Al
10 Jazeera's information technology manager, Mohammed Jasim AlAli, had
11 requested that Network Solutions reset the password for the Al
12 Jazeera account to a password designated by defendant. In
13 addition, defendant forged the signature of Mohammed Jasim AlAli on
14 the Statement of Authorization Form.

15 h. On or about March 25, 2003, defendant sent a copy of
16 the fraudulent photo identification card, false fax cover page and
17 forged Statement of Authorization Form to Network Solutions in
18 Dulles, Virginia via facsimile from the Central District of
19 California.

20 i. Defendant then contacted Network Solutions by
21 telephone to confirm that Network Solutions had received the
22 facsimile.

23 j. Based on the fraudulent documentation submitted by
24 defendant, Network Solutions reset the user password for the Al
25 Jazeera account and notified defendant.

26 k. After the account password was reset to the password
27 requested by defendant, defendant exclusively controlled the
28

1 Aljazeera.net domain name and all services associated with the Al
2 Jazeera account.

3 1. Defendant subsequently accessed the Al Jazeera
4 account at Network Solutions without Al Jazeera's authorization and
5 redirected all website traffic to his account at Mydomain.com. The
6 web traffic was subsequently forwarded to his web page at
7 Networld.com where he had placed the words "Let Freedom Ring . . ."
8 and a graphic of the American flag in the shape of the continental
9 United States. In addition, defendant forwarded all e-mail
10 destined for Aljazeera.net to the MSN Hotmail account he had
11 created with the username "mj_alali@hotmail.com."

12 m. During the time defendant controlled the Al Jazeera
13 account and domain name, Internet users attempting to access the Al
14 Jazeera websites were redirected to defendant's web page. In
15 addition, all e-mail sent to the Aljazeera.net domain name was
16 redirected to defendant's MSN Hotmail account.

17 USE OF THE WIRES

18 3. On or about the date set forth below, in Riverside
19 County, within the Central District of California, defendant JOHN
20 WILLIAM RACINE II transmitted and caused to be transmitted a
21 writing by wire communication in interstate commerce for the
22 purpose of executing the scheme to defraud:

23

<u>COUNT</u>	<u>DATE</u>	<u>ITEM WIRED</u>
24 ONE	25 On or about 26 March 25, 2003	Statement of Authorization Form sent via facsimile from Corona, California to Network Solutions in Dulles, Virginia.

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COUNT TWO

[18 U.S.C. § 2511(1)(a)]

Beginning on or about March 25, 2003 and continuing through on or about March 27, 2003, in Riverside County, within the Central District of California and elsewhere, defendant JOHN WILLIAM RACINE II, aka John Buffo, knowingly and intentionally intercepted and endeavored to intercept without authorization an electronic communication, namely, approximately 300 e-mail messages sent to the Internet domain name of Aljazeera.net.

DEBRA W. YANG
United States Attorney

JACQUELINE CHOOLJIAN
Assistant United States Attorney
Chief, Criminal Division

ARIF ALIKHAN
Assistant United States Attorney
Chief, Computer Crimes Section