

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
) Criminal No.
 v.)
) (18 U.S.C. §§ 1343, 844(e),
) and 875(d))
 ADAM STUART BUSBY)

INDICTMENT

INTRODUCTION

The Grand Jury charges:

At all times material to the Indictment:

1. Defendant ADAM STUART BUSBY was a resident of Dublin, Ireland.

2. The University of Pittsburgh is located in Pittsburgh, Pennsylvania with an enrollment of approximately 24,700 students. The University of Pittsburgh also employs over 11,600 faculty involved in teaching and research. Mark A. Nordenberg is the Chancellor of the University.

3. Academic activities, including the teaching of classes, occur in designated buildings on campus. These buildings include the Cathedral of Learning, Thackeray Hall, Sennott Square, Benedum Hall, Victoria Hall, Allen Hall, Barco Law Library, Hillman Library, Mervis Hall, Bellefield Hall, Salk Hall, and Scaife Hall.

4. A large portion of the student body of the University of Pittsburgh live on campus at the University of Pittsburgh. Dormitories at the University of Pittsburgh house approximately 7,136 students. These Dormitories include Lothrop

Hall, Amos Hall, Bruce Hall, Panther Hall, Brackenridge Hall, Holland Hall, Pennsylvania Hall, Litchfield Towers, and Ruskin Hall.

5. The University of Pittsburgh also holds a proprietary interest in other buildings which perform other functions such as the Heinz Chapel, Panther Central, Alumni Hall, and Craig Hall.

6. The University of Pittsburgh retains its own police force whose primary mission is the protection and welfare of all students, staff, and faculty, as well as the safeguarding of all property. Tim Delaney is the Chief of the University of Pittsburgh Police Department.

7. Between March 30, 2012 and April 21, 2012, the University of Pittsburgh received over 40 bomb threats sent over email targeting its buildings.

8. Between March 30, 2012 and April 21, 2012, buildings of the University of Pittsburgh were evacuated over 100 times as a result of these bomb threats, causing a loss of class time and dormitory residence use for which students had paid tuition and board.

9. Between March 30, 2012 and April 21, 2012, bomb threats at the University of Pittsburgh caused the University of Pittsburgh to incur over \$300,000 in costs for things such as additional security to check bags of students entering classroom

buildings, transportation for evacuees, and specialized explosives detectors.

10. On April 2, 2012, the administration of the University of Pittsburgh increased the reward it had offered, from \$10,000 to \$50,000, for information leading to the identification of the individual who was perpetrating the bomb threats against the University. This reward was withdrawn on April 21, 2012.

COUNTS ONE THROUGH SEVENTEEN: FRAUD BY WIRE

THE SCHEME AND ARTIFICE

11. From on or about March 30, 2012, and continuing thereafter to on or about April 21, 2012, in the Western District of Pennsylvania and elsewhere, the defendant, ADAM STUART BUSBY, devised and intended to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, well knowing at the time that the pretenses, representations and promises were false and fraudulent when made.

12. It was part of the scheme and artifice to defraud that defendant ADAM STUART BUSBY would send emails over the internet to news media in the Pittsburgh, Pennsylvania area, to employees and other associates of the University of Pittsburgh, and to others in the Pittsburgh, Pennsylvania area.

13. It was further a part of the scheme and artifice to defraud that these emails sent by defendant ADAM STUART BUSBY over the internet would threaten the University of Pittsburgh by claiming that there were bombs in classroom buildings, libraries, dormitories and other buildings used by students and faculty of the University of Pittsburgh.

14. It was further a part of the scheme and artifice to defraud that these emails were sent by defendant ADAM STUART BUSBY although no such bombs existed.

15. It was further a part of the scheme and artifice to defraud that the emails sent by defendant ADAM STUART BUSBY were intended to direct the recipient of the emails to warn the University of Pittsburgh Police Department of the bomb threat so as to induce an evacuation.

16. It was further a part of the scheme and artifice to defraud that the emails sent by defendant ADAM STUART BUSBY were sent with the purpose of causing evacuations and disrupting University of Pittsburgh residential and academic activities.

THE WIRE COMMUNICATIONS

17. On or about the dates listed on Schedule "A" below,, in the Western District of Pennsylvania and elsewhere, the defendant, ADAM STUART BUSBY, for the purpose of executing and attempting to execute the scheme and artifice to defraud, did transmit and cause to be transmitted in interstate and foreign commerce, by means of a wire communication, certain writings and signals, each such communication being a separate count of this Indictment incorporating the scheme and artifice to defraud, as if set forth in full.

SCHEDULE A

COUNT	DATE (ON OR ABOUT)	INTERSTATE OR FOREIGN TRANSMISSION	ADDRESSEE	EMAIL CONTENT
1	April 6, 2012	Austria to the Western District of PA	asostek@post-gazette.com	"A bomb is in the cathedral of learning."
2	April 7, 2012	Austria to the Western District of PA	hillr@pitt.edu	"A bomb is in Thackeray. Your new website looks ridiculous and it will not help you."
3	April 8, 2012	Germany to the Western District of PA	lnavrati1@post-gazette.com	"Tell the cops at Pitt. Bombs in Sennot Square, Hillman and Benedum Buildings."
4	April 8, 2012	Sweden to the Western District of PA	newsroom@thepittsburghchannel.com	"Tell cops at Pitt, there is a bomb at Lothrop, and bombs in Hillman, Benedum and in Sennot Square."
5	April 8, 2012	Germany to the Western District of PA	newsroom@thepittsburghchannel.com	"Tell cops at Pitt, there is a bomb at Lothrop, and bombs in Hillman, Bendum and in Sennot Square."
6	April 9, 2012	Austria to the Western District of PA	lnavrati1@post-gazette.com	"Pass this to cops at Pitt. Bombs in Amos, Bruce, Panther halls and in Brackenridge"
7	April 9, 2012	New York to the Western District of PA	newsroom@thepittsburghchannel.com	"Pass this to cops at Pitt. Bombs in Amos, Bruce, Panther halls and in Brackenridge"

8	April 9, 2012	New York to the Western District of PA	newsroom@thepittsburghchannel.com	"Pass this to cops at Pitt. Bombs in Amos, Bruce, Panther halls and in Brackenridge."
9	April 9, 2012	Germany to the Western District of PA	lnavrati@post-gazette.com	"Bombs are in Heinz chapel, in Victoria and in panthers central"
10	April 10, 2012	Austria to the Western District of PA	lnavrati@post-gazette.com	"Tell police - a bomb is at Pitt chancellor Nordenberg's house on Devonshire Street, Pittsburgh. Nordenberg only has to withdraw the \$50000 bounty, to end the threats against Pitt. He has refused. Our offer still stands."
11	April 18, 2012	Austria to the Western District of PA	plaid@andrew.cmu.edu	"Urgent!!! Call Pitt immediately. There are bombs at Pitt. The locations are - Hillman Library, Allen, Craig and Alumni Halls."
12	April 18, 2012	Netherlands to the Western District of PA	oie@andrew.cmu.edu	"Urgent!!! Call Pitt immediately. There are bombs at Pitt. The locations are - Barco, Holland, Craig, and Bellefield Halls."
13	April 18, 2012	Netherlands to the Western District of PA	thehub@andrew.cmu.edu	"Urgent!!! Call Pitt immediately. There are bombs at Pitt. The locations are - Sennot Square, Amos, Mervis, and Pennsylvania Halls."
14	April 20, 2012	Netherlands to the Western District of PA	wqed@wqed.org	Entitled "Open Letter to the Chancellor from the Threateners" detailed below in Paragraph 24

15	April 21, 2012	Netherlands to the Western District of PA	sgurman@ post- gazette. com	"Tell the Pitt police that bombs are in Litchfield Towers, the Cathedral of Learning, Salk, Scaife, PA and Ruskin Halls."
16	April 21, 2012	Austria to the Western District of PA	pc@ bc.pitt. edu	"Tell Pitt cops that bombs are in Litchfield Towers, the Cathedral, Salk, Scaife, PA and Ruskin Halls."
17	April 21, 2012	Netherlands to the Western District of PA	lnavrati l@ post- gazette. com	"Tell the Pitt police that bombs are in Litchfield Towers, the Cathedral, Salk, Scaife, PA and Ruskin Halls."

In violation of Title 18, United States Code, Section
1343.

COUNTS EIGHTEEN THROUGH THIRTY-THREE: FALSE INFORMATION AND HOAXES

18. Paragraphs 1 through 6 are realleged here as if set forth in full.

19. On or about the dates listed in Schedule "B" below, in the Western District of Pennsylvania and elsewhere, the defendant, ADAM STUART BUSBY, through the use of an instrument of interstate and foreign commerce, namely the internet, maliciously conveyed false information knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill or injure individuals on the campus of the University of Pittsburgh, and to unlawfully damage or destroy a building or other real or personal property located at, and belonging to, the University of Pittsburgh, by means of fire or an explosive.

SCHEDULE B

COUNT	DATE (ON OR ABOUT)	INTERSTATE OR FOREIGN TRANSMISSION	ADDRESSEE	EMAIL CONTENT
18	April 6, 2012	Austria to the Western District of PA	asostek@post-gazette.com	"A bomb is in the cathedral of learning."
19	April 7, 2012	Austria to the Western District of PA	hillr@pitt.edu	"A bomb is in Thackeray. Your new website looks ridiculous and it will not help you."
20	April 8, 2012	Germany to the Western District of PA	lnavrati1@post-gazette.com	"Tell the cops at Pitt. Bombs in Sennot Square, Hillman and Benedum Buildings."

21	April 8, 2012	Sweden to the Western District of PA	newsroom @ thepitts burgh channel. com	"Tell cops at Pitt, there is a bomb at Lothrop, and bombs in Hillman, Benedum and in Sennot Square."
22	April 8, 2012	Germany to the Western District of PA	newsroom @ thepitts burgh channel. com	"Tell cops at Pitt, there is a bomb at Lothrop, and bombs in Hillman, Benedum and in Sennot Square."
23	April 9, 2012	Austria to the Western District of PA	lnavrati l@ post- gazette. com	"Pass this to cops at Pitt. Bombs in Amos, Bruce, Panther halls and in Brackenridge"
24	April 9, 2012	New York to the Western District of PA	newsroom @ thepitts burgh channel. com	"Pass this to cops at Pitt. Bombs in Amos, Bruce, Panther halls and in Brackenridge"
25	April 9, 2012	New York to the Western District of PA	newsroom @ thepitts burgh channel. com	"Pass this to cops at Pitt. Bombs in Amos, Bruce, Panther halls and in Brackenridge"
26	April 9, 2012	Germany to the Western District of PA	lnavrati l@ post- gazette. com	"Bombs are in Heinz chapel, in Victoria and in panthers central"
27	April 10, 2012	Austria to the Western District of PA	lnavrati l@post- gazette. com	"Tell police - a bomb is at Pitt chancellor Nordenberg's house on Devonshire Street, Pittsburgh. Nordenberg only has to withdraw the \$50000 bounty, to end the threats against Pitt. He has refused. Our offer still stands."

28	April 18, 2012	Austria to the Western District of PA	plaid@andrew.cmu.edu	"Urgent!!! Call Pitt immediately. There are bombs at Pitt. The locations are - Hillman Library, Allen, Craig and Alumni Halls."
29	April 18, 2012	Netherlands to the Western District of PA	oie@andrew.cmu.edu	"Urgent!!! Call Pitt immediately. There are bombs at Pitt. The locations are - Barco, Holland, Craig, and Bellefield Halls."
30	April 18, 2012	Netherlands to the Western District of PA	thehub@andrew.cmu.edu	"Urgent!!! Call Pitt immediately. There are bombs at Pitt. The locations are - Sennott Square, Amos, Mervis, and Pennsylvania Halls."
31	April 21, 2012	Netherlands to the Western District of PA	sgurman@post-gazette.com	"Tell the Pitt police that bombs are in Litchfield Towers, the Cathedral of Learning, Salk, Scaife, PA and Ruskin Halls."
32	April 21, 2012	Austria to the Western District of PA	pc@bc.pitt.edu	"Tell Pitt cops that bombs are in Litchfield Towers, the Cathedral, Salk, Scaife, PA and Ruskin Halls."
33	April 21, 2012	Netherlands to the Western District of PA	lnavrati1@post-gazette.com	"Tell the Pitt police that bombs are in Litchfield Towers, the Cathedral, Salk, Scaife, PA and Ruskin Halls."

In violation of Title 18, United States Code, Section

844 (e).

COUNT THIRTY-FOUR: INTERNATIONAL EXTORTION

The grand jury further charges:

20. Paragraphs 1 through 16 are realleged here as if set forth in full.

21. On April 10, 2012, ADAM STUART BUSBY sent an email to the email account "lnavratil@post-gazette.com," received in the Western District of Pennsylvania, which stated "Tell police - a bomb is at Pitt chancellor Nordenberg's house on Devonshire Street, Pittsburgh. Nordenberg only has to withdraw the \$50000 bounty, to end the threats against Pitt. He has refused. Our offer still stands."

22. On or about April 10, 2012, in the Western District of Pennsylvania and elsewhere, the defendant, ADAM STUART BUSBY, with intent to extort from persons money or other things of value, did transmit in interstate and foreign commerce, from the country of Austria to the Western District of Pennsylvania, a communication containing a threat to injure the property or reputation of another, namely the University of Pittsburgh.

In violation of Title 18, United States Code, Section 875(d).

COUNT THIRTY-FIVE: INTERNATIONAL EXTORTION

The grand jury further charges:

23. Paragraphs 1 through 16 and 21 are realleged here as if set forth in full.

24. On April 20, 2012, ADAM STUART BUSBY sent an email to the email account "wqed@wqed.org," received in the Western District of Pennsylvania, entitled "Open Letter" which stated:

An Open Letter To Chancellor Nordenberg From The Threateners

Firstly, can we prove that we ARE the Threateners? Easy. No threats will be issued by mixmaster for 24 hrs from 8am today Friday. (But note! We have no control over copycat scribblers.)

This all began when you, Nordenberg, put out a \$10 000 - then \$50 000 - "reward" (bounty) for some young kid who'd pranked the University. Remember?

That REALLY angered us! Hey, man! This is America! We don't treat our kids like that!

So, from late March (we had nothing to do with earlier threats) we disrupted Pitt to teach you, Nordenberg, a lesson.

Then, on 10th April, we declared a 12 hr truce, and let you, Nordenberg, know we'd end the threats if you withdrew the reward.

You didn't! (You don't care about the students. You have overweening pride and conceit.)

The local press, or Chief Delaney, will confirm the above.

We make the same offer to you now. Simply withdraw the "reward", and we will end our actions permanently.

The Threateners

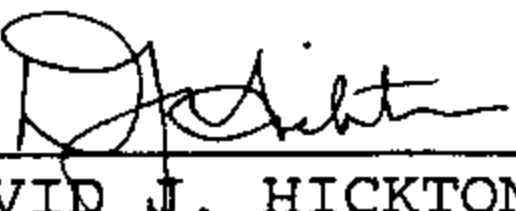
25. On or about April 20, 2012, in the Western District of Pennsylvania and elsewhere, the defendant, ADAM STUART BUSBY,

with intent to extort from persons money or other things of value, did transmit in interstate and foreign commerce, from the Netherlands to the Western District of Pennsylvania, a communication containing a threat to injure the property or reputation of another, namely the University of Pittsburgh.

In violation of Title 18, United States Code, Section 875 (d) .

A True Bill,

FOREPERSON



DAVID J. HICKTON
United States Attorney
PA ID No. 34524