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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

February 2018 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

MALIK LUQMAN FAROOQ,

aka "dark999,"

aka "dark9,"

aka "codex,"

aka "code.x,"

aka "Code X"

aka "incredibl3,"

aka "a163a1633,"

aka "a163mok,"

aka "martin,"

aka "martin.x45,"

aka "Lucky,"

ADITYA RAJ,

aka "adi,"

aka "Raj Aditya"

SAM NHANCE,

aka "Sam NhaNc3,"

aka "salim,"

GHOBHIRAJAH SELVARAJAH,

aka "Hunter,"

aka "Hunter X"

aka "gh0bhi," and

JITESH JADHAV,

Defendants.

CR No. 18-

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy;  
18 U.S.C. § 1030(a)(2)(C),  
(c)(2)(B)(i), (ii), (iii):  
Unauthorized Access to a Computer  
to Obtain Information; 18 U.S.C.  
§ 1028A(a)(1): Aggravated  
Identity Theft; 17 U.S.C.  
§ 506(a)(1)(A), (B) and  
18 U.S.C. § 2319(a), (b)(1),  
(c)(1): Copyright Infringement]

1 The Grand Jury charges:

2 INTRODUCTORY ALLEGATIONS AND DEFINITIONS

3 At all times relevant to this indictment:

4 1. Defendant LUQMAN FAROOQ, also known as ("aka") "dark999,"  
5 aka "dark9," aka "codex," aka "code.x," aka "Code X," aka  
6 "incredibl3," aka "a163a1633," aka "a163mok," aka "martin," aka  
7 "martin.x45," aka "Lucky" ("FAROOQ"), was a resident of the United  
8 Kingdom.

9 2. Defendant FAROOQ owned a personal computer (the "Compaq  
10 Computer"), which defendant FAROOQ used at his residence in the  
11 United Kingdom.

12 3. Defendant FAROOQ owned a Western Digital four-terabyte  
13 external hard drive (the "WD External Hard Drive"), which defendant  
14 FAROOQ used at his residence in the United Kingdom.

15 4. OVH was a cloud computing and dedicated server company in  
16 France, which offered server space for rent to the public, including  
17 in particular a server assigned Internet Protocol address 37.187.30.2  
18 (the "OVH Server").

19 5. The Onion Router, also known as TOR, was a software  
20 designed to enable anonymous, untraceable transmission of information  
21 over the internet by adding layers of encryption and routing data  
22 through multiple relay points, known as "TOR nodes."

23 6. PayPal Holdings, Inc. ("PayPal") was a company operating a  
24 worldwide online payment system, for which users registered using an  
25 email address, and which allowed them to receive or transfer funds to  
26 any other user, in various currencies.

27 7. Victim Company A was a motion picture production and  
28 distribution company, with headquarters and servers located in Los

1 Angeles, California.

2 8. Victim Company B was a content-management services company,  
3 which serviced a cloud-based application known as "DAX" used for  
4 storage, review, and distribution of digital motion picture assets,  
5 located in Culver City, California, with servers located in El  
6 Segundo, California.

7 9. Victim Company C was a motion picture production and  
8 distribution company, with headquarters and servers located in  
9 Burbank, California.

10 10. Victim Company D was a motion picture production, content  
11 management, and distribution company, with headquarters located in  
12 Burbank, California and servers located in London, United Kingdom.

13 11. Investigative Firm A was a private investigative firm  
14 employed by the Motion Picture Association of America to combat  
15 online piracy of motion pictures.

16 12. "22 Jump Street" was a motion picture produced by LStar  
17 Capital, among others, and distributed by Columbia Pictures and  
18 Metro-Goldwyn-Mayer, released in the United States on or about June  
19 13, 2014.

20 13. "The Amazing Spider-Man 2" was a motion picture produced by  
21 Columbia Pictures and Marvel Entertainment, and distributed by Sony  
22 Pictures Releasing, released in the United States on or about May 2,  
23 2014.

24 14. "Annabelle" was a motion picture produced by New Line  
25 Cinema, among others, and distributed by Warner Bros. Pictures,  
26 released in the United States on or about October 3, 2014.

27 15. "As Above So Below" was a motion picture produced by  
28 Legendary Pictures and distributed by Universal Pictures, released in

1 the United States on or about August 29, 2014.

2 16. "Bang Bang" was a motion picture produced by Fox Star  
3 Studios, released in India on or about October 2, 2014.

4 17. "Blackhat" was a motion picture produced by Legendary  
5 Pictures, among others, and distributed by Universal Pictures,  
6 released in the United States on or about January 8, 2015.

7 18. "The Coup," also titled "No Escape," was a motion picture  
8 produced by Bold Films and distributed by The Weinstein Company,  
9 released in the United States on or about August 26, 2015.

10 19. "Dawn of the Planet of the Apes" was a motion picture  
11 produced by Chernin Entertainment and TSG Entertainment, and  
12 distributed by 20th Century Fox, released in the United States on or  
13 about July 11, 2014.

14 20. "Divergent" was a motion picture produced by Red Wagon  
15 Entertainment and Summit Entertainment, and distributed by Lionsgate,  
16 released in the United States on or about March 21, 2014.

17 21. "Earth to Echo" was a motion picture produced by Panay  
18 Films and distributed by Relativity Media, released in the United  
19 States on or about July 2, 2014.

20 22. "The Edge of Tomorrow" was a motion picture produced by  
21 Village Roadshow Pictures, among others, and distributed by Warner  
22 Bros. Pictures, released in the United States on or about June 6,  
23 2014.

24 23. "The Expendables 3" was a motion picture produced by  
25 Millennium Films, among others, and distributed by Lionsgate and 20th  
26 Century Fox, released in the United States on or about August 15,  
27 2014.

28 24. "The Fault in Our Stars" was a motion picture produced by

1 Fox 2000 Pictures, among others, and distributed by 20th Century Fox,  
2 released in the United States on or about June 6, 2014.

3 25. "Fifty Shades of Grey" was a motion picture produced by  
4 Focus Features, among others, and distributed by Universal Pictures,  
5 released in the United States on or about February 13, 2015.

6 26. "Furious 7" was a motion picture produced by Original Film,  
7 among others, and distributed by Universal Pictures, released in the  
8 United States on or about April 3, 2015.

9 27. "Godzilla" was a motion picture produced by Legendary  
10 Pictures and distributed by Warner Bros. Pictures, released in the  
11 United States on or about May 16, 2014.

12 28. "The Great Gatsby" was a motion picture produced by Village  
13 Roadshow Pictures, among others, and distributed by Warner Bros.  
14 Pictures, released in the United States on or about May 10, 2013.

15 29. "The Hobbit: The Battle of the Five Armies" was a motion  
16 picture produced by New Line Cinema, among others, and distributed by  
17 Warner Bros. Pictures, released in the United States on or about  
18 December 11, 2014.

19 30. "Horrible Bosses 2" was a motion picture produced by New  
20 Line Cinema, among others, and distributed by Warner Bros. Pictures,  
21 released in the United States on or about November 26, 2014.

22 31. "How to Train Your Dragon 2" was a motion picture produced  
23 by DreamWorks Animation and distributed by 20th Century Fox, released  
24 in the United States on or about June 13, 2014.

25 32. "Into the Storm" was a motion picture produced by New Line  
26 Cinema, among others, and distributed by Warner Bros. Pictures,  
27 released in the United States on or about August 8, 2014.

28 33. "Jane Got a Gun" was a motion picture produced by

1 Relativity Media, among others, and distributed by The Weinstein  
2 Company, released in the United States on or about January 29, 2016.

3 34. "Jessabelle" was a motion picture produced and distributed  
4 by Lionsgate, released in the United States on or about November 7,  
5 2014.

6 35. "Jupiter Ascending" was a motion picture produced by  
7 Village Roadshow Pictures, among others, and distributed by Warner  
8 Bros. Pictures, released in the United States on or about February 6,  
9 2015.

10 36. "Kingsman: The Secret Service" was a motion picture  
11 produced by Marv Films, among others, and distributed by 20th Century  
12 Fox, released in the United States on or about February 13, 2015.

13 37. "Mortdecai" was a motion picture produced by Odd Lot  
14 Entertainment, among others, and distributed by Lionsgate, released  
15 in the United States on or about January 23, 2015.

16 38. "The November Man" was a motion picture produced by Irish  
17 DreamTime, among others, and distributed by Relativity Media,  
18 released in the United States on or about August 27, 2014.

19 39. "The Other Woman" was a motion picture produced by LBI  
20 Productions and distributed by 20th Century Fox, released in the  
21 United States on or about April 25, 2014.

22 40. "Rio 2" was a motion picture produced by Blue Sky Studios  
23 and 20th Century Fox Animation, and distributed by 20th Century Fox,  
24 released in the United States on or about April 11, 2014.

25 41. "Seventh Son" was a motion picture produced by Legendary  
26 Pictures, among others, and distributed by Universal Pictures,  
27 released in the United States on or about February 6, 2015.

28 42. "Sex Tape" was a motion picture produced by Media Rights

1 Capital, among others, and distributed by Columbia Pictures, released  
2 in the United States on or about July 18, 2014.

3 43. "The Smurfs 2" was a motion picture produced by Columbia  
4 Pictures Corporation and Sony Pictures Animation, among others, and  
5 distributed by Columbia Pictures, released in the United States on or  
6 about July 31, 2013.

7 44. "Somnia," also titled "Before I Wake," was a motion picture  
8 produced by Intrepid Pictures, among others, and distributed by  
9 Relativity Media and Netflix, released in the United States on or  
10 about January 5, 2018.

11 45. "The Spongebob Movie/Sponge Out of Water" was a motion  
12 picture produced by Paramount Animation, among others, and  
13 distributed by Paramount Pictures, released in the United States on  
14 or about February 6, 2015.

15 46. "Taken 3" was a motion picture produced by EuropaCorp,  
16 among others, and distributed by 20th Century Fox, released in the  
17 United States on or about January 9, 2015.

18 47. "Turbo" was a motion picture produced by DreamWorks  
19 Animation and distributed by 20th Century Fox, released in the United  
20 States on or about July 17, 2013.

21 48. "The Walking Dead" was a television series shown on cable  
22 television channel AMC, season five of which premiered on October 12,  
23 2014.

24 49. "The Wolverine" was a motion picture produced by Marvel  
25 Entertainment and distributed by 20th Century Fox, released in the  
26 United States on or about July 26, 2013.

27 50. "X-Men: Days of Future Past" was a motion picture produced  
28 by 20th Century Fox and Marvel Entertainment, among others, and

1 distributed by 20th Century Fox, released in the United States on or  
2 about May 23, 2014.

3 51. Each of the motion pictures described in this Indictment  
4 was protected by copyright.

5 52. These Introductory Allegations and Definitions are hereby  
6 re-alleged and incorporated into each and every count of this  
7 Indictment.

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COUNT ONE

[18 U.S.C. § 371]

A. OBJECTS OF THE CONSPIRACY

Beginning on an unknown date but prior to May 5, 2013, and continuing to on or about May 20, 2015, in Los Angeles County, within the Central District of California, and elsewhere, defendants LUQMAN FAROOQ, also known as ("aka") "dark999," aka "dark9," aka "codex," aka "code.x," aka "Code X," aka "incredibl3," aka "a163a1633," aka "a163mok," aka "martin," aka "martin.x45," aka "Lucky" ("FAROOQ"); ADITYA RAJ, aka "adi," aka "Raj Aditya" ("RAJ"); SAM NHANCE, aka "Sam NhaNc3," aka "salim" ("NHANCE"); GHOBHIRAJAH SELVARAJAH, aka "Hunter," aka "Hunter X," aka "gh0bhi" ("SELVARAJAH"); and JITESH JADHAV ("JADHAV"); and others known and unknown to the Grand Jury, knowingly conspired and agreed with each other to do the following:

(1) to willfully infringe the copyrights of copyrighted works, in violation of Title 17, United States Code, Section 506(a)(1)(A), (B), and Title 18, United States Code, Section 2319(a), (b)(1), (c)(1); and

(2) to intentionally access computers without authorization and obtain information from protected computers, in violation of Title 18, United States Code, Section 1030(a)(2)(C), (c)(2)(B)(i), (ii), (iii).

B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE ACCOMPLISHED

The objects of the conspiracy were to be accomplished in substance as follows:

1. Defendants FAROOQ, RAJ, NHANCE, and SELVARAJAH, and other co-conspirators would rent computer server capacity from third-party

1 companies, such as OVH, which they would use to upload, download,  
2 store, and manipulate digital copies of motion picture assets,  
3 including partial works, samples of motion pictures, audio tracks,  
4 screen shots, and complete motion picture works.

5 2. Defendants FAROOQ, NHANCE, and SELVARAJAH, and other co-  
6 conspirators would share a PayPal account registered to defendant  
7 SELVARAJAH for, among other things, receipt of money from sales of  
8 motion picture works and for payment for the third-party servers.

9 3. Defendant FAROOQ and other co-conspirators would remotely  
10 access, without authorization, servers of motion picture production  
11 and distribution companies and third-party companies which provided  
12 data storage, access, and distribution services to motion picture  
13 production companies.

14 4. Through such access, defendant FAROOQ and other co-  
15 conspirators would download copyright-protected digital motion  
16 picture assets, that is, feature films, film trailers, television  
17 series episodes, audio tracks, and related files, to their own  
18 computers and to commercially provided servers, including the OVH  
19 Server.

20 5. Defendants FAROOQ and JADHAV, and other co-conspirators  
21 would also acquire copies of motion picture assets by other means,  
22 including by recording cinema screenings of the motion pictures, a  
23 practice known as "camcording" or "camming," and by obtaining copies  
24 of motion pictures distributed to industry professionals, known as  
25 "screeners."

26 6. Defendant FAROOQ and other co-conspirators would make  
27 additional copies of the stolen motion picture files.

28 7. In some cases, defendants FAROOQ and NHANCE, and other co-

1 conspirators would alter the properties of the files in such a way as  
2 to make them more easily distributable over the internet, or would  
3 combine audio and video files and synchronize them for later  
4 distribution or viewing.

5 8. Defendant FAROOQ and other co-conspirators would offer  
6 stolen motion picture files for sale to other persons via private  
7 electronic communications.

8 9. Defendant RAJ and other co-conspirators would also release  
9 stolen motion picture files on the internet without payment by  
10 uploading files to pirate motion picture websites.

11 10. Defendant FAROOQ and other co-conspirators would keep  
12 copies of some of the stolen motion picture files on their own  
13 digital devices and on the OVH Server.

14 11. Defendants FAROOQ, SELVARAJAH, and JADHAV, and other co-  
15 conspirators, would use the co-conspirators' shared PayPal account to  
16 receive and distribute monies from the sale of pirated motion  
17 pictures.

18 C. OVERT ACTS

19 In furtherance of the conspiracy and to accomplish its objects,  
20 defendants FAROOQ, RAJ, NHANCE, SELVARAJAH, and JADHAV, and others,  
21 committed various overt acts within the Central District of  
22 California, and elsewhere, including but not limited to the  
23 following:

24 Overt Act No. 1: On or about May 5, 2013, defendant FAROOQ  
25 asked defendant RAJ in an internet chat to put defendant FAROOQ in  
26 touch with someone in India who would camcord a screening of the  
27 motion picture "The Great Gatsby" in exchange for money.

28 Overt Act No. 2: On or about May 24, 2013, defendant FAROOQ

1 paid an unindicted co-conspirator for access to a torrent tracker  
2 used to obtain pirated copies of copyright-protected works.

3 Overt Act No. 3: On or about May 25, 2013, defendant FAROOQ  
4 instructed defendant NHANCE in an internet chat to make space on a  
5 shared computer server so that defendant FAROOQ could save a digital  
6 movie file there, and then asked defendant NHANCE to publicly release  
7 a pirated asset so as to make another piracy group angry.

8 Overt Act No. 4: On or about June 13, 2013, defendant FAROOQ  
9 accessed, without authorization, a server located in Los Angeles,  
10 California, belonging to Victim Company A, and downloaded a file  
11 containing a digital version of a trailer for the motion picture "The  
12 Wolverine" to his Compaq Computer, prior to the U.S. theatrical  
13 release of the film.

14 Overt Act No. 5: On or about June 13, 2013, defendant FAROOQ  
15 accessed, without authorization, a server located in Los Angeles,  
16 California, belonging to Victim Company A, and downloaded a file  
17 containing a digital version of a trailer for the motion picture  
18 "Turbo" to his Compaq Computer, prior to the U.S. theatrical release  
19 of the film.

20 Overt Act No. 6: On or about July 31, 2013, defendant NHANCE  
21 told defendant FAROOQ in an internet chat that defendant NHANCE was  
22 setting up a new computer server for them to share and asked  
23 defendant FAROOQ to help pay for it.

24 Overt Act No. 7: On or about July 31, 2013, defendant FAROOQ  
25 transferred money into the PayPal account shared by the co-  
26 conspirators to pay for the server.

27 Overt Act No. 8: On or about August 2, 2013, an unindicted  
28 co-conspirator camcordered a screening of the motion picture "The

1 Smurfs 2" at a theater in Bhopal, India.

2 Overt Act No. 9: On or about August 3, 2013, defendant FAROOQ  
3 sold a copy of the camcorded version of "The Smurfs 2" to a person he  
4 believed to be a customer of pirated motion pictures, but who was in  
5 fact a confidential source working with Investigative Firm A (the  
6 "CS"). Defendant FAROOQ then shared the proceeds from this sale with  
7 an unindicted co-conspirator.

8 Overt Act No. 10: On or about August 15, 2013, defendant  
9 FAROOQ, defendant NHANCE, defendant RAJ, and other co-conspirators  
10 began a subscription to the OVH Server under defendant RAJ's name for  
11 dedicated data storage space.

12 Overt Act No. 11: On or about August 27, 2013, in an internet  
13 chat, defendant NHANCE provided defendant FAROOQ the internet  
14 protocol address and login credentials for the OVH Server, and  
15 instructed defendant FAROOQ to move his files to that location, as it  
16 would be their permanent server.

17 Overt Act No. 12: On or about October 28, 2013, defendant  
18 FAROOQ told defendant RAJ in an internet chat that defendant FAROOQ  
19 was thinking of reviving a piracy group known as "TeamTNT."

20 Overt Act No. 13: On or about October 28, 2013, defendant RAJ  
21 told defendant FAROOQ in an internet chat which other members of  
22 TeamTNT were active.

23 Overt Act No. 14: On or about October 30, 2013, defendant  
24 FAROOQ told the CS in an internet chat that the content the CS  
25 purchased would be found on the OVH Server from that point forward.

26 Overt Act No. 15: On or about January 1, 2014, defendant  
27 FAROOQ told defendant RAJ in an internet chat that he wanted to get  
28 in touch with another person from whom he could buy screener copies

1 of motion pictures.

2 Overt Act No. 16: On or about January 1, 2014, defendant RAJ  
3 told defendant FAROOQ in an internet chat that he would have a friend  
4 approach the person about getting such screener copies.

5 Overt Act No. 17: On or about February 9, 2014, defendant RAJ  
6 told defendant FAROOQ in an internet chat that defendant RAJ was  
7 thinking of bringing back "BollyTNT," a piracy website specializing  
8 in Bollywood motion pictures.

9 Overt Act No. 18: On or about February 10, 2014, defendant  
10 FAROOQ told defendant RAJ in an internet chat that he still had the  
11 files for the BollyTNT site, but the domain had been blacklisted  
12 because of copyright violation claims, and suggested that they create  
13 a new domain.

14 Overt Act No. 19: Between on or about April 12, 2014 and on or  
15 about July 20, 2014, defendant FAROOQ and other co-conspirators  
16 accessed, without authorization, a server located in El Segundo,  
17 California, belonging to Victim Company B, and downloaded, primarily  
18 via TOR nodes, approximately 142 digital files of motion picture-  
19 related assets, including video files of the motion pictures  
20 "Divergent," "Godzilla" (working title "Nautilus"), "Seventh Son,"  
21 "Jane Got a Gun," "Jessabelle," "The November Man," "The Coup,"  
22 "Mortdecai," and the first five episodes of Season Five of "The  
23 Walking Dead," prior to the U.S. theatrical or broadcast releases of  
24 these assets.

25 Overt Act No. 20: On or about April 30, 2014, defendant FAROOQ  
26 accessed, without authorization, a server located in Los Angeles,  
27 California belonging to Victim Company A and downloaded a file  
28 containing a digital version of the motion picture "How to Train Your

1 Dragon 2" to his Compaq Computer, prior to the U.S. theatrical  
2 release of the film.

3 Overt Act No. 21: On or about May 2, 2014, defendant JADHAV or  
4 another co-conspirator camcordered a screening of the motion picture  
5 "The Amazing Spider-Man 2" at a theater in Bhopal, India.

6 Overt Act No. 22: On or about May 3, 2014, defendant FAROOQ  
7 sold the CS and Investigative Firm A a copy of the camcordered version  
8 of "The Amazing Spider-Man 2."

9 Overt Act No. 23: On or about May 3, 2014, defendant FAROOQ  
10 transferred part of the funds from this sale of "The Amazing Spider-  
11 Man 2" from the co-conspirators' shared PayPal account to his own  
12 PayPal account.

13 Overt Act No. 24: On or about May 3, 2014, defendant JADHAV  
14 received the remainder of the funds from this sale of "The Amazing  
15 Spider-Man 2" from the co-conspirators' shared PayPal account.

16 Overt Act No. 25: On or about May 14, 2014, in an email  
17 communication, defendant FAROOQ offered to sell the CS a copy of the  
18 motion picture "Godzilla."

19 Overt Act No. 26: On or about May 18, 2014, in an email  
20 communication, defendant FAROOQ told the CS that a sample of the  
21 motion picture "Godzilla" was available for download from the OVH  
22 Server.

23 Overt Act No. 27: On or about May 23, 2014, defendant JADHAV  
24 or another co-conspirator camcordered a screening of the motion picture  
25 "X-Men: Days of Future Past" at a theater in Bhopal, India.

26 Overt Act No. 28: On or about May 24, 2014, defendant FAROOQ  
27 sold the CS and Investigative Firm A a copy of the camcordered version  
28 of "X-Men: Days of Future Past."

1           Overt Act No. 29:    On or about May 25, 2014, defendant JADHAV  
2 received the funds from this sale of "X-Men: Days of Future Past"  
3 from the co-conspirators' shared PayPal account.

4           Overt Act No. 30:    On or about May 25, 2014, defendant  
5 SELVARAJAH told defendant FAROOQ in an internet chat that defendant  
6 RAJ had already restarted the BollyTNT website.

7           Overt Act No. 31:    On or about May 25, 2014, defendant FAROOQ  
8 told defendant SELVARAJAH in an internet chat that the BollyTNT  
9 website's appearance was not good.

10          Overt Act No. 32:    On or about May 25, 2014, defendant FAROOQ  
11 and defendant SELVARAJAH discussed in an internet chat that there  
12 were problems with the co-conspirators' shared server, and that  
13 defendant NHANCE was unhappy that defendant FAROOQ had not been  
14 providing money for the server.

15          Overt Act No. 33:    On or about May 25, 2014, defendant FAROOQ  
16 transferred money from his own PayPal account into the PayPal account  
17 shared by the co-conspirators.

18          Overt Act No. 34:    On or about May 27, 2014, defendant FAROOQ  
19 accessed, without authorization, a server located in Los Angeles,  
20 California belonging to Victim Company A and downloaded a file  
21 entitled "assetproperties.xml" to his Compaq Computer.

22          Overt Act No. 35:    On or about May 28, 2014, defendant FAROOQ  
23 or another co-conspirator accessed, without authorization, a server  
24 located in Los Angeles, California belonging to Victim Company A and  
25 downloaded to the OVH Server files containing digital versions of the  
26 motion pictures "Rio 2" and "The Other Woman."

27          Overt Act No. 36:    On or about May 29, 2014, defendant FAROOQ  
28 copied the same files containing copies of the motion pictures "Rio



1 2" and "The Other Woman" to his Compaq Computer.

2 Overt Act No. 37: On or about May 29, 2014, in an internet  
3 chat, defendant FAROOQ told the CS that defendant FAROOQ had high-  
4 quality copies of the motion pictures "Rio 2" and "The Other Woman."

5 Overt Act No. 38: On or about June 2, 2014, defendant FAROOQ  
6 created a file containing a digital version of the motion picture  
7 "Seventh Son," bearing the watermarks "DAX" and "Property of  
8 Legendary," on the WD External Hard Drive, prior to the U.S.  
9 theatrical release of the film.

10 Overt Act No. 39: On or about June 3, 2014, defendant FAROOQ  
11 provided the CS a sample of the motion picture "Seventh Son," bearing  
12 the watermarks "DAX" and "Property of Legendary."

13 Overt Act No. 40: On or about June 5, 2014, defendant FAROOQ  
14 told the CS in an internet chat that he had copies of the motion  
15 pictures "Jessabelle," "The Coup," "Jane Got a Gun," "Earth to Echo,"  
16 "The Amazing Spider-man 2," "Taken 3," "As Above So Below," "22 Jump  
17 Street," "Godzilla," "The Hobbit: The Battle of the Five Armies," and  
18 "Kingsman: The Secret Service," but that it was very risky for him to  
19 share them.

20 Overt Act No. 41: On or about June 9, 2014, defendant FAROOQ  
21 told the CS in an internet chat that he had high-quality copies of  
22 the motion pictures "Rio 2" and "The Fault in Our Stars."

23 Overt Act No. 42: On or about June 15, 2014, defendant FAROOQ  
24 told the CS in an internet chat that he had work prints of the motion  
25 pictures "The November Man," "The Coup," "Jessabelle," "Taken 3" and  
26 "The Hobbit," as well as video for the motion picture "Edge of  
27 Tomorrow" and audio for the motion picture "Sex Tape."

28 Overt Act No. 43: On or about June 21, 2014, defendant FAROOQ

1 created two files containing digital versions of the motion picture  
2 "Jane Got a Gun," one on the WD External Hard Drive and one on the  
3 OVH Server, prior to the U.S. theatrical release of the film.

4 Overt Act No. 44: On or about June 30, 2014, defendant FAROOQ  
5 told the CS in an internet chat that he had copies of the motion  
6 pictures "Mortdecai" and "Jane Got a Gun" available, and said that he  
7 and other co-conspirators would be obtaining a copy of "Dawn of the  
8 Planet of the Apes."

9 Overt Act No. 45: On or about July 4, 2014, defendant FAROOQ  
10 or another co-conspirator accessed, without authorization, a server  
11 located in Burbank, California belonging to Victim Company C and  
12 downloaded to the OVH Server and defendant FAROOQ's Compaq Computer  
13 digital files containing versions of the motion picture "The Edge of  
14 Tomorrow."

15 Overt Act No. 46: On or about July 11, 2014, defendant JADHAV  
16 or another co-conspirator camcordered a screening of the motion picture  
17 "Dawn of the Planet of the Apes" at a theater in Bhopal, India.

18 Overt Act No. 47: On or about July 17, 2014, defendant FAROOQ  
19 sold the CS and Investigative Firm A a copy of the camcordered version  
20 of "Dawn of the Planet of the Apes."

21 Overt Act No. 48: On or about July 20, 2014, defendant FAROOQ  
22 or another co-conspirator accessed, without authorization, a server  
23 located in El Segundo, California belonging to Victim Company B and  
24 downloaded via a TOR node a digital file containing a version of the  
25 motion picture "The Expendables 3," prior to the U.S. theatrical  
26 release of the film.

27 Overt Act No. 49: On or about July 20, 2014, defendant FAROOQ  
28 or another co-conspirator created eight linked, or "daisy-chained,"

1 files within a directory on the OVH Server, which, when reassembled,  
2 were a modified version of the motion picture "The Expendables 3."

3 Overt Act No. 50: On or about July 20, 2014, defendant FAROOQ  
4 sent an email to the CS offering to sell the CS a studio print of the  
5 motion picture "The Expendables 3."

6 Overt Act No. 51: On or about July 20, 2014, defendant FAROOQ  
7 created two files containing digital versions of the motion picture  
8 "The Expendables 3," one on his Compaq Computer and one on the WD  
9 External Hard Drive.

10 Overt Act No. 52: On or about July 21, 2014, defendant FAROOQ  
11 told defendant SELVARAJAH in an internet chat that he had acquired a  
12 copy of the motion picture "The Expendables 3" and that it "might  
13 leak."

14 Overt Act No. 53: On or about July 22, 2014, defendant FAROOQ  
15 or another co-conspirator created 30 daisy-chained password-protected  
16 files within a directory on the OVH Server, which, when reassembled,  
17 were a version of the motion picture "The Expendables 3."

18 Overt Act No. 54: On or about July 23, 2014, defendant FAROOQ  
19 sold the CS and Investigative Firm A a copy of the motion picture  
20 "The Expendables 3," prior to the U.S. theatrical release of the  
21 film.

22 Overt Act No. 55: On or about August 2, 2014, in email  
23 communications, defendant FAROOQ offered to sell the CS copies of the  
24 motion pictures "The November Man," "Jessebelle," and "Seventh Son."

25 Overt Act No. 56: On or about August 3, 2014, defendant FAROOQ  
26 created a file containing a digital version of the motion picture  
27 "Jessabelle" on the WD External Hard Drive, prior to the U.S.  
28 theatrical release of the film.

1           Overt Act No. 57:    On or about August 5, 2014, defendant FAROOQ  
2 sold the CS and Investigative Firm A copies of the motion pictures  
3 "Jessabelle" and "Seventh Son," prior to the U.S. theatrical release  
4 of the films, and placed a sample of the motion picture "The November  
5 Man" on the OVH Server for the CS to view.

6           Overt Act No. 58:    On or about August 5, 2014, in email  
7 communications, defendant FAROOQ offered to sell the CS a studio  
8 screener copy of the motion picture "Into the Storm."

9           Overt Act No. 59:    On or about August 12, 2014, defendant  
10 FAROOQ sold the CS and Investigative Firm A a copy of the motion  
11 picture "Into the Storm," a few days after the U.S. theatrical  
12 release of the film.

13           Overt Act No. 60:    On or about August 13, 2014, in email  
14 communications, defendant FAROOQ told the CS that he had a copy of  
15 the motion picture "Somnia" for sale.

16           Overt Act No. 61:    On or about August 19, 2014, defendant  
17 FAROOQ created a file containing a digital version of the motion  
18 picture "The November Man" on the WD External Hard Drive, prior to  
19 the U.S. theatrical release of the film.

20           Overt Act No. 62:    On or about August 20, 2014, defendant  
21 FAROOQ sold the CS and Investigative Firm A a copy of the motion  
22 picture "The November Man," prior to the U.S. theatrical release of  
23 the film.

24           Overt Act No. 63:    On or about August 20, 2014, defendant  
25 FAROOQ transferred a portion of the funds from this sale of "The  
26 November Man" into his own PayPal account.

27           Overt Act No. 64:    On or about August 20, 2014, defendant  
28 SELVARAJAH transferred the remaining portion of the funds from this

1 sale of "The November Man" into his own bank account.

2 Overt Act No. 65: On or about August 30, 2014, defendant  
3 FAROOQ or another co-conspirator created a file containing a digital  
4 version of the motion picture "How to Train Your Dragon 2" on the OVH  
5 Server.

6 Overt Act No. 66: On or about September 7, 2014, defendant  
7 FAROOQ created a file on the WD External Hard Drive containing a  
8 digital version of the motion picture "Somnia," prior to the U.S.  
9 theatrical release of the film.

10 Overt Act No. 67: On or about September 11, 2014, in an email  
11 communication, defendant FAROOQ told the CS that he had uploaded  
12 files containing a copy of the motion picture "Somnia" and instructed  
13 the CS to transfer funds into defendant FAROOQ's PayPal account for  
14 payment for the film.

15 Overt Act No. 68: On or about September 11, 2014, defendant  
16 FAROOQ created a file on the WD External Hard Drive containing a  
17 digital version of the motion picture "The Coup," bearing the  
18 watermark "Property of Bold Films," prior to the U.S. theatrical  
19 release of the film.

20 Overt Act No. 69: On or about September 11, 2014, defendant  
21 FAROOQ uploaded a sample of the motion picture "The Coup," bearing  
22 the watermark "Property of Bold Films," for the CS, and provided a  
23 password to download the file in an email communication to the CS.

24 Overt Act No. 70: On or about September 13, 2014, defendant  
25 FAROOQ provided the CS and Investigative Firm A the password to  
26 download a copy of the motion picture "Somnia," prior to the U.S.  
27 theatrical release of the film.

28 Overt Act No. 71: On or about September 14, 2014, defendant

1 FAROOQ created a file on the WD External Hard Drive containing a  
2 digital version of the motion picture "Mortdecai," bearing the  
3 watermarks "Property of Lionsgate" and "For LG 06-13-14," prior to  
4 the U.S. theatrical release of the film.

5 Overt Act No. 72: On or about September 14, 2014, defendant  
6 FAROOQ, in an email communication, told the CS that he had uploaded a  
7 sample of the motion picture "Mortdecai" and provided the password to  
8 download the file.

9 Overt Act No. 73: On or about September 14, 2014, defendant  
10 FAROOQ created a file on the WD External Hard Drive containing a  
11 digital version of the motion picture "The Coup," bearing the  
12 watermark "Property of Bold Films," prior to the U.S. theatrical  
13 release of the film.

14 Overt Act No. 74: On or about September 14, 2014, defendant  
15 FAROOQ, in an email communication, told the CS that he had acquired  
16 copies of the first two episodes of season five of the television  
17 series "The Walking Dead."

18 Overt Act No. 75: On or about September 16, 2014, defendant  
19 FAROOQ sold the CS and Investigative Firm A a copy of the motion  
20 picture "Mortdecai," prior to the U.S. theatrical release of the  
21 film, and directed in an email communication that funds be paid into  
22 defendant FAROOQ's PayPal account.

23 Overt Act No. 76: On or about September 16, 2014, defendant  
24 FAROOQ created a file on the WD External Hard Drive containing a  
25 version of the season five premiere of the television series "The  
26 Walking Dead," bearing the watermark "Property of TWD V Productions  
27 LLC & Stalwart Films LLC AMC2 07-03-2014," prior to the broadcast  
28 date of the episode.

1           Overt Act No. 77:    On or about September 16, 2014, defendant  
2 FAROOQ created a file on the WD External Hard Drive containing a  
3 modified version of the season five premiere of the television series  
4 "The Walking Dead," bearing the watermark "Property of TWD V  
5 Productions LLC & Stalwart Films LLC AMC2 07-03-2014," prior to the  
6 broadcast date of the episode.

7           Overt Act No. 78:    On or about September 16, 2014, defendant  
8 FAROOQ created a file on the WD External Hard Drive containing a  
9 second modified version of the season five premiere of the television  
10 series "The Walking Dead," bearing the watermark "Property of TWD V  
11 Productions LLC & Stalwart Films LLC AMC2 07-03-2014," prior to the  
12 broadcast date of the episode.

13           Overt Act No. 79:    On or about September 16, 2014, defendant  
14 FAROOQ told the CS in an email communication that he had uploaded a  
15 version of the season five premiere of the television series "The  
16 Walking Dead," and provided a password to download the file.

17           Overt Act No. 80:    On or about September 16, 2014, defendant  
18 FAROOQ created a file on the WD External Hard Drive containing a  
19 version of the second episode of season five of the television series  
20 "The Walking Dead," bearing the watermark "Property of TWD V  
21 Productions LLC & Stalwart Films LLC 502 Director's Cut 06-12-14,"  
22 prior to the broadcast date of the episode.

23           Overt Act No. 81:    On or about September 16, 2014, defendant  
24 FAROOQ created a file on the WD External Hard Drive containing a  
25 modified version of the second episode of season five of the  
26 television series "The Walking Dead," bearing the watermark "Property  
27 of TWD V Productions LLC & Stalwart Films LLC 502 Director's Cut 06-  
28 12-14," prior to the broadcast date of the episode.

1           Overt Act No. 82:    On or about September 25, 2014, defendant  
2 FAROOQ told the CS in an email communication that he had acquired a  
3 total of five episodes of the television series "The Walking Dead."

4           Overt Act No. 83:    On or about October 2, 2014, defendant  
5 JADHAV or another co-conspirator camcordered a screening of the motion  
6 picture "Bang Bang" at a theater in Bhopal, India.

7           Overt Act No. 84:    On or about October 3, 2014, defendant  
8 SELVARAJAH received payment from Investigative Firm A in exchange for  
9 the camcordered version of the motion picture "Bang Bang."

10          Overt Act No. 85:    On or about October 5, 2014, defendant  
11 FAROOQ created a file on the WD External Hard Drive containing a  
12 digital version of the motion picture "Annabelle," bearing the Warner  
13 Bros. Pictures forensic watermark "DETE payload 841," approximately  
14 two days after the U.S. theatrical release of the film.

15          Overt Act No. 86:    On or about October 5, 2014, defendant  
16 FAROOQ told the CS in email communications that he had obtained a  
17 high-definition print of the motion picture "Annabelle," that it  
18 could be released publicly after one week, and that defendant FAROOQ  
19 had uploaded a sample for the CS to download.

20          Overt Act No. 87:    On or about November 27, 2014, defendant  
21 FAROOQ told the CS in an email communication that he and other co-  
22 conspirators had released six Sony Oscar DVD screeners to pirate  
23 release groups.

24          Overt Act No. 88:    On or about November 29, 2014, defendant  
25 FAROOQ told the CS in an email communication that he had obtained a  
26 studio screener copy of the motion picture "Horrible Bosses 2" and  
27 would sell it to the CS.

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1           Overt Act No. 89:    On or about December 2, 2014, defendant  
2 FAROOQ created a file on the WD External Hard Drive containing a  
3 digital version of the motion picture "Horrible Bosses 2,"  
4 approximately six days after the U.S. theatrical release of the film.

5           Overt Act No. 90:    On or about December 2, 2014, defendant  
6 FAROOQ told the CS in an email communication that he had uploaded a  
7 sample of the motion picture "Horrible Bosses 2" for the CS to  
8 download.

9           Overt Act No. 91:    On or about December 4, 2014, defendant  
10 FAROOQ sold the CS and Investigative Firm A a copy of the motion  
11 picture "Horrible Bosses 2."

12           Overt Act No. 92:    On or about February 7, 2015, defendant  
13 FAROOQ created a file on the WD External Hard Drive containing a  
14 digital version of the motion picture "Jupiter Ascending,"  
15 approximately one day after the U.S. theatrical release of the film.

16           Overt Act No. 93:    On or about February 7, 2015, defendant  
17 FAROOQ told the CS in an email communication that he had obtained a  
18 studio screener version of the motion picture "Jupiter Ascending."

19           Overt Act No. 94:    On or about February 9, 2015, defendant  
20 FAROOQ told the CS in an email communication that he and other co-  
21 conspirators would be offering copies of the motion pictures  
22 "Kingsman: The Secret Service" and "Fifty Shades of Grey" for sale  
23 the same day as the U.S. theatrical release of both films.

24           Overt Act No. 95:    On or about February 12, 2015, defendant  
25 FAROOQ sold the CS and Investigative Firm A a copy of the motion  
26 picture "Jupiter Ascending," and told the CS in an email  
27 communication to make payment into defendant FAROOQ's own PayPal  
28 account.

1           Overt Act No. 96:    On or about February 17, 2015, defendant  
2 FAROOQ told the CS in email communications that he and other co-  
3 conspirators had acquired and were willing to sell a studio screener  
4 of the motion picture "Kingsman: The Secret Service."

5           Overt Act No. 97:    On or about February 18, 2015, defendant  
6 FAROOQ sold the CS and Investigative Firm A a copy of the motion  
7 picture "Kingsman: The Secret Service," and told the CS in an email  
8 communication to make payment into defendant FAROOQ's own PayPal  
9 account.

10          Overt Act No. 98:    On or about March 23, 2015, defendant FAROOQ  
11 accessed, without authorization, a server located in the United  
12 Kingdom belonging to Victim Company D, and downloaded to his Compaq  
13 Computer copies of digital files containing the motion pictures  
14 "Furious 7," "The Spongebob Movie/Sponge Out of Water," and  
15 "Blackhat."

16          Overt Act No. 99:    On or about March 23, 2015, defendant FAROOQ  
17 told the CS in an email communication that a copy of the motion  
18 picture "Furious 7" would be available for sale in two days, from  
19 which additional copies could be made and released to publicly, and  
20 that he and his co-conspirators were currently processing the file to  
21 their virtual host.

22          Overt Act No. 100:   On or about March 25, 2015, defendant FAROOQ  
23 told his wife via a text application that he would be watching  
24 "Furious 7" when he got home, and that she would be the first one to  
25 watch it in the United Kingdom before it was publicly released on  
26 April 5, 2015.

27          Overt Act No. 101:   On or about March 26, 2015, defendant FAROOQ  
28 told the CS in an email communication that the files for the motion

1 picture "Furious 7" were ready, and that the CS should make payment  
2 into defendant FAROOQ's own PayPal account.

3 Overt Act No. 102: On or about March 27, 2015, defendant FAROOQ  
4 sold the CS and Investigative Firm A a ten-gigabyte copy of the  
5 motion picture "Furious 7," prior to the U.S. theatrical release of  
6 the film.

7 Overt Act No. 103: On March 27 2015, defendant FAROOQ told the  
8 CS in an email communication that the motion picture "Blackhat" would  
9 be available for purchase in the future.

10 Overt Act No. 104: On or about March 28, 2015, defendant FAROOQ  
11 sold the CS and Investigative Firm A a 160-gigabyte copy of the  
12 motion picture "Furious 7," prior to the U.S. theatrical release of  
13 the film.

14 Overt Act No. 105: On or about April 9, 2015, defendant FAROOQ  
15 possessed digital files containing copies of multiple copyrighted  
16 motion picture assets on devices in his residence, including the  
17 following: "Horrible Bosses 2," "Into the Storm," "Annabelle,"  
18 "Godzilla," "Jupiter Ascending," "The Edge of Tomorrow," "Furious 7,"  
19 "The Expendables 3," "Seventh Son," "Jessabelle," "Jane Got a Gun,"  
20 "Mortdecai," "The Coup," "The November Man," "Somnia," and episodes  
21 of "The Walking Dead."

22 Overt Act No. 106: On or about May 20, 2015, defendants FAROOQ,  
23 RAJ, NHANCE, and SELVARAJAH, and other co-conspirators, possessed  
24 approximately 25,000 digital files relating to motion picture assets  
25 on the OVH Server, including copies of the following films: "The  
26 Expendables 3," "Jessabelle," "Mortdecai," "Seventh Son," "The  
27 November Man," "The Coup," "Jane Got a Gun," "The Walking Dead/Season  
28 Five," "Somnia," "Horrible Bosses 2," "The Edge of Tomorrow,"

1 "Godzilla," "Jupiter Ascending," "How to Train Your Dragon 2," "Rio  
2 2," and "The Other Woman."

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COUNT TWO

[18 U.S.C. § 1030(a)(2)(C), (c)(2)(B)(i), (ii), (iii)]

From on or about June 13, 2013, through on or about May 28, 2014, in Los Angeles County, within the Central District of California, and elsewhere, defendant LUQMAN FAROOQ, also known as ("aka") "dark999," aka "dark9," aka "codex," aka "code.x," aka "Code X," aka "incredibl3," aka "a163a1633," aka "a163mok," aka "martin," aka "martin.x45," aka "Lucky," together with others, intentionally accessed a computer without authorization, and thereby obtained information, the value of which exceeded \$5,000, namely, digital files of versions of motion picture assets, including "Wolverine," "Turbo," "How to Train Your Dragon 2," "The Other Woman," and "Rio 2," from a protected computer, as that term is defined in Title 18, United States Code, Section 1030(e)(2), that is, servers of Victim Company A, in furtherance of a criminal act, to wit, copyright infringement, in violation of Title 17, United States Code, Section 506(a)(1), and Title 18, United States Code, Section 2319(a), and Grand Theft, in violation of California Penal Code Section 487, for purposes of commercial advantage and private financial gain.

COUNT THREE

[18 U.S.C. § 1028A(a)(1)]

From on or about June 13, 2013, through on or about May 28, 2014, in Los Angeles County, within the Central District of California, and elsewhere, defendant LUQMAN FAROOQ, also known as ("aka") "dark999," aka "dark9," aka "codex," aka "code.x," aka "Code X," aka "incredibl3," aka "a163a1633," aka "a163mok," aka "martin," aka "martin.x45," aka "Lucky" ("FAROOQ"), together with others, knowingly transferred, possessed, and used, without lawful authority, means of identification that defendant FAROOQ knew belonged to other persons, namely, C.Z. and P.C., during and in relation to the offense of Unauthorized Access to a Computer to Obtain Information, a felony violation of Title 18, United States Code, Section 1030(a)(2)(C), (c)(2)(B)(i), (ii), (iii), as charged in Count Two of this Indictment.

COUNT FOUR

[18 U.S.C. § 1030(a)(2)(C), (c)(2)(B)(i), (ii), (iii)]

From on or about April 12, 2014, through on or about July 20, 2014, in Los Angeles County, within the Central District of California, and elsewhere, defendant LUQMAN FAROOQ, also known as ("aka") "dark999," aka "dark9," aka "codex," aka "code.x," aka "Code X," aka "incredibl3," aka "a163a1633," aka "a163mok," aka "martin," aka "martin.x45," aka "Lucky," together with others, intentionally accessed a computer without authorization, and thereby obtained information, the value of which exceeded \$5,000, namely, approximately 142 digital files of motion picture assets, including "Seventh Son," "Jane Got a Gun," "The Expendables 3," "Jessabelle," "The November Man," "The Coup," "Mortdecai," and the first five episodes of season five of "The Walking Dead," from a protected computer, as that term is defined in Title 18, United States Code, Section 1030(e)(2), that is, servers of Victim Company B, in furtherance of a criminal act, to wit, copyright infringement, in violation of Title 17, United States Code, Section 506(a)(1), and Title 18, United States Code, Section 2319(a), and Grand Theft, in violation of California Penal Code Section 487, for purposes of commercial advantage and private financial gain.

COUNT FIVE

[18 U.S.C. § 1028A(a)(1)]

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2  
3 From on or about April 12, 2014, through on or about July 20,  
4 2014, in Los Angeles County, within the Central District of  
5 California, and elsewhere, defendant LUQMAN FAROOQ, also known as  
6 ("aka") "dark999," aka "dark9," aka "codex," aka "code.x," aka "Code  
7 X," aka "incredibl3," aka "a163a1633," aka "a163mok," aka "martin,"  
8 aka "martin.x45," aka "Lucky" ("FAROOQ"), together with others,  
9 knowingly transferred, possessed, and used, without lawful authority,  
10 means of identification that defendant FAROOQ knew belonged to  
11 another person, namely, B.M., during and in relation to the offense  
12 of Unauthorized Access to a Computer to Obtain Information, a felony  
13 violation of Title 18, United States Code, Section 1030(a)(2)(C),  
14 (c)(2)(B)(i), (ii), (iii), as charged in Count Four of this  
15 Indictment.



COUNT SIX

[17 U.S.C. § 506(a)(1)(A), (a)(1)(B) and  
18 U.S.C. § 2319(a), (b)(1), (c)(1)]

Between or about April 12, 2014, and on or about September 30, 2014, in Los Angeles County, within the Central District of California, and elsewhere, defendant LUQMAN FAROOQ, also known as ("aka") "dark999," aka "dark9," aka "codex," aka "code.x," aka "Code X," aka "incredibl3," aka "a163a1633," aka "a163mok," aka "martin," aka "martin.x45," aka "Lucky," together with others, willfully infringed the copyrights of copyrighted works, namely approximately 142 motion picture assets downloaded from the servers of Victim Company B, including "Divergent," "Godzilla" (working title "Nautilus"), "Seventh Son," "Jane Got a Gun," "The Expendables 3," "Jessabelle," "The November Man," "The Coup," "Mortdecai," and the first five episodes of season five of "The Walking Dead," for commercial advantage and private financial gain, by the reproduction and distribution, including by electronic means, during a 180-day period, of at least ten copies of one or more copyrighted works, their retail value together totaling more than \$2,500.

COUNT SEVEN

[18 U.S.C. § 1030(a)(2)(C), (c)(2)(B)(i), (ii), (iii)]

On or about July 4, 2014, in Los Angeles County, within the Central District of California, and elsewhere, defendant LUQMAN FAROOQ, also known as ("aka") "dark999," aka "dark9," aka "codex," aka "code.x," aka "Code X," aka "incredibl3," aka "a163a1633," aka "a163mok," aka "martin," aka "martin.x45," aka "Lucky," together with others, intentionally accessed a computer without authorization, and thereby obtained information, the value of which exceeded \$5,000, namely, a digital file containing a version of the motion picture asset "Edge of Tomorrow," from a protected computer, as that term is defined in Title 18, United States Code, Section 1030(e)(2), namely, servers of Victim Company C, in furtherance of a criminal act, to wit, copyright infringement, in violation of Title 17, United States Code, Section 506(a)(1), and Title 18, United States Code, Section 2319(a), and Grand Theft, in violation of California Penal Code

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1 Section 487, for purposes of commercial advantage and private  
2 financial gain.

3  
4 A TRUE BILL

5  
6 Foreperson

7  
8 NICOLA T. HANNA  
9 United States Attorney

10  
11 PATRICK R. FITZGERALD  
12 Assistant United States Attorney  
13 Chief, National Security Division

14 RYAN WHITE  
15 Assistant United States Attorney  
16 Chief, Cyber & Intellectual  
17 Property Crimes Section

18 CAMERON L. SCHROEDER  
19 Assistant United States Attorney  
20 Cyber & Intellectual Property  
21 Crimes Section