

AB: CMP/MBM
F.#2010R02203

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U.S. DISTRICT COURT E.D.N.Y
★ NOV 18 2010 ★

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

BROOKLYN OFFICE

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UNITED STATES OF AMERICA

- against -

LIN MUN POO,

Defendant.

I N D I C T M E N T

CR 10 - 891

Cr. No. (T. 18, U.S.C., §§
1028A(a) (1), 1028A(b),
1028A(c) (4), 1029(a) (3),
1029(c) (1) (A) (i),
1030(a) (2) (B),
1030(a) (5) (A), 1030(b),
1030(c) (2) (B) (i),
1030(c) (4) (B), 2 and
3551 et seq.)

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THE GRAND JURY CHARGES:

IRIZARRY, J.
JARTER, M.J.

COUNT ONE
(Access Device Fraud)

1. In or about October 2010, within the Eastern District of New York and elsewhere, the defendant LIN MUN POO, together with others, did knowingly and with intent to defraud possess fifteen or more unauthorized access devices, to wit: credit and debit card account numbers, in a manner affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 1029(a) (3), 1029(c) (1) (A) (i), 2 and 3551 et seq.)

COUNT TWO
(Aggravated Identity Theft)

2. In or about October 2010, within the Eastern District of New York and elsewhere, the defendant LIN MUN POO, together with others, during and in relation to the crime charged in Count One, did knowingly and intentionally possess, without lawful authority, means of identification of one or more persons, to wit: credit and debit card account numbers of individuals, knowing that the means of identification belonged to said persons.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), 1028A(c)(4), 2 and 3551 et seq.)

COUNT THREE
(Unlawful Transmission of Computer Code and Commands -
Federal Reserve Bank)

3. In or about and between April 2010 and October 2010, both dates being approximate and inclusive, within the Northern District of Ohio and elsewhere, the defendant LIN MUN POO, together with others, did knowingly and intentionally cause and attempt to cause the transmission of one or more programs, information, codes and commands, to wit: malicious codes and commands, and as a result of such conduct, did intentionally cause damage without authorization to one or more protected computers, to wit: computers of the Federal Reserve Bank, which offense caused, and if completed would have caused, loss to one

or more persons during a one-year period aggregating at least \$5,000 in value, and damage affecting ten or more protected computers during a one-year period.

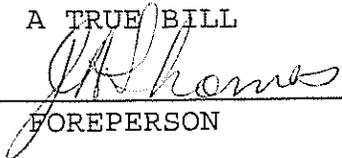
(Title 18, United States Code, Sections 1030(a)(5)(A), 1030(b), 1030(c)(4)(B), 2 and 3551 et seq.)

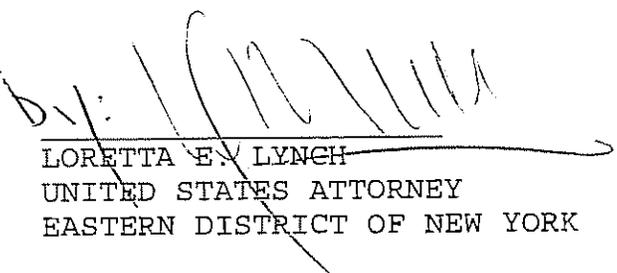
COUNT FOUR
(Unauthorized Computer Access
Involving Government Information)

4. In or about and between April 2010 and October 2010, both dates being approximate and inclusive, within the Northern District of Ohio and elsewhere, the defendant LIN MUN POO, together with others, did knowingly and intentionally access and attempt to access one or more computers without authorization, to wit: computers of the Federal Reserve Bank, and thereby obtained and attempted to obtain information from a department and agency of the United States, to wit: the Federal Reserve Bank, which offense was committed for the purpose of commercial advantage and private financial gain.

(Title 18, United States Code, Sections 1030(a)(2)(B), 1030(b), 1030(c)(2)(B)(i), 2 and 3551 et seq.)

A TRUE BILL


FOREPERSON


LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK