

the card holders' identification information, and the authentication features for the credit cards known as the Card Verification Values (CVV), and by transferring and posting the hyperlink, **Brown** caused the data to be made available to other persons online without the knowledge and authorization of Stratfor Global Intelligence and the card holders.

In violation of 18 U.S.C. §§ 2 and 1028(a)(2), (b)(1)(B), and (c)(3)(A).

Count Two
Access Device Fraud
(18 U.S.C. §§ 1029(a)(3) and (c)(1)(A)(i))
Aid and Abet
(18 U.S.C. § 2)

From on or about December 25, 2011, through at least on or about March 6, 2012, in the Dallas Division of the Northern District of Texas and elsewhere, defendant **Barrett Lancaster Brown**, aided and abetted by persons known and unknown to the Grand Jury, with intent to defraud did possess at least fifteen and more devices unauthorized access devices in and affecting interstate and foreign commerce, in that **Brown** possessed stolen credit card account numbers and the authentication features for the credit cards known as the Card Verification Values (CVV) without the knowledge and authorization of the card holders.

In violation of 18 U.S.C. §§ 2 and 1029(a)(3), and (c)(1)(A)(i).

Counts Two Through Twelve
 Aggravated Identity Theft
 (18 U.S.C. §§ 1028A(a)(1))
 Aid and Abet
 (18 U.S.C. § 2)

From on or about December 25, 2011 through at least on or about March 6, 2012, in the Dallas Division of the Northern District of Texas and elsewhere, defendant **Barrett Lancaster Brown**, aided and abetted by persons known and unknown to the Grand Jury, during and in relation to a felony violation of 18 U.S.C. § 1028(a)(2), knowingly transferred and possessed without lawful authority the means of identification of the persons below referenced, said means of identification consisting of the credit card account numbers; the corresponding authentication features for the credit cards known as the Card Verification Values (CVV); the card holders' names and usernames for online account access; and the card holders' physical addresses, phone numbers, and email addresses.


COUNT	CARD HOLDER	CITY, STATE	AMERICAN EXPRESS CC # (last four digits)	CC CVV (redacted)
3	BM	Houston, TX	5003	4*87
4	CD	Dallas, TX	4011	9*71
5	BH	Spicewood, TX	1007	4*28
6	BL	Galveston, TX	2004	4*20
7	BS	Dallas, TX	1009	8*55
8	BC	Dallas, TX	3009	4*10

9	BW	Dallas, TX	2732	7*16
10	MT	Coco Beach, FL	4007	9*98

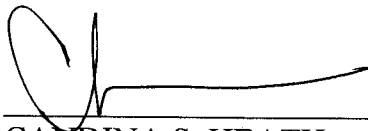
COUNT	CARD HOLDER	CITY, STATE	MASTER CARD CC # (last four digits)	CC CVV (redacted)
11	KR	Tucson, AZ	6394	4*8
12	BJ	Richardson, TX	6444	4*3

In violation of 18 U.S.C. §§ 2 and 1028A(a)(1).

A TRUE BILL:


 FOREPERSON

SARAH R. SALDAÑA
 UNITED STATES ATTORNEY



CANDINA S. HEATH
 Assistant United States Attorney
 Northern District of Texas
 State of Texas Bar No. 09347450
 1100 Commerce Street, 3rd Floor
 Dallas, Texas 75242
 office: 214.659.8600
 fax: 214.659.8805
 candina.heath@usdoj.gov

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

BARRETT LANCASTER BROWN (1)

INDICTMENT

18 U.S.C. §§ 1028(a)(2), (b)(1)(B), and (c)(3)(A); 18 U.S.C. § 2
Traffic in Stolen Authentication Features; and Aid and Abet

18 U.S.C. §§ 1029(a)(3) and (c)(1)(A)(i); and 18 U.S.C. § 2
Access Device Fraud; and Aid and Abet

18 U.S.C. §§ 1028A(a)(1); and 18 U.S.C. § 2
Aggravated Identity Theft; and Aid and Abet

12 Counts

A true bill rendered

DALLAS

Andrew L. Fuggle
FOREPERSON

Filed in open court this 4 day of December, 2012

Clerk

Defendant already in Federal Custody since 9/13/12 at Mansfield

[Signature]

UNITED STATES DISTRICT/MAGISTRATE JUDGE

Magistrate Case pending 3:12-MJ-405