

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

UNITED STATES OF AMERICA) Criminal No. 15-15715-JUL-000002
) [UNDER SEAL]
 v.) (18 U.S.C. §§ 1028(a)(7),
) (c)(3)(A), and (f))
MURTAZA SAIFUDDIN)

INDICTMENT

INTRODUCTION

At all times relevant to the Indictment:

1. DARKODE was an Internet forum where individuals convened online to buy, sell, trade, and discuss intrusions on others' computers and electronic devices. One could only become a member of DARKODE by declaring to existing members what type of relevant ability or product they could bring to the forum and then being approved for membership by the other members.

2. Defendant MURTAZA SAIFUDDIN resided in the country of Pakistan and used the Internet nickname "rzor". SAIFUDDIN was a member of the Internet forum known as DARKODE.

COUNT ONE

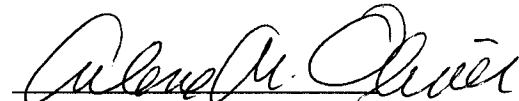
The grand jury charges:


3. On or about September 19, 2014, in the Western District of Pennsylvania and elsewhere, the defendant, MURTAZA SAIFUDDIN, did attempt to transfer and did knowingly transfer in or affecting interstate or foreign commerce, without lawful authority, a means of identification of another person, to wit, access devices (as that

term is defined in 18 U.S.C. § 1029(e)), knowing that the means of identification belonged to another actual person, with the intent to commit, and to aid and abet, and in connection with, unlawful activity that constituted a violation of Federal law, to wit, access device fraud, contrary to the provisions of 18 U.S.C. §§ 1029(a)(2) and (a)(3).

In violation of Title 18, United States Code, Sections 1028(a)(7), (c)(3)(A), and (f).

A True Bill,


Foreperson


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