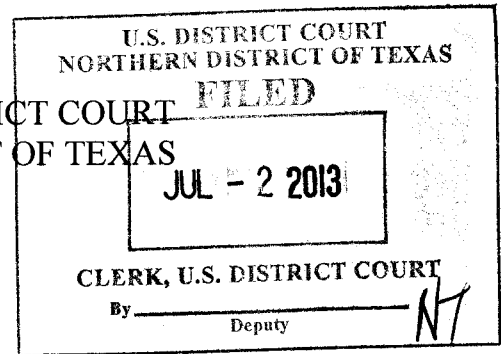


ORIGINAL

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



UNITED STATES OF AMERICA §  
VS. §  
BARRETT LANCASTER BROWN (1) §

NO. 3:12-CR-413-L  
[Supersedes Indictment returned  
on December 4, 2012]

The Grand Jury charges:

FIRST SUPERSEDING INDICTMENT

Count One

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

On or about December 25, 2011, 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, in and affecting interstate and foreign commerce, did knowingly traffic in more than five authentication features knowing that such features were stolen, in that **Brown** transferred the hyperlink "http://wikisend.com/download/597646/stratfor\_full\_b.txt.gz" from the Internet Relay Chat (IRC) channel called "#Anonops" to an IRC channel under **Brown's** control called "#ProjectPM," which hyperlink provided access to data stolen from the company Stratfor Forecasting Inc., to include in excess of 5,000 credit card account numbers, 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 Forecasting Inc. 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, in and affecting interstate and foreign commerce and with intent to defraud, did possess at least fifteen unauthorized access devices, 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 Three Through Twelve  
 Aggravated Identity Theft  
 (18 U.S.C. § 1028A(a)(1))  
 Aid and Abet  
 (18 U.S.C. § 2)

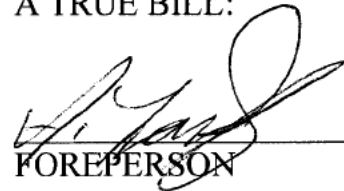
From on or about December 25, 2011, through at least on or about March 6, 2012, in the Dallas Division of the Northern District of Texas and elsewhere, defendant **Barrett Lancaster Brown**, aided and abetted by persons known and unknown to the Grand Jury, during and in relation to a felony violation 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



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

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THE UNITED STATES OF AMERICA

v.

BARRETT LANCASTER BROWN

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FIRST SUPERSEDING INDICTMENT

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

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

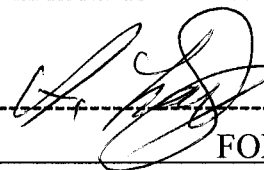
18 U.S.C. § 1028A(a)(1)  
Aggravated Identity Theft  
18 U.S.C. § 2  
Aid and Abet

12 Counts

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A true bill rendered

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DALLAS

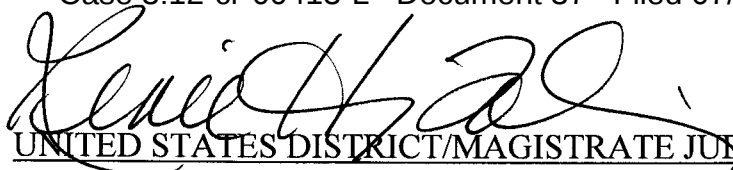


FOREPERSON

Filed in open court this 2 day of July 2013

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Clerk

**Defendant already in Federal custody at Mansfield since 9/13/2012**  
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UNITED STATES DISTRICT/MAGISTRATE JUDGE  
Criminal Case pending 3:12-CR-413-L

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Defendant also indicted in two other cases (3:12-CR-317-L and 3:13-CR-030-L)