EXHIBIT 2

within the Eastern District of New York and elsewhere, the

sniffer.

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

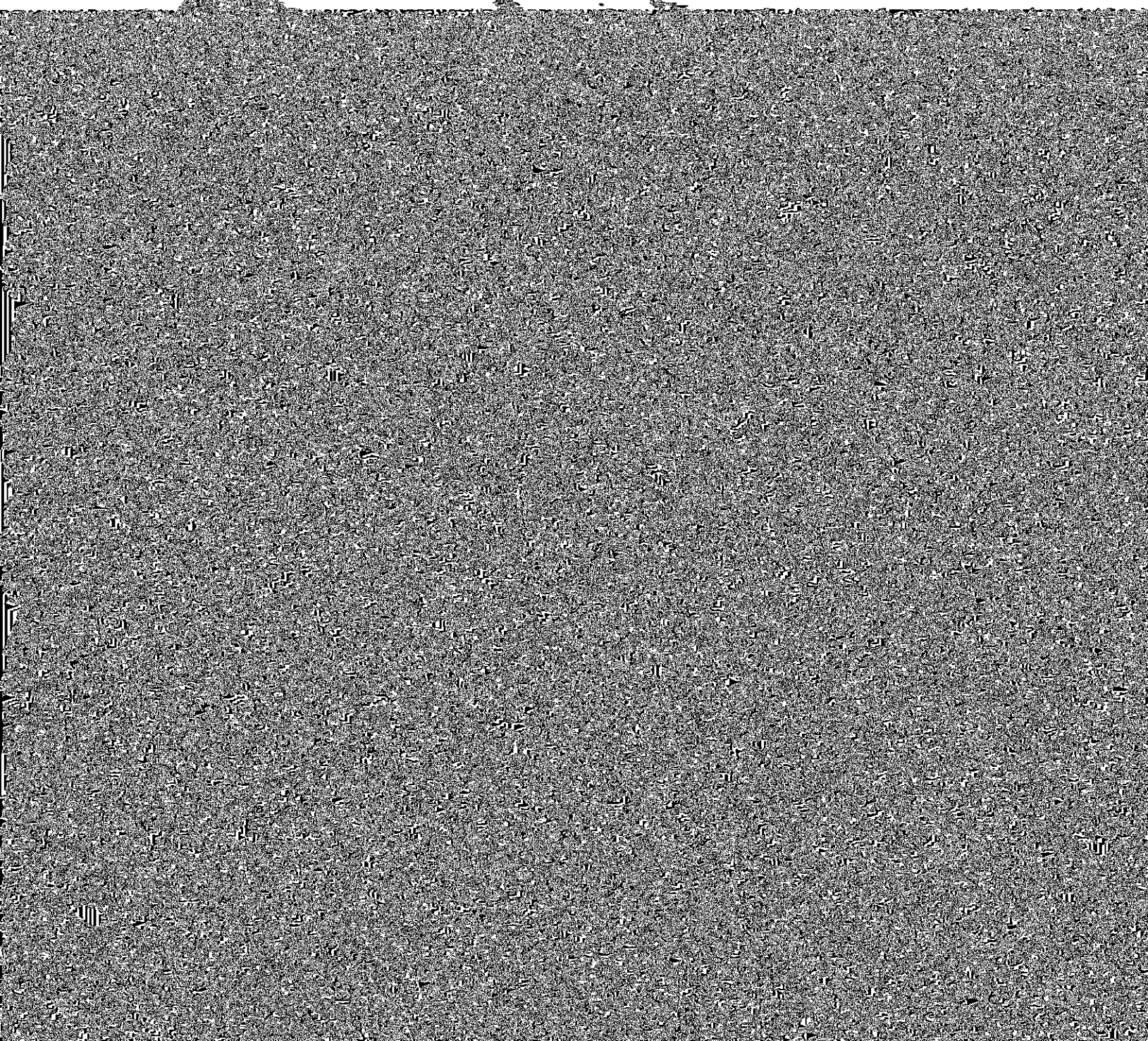
COUNTS SEVEN THROUGH NINE
(Possession of Unauthorized Access Devices)

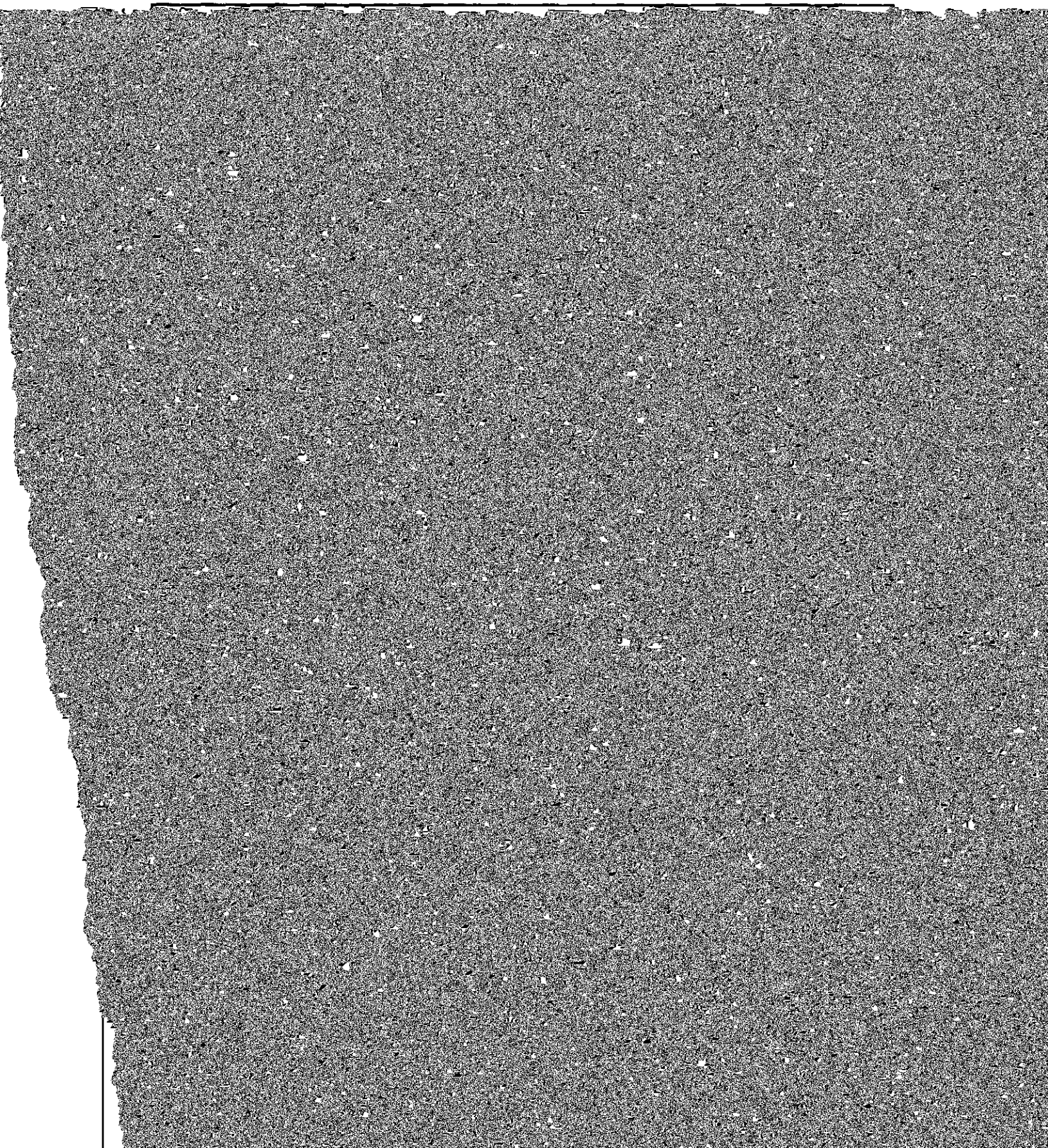
22. The allegations contained in paragraphs 1 through 14 are realleged and incorporated as if fully set forth in this paragraph.

23. On or about the dates set forth below, within the Eastern of New York and elsewhere, the defendants MAKSYM YASTREMSKIY, also known as "Maksik," ALEKSANDR SUVOROV, also known as "JonnyHell," and ALBERT GONZALEZ, also known as "Segvec," together with others, did knowingly and with intent to defraud possess fifteen or more unauthorized access devices, in a

sniffer.

c. On or about July 23, 2007, YASTREMSKIY, SUVOROV and GONZALEZ gained unauthorized access to the POS server at D&B Store #32, collected a log file and reactivated the packet sniffer.

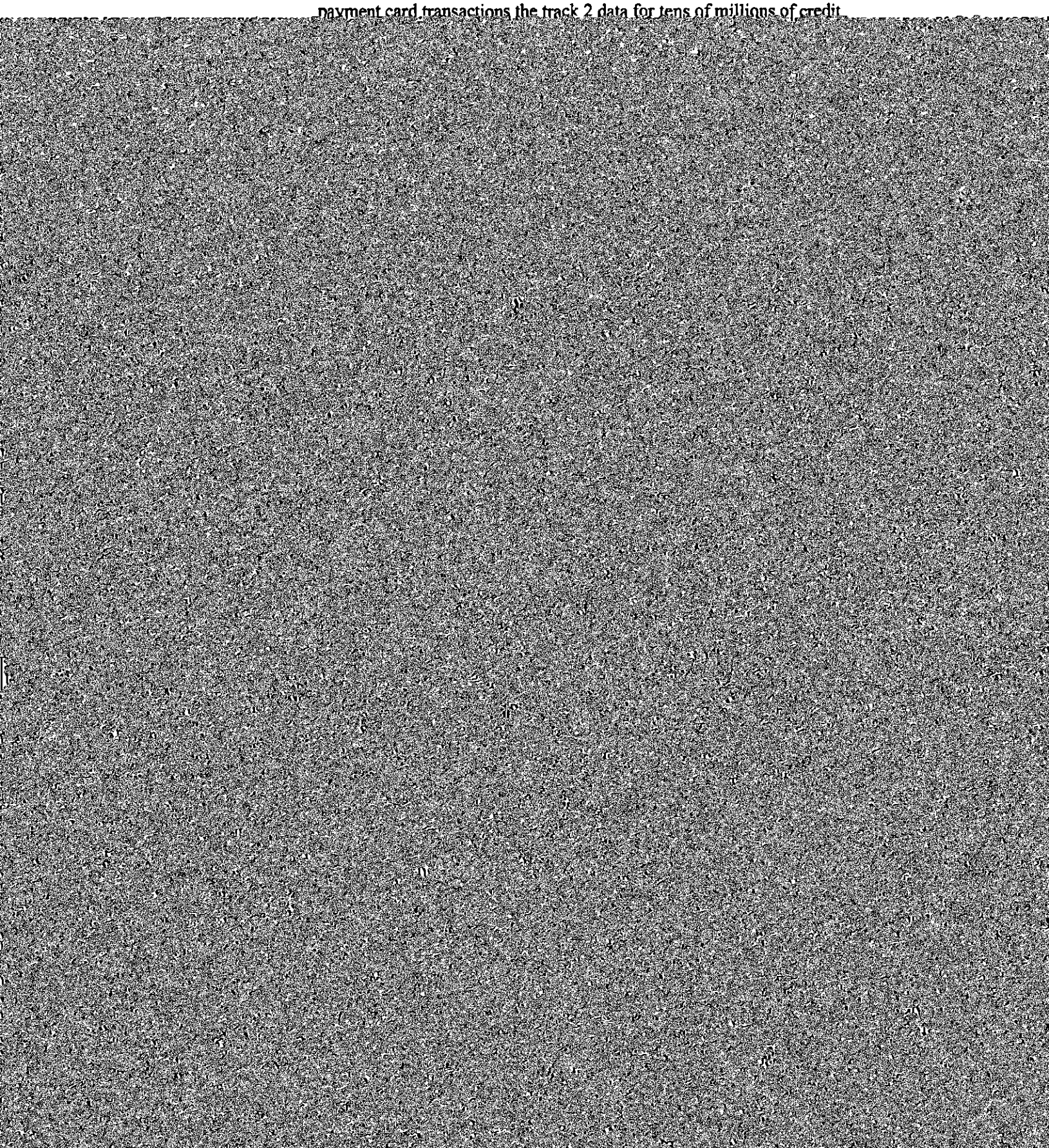




things of value, to wit: credit and debit card account numbers,

other property of such defendant(s) up to the value of the

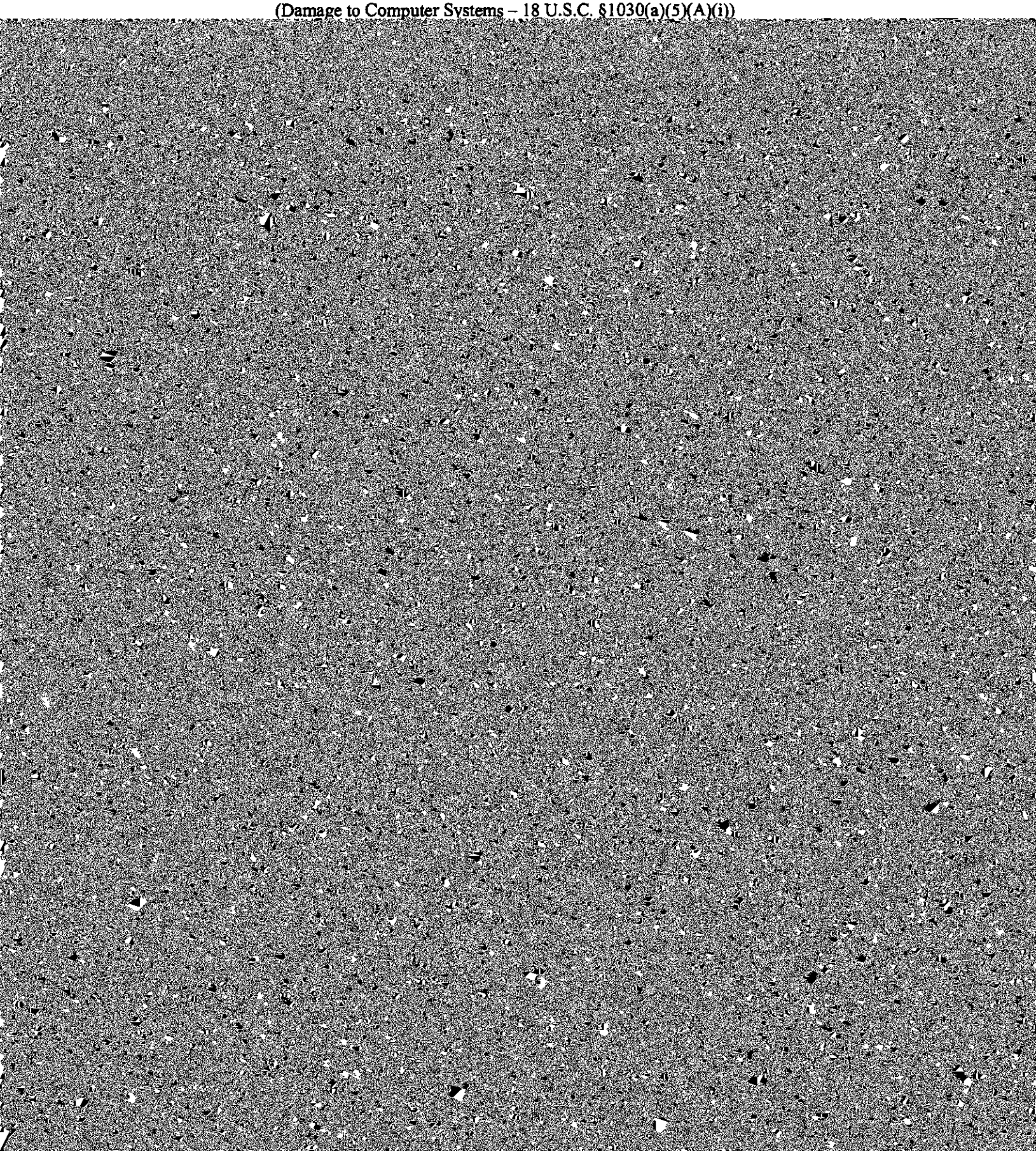
e. Downloaded from the corporate networks processing and/or storing payment card transactions the track 2 data for tens of millions of credit



[redacted] Used Internet-based attacks, often SQL injection attacks (which exploited

COUNTS TWO THROUGH SIX

(Damage to Computer Systems – 18 U.S.C. §1030(a)(5)(A)(i))



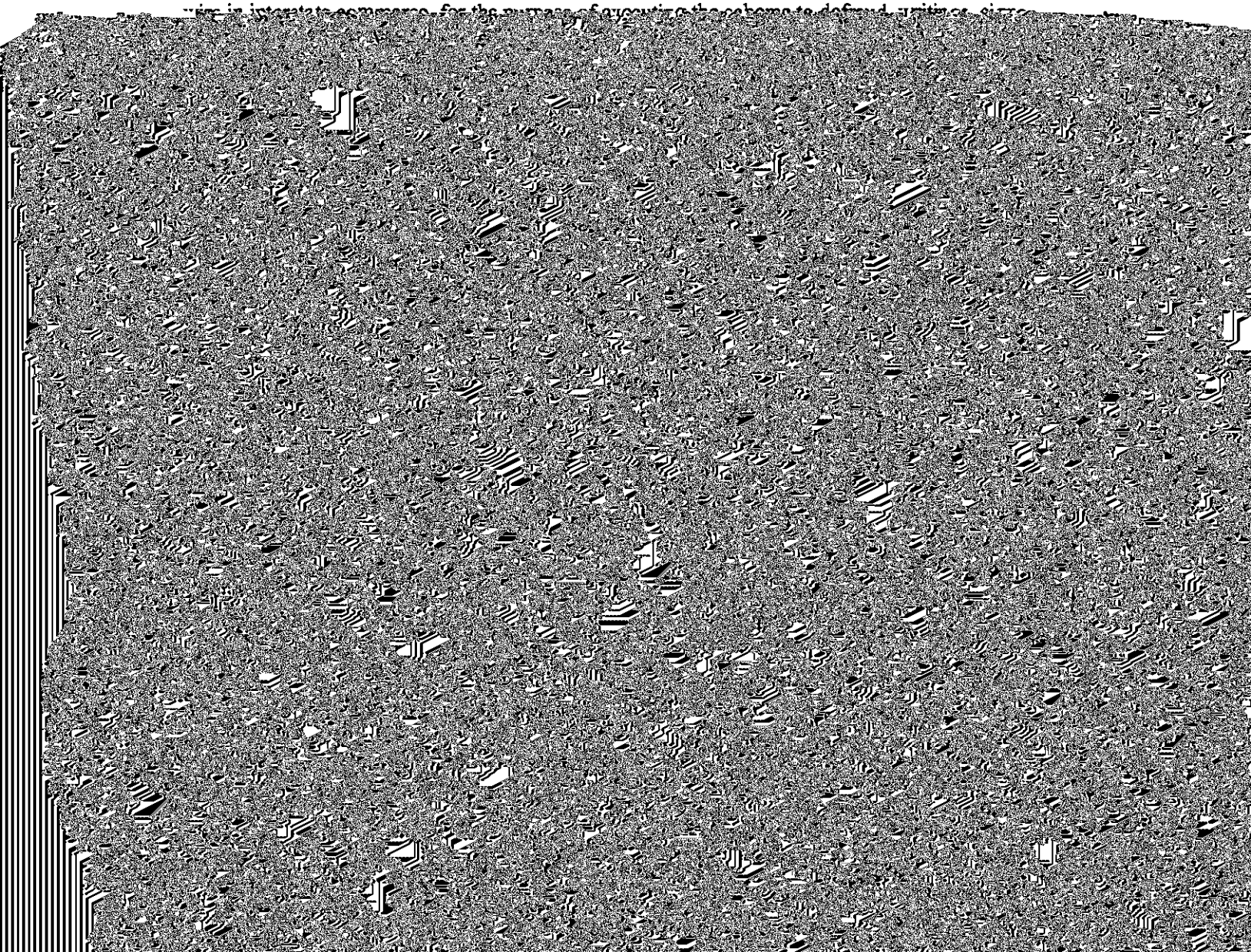
COUNTS SEVEN THROUGH TEN
(Wire Fraud - 18 U.S.C. § 1343)

8. The Grand Jury realleges and incorporates by reference paragraphs 1 through 4 of this Indictment, and further charges that:

9. On or about the following dates, in the Southern District of Florida, the District of Massachusetts, and elsewhere,

ALBERT GONZALEZ,

having devised a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, transmitted and caused to be transmitted by



COUNTS SIXTEEN THROUGH NINETEEN
(Aggravated Identity Theft - 18 U.S.C. § 1028A)