

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	
	:	Hon.
	:	
v.	:	Criminal No. 09-
	:	
	:	18 U.S.C. §§ 1030(a)(7)(A)
VIKTOR P. SAVTYREV,	:	18 U.S.C. § 1030(c)(3)(A)
a/k/a "Victor Savturev"	:	18 U.S.C. § 2

I N F O R M A T I O N

The defendant having waived in open court prosecution by indictment, the Acting United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:

a. Company A was a mutual fund management company located in New York City that managed more than \$15 billion in assets and employed more than 75 individuals. Company A serviced clients throughout the United States.

b. Defendant Viktor P. Savtyrev, a/k/a "Victor Savturev" (hereinafter "defendant Savtyrev"), resided in Middlesex County. Between in or about 2003 and on or about November 5, 2008, defendant Savtyrev worked as a systems administrator at Company A, and as such had access to Company A's computer servers.

2. On or about November 5, 2008, Company A laid off approximately fourteen employees. As part of the layoffs, Company A offered a severance package to each of those employees.

Defendant Savtyrev was among the individuals laid off.

3. On or about November 6, 2008, defendant Savtyrev sent an e-mail message to Company A (the "November 6 E-Mail") in which he stated, in substance and in part, that he was not satisfied with the terms of his severance package. Defendant Savtryev threatened to cause extensive damage to Company A's computer systems if the company did not provide him with additional severance pay and benefits.

4. In the November 6 E-Mail, defendant Savtyrev also threatened, if Company A did not meet his demands, to alert the news media to the damage that he would cause for the purpose of embarrassing Company A and potentially causing its clients to close their accounts.

5. On or about November 6, 2008, defendant Savtyrev repeated his demands and threats in a telephone call to a Company A representative.

6. On or about November 7, 2008, defendant Savtyrev repeated his threats in an e-mail to a Company A representative.

7. From on or about November 6, 2008 to on or about November 7, 2008, in Middlesex County, in the District of New Jersey, and elsewhere, defendant

VIKTOR P. SAVTYREV,  
a/k/a "Victor Savturev"

did knowingly, and with intent to extort from persons money and other things of value, transmit in interstate and foreign commerce communications containing threats to cause damage to protected computers.

In violation of Title 18, United States Code, Sections 1030(a)(7)(A) and 1030(c)(3)(A) and Section 2.

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RALPH J. MARRA, JR.  
ACTING UNITED STATES ATTORNEY