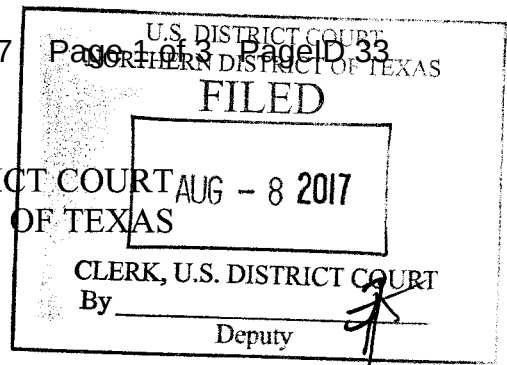


ORIGINAL

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



UNITED STATES OF AMERICA

v.

KAMYAR JAHANRAKHSAN
also known as KAMYAR JAHAN RAKHSAN;
ANDY or ANDREW RAKHSAN; ANDY or
ANDREW KAMYAR (or KAMIAR or KAMIER)
RAKHSAN

NO.

3-17CR-414-N

The Grand Jury Charges:

INDICTMENT

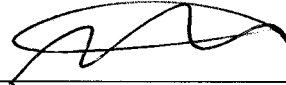
Count One

Knowingly Causing the Transmission of a Command to a Protected Computer
(18 U.S.C. § 1030(a)(5)(A) (18 U.S.C. § 1030(c)(4)(A)(i)(I) and (B)))

Between on or about December 30, 2014, and on or about January 25, 2015, in the Dallas Division of the Northern District of Texas and elsewhere, defendant **Kamyar Jahanrakhshan, also known as Kamyar Jahan Rakhshan; Andy or Andrew Rakhshan; Andy or Andrew Kamyar (or Kamiar or Kamier) Rakhshan** knowingly caused the transmission of a program, information, code, and command, and, as a result of such conduct, intentionally caused damage without authorization to a protected computer; in that the defendant knowingly caused a denial of service attack on the website Leagle.com, and by said transmission caused a loss aggregating at least \$5,000 or more during a one-year period.

In violation of 18 U.S.C. § 1030(a)(5)(A) (18 U.S.C. § 1030(c)(4)(A)(i)(I) and (B)).

A TRUE BILL:



FOREPERSON

JOHN R. PARKER
UNITED STATES ATTORNEY



CANDINA S. HEATH
Assistant United States Attorney
Northern District of Texas
Texas State Bar No. 09347450
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
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THE UNITED STATES OF AMERICA

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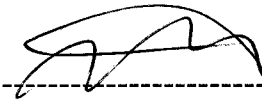
INDICTMENT

18 U.S.C. § 1030(a)(5)(A) (18 U.S.C. § 1030(c)(4)(A)(i)(I) and (B))
Knowingly Causing the Transmission of a Command to a Protected Computer

1 Count

A true bill rendered

DALLAS



FOREPERSON

Filed in open court this 8th day of August, 2017.

**Defendant in Federal Custody since
July 26, 2017 Seattle, Washington**



UNITED STATES MAGISTRATE JUDGE
Magistrate Court Number: 3:16-MJ-635-BK