

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

FILED IN OPEN COURT
U.S.D.C. - Atlanta
MAR 14 2017
By: JAMES N. HATTEN, Clerk
Deputy Clerk

UNITED STATES OF AMERICA

v.

MARK VARTANYAN, A/K/A
"KOLYPTO"

Criminal Information

No. 1:17-CR-102

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE
Computer Fraud

1. The Defendant, MARK VARTANYAN, is a Russian citizen who is known to have used the alias "Kolypto". VARTANYAN resided in both Ukraine and Norway during the period relevant to this Information.

2. "Citadel" is a malware toolkit designed to infect computer systems and steal financial account credentials and personally identifiable information from victim computer networks. Beginning in or about 2011, Citadel was offered for sale on invite-only, Russian-language internet forums frequented by cybercriminals. Users of Citadel targeted and exploited the computer networks of major financial and government institutions around the world, including several financial institutions in the United States. According to industry estimates, Citadel infected approximately 11 million computers worldwide and is responsible for over \$500 million in losses.

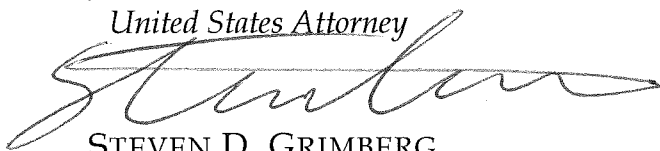
3. Between on or about August 21, 2012 and January 9, 2013, while residing in Ukraine, and again between on or about April 9, 2014 and June 2, 2014, while residing in Norway, VARTANYAN engaged in the development, improvement, maintenance and distribution of Citadel. During the above-referenced periods, VARTANYAN uploaded numerous electronic files that consisted of Citadel malware, Citadel components, Citadel updates and patches, and Citadel customer information, all with the intent of improving Citadel's illicit functionality.

4. On or about November 6, 2012, in the Northern District of Georgia and elsewhere, the defendant, MARK VARTANYAN, aided and abetted by others known and unknown to the United States Attorney, knowingly caused and would, if completed, have 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, specifically, loss to a person and persons during a 1-year period from VARTANYAN's course of conduct affecting protected computers aggregating at least \$5,000 in value, and damage affecting 10 or more protected computers during a 1-year period.

All in violation of Title 18, United States Code, Sections 1030(a)(5)(A) and (c)(4)(B), and 2.

JOHN A. HORN

United States Attorney

A handwritten signature in black ink, appearing to read "S. Grimberg", written over a horizontal line.

STEVEN D. GRIMBERG

Assistant United States Attorney

Georgia Bar No. 312144

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