

**ORIGINAL**

FILED IN CHAMBERS  
U.S.D.C. Atlanta

JUN 28 2016

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

JAMES N. HATTEN, Clerk  
By: *bn* Deputy Clerk

UNITED STATES OF AMERICA

*v.*

AARON GLENDE A.K.A.  
ICYEAGLE

Criminal Indictment

No. **1:16-CR-0239**

THE GRAND JURY CHARGES THAT:

**Counts 1 - 5  
(Bank Fraud)**

1. Beginning on a date unknown, but at least by on or about November 5, 2015, through on or about May 4, 2016, the exact dates being unknown, in the Northern District of Georgia and elsewhere, the Defendant AARON GLENDE a.k.a. IcyEagle, aided and abetted by others known and unknown, did knowingly, and with intent to defraud, attempt to execute a scheme and artifice to defraud SunTrust Bank; and did knowingly and with intent to defraud, attempt to execute a scheme and artifice to obtain monies, funds, credits, and assets owned by and under the custody and control of SunTrust Bank, which was a financial institution the deposits of which were at the time insured by the Federal Deposit Insurance Corporation, by means of materially and false fraudulent pretenses, as well as by omissions of material facts, in violation of Title 18, United States Code, Section 1344 and 2.

### Overview of the Scheme

2. Beginning on a date unknown, but at least by on or about November 5, 2015, the Defendant, AARON GLENDE a.k.a. IcyEagle, began advertising criminal services on a TOR<sup>1</sup> hidden services marketplace known as AlphaBay Market (“AlphaBay”). The Defendant, AARON GLENDE a.k.a. IcyEagle, devised a scheme and artifice to defraud by which he would sell hacked (*i.e.*, stolen by means of computer intrusion) SunTrust bank account information on AlphaBay; the purpose selling this stolen bank account information was to assist his AlphaBay customers in obtaining unauthorized access to SunTrust bank accounts so that his customers could obtain money, funds, credits, and assets that were under the custody and control of SunTrust Bank and to defraud SunTrust Bank by falsely and fraudulently posing as SunTrust bank customers.

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<sup>1</sup> TOR stands for “The Onion Router” and is a technology that allows individuals to access the internet with a high degree of anonymity by using “onion routing,” which encrypts communications and transfers them through random relay servers to obfuscate the identity of the communications’ sender. TOR hidden services are a technology that allows web sites and other internet services to similarly offer their services with a high degree of anonymity. To access a TOR hidden service web site, a user must connect to the web site via TOR. Through TOR, both the user and the web site are able to connect without revealing their IP address. As a consequence, it is technically difficult for investigators to determine where the computer systems for TOR hidden services web sites are physically located. TOR hidden services web sites are popularly termed the “Dark Web.”

3. At all times relevant to this Indictment, AlphaBay was a website where individuals could buy and sell contraband and other goods designed to facilitate criminal conduct.

4. The AlphaBay website contained a number of features designed to assist prospective buyers who wished to purchase criminal services. For example, the AlphaBay sales listings contained categories corresponding to various types of criminal services; those categories included "Fraud," "Drugs & Chemicals," "Counterfeit Items," "Weapons," and "Carded Items." Moreover, the website had a search functionality that allowed users to search for items by name. Much like Amazon.com or eBay.com, users of the website can rate sellers and search for certain sellers by name.

6. Unlike Amazon.com or eBay.com, however, customers that want to buy goods or services on AlphaBay must use a virtual cryptocurrency known as Bitcoin.<sup>2</sup>

7. On or about May 4, 2016, the Defendant, AARON GLENDE a.k.a. IcyEagle, advertised the sale of stolen bank account information on the AlphaBay Market under the "Fraud" category. In a listing entitled "High Balance SunTrust Logins 30K-150K Available," using his online nickname IcyEagle, the Defendant, AARON GLENDE a.k.a. IcyEagle, wrote that "I bring you freshly hacked Sun

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<sup>2</sup> Bitcoin is a type of digital currency that uses encryption to limit the availability of currency and to verify the transfer of funds and operates independently of a central bank. But because Bitcoin is similar to paper currency in that the exchange of Bitcoin between individuals is not recorded by financial institutions, it can be used to anonymize criminal transactions.

Trust Bank Account Logins. The accounts are notorious for having weak security.” The listing identified the sales price as \$66.99 USD and indicated that IcyEagle had sold 11 of the high-balance account logins since November 11, 2015.

8. On or about March 19, 2016, the Defendant, AARON GLENDE a.k.a. IcyEagle, advertised the sale of “Hacked SunTrust Bank Account Logins \$100-\$500 Balances.” The listing indicated that the sales price was \$9.99 USD, that he had sold 32 since November 5, 2015, and noted that “[t]his listing is for active SunTrust bank account balances of \$100-\$500.”

9. On multiple dates in March and April 2016, a Federal Bureau of Investigations (“FBI”) agent in the Northern District of Georgia, acting in an undercover capacity, accessed the AlphaBay website. While on the website, the agent purchased SunTrust account information from IcyEagle using Bitcoin. A review of the information purchased from IcyEagle confirmed that it contained usernames, passwords, physical addresses, email addresses, telephone numbers, and bank account numbers that belonged to five different SunTrust Bank customers.

10. On or about the dates listed below for each count, in the Northern District of Georgia and elsewhere, the Defendant, AARON GLENDE a.k.a. IcyEagle, and others known and unknown, did attempt to execute the aforementioned scheme and artifice to defraud SunTrust Bank and to obtain money, funds, credits, and assets that were under the custody and control of SunTrust Bank, by selling, distributing, and transferring hacked usernames, passwords, physical addresses,

email addresses, telephone numbers, and bank account numbers that belonged to SunTrust Bank customers, as listed below:

Count	Date	SunTrust Bank Account Holder
1	Apr. 7, 2016	M.C
2	Apr. 7, 2016	H.J.
3	Apr. 7, 2016	M.G.
4	Mar. 24, 2016	J.A.
5	Mar. 28, 2016	M.H.

in violation of Title 18, United States Code, Section 1344 and 2.

**Count 6  
(Access Device Fraud)**

11. The Grand Jury re-alleges and incorporates by reference paragraphs 2 through 9 of this Indictment as if fully set forth here.

12. Beginning on a date unknown, but from at least on or about November 5, 2015 through on or about May 4, 2016, in the Northern District of Georgia and elsewhere, the defendant, AARON GLENDE a.k.a. IcyEagle, aided and abetted by others known and unknown, using a TOR hidden services marketplace known as AlphaBay, knowingly and with intent to defraud, trafficked in and used unauthorized access devices, namely, SunTrust Bank account information including usernames, passwords, email addresses, telephone numbers, and bank account numbers, that could be used alone or in conjunction with another access to device to obtain money, goods, services, and other things of value, and could be used to initiate a transfer of funds, and that were stolen and obtained with intent to defraud; and by such conduct obtained things of value aggregating at

least \$1,000 during a one-year period, affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(2) and 2.

**Counts 7 - 11**  
**(Aggravated Identity Theft)**

13. The Grand Jury re-alleges and incorporates by reference paragraphs 2 through 9 of this Indictment as if fully set forth here.

14. Beginning on a date unknown, but at least by on or about the dates listed below, in the Northern District of Georgia and elsewhere, the Defendant AARON GLENDE a.k.a. IcyEagle, aided and abetted by others known and unknown to the Grand Jury, did knowingly possess, transfer, and use at least one means of identification of another person without lawful authority, during and in relation to a felony violation of Title 18, United States Code, Section 1344, as described in Counts 1 through 5 of Indictment, knowing that the means of identification belonged to other actual persons (as identified below):

<b>Count</b>	<b>Date</b>	<b>Actual Person</b>
7	Apr. 7, 2016	M.C
8	Apr. 7, 2016	H.J.
9	Apr. 7, 2016	M.G.
10	Mar. 24, 2016	J.A.
11	Mar. 28, 2016	M.H.

in violation of Title 18, United States Code, Sections 1028A and 2.

**FORFEITURE**

15. Upon conviction of one or more of the offenses alleged in Counts One through Six of this Indictment, the Defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 982(a)(2)(B), any and all property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offenses, including, but not limited to, the following:

a. A sum of money equal to the amount of proceeds the Defendant obtained as a result of the offenses.

If any of the above described forfeitable property, as a result of any act or omission of the Defendant:

(a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), Title 18, United States Code, Section 982(b), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said Defendant up to the value of the forfeitable property described above.

A True BILL  
Bob J...  
FOREPERSON

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