

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

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CLERK, US DISTRICT COURT
MIDDLE DISTRICT FLORIDA
TAMPA, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 8:18-cr-545-T-SDM-SPF

18 U.S.C. § 371

18 U.S.C. § 1029(a)(3)

ALEXANDRU HABASESCU
a/k/a Alexander Habasescu,
a/k/a Alex Haba,
a/k/a below

SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT ONE
(Conspiracy)

A. Introduction

At times material to this Superseding Indictment:

1. Defendant ALEXANDRU HABASESCU, residing in Moldova, conspired with others known and unknown to the grand jury to develop and administer a website referred to herein as the Marketplace. The Marketplace was an e-commerce storefront that facilitated the unauthorized sale of login credentials, such as passwords, of compromised computers all over the world. The Marketplace existed primarily as a place for individuals to buy and sell access to compromised computers, which were used to facilitate a wide range of illegal activity, including tax fraud and ransomware attacks. The Marketplace also engaged in the unauthorized sale of social security numbers belonging to United States citizens.

2. An “internet protocol address” or “IP address” was a unique identifier assigned to every computer on the internet or a local network, much like a phone number. An IP address could at times be used to identify the location of the computer connected to the internet.

3. A “server” was a computer that provided services for other computers connected to it via a computer network—i.e., a set of computers connected together locally for the purpose of sharing resources—or the internet. Servers could be physically located and accessed anywhere with a network or internet connection.

4. “Remote Desktop Protocol” or “RDP” was a proprietary protocol developed by Microsoft, which allowed a user to connect to another computer over a network and control the computer remotely.

5. Digital currencies were electronically sourced units of value that existed on the internet and were not stored in a physical form. They were not issued by any government.

6. An “access device” was any card, plate, code, account number, electronic serial number, mobile identification number, personal identification number (including a social security number and credentials) or other telecommunications service, equipment, or instrument identifier, or other means of account access that could be used alone or in conjunction with another access device to obtain money, goods, services, or any other thing of value, or that could be used to initiate a transfer of funds (other than a transfer originated solely by paper instrument).

7. An “unauthorized access device” was any access device that was lost, stolen, expired, revoked, canceled, or obtained with intent to defraud.

B. The Conspiracy

8. Beginning on an unknown date, but from as early as in or around October 2014, and continuing through on or about January 24, 2019, in the Middle District of Florida and elsewhere, the defendant,

ALEXANDRU HABASESCU,
a/k/a Alexander Habasescu,
a/k/a Alex Haba,
a/k/a below,

RO C
knowingly and willfully conspired, ~~with others~~ combined, and confederated with others known and unknown to the grand jury, to commit the following offenses against the

United States:

- a. trafficking in unauthorized access devices, in violation of 18 U.S.C. § 1029(a)(2); and
- b. possession of 15 or more unauthorized access devices, in violation of 18 U.S.C. § 1029(a)(3).

C. Manner and Means of the Conspiracy

9. The manner and means by which the defendant and others sought to accomplish the conspiracy included, among others, the following:

- a. It was a part of the conspiracy that the conspirators would and did develop or commission the development of the Marketplace in order to, among other things, assist sellers (including themselves) in selling login credentials (IP

addresses, usernames, and passwords) for compromised servers around the world, and enrich themselves and others;

b. It was a further part of the conspiracy that the conspirators would and did employ various techniques to protect their anonymity and to provide security for the conspirators from attack by other criminals, and from exposure by law-enforcement agencies or civilian cybersecurity firms;

c. It was a further part of the conspiracy that the conspirators would and did cultivate online monikers—which were intended to be distinct from their real-world identities—for use on cybercriminal forums and websites, and would and did reuse the same online monikers on a variety of cybercriminal forums and websites over an extended period of time, to establish reputations and expertise among other cybercriminals;

d. It was a further part of the conspiracy that the conspirators would and did advertise the Marketplace on cybercriminal forums and websites in order to promote the Marketplace and to attract new sellers and buyers;

e. It was a further part of the conspiracy that the conspirators would and did create and maintain records of, among other things, IP addresses, usernames, and cracked passwords to compromised servers, that were to be sold on the Marketplace;

f. It was a further part of the conspiracy that conspirators would and did take steps to identify various attributes of a compromised server including the location of the server, the internet provider, the operating system, upload and

download speeds, and the presence of anti-virus software, and did use that information to create listings on the Marketplace;

g. It was a further part of the conspiracy that conspirators would and did create listings for login credentials to compromised servers throughout the United States and the world, including login credentials to compromised servers located in the Middle District of Florida;

h. It was a further part of the conspiracy that conspirators would and did list and display several methods of contact on the Marketplace webpage for buyers and sellers to contact them for issues related to the Marketplace, including customer support for accessing compromised servers;

i. It was a further part of the conspiracy that the conspirators would and did require the Marketplace users to use digital currencies and payment methods to effectuate sales on the Marketplace, in order to conceal the identities of the conspirators and the Marketplace users, to further the illegal activity, and to keep the fraudulently obtained proceeds anonymous;

j. It was a further part of the conspiracy that the conspirators would and did at times: maintain and control digital currency addresses through which buyers paid sellers on the Marketplace website; take a percentage of all illegal transactions as a commission, and share those commissions with the administrators of the Marketplace; and transfer the proceeds from administering the Marketplace to digital currency exchangers, where the funds could be converted into official currency and spent on personal goods and services;

k. It was a further part of the conspiracy that conspirators would and did share in the proceeds of the fraud scheme, usually receiving percentages commensurate with their respective roles, to promote and perpetuate the scheme and for their personal enrichment and entertainment; and

l. It was a further part of the conspiracy that conspirators would and did engage in multiple meetings, perform acts, and make statements to promote and achieve the objects of the conspiracy and to misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, the purpose of the conspiracy and the acts committed in furtherance thereof.

D. Overt Acts

10. In furtherance of the conspiracy and to effect its objects, the defendant or coconspirators committed the following overt acts, among others, in the Middle District of Florida and elsewhere:

a. In or around October 2014, the conspirators publicly launched the Marketplace.

b. On or about October 31, 2015, a conspirator created a post on the Marketplace homepage entitled “What is RDP and what they using for?” which included a list of things that a buyer could use RDP for, including “stoling info from RDP’s. Yes, many rdps have a lot of useful info about people and companies, and can be sold at black markets for big price.”

c. On or about January 30, 2017, a conspirator created a post on the Marketplace homepage entitled “How to create an account and patch RDP

manually,” which included, among other content, the advice, “don’t buy RDPs in day time. Only night (when real rdp owner sleeps and [can’t] see unusual activity on a rdp). . . .”.

d. On or about January 25, 2017, the conspirators sold to an undercover agent (who was physically located in the Middle District of Florida) login credentials for a compromised server belonging to a company located in the Middle District of Florida (Company A).

e. On or about January 25, 2017, after the undercover agent purchased login credentials for Company A, a conspirator accessed Company A’s server from an IP address belonging to a server controlled by the Marketplace.

f. On or about March 8, 2017, the conspirators sold to an undercover agent (who was physically located in the Middle District of Florida) login credentials for a compromised server belonging to a business located in the Middle District of Florida.

g. On July 1, 2017, a conspirator created a post on the Marketplace homepage entitled “Added new feature,” which explained that a new feature had been added to the Marketplace to allow users to “search info about full SSN and DOB . . . about someone that live in USA.”

h. On or about March 21, 2018, an online covert employee physically located in the Middle District of Florida communicated with a conspirator regarding certain updates to the Marketplace site.

i. On or about September 18, 2018, the conspirators possessed, within the Middle District of Florida, 15 social security numbers belonging to persons who resided in or previously resided in the Middle District of Florida.

j. On or about December 19, 2018, the conspirators sold to an undercover agent (who was physically located in the Middle District of Florida) login credentials for a compromised server belonging to a business located in the Middle District of Florida.

All in violation of 18 U.S.C. § 371.

COUNT TWO
(Possession of Unauthorized Access Devices)

1. The allegations contained in Parts A and C of Count One of this Superseding Indictment are incorporated by reference as if fully set forth herein.

2. On or about September 18, 2018, in the Middle District of Florida and elsewhere, the defendant,

ALEXANDRU HABASESCU,
a/k/a Alexander Habasescu,
a/k/a Alex Haba,
a/k/a below,

knowingly and with intent to defraud, possessed and aided and abetted others in the possession of 15 or more unauthorized access devices, that is, the social security numbers of 15 or more Florida residents, said possession affecting interstate and foreign commerce.

In violation of 18 U.S.C. §§ 1029(a)(3), 1029(c)(1)(a)(i), and 2.

FORFEITURE

1. The allegations contained in Counts One and Two of this Superseding Indictment are incorporated by reference as if fully set forth herein for the purpose of alleging forfeitures pursuant to 18 U.S.C. §§ 981, 982(a)(2)(B), 1029(c)(1)(C), and 1030(i), and 28 U.S.C. § 2461(c).

2. Upon conviction of a violation of 18 U.S.C. § 1029 (18 U.S.C. § 371), or a conspiracy to violate 18 U.S.C. § 1029, the defendant,

ALEXANDRU HABASESCU,
a/k/a Alexander Habasescu,
a/k/a Alex Haba,
a/k/a below,

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting, or derived from, proceeds the person obtained directly or indirectly, as a result of such violation, and pursuant to 18 U.S.C. § 1029(c)(1)(C), any personal property used or intended to be used to commit the offense.

6. The property to be forfeited includes, but is not limited to, an order of forfeiture in the amount of proceeds the defendant obtained from the offenses.

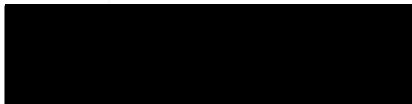
7. If any of the property described above, as a result of any act or omission of the defendant:

- 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,

the United States of America shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. §§ 982(b)(1) and 1029(c)(2), and 28 U.S.C. § 2461(c).

A TRUE BILL,



Foreperson

ROGER B. HANDBERG
United States Attorney

By: 
Rachel K. Jones
Assistant United States Attorney


By: Carlton C. Gammons
Assistant United States Attorney
Deputy Chief, Economic Crimes Section

No. . 8:18-cr-545-T-SDM-SPF

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

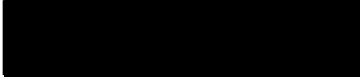
vs.

ALEXANDRU HABASESCU
a/k/a Alexander Habasescu,
a/k/a Alex Haba,
a/k/a below

INDICTMENT

Violations: 18 U.S.C. §§ 371 and 1029(a)(3)

A true bill,



Foreperson

Filed in open court this 23rd day
of March 2022.

Clerk

Bail \$ _____
