

United States District Court

FOR THE DISTRICT OF NEBRASKA

SEALED

UNITED STATES OF AMERICA

v.

JAISANKAR MARIMUTHU

WARRANT FOR ARREST

CASE NUMBER: 8:07CR-30

To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest JAISANKAR MARIMUTHU
Name

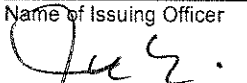
and bring him/her forthwith to the nearest magistrate to answer a(n)

Indictment Information Complaint Order of Court Violation Notice Probation Violation Petition

charging him/her with (brief description of offense)

- Conspiracy to commit computer and securities fraud, computer fraud, securities fraud, wire fraud, and aggravated identity fraud.

in violation of Title 18 United States Code, Section(s) 371, 1030(a)(4) & 2, 1348 & 2, 1343 & 2, 1028A & 2

<u>DENISE M. LUCKS</u> Name of Issuing Officer	<u>CLERK OF COURT</u> Title of Issuing Officer
 Signature of Issuing Officer	<u>1/19/07</u> <u>Omaha, NE</u> Date and Location

Bail fixed at \$ _____ by _____
Name of Judicial Officer

RETURN		
This warrant was received and executed with the arrest of the above-named defendant at _____		
DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

THE FOLLOWING IS FURNISHED FOR INFORMATION ONLY:

DEFENDANT'S NAME: Jaisankar Marimuthu

ALIAS: _____

LAST KNOWN RESIDENCE: _____

LAST KNOWN EMPLOYMENT: _____

PLACE OF BIRTH: _____

DATE OF BIRTH: 04/25/1974

SOCIAL SECURITY NUMBER: Passport No. (India) E7079311

HEIGHT: _____ WEIGHT: _____

SEX: Male RACE: _____

HAIR: _____ EYES: _____

SCARS, TATTOOS, OTHER DISTINGUISHING MARKS: _____

FBI NUMBER: _____

COMPLETE DESCRIPTION OF AUTO: _____

INVESTIGATIVE AGENCY AND ADDRESS: FBI

United States District Court

SEALED

FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA

v.

CHOCKALINGAM RAMANATHAN

WARRANT FOR ARREST

CASE NUMBER: 8:07CR- 30

To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest CHOCKALINGAM RAMANATHAN
Name

and bring him/her forthwith to the nearest magistrate to answer a(n)

Indictment Information Complaint Order of Court Violation Notice Probation Violation Petition

charging him/her with (brief description of offense)

- Conspiracy to commit computer and securities fraud, computer fraud, securities fraud, wire fraud, and aggravated identity fraud.

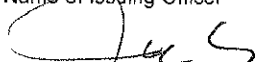
in violation of Title 18 United States Code, Section(s) 371, 1030(a)(4) & 2, 1348 & 2, 1343 & 2, 1028A & 2

DENISE M. LUCKS

Name of Issuing Officer

CLERK OF COURT

Title of Issuing Officer


Signature of Issuing Officer

1/19/07
Date and Location

Omaha, NE

Bail fixed at \$ _____ by _____
Name of Judicial Officer

RETURN		
This warrant was received and executed with the arrest of the above-named defendant at _____		
DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

THE FOLLOWING IS FURNISHED FOR INFORMATION ONLY:

DEFENDANT'S NAME: Chockalingam Ramanathan

ALIAS: _____

LAST KNOWN RESIDENCE: _____

LAST KNOWN EMPLOYMENT: _____

PLACE OF BIRTH: _____

DATE OF BIRTH: 07/30/1973

SOCIAL SECURITY NUMBER: Passport No. (India) E8401128

HEIGHT: _____ WEIGHT: _____

SEX: Male RACE: _____

HAIR: _____ EYES: _____

SCARS, TATTOOS, OTHER DISTINGUISHING MARKS: _____

FBI NUMBER: _____

COMPLETE DESCRIPTION OF AUTO: _____

INVESTIGATIVE AGENCY AND ADDRESS: FBI

United States District Court

FOR THE DISTRICT OF NEBRASKA

SEALED

UNITED STATES OF AMERICA

V.

THIRUGNANAM RAMANATHAN

WARRANT FOR ARREST

CASE NUMBER: 8:07CR-30

To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest THIRUGNANAM RAMANATHAN

Name

and bring him/her forthwith to the nearest magistrate to answer a(n)

Indictment Information Complaint Order of Court Violation Notice Probation Violation Petition

charging him/her with (brief description of offense)

- Conspiracy to commit computer and securities fraud, computer fraud, and aggravated identity fraud.


in violation of Title 18 United States Code, Section(s) 371, 1030(a)(4) & 2, 1028A & 2

DENISE M. LUCKS

Name of Issuing Officer

CLERK OF COURT

Title of Issuing Officer


Signature of Issuing Officer

1/19/07 Omaha, NE
Date and Location

Bail fixed at \$ _____ by _____
Name of Judicial Officer

RETURN		
This warrant was received and executed with the arrest of the above-named defendant at _____		
DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

THE FOLLOWING IS FURNISHED FOR INFORMATION ONLY:

DEFENDANT'S NAME: Thirugnanam Ramanathan

ALIAS: _____

LAST KNOWN RESIDENCE: _____

LAST KNOWN EMPLOYMENT: _____

PLACE OF BIRTH: _____

DATE OF BIRTH: 06/04/1972

SOCIAL SECURITY NUMBER: Passport No. (India) F4729971

HEIGHT: _____ WEIGHT: _____

SEX: Male RACE: _____

HAIR: _____ EYES: _____

SCARS, TATTOOS, OTHER DISTINGUISHING MARKS: _____

FBI NUMBER: _____

COMPLETE DESCRIPTION OF AUTO: _____

INVESTIGATIVE AGENCY AND ADDRESS: FBI

Warrants issued - 1/19/07 X 3

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
07 JAN 19 PM 5:16
SEALED
OFFICE OF THE CLERK

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 JAISANKAR MARIMUTHU,)
 CHOCKALINGAM RAMANATHAN)
 and)
 THIRUGNANAM RAMANATHAN,)
 Defendants.)

CRIMINAL NO.

8.07CM 30

INDICTMENT

[18 U.S.C. § 371, 18 U.S.C. § 1030(a)(4),
18 U.S.C. § 1348, 18 U.S.C. § 1343,
18 U.S.C. § 1028A, and 18 U.S.C. § 2]

The Grand Jury charges that, unless otherwise stated, at all times relevant to this indictment:

COUNT ONE
(Conspiracy, 18 U.S.C. § 371)

INTRODUCTION

The Defendants

1. Defendant **JAISANKAR MARIMUTHU** ("MARIMUTHU") was a resident of Chennai, India. **MARIMUTHU** maintained online brokerage accounts, which allowed him to trade securities over the Internet, at TD Ameritrade ("TDA"), E*Trade, Firsttrade, ChoiceTrade, OptionsXpress, TradeKing, and TerraNova.
2. Defendant **CHOCKALINGAM RAMANATHAN** ("CHOCKALINGAM") was a resident of Chennai, India. **CHOCKALINGAM** maintained online brokerage accounts, which allowed him to trade securities over the Internet, at E*Trade, ChoiceTrade, and OptionsXpress.
3. Defendant **THIRUGNANAM RAMANATHAN** ("THIRUGNANAM") was a native of Chennai, India, and a resident of Malaysia. **THIRUGNANAM** maintained an online brokerage

account, which allowed him to trade securities over the Internet, at E*Trade.

Definitions

4. An “online brokerage” was a company that enabled individuals to trade securities by placing orders through the Internet. Online brokerage clients maintained personal accounts with the brokerage and accessed their personal accounts by using a unique username and password.
5. “Internet Service Providers” (“ISPs”) were companies that provided their customers with access to the Internet using telephone or other telecommunications lines such as cable TV, DSL or fiber optic service.
6. An “Internet protocol address” or “IP address” was a unique numeric address used by computers on the Internet. An IP address consisted of a series of four numbers, each in the range 0 to 255, separated by periods (e.g., 123.45.67.89). Every computer connected to the Internet was assigned an IP address, with no two computers having the same IP address at the same time. Most ISPs controlled a range of IP addresses, which they assigned to their subscribers.
7. Acorda Therapeutics, Pacel Corporation, IGI, Inc., Image Entertainment, Inc., Conversion Services International, Inc., and Pressure BioSciences, Inc., were corporations whose common stocks were registered with the United States Securities and Exchange Commission under section 12 of the Securities Exchange Act of 1934.
8. A “pump and dump” scheme was a scheme in which a perpetrator sought to artificially inflate the value of securities he owned by causing others, through false information or some other artifice, to purchase the same securities. In such a scheme, the induced purchases “pump” the security price up to an artificial level, at which time the perpetrator sells, or “dumps,” his holdings for a profit.

9. A “put option” contract was a financial contract that gave the owner the right to sell a certain number of shares of a stock at a stated price, called the “strike price,” by a certain deadline. For example, a \$100 put option for XYZ Corp., with an expiration date of December 1, 200X gave the owner the right to sell a stated number of XYZ Corp. shares for the “strike price” of \$100 a share by December 1, 200X. If XYZ Corp.’s stock did not fall below the \$100 price before the December 1, 200X deadline, the options expired and were worthless.

THE CONSPIRACY

10. From in or about February 2006, through in or about December 2006, the exact date being unknown to the Grand Jury, in the District of Nebraska, and elsewhere, defendants

**JAISANKAR MARIMUTHU,
CHOCKALINGAM RAMANATHAN
and
THIRUGNANAM RAMANATHAN,**

did knowingly and willfully conspire and agree with each other and others to commit offenses against the United States, that is:

a. to, with intent to defraud, access a protected computer, without authorization and in excess of authorized access, and by means of such conduct further an intended fraud and obtain something of value, contrary to Title 18, United States Code, Section 1030(a)(4);

b. to execute a scheme and artifice to defraud persons in connection with, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property in connection with the purchase or sale of a security of an issuer with a class of securities registered under section 12 of the Securities Exchange Act of 1934, and required to file reports under section 15(d) of the Securities Exchange Act of 1934, contrary to Title 18,

United States Code, Section 1348;

c. to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and to transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, contrary to Title 18, United States Code, Section 1343; and

d. to transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to violations of Title 18, United States Code, Sections 1030(a)(4) and 1343, contrary to Title 18, United States Code, Section 1028A.

Purpose of the Conspiracy

11. It was a purpose of the conspiracy for the conspirators to enrich themselves by artificially inflating the prices of various securities to increase the value of the conspirators' holdings in those securities and then sell the securities to realize an illicit profit.

Manner and Means of the Conspiracy

12. **MARIMUTHU, CHOCKALINGAM and THIRUGNANAM**, and other co-conspirators, used the following manner and means, among others, to accomplish the objects and purpose of the conspiracy:

a. The conspirators would preselect securities whose prices could be easily manipulated because of their relatively low prices and trading volumes and then purchase shares of these securities through online brokerage accounts they controlled.

b. The conspirators would surreptitiously and without permission acquire the usernames and passwords of other online brokerage clients to gain unauthorized access, *i.e.*, to

“hack,” into those online accounts through the Internet.

c. In some instances, in addition to acquiring usernames and passwords for existing client accounts, the conspirators would surreptitiously acquire individuals’ personal information and establish new online brokerage accounts in the individuals’ names without permission. The conspirators would, without authorization, have funds from the victims’ authentic bank accounts transferred to the falsely established online brokerage accounts and use these funds to place unauthorized trades.

d. The conspirators would, without authorization, sell some or all of the securities in the victims’ online brokerage accounts. Using the proceeds, they would make large unauthorized purchases, through the victims’ accounts, of the same thinly-traded securities that they had recently purchased in their own accounts, in order to artificially inflate, *i.e.*, to “pump,” the prices of those securities.

e. After artificially inflating the share prices through the unauthorized trades, the conspirators would then sell, *i.e.*, “dump,” the holdings in their own online brokerage accounts to realize an illicit profit.

Overt Acts

13. In furtherance of the conspiracy and to achieve its objects and purpose, at least one of the following overt acts was committed by a conspirator in the District of Nebraska and elsewhere:

a. In or about February 2006, **MARIMUTHU** and **CHOCKALINGAM** sent, in the same package, applications for E*Trade accounts in their own names to E*Trade.

b. On or about August 15, 2006, **MARIMUTHU** opened a TDA account using his own name.

c. On or about August 28, 2006, **MARIMUTHU** wired \$5,100 to a TDA account in his own name at First National Bank in Omaha, Nebraska.

d. On or about September 6, 2006, **MARIMUTHU** wired \$12,000 to a TDA account in his own name at First National Bank in Omaha, Nebraska.

Acorda Therapeutics

e. On or about August 28, 2006, **MARIMUTHU** placed an order through his TDA account to purchase 1,500 shares of stock in Acorda Therapeutics (stock symbol: ACOR) at a limit price of \$3.22 per share; this was one of seventeen orders for ACOR stock placed on August 28, 2006, in **MARIMUTHU**'s TDA and E*Trade accounts resulting in the acquisition of 32,000 shares at prices from \$2.00 to \$3.29.

f. On or about August 28, 2006, **CHOCKALINGAM** placed an order to purchase 450 shares of ACOR stock for \$3.20 per share through his E*Trade account.

g. On or about August 28, 2006, the defendants caused unauthorized access to be gained into a TDA account owned by S.C. through a computer with an IP address registered in Bangkok, Thailand.

h. On or about August 28, 2006, the defendants caused an unauthorized order to purchase 5,000 shares of ACOR stock to be placed through S.C.'s TDA account. This was one of four unauthorized purchase orders placed in S.C.'s TDA account, resulting in the acquisition of 26,000 shares of ACOR stock at prices from \$2.84 to \$3.40 per share, and causing ACOR stock's trading volume to rise to more than nine times its 15-day average.

i. On or about August 28, 2006, **MARIMUTHU** placed an order to sell 1,500 shares of ACOR stock from his TDA account at \$5.00 per share; this was one of at least twenty-

two (22) sell orders for ACOR stock placed in **MARIMUTHU's** E*Trade and TDA accounts between August 28, 2006, and the morning of August 29, 2006, resulting in the sale of 30,700 shares and yielding \$21,762 in profit.

j. On or about August 30, 2006, **CHOCKALINGAM** placed an order to sell 450 shares of ACOR stock at \$2.84 per share.

Pacel Corporation

k. On or about August 11, 2006, **MARIMUTHU** placed an order to purchase 42,500,000 shares of Pacel Corporation stock (stock symbol: PCLO) through his E*Trade account for \$0.0002 per share.

l. On or about August 29, 2006, the defendants caused unauthorized access to be gained to a TDA account owned by R.K. using a computer with IP address 203.156.89.199, which was registered in Bangkok, Thailand.

m. On or about September 5, 2006, the defendants caused an unauthorized order to purchase 12,000,000 shares of PCLO stock to be placed through R.K.'s TDA account.

n. On or about September 6, 2006, **MARIMUTHU** placed an order to sell 50,000,000 shares of PCLO stock through his E*Trade account.

o. On or about September 7, 2006, **MARIMUTHU** spoke via telephone with a TDA fraud investigator in TDA's corporate offices in Omaha, Nebraska, seeking to have TDA unfreeze his account.

CTR Investments & Consulting, Inc.

p. On or about August 16, 2006, **MARIMUTHU** placed an order to purchase 1,000,000 shares of CTR Investments & Consulting, Inc. stock (stock symbol: CIVX) for a

maximum price of \$0.006 per share through his E*Trade account.

q. On or about August 16, 2006, **CHOCKALINGAM** placed an order to purchase 1,500,000 shares of CIVX stock for \$0.007 per share through his E*Trade account.

r. On or about August 30, 2006, the defendants caused unauthorized access to be gained to a TDA account owned by M.C.

s. On or about September 1, 2006, the defendants caused an unauthorized order to purchase 1,700,000 shares of CIVX stock to be placed through M.C.'s TDA account for \$0.011 per share; this order was one of seven purchase orders for CIVX stock placed in M.C.'s account on the morning of September 1, 2006, resulting in the acquisition of 3,106,300 shares.

t. On or about September 1, 2006, after placing the buy order through M.C.'s TDA account, **MARIMUTHU** subsequently placed an order to sell 1,000,000 shares of CIVX stock from his own E*Trade account at \$0.01 per share.

u. On or about September 1, 2006, shortly after the last of the unauthorized purchases using M.C.'s TDA account, **CHOCKALINGAM** placed an order to sell 1,500,000 shares of CIVX stock at \$0.01 per share.

IGI, Inc.

v. On or about September 5, 2006, **MARIMUTHU** placed an order to purchase 12,800 shares of IGI, Inc. stock (stock symbol: IG) in his own TDA account for \$0.90 per share.

w. On or about September 5, 2006, **CHOCKALINGAM** placed an order to purchase 110 shares of IG stock for \$1.04 per share through his own E*Trade account.

x. On or about September 5, 2006, the defendants caused an unauthorized order to purchase 30,000 shares of IG stock to be placed through a TDA account owned by R.A. at a

maximum price of \$1.30 per share; this order was one of fourteen purchase orders for IG stock placed through R.A.'s TDA account on September 5, 2006, resulting in the acquisition of 171,200 shares and causing IG stock's total trading volume to rise more than ten times its 15-day average trading volume.

y. On or about September 5, 2006, less than five minutes after purchasing 12,800 shares of IG stock, **MARIMUTHU** placed an order to sell 12,800 shares of IG stock at \$1.30 per share through his own TDA account.

z. On or about September 5, 2006, **CHOCKALINGAM** placed an order to sell 110 shares of IG at \$1.50 per share through his E*Trade account, less than one minute after purchasing 110 shares of IG stock for \$1.04 per share.

Image Entertainment, Inc.

aa. On or about September 21, 2006, **MARIUMUTHU** purchased 7,500 shares of Image Entertainment, Inc. stock (stock symbol: DISK) for \$3.40 per share through his own Firsttrade account; this was one of three trades **MARIMUTHU** placed for DISK stock on September 21, 2006, in his Firsttrade account, resulting in the acquisition of 10,530 shares at prices from \$3.00 to \$3.49 per share.

bb. On or about September 21, 2006, the defendants caused an unauthorized order to purchase 2,500 shares of DISK stock to be placed through a TDA account owned by T.M. for \$3.94; this was one of seven orders for purchasing DISK stock placed in T.M.'s TDA account that morning, resulting in the acquisition of 6,370 at prices from \$3.93 to \$4.25 per share.

cc. On or about September 21, 2006, the defendants caused an unauthorized order to purchase 9,500 shares of DISK stock to be placed through a TDA account owned by T.B. at a

maximum price of \$4.40 per share; this was one of twenty-four orders for purchasing DISK stock placed in T.B.'s TDA account that morning, resulting in the acquisition of 169,000 shares.

dd. On or about September 21, 2006, **MARIMUTHU** sold 8,500 shares of DISK stock through his Firsttrade account at \$4.00 per share; this was one of two trades on that day selling **MARIMUTHU**'s DISK stock holdings in his Firsttrade account.

Conversion Services International, Inc.

ee. On or about September 29, 2006, **MARIMUTHU** placed an order to purchase 7,500 shares of Conversion Services International, Inc. stock (stock symbol: CVN) for \$0.69 per share through his E*Trade account.

ff. On or about September 29, 2006, **CHOCKALINGAM** placed an order to purchase 5,300 shares of CVN stock for \$0.73 per share through his E*Trade account.

gg. On or about September 29, 2006, the defendants caused a TDA account to be opened in the name of J.L. without authorization.

hh. On or about September 29, 2006, the defendants caused an unauthorized order to purchase 5,000 shares of CVN stock to be placed through the unauthorized J.L. TDA account; this was one of six purchase orders for CVN stock placed through the unauthorized J.L. TDA account, resulting in the acquisition of 113,900 shares.

ii. On or about September 29, 2006, **MARIMUTHU** placed an order to sell 7,500 shares of CVN stock at \$1.10 per share, realizing a profit of approximately \$3,075.

jj. On or about September 29, 2006, **CHOCKALINGAM** placed an order to sell 5,300 shares of CVN stock at \$1.10 per share, realizing a profit of approximately \$1,961.

Pressure BioSciences, Inc.

kk. On or about October 4, 2006, **MARIMUTHU** purchased 7,325 shares of Pressure BioSciences, Inc. stock (stock symbol: PBIO) for \$3.36 per share through his Firstrade account.

ll. On or about October 4, 2006, the defendants caused a TDA account to be opened in the name of S.L. without authorization.

mm. On or about October 4, 2006, the defendants caused a purchase order for 50,000 shares of PBIO stock to be placed through the unauthorized S.L. TDA account; this was one of thirteen unauthorized purchase orders for PBIO stock placed through the unauthorized S.L. TDA account that day, resulting in the acquisition of 105,050 shares at prices ranging from \$3.71 to \$10.00 per share.

nn. Also on or about October 4, 2006, the defendants caused a TDA account to be opened in the name of J.B. without authorization.

oo. On or about October 5, 2006, **MARIMUTHU** sold the 7,325 shares of PBIO stock in his Firstrade account at approximately \$4.29 per share, realizing a profit of approximately \$6,824.78 in one day.

Citizens Financial Corp.

pp. On or about October 16, 2006, **THIRUGNANAM** purchased 397 shares of Citizens Financial Corp. stock (stock symbol: CNFL) through his E*Trade account for \$5.00 per share.

qq. On or about October 16, 2006, **MARIMUTHU** purchased 5,162 shares of CNFL stock through his Firstrade account for \$5.19 per share.

rr. On or about October 16, 2006, the defendants caused an unauthorized order to purchase 500 shares of CNFL to be placed in a Charles Schwab account owned by R.B.

ss. On or about October 16, 2006, **THIRUGNANAM** sold 397 shares of CNFL stock at \$6.00 per share through his E*Trade account.

tt. On or about October 16, 2006, **MARIMUTHU** sold 5,162 shares of CNFL stock at \$5.50 per share through his Firsttrade account.

American Access Technologies, Inc.

uu. On or about October 17, 2006, **THIRUGNANAM** purchased 1,500 shares of American Access Technologies, Inc. stock (stock symbol: AATK) through his E*Trade account for \$1.11 per share; this was one of two trades placed by **THIRUGNANAM** for AATK stock that day, resulting in the acquisition of 2,700 shares.

vv. On or about October 17, 2006, the defendants caused an unauthorized purchase order for 5,000 shares of AATK stock for \$1.55 per share to be placed through a Charles Schwab account owned by M.B.

ww. On or about October 17, 2006, **THIRUGNANAM** sold 1,000 shares of AATK stock through his E*Trade account at \$1.73 per share.

Google

xx. On or about October 31, 2006, **MARIMUTHU** purchased 200 Google “put option” contracts with an expiration date of December 16, 2006 and a “strike price” of \$240 (hereinafter “Google put options”) for \$0.05 per share through his OptionsXpress account.

yy. On or about October 31, 2006, **CHOCKALINGAM** purchased 200 Google put options for \$0.05 per share through his own OptionsXpress account.

zz. On or about November 6, 2006, **THIRUGNANAM** purchased 130 Google put options for \$0.05 per share through his own E*Trade account.

aaa. On or about November 6, 2006, the defendants caused an unauthorized purchase order for 250 Google put options, at \$0.10 per share to be placed through a TDA account owned by L.B; this was one of approximately seventy-eight unauthorized purchase orders for Google put options placed in L.B.'s TDA account, totaling 9,860 Google put options.

bbb. On or about November 6, 2006, **MARIMUTHU** sold 250 Google put options at \$0.10 per share through his OptionsXpress account.

ccc. On or about November 6, 2006, **CHOCKALINGAM** sold 198 Google put options at \$0.10 per share through his OptionsXpress account.

ddd. On or about November 6, 2006, **THIRUGNANAM** sold 190 Google put options at \$0.10 per share through his E*Trade account.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO THROUGH SEVEN

**(Accessing a Protected Computer in Furtherance of a Scheme to Defraud,
18 U.S.C. §§ 1030(a)(4), 2)**

14. The allegations in paragraphs 1 through 9 and 11 through 13, which constitute the scheme, are re-alleged and incorporated by reference as though fully set forth herein.

15. On or about the dates set forth below, in the District of Nebraska, and elsewhere, defendants

**JAISANKAR MARIMUTHU
and
CHOCKALINGAM RAMANATHAN,**

and others, did knowingly and with intent to defraud access a protected computer of TD Ameritrade without authorization, and in excess of authorized access, and by means of such conduct furthered the intended scheme to defraud and obtained something of value, specifically the use of the funds in the victim's account, as follows:

Count	Victim	Account Number	Date of Access	Time of Access
Two	S.C.	***-***172	08/28/06	1:37 p.m. Central Standard Time
Three	R.K.	***-***367	09/05/06	1:47 p.m. Central Standard Time
Four	M.C.	***-***449	09/01/06	8:51 a.m. Central Standard Time
Five	R.A.	***-***330	09/05/06	8:22 a.m. Central Standard Time
Six	T.M.	***-***951	09/21/06	8:05 a.m. Central Standard Time
Seven	T.B.	***-***257	09/21/06	8:27 a.m. Central Standard Time

16. The above offenses were committed and carried out in the course of, and in furtherance of, the conspiracy set forth in Count One of the Indictment and while **MARIMUTHU** and **CHOCKALINGAM** were members of the conspiracy.

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

COUNTS EIGHT THROUGH NINE
**(Accessing a Protected Computer in Furtherance of a Scheme to Defraud,
18 U.S.C. §§ 1030(a)(4), 2)**

17. The allegations in paragraphs 1 through 9 and 11 through 13, which constitute the scheme, are re-alleged and incorporated by reference as though fully set forth herein.

18. On or about the dates set forth below, in the District of Nebraska, and elsewhere, defendants

**JAISANKAR MARIMUTHU,
CHOCKALINGAM RAMANATHAN
and
THIRUGNANAM RAMANATHAN,**

and others, did knowingly and with intent to defraud access a protected computer of TD Ameritrade without authorization, and in excess of authorized access, and by means of such conduct furthered the intended scheme to defraud and obtained something of value, specifically the use of the funds in the victim's account, as follows:

Count	Victim	Account Number	Date of Access	Time of Access
Eight	R.G.	***-***364	10/16/06	10:47 a.m. Central Standard Time
Nine	L.B.	***-***068	11/06/06	9:49 a.m. Central Standard Time

19. The above offenses were committed and carried out in the course of, and in furtherance of, the conspiracy set forth in Count One of the Indictment and while **MARIMUTHU, CHOCKALINGAM** and **THIRUGNANAM**, were members of the conspiracy.

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

COUNTS TEN THROUGH FIFTEEN
(Wire Fraud, 18 U.S.C. §§ 1343, 2)

20. The allegations in paragraphs 1 through 9 and 11 through 13, which constitute the scheme, are re-alleged and incorporated by reference as though fully set forth herein.

21. On or about the dates set forth below, in the District of Nebraska, and elsewhere, defendants

JAISANKAR MARIMUTHU
and
CHOCKALINGAM RAMANATHAN,

and others, knowingly and willfully devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, as described in paragraphs 1-9 and 11-13.

22. On or about the dates set forth below, in the District of Nebraska, and elsewhere, the defendants and others, for the purpose of executing the scheme, did knowingly and willfully cause to be transmitted in interstate and foreign commerce, by means of wire communications, writings, signs, signals, pictures, and sounds, as follows:

Count	Communication	Date	From	To
Ten	Wire transfer of \$5,100 to Marimuthu's TD Ameritrade account	08/28/06	New York	Nebraska
Eleven	Wire transfer of \$12,000 to Marimuthu's TD Ameritrade account	09/06/06	New York	Nebraska
Twelve	Electronic funds transfer through wires of \$150,000 to TD Ameritrade account ***-***635	09/29/06	California	Nebraska

Thirteen	Electronic funds transfer through wires of \$150,000 to TD Ameritrade account ***-***951	09/29/06	California	Nebraska
Fourteen	Electronic funds transfer through wires of \$150,000 to TD Ameritrade account ***-***800	10/04/06	California	Nebraska
Fifteen	Electronic funds transfer through wires of \$150,000 to TD Ameritrade account ***-***947	10/04/06	California	Nebraska

23. The above offenses were committed and carried out in the course of, and in furtherance of, the conspiracy set forth in Count One of the Indictment and while **MARIMUTHU** and **CHOCKALINGAM** were members of the conspiracy.

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS SIXTEEN THROUGH SEVENTEEN
(Securities Fraud, 18 U.S.C. §§ 1348, 2)

24. The allegations in paragraphs 1 through 9 and 11 through 13, which constitute the scheme, are re-alleged and incorporated by reference as though fully set forth herein.

25. On or about the dates set forth below, in the District of Nebraska, and elsewhere, defendants

JAISANKAR MARIMUTHU
and
CHOCKALINGAM RAMANATHAN,

and others, knowingly executed and attempted to execute, a scheme and artifice to defraud persons in connection with, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property in connection with the purchase or sale of a security of an issuer with a class of securities registered under section 12 of the Securities Exchange Act of 1934, and that is required to file reports under section 15(d) of the Securities Exchange Act of 1934, as follows:

Count	Date	Security	Act of Execution
Sixteen	8/29/06	ACOR	Order to sell 1,400 shares
Seventeen	9/05/06	IG	Order to sell 12,800 shares

26. The above offenses were committed and carried out in the course of, and in furtherance of, the conspiracy set forth in Count One of the Indictment and while **MARIMUTHU** and **CHOCKALINGAM** were members of the conspiracy.

All in violation of Title 18, United States Code, Sections 1348 and 2.

COUNTS EIGHTEEN THROUGH TWENTY-ONE
(Aggravated Identity Theft, 18 U.S.C. §§ 1028A, 2)

27. The allegations in paragraphs 1 through 9 and 11 through 13, which constitute the scheme, are re-alleged and incorporated by reference as though fully set forth herein.

28. On or about the dates set forth below, in the District of Nebraska, and elsewhere, defendants

JAISANKAR MARIMUTHU
and
CHOCKALINGAM RAMANATHAN,

and others, during and in relation to violations of Title 18, United States Code, Sections 1030(a)(4) and 1343, as alleged in Counts Twelve through Fifteen, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, as follows:

Count	Date	Victim	Means of Identification
Eighteen	09/29/06	J.L.	Name, Social Security Number, Date of Birth, and Bank Account Number
Nineteen	09/29/06	B.O.	Name, Social Security Number, Date of Birth, and Bank Account Number
Twenty	10/04/06	S.L.	Name, Social Security Number, Date of Birth, and Bank Account Number
Twenty-one	10/04/06	J.B.	Name, Social Security Number, Date of Birth, and Bank Account Number

29. The above offenses were committed and carried out in the course of, and in furtherance of, the conspiracy set forth in Count One of the Indictment and while **MARIMUTHU** and **CHOCKALINGAM** were members of the conspiracy.

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

COUNTS TWENTY-TWO THROUGH TWENTY-THREE

(Aggravated Identity Theft, 18 U.S.C. §§ 1028A, 2)

30. The allegations in paragraphs 1 through 9 and 11 through 13, which constitute the scheme, are re-alleged and incorporated by reference as though fully set forth herein.

31. On or about the dates set forth below, in the District of Nebraska, and elsewhere, defendants

**JAISANKAR MARIMUTHU,
CHOCKALINGAM RAMANATHAN
and
THIRUGNANAM RAMANATHAN,**

and others, during and in relation to violations of Title 18, United States Code, Sections 1030(a)(4) and 1343, as alleged in Counts Eight and Nine, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, as follows:

Count	Date	Victim	Means of Identification
Twenty-two	10/16/06	R.G.	TD Ameritrade account username and password
Twenty-three	11/06/06	L.B.	TD Ameritrade account username and password

32. The above offenses were committed and carried out in the course of, and in furtherance of, the conspiracy set forth in Count One of the Indictment and while **MARIMUTHU, CHOCKALINGAM** and **THIRUGNANAM**, were members of the conspiracy.

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

FORFEITURE
(18 U.S.C. §§ 981(a)(1)(C), 982(a)(2)(A) and (B))

33. The allegations in paragraphs 1 through 9, 11 through 13, 15, 18, 21, and 25 are re-alleged and incorporated by reference as though fully set forth herein.

34. Each defendant who is convicted of one or more of Count One (conspiracy), Counts Two through Nine (computer fraud), Ten through Fifteen (wire fraud) and Sixteen through Seventeen (securities fraud) of this Indictment shall forfeit to the United States, pursuant to 18 U.S.C. Section 981(a)(1)(C) and 28 U.S.C. 2461(c):

- a. any property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as the result of such violation;
- b. all current holdings in **MARIMUTHU**'s TDA account, #785-471621;
- c. all current holdings in **MARIMUTHU**'s E*Trade account, #6080-3553;
- d. all current holdings in **MARIMUTHU**'s Firsttrade account, #882-54380;
- e. all current holdings in **MARIMUTHU**'s OptionsXpress account, #5487-3046;
- f. all current holdings in **MARIMUTHU**'s TradeKing account, #3069-0477;
- g. all current holdings in **MARIMUTHU**'s TerraNova Trading account, #32029574;
- h. all current holdings in **MARIMUTHU**'s ChoiceTrade account, #27636687;
- i. all current holdings in **CHOCKALINGAM**'s E*Trade account, #6080-3554;
- j. all current holdings in **CHOCKALINGAM**'s OptionsXpress account, #3495-1835;
- k. all current holdings **CHOCKALINGAM RAMANATHAN**'s TradeKing account, #1641-1714;

- l. all current holdings in **THIRUGNANAM**'s E*Trade account, #6123-632; and
 - m. all current holdings in **THIRUGNANAM**'s Firstrade account, #882-54391;
35. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.
36. Each defendant who is convicted of one or more of Counts Two through Nine (computer fraud) and Ten through Fifteen (wire fraud) of this Indictment, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(A) and (B):
- a. any property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as the result of such violation;
 - b. all current holdings in **MARIMUTHU**'s TDA account, #785-471621;
 - c. all current holdings in **MARIMUTHU**'s E*Trade account, #6080-3553;
 - d. all current holdings in **MARIMUTHU**'s Firstrade account, #882-54380;
 - e. all current holdings in **MARIMUTHU**'s OptionsXpress account, #5487-3046;
 - f. all current holdings in **MARIMUTHU**'s TradeKing account, #3069-0477;
 - g. all current holdings in **MARIMUTHU**'s TerraNova Trading account, #32029574;
 - h. all current holdings in **MARIMUTHU**'s ChoiceTrade account, #27636687;
 - i. all current holdings in **CHOCKALINGAM**'s E*Trade account, #6080-3554;
 - j. all current holdings in **CHOCKALINGAM**'s OptionsXpress account, #3495-1835;
 - k. all current holdings **CHOCKALINGAM RAMANATHAN**'s TradeKing account, #1641-1714;
 - l. all current holdings in **THIRUGNANAM**'s E*Trade account, #6123-632; and

m. all current holdings in **THIRUGNANAM**'s Firsttrade account, #882-54391.

37. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

38. If any property subject to forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A) and (B), as a result of any act or omission of **MARIMUTHU, CHOCKALINGAM, and THIRUGNANAM**:

- a. cannot be located upon the execution 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 that cannot be divided without difficult;

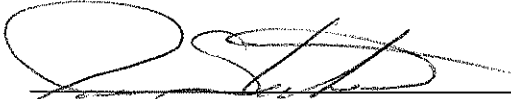
it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code Section 982(b)(1), to seek forfeiture of properties of the defendant up to the value of the above forfeitable property in United States currency.

All pursuant to Title 18, United States Code, Sections 981 and 982.


8.5.14.30
A TRUE BILL:



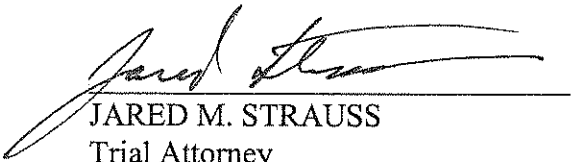
FOREPERSON



JOE W. STECHER
United States Attorney
District of Nebraska



NICOLA MRÁZEK
Trial Attorney
Fraud Section, Department of Justice



JARED M. STRAUSS
Trial Attorney
Computer Crime and Intellectual Property Section, Department of Justice

The United States of America requests that trial of this case be held at Omaha, Nebraska,
pursuant to the rules of this Court.



MICHAEL P. NORRIS
Assistant U.S. Attorney
District of Nebraska