

1523

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 15-155
	)	
MORGAN CULBERTSON	)	(18 U.S.C. § 1030(b))
a/k/a "Android"	)	

INFORMATION

INTRODUCTION

At all times relevant to the Information:

1. DARKODE was an Internet forum where individuals convened online to buy, sell, trade, and discuss intrusions on other's computers and electronic devices. One could only become a member of DARKODE by declaring to existing members what type of relevant ability or product they could bring to the forum and then being approved for membership by the other members.

2. Defendant MORGAN CULBERTSON primarily resided in Pittsburgh, Pennsylvania and used the Internet nickname "Android." CULBERTSON was a member of the Internet forum known as DARKODE.

3. "Google Android phones" are smartphones manufactured by Google. Google Android phones are capable of downloading and storing electronic data over the Internet, including applications provided by Google (hereinafter "Google Apps") on the Google app Internet marketplace, Google Play.

4. DENDROID was the name of malware which was crafted, through the use of a "binder," to be hidden within Google Apps offered on,

among other places, Google Play. DENDROID was designed to avoid detection by anti-virus scanners and Google Play security features and did not affect the functionality of the Google App that it was "bound" to. When a Google Android phone user purchased/downloaded a Google App "bound" with DENDROID, that user would also unknowingly download DENDROID.

5. Once installed on a Google Android user's phone, DENDROID would connect to a command-and-control server controlled by a person other than the Google Android user. DENDROID was intended, designed and marketed on DARKODE and elsewhere to allow its owner/controller to remotely manipulate, locate, and spy on others' Google Android phones. Among its features were the ability to intercept others' text messages, record others' calls, take photos/videos remotely, make phone calls, observe the Google Android user's Internet browsing history, and steal/delete files, photos, and/or contact lists stored on the device.

6. Although DENDROID's source code was offered for sale for as much as \$65,000 on DARKODE, DARKODE members could purchase the DENDROID application package (hereinafter "Android APK"), its binder, and the "control panel" (to control the victim Android phones remotely) for approximately \$300.

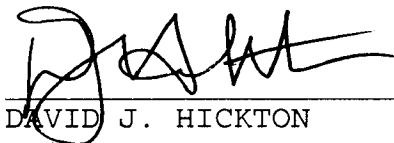
COUNT ONE

The United States Attorney charges:

7. From on or about January 2013, and continuing thereafter until on or about August 20, 2014, in the Western District of Pennsylvania and elsewhere, the defendant, MORGAN CULBERTSON, a/k/a "Android," knowingly and willfully did conspire, combine, confederate and agree with other persons known and unknown to the United States Attorney, and did aid, abet, assist and attempt to knowingly cause the transmission of a program, information, code, or command, namely DENDROID, and as a result of such conduct, intentionally cause damage without authorization, to 10 or more protected computers during any 1-year period, in violation of Title 18, United States Code, Sections 1030(a)(5)(A) and (c)(4)(B)(i) &(ii).

In violation of Title 18, United States Code, Section 1030(b).

Signed:

A handwritten signature in black ink, appearing to read "David J. Hickton", is written over a horizontal line.

DAVID J. HICKTON
United States Attorney
PA ID No. 34524