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IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

2016 DEC -9 A 10:02

UNITED STATES OF AMERICA

v.

ZACHARY LEE SHAMES,  
Defendant

Criminal No. 1:16-cr-289

CLERK US DISTRICT COURT  
ALEXANDRIA, VIRGINIA

**CRIMINAL INFORMATION**

**COUNT ONE**

**(Computer Intrusion; Aiding and Abetting)**

THE UNITED STATES ATTORNEY CHARGES THAT:

From on or about August 2013 through on or about March 17, 2015, in the Eastern District of Virginia and elsewhere, the defendant, ZACHARY LEE SHAMES, knowingly and intentionally aided and abetted the commission of computer intrusions, in violation of 18 U.S.C.

§§ 1030(a)(5)(A) and 2. In particular, at times listed above, in the Eastern District of Virginia and elsewhere, SHAMES designed, marketed and sold certain malicious keylogger software, knowing that the software was going to be used to knowingly cause the transmission of a program, information, code, or command, and as a result of such conduct, intentionally cause damage without authorization to 10 or more protected computers during any one year period.

(All in violation of Title 18, United States Code, Section 1030(a)(5)(A) and 2)

Dana J. Boente  
United States Attorney

Date: December 8, 2016

By: Kellen S. Dwyer  
Kellen S. Dwyer  
Assistant United States Attorney

**Ryan K. Dickey**  
**Senior Counsel**  
**Computer Crime and Intellectual Property Section,**  
**U.S. Department of Justice, Criminal Division**