

4W
JMC/USAO # 2008R00867

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

RAJENDRASINH BABUBHAI
MAKWANA

Defendant.

2009 JAN 27 P 4: 24

CLERK'S OFFICE
AT BALTIMORE
CRIMINAL NO. JFM-09-043

BY : (Computer Intrusion, 18 U.S.C. §§
: 1030(a)(5)(A)(i), 1030(a)(5)(B)(i), and
: 1030(c)(4)(A))

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INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges:

1. **RAJENDRASINH BABUBHAI MAKWANA (MAKWANA)** is a resident of Glen Allen, Virginia, and previously lived in Gaithersburg, Maryland. From about the beginning of 2006 to about October 24, 2008, **MAKWANA** was a contractor employee at Fannie Mae, located at Fannie Mae's Urbana, Maryland facility.

2. Fannie Mae is a government-sponsored enterprise (GSE) chartered by Congress with a mission to provide liquidity and stability to the U.S. housing and mortgage markets. Fannie Mae utilizes an interstate computer network to conduct its business. The computers are protected computers as that term is defined in 18 U.S.C. § 1030(e)(2).

3. After being terminated from his employment at Fannie Mae, **MAKWANA** intentionally and without authorization caused and attempted to cause damage to Fannie Mae's computer network by entering malicious code that was intended to execute on January 31, 2009, and that would have resulted in destroying and altering all of the data on all Fannie Mae servers.

4. On or about October 24, 2008, in the District of Maryland, and elsewhere, the defendant,

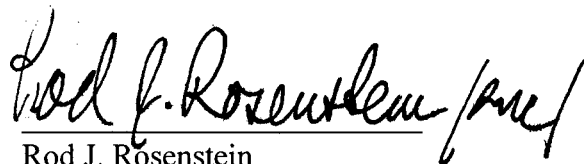
RAJENDRASINH BABUBHAI MAKWANA

did knowingly cause and attempt to cause the transmission of a program, information, code, and command, and as a result of such conduct, intentionally caused damage without authorization to a protected computer, and by such conduct caused and would, if completed, have caused loss to Fannie Mae during any one year period aggregating at least \$5,000 in value.

18 U.S.C. §§1030(a)(5)(A)(i), 1030(a)(5)(B)(i), and 1030(c)(4)(A).

A TRUE BILL:

SIGNATURE REDACTED


Rod J. Rosenstein
United States Attorney

Dated: 1/27/2009