

Hack of Zimbabwean Government Computers

e. In or about early 2011, MONSEGUR participated in "Operation Zimbabwe," in which members of Anonymous [REDACTED] used by the government of Zimbabwe. Among other things, MONSEGUR identified security weaknesses in those computer systems. MONSEGUR tested the security weaknesses by accessing without [REDACTED] downloading certain information. MONSEGUR shared the security weaknesses with other computer hackers in Anonymous and attempted to steal information from a Zimbabwean government email server.

STATUTORY ALLEGATIONS

6. From at least in or about December 2010, up to and including on or about June 7, 2011, in the Southern District of New York and elsewhere, [REDACTED] [REDACTED], and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to engage in computer hacking, in violation of Title 18, United States Code, Section 1030(a)(5)(A).

7. It was a part and an object of the conspiracy that [REDACTED]

[REDACTED] and others known and