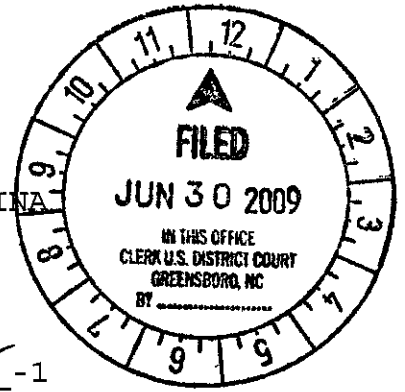


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :
 :
 v. : 1:09CR 235-1
 :
 BRENDAN CANNELL :

The Grand Jury charges:

COUNT ONE

From on or about June 3, 2008, continuing up to and including on or about April 16, 2009, the exact dates to the Grand Jurors unknown, in the County of Orange, in the Middle District of North Carolina, and elsewhere, BRENDAN CANNELL knowingly and with intent to defraud did traffic in and use one or more unauthorized access devices, that is, credit cards and credit card account numbers that were obtained with the intent to defraud, and by such trafficking and use did obtain and cause to be obtained things of value aggregating \$1,000.00 or more during a one-year period, which trafficking and use affected interstate and foreign commerce; in violation of Title 18, United States Code, Sections 1029(a)(2), 1029(c)(1)(A)(i) and 2.

COUNT TWO

From on or about June 3, 2008, continuing up to and including on or about April 16, 2009, the exact dates to the Grand Jurors unknown, in the County of Orange, in the Middle District of North Carolina, and elsewhere, BRENDAN CANNELL, during and in relation to

a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: access device fraud, in violation of Title 18, United States Code, Section 1029(a)(2), as alleged in Count One and incorporated by reference herein, knowingly did possess and use, without lawful authority, a means of identification of another person, that is, the names and Social Security numbers of persons whose initials are Y.Z. and K.B.; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THREE

On or about June 3, 2008, in the County of Orange, in the Middle District of North Carolina, BRENDAN CANNELL, in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, the United States Postal Service, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in that BRENDAN CANNELL, on a PS Form 1583, United States Postal Service Application for Delivery of Mail Through Agent, stated that he was a person whose initials were M.S. and that M.S. wanted to have mail delivered to The UPS Store, 104-R NC Hwy 54 West Bypass, Carrboro, North Carolina, when in truth and in fact, as BRENDAN CANNELL then well knew, he was not a person whose initials were M.S. and M.S. did not want to have mail delivered to The UPS Store, 104-R NC Hwy 54 West Bypass, Carrboro, North Carolina; in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT FOUR

On or about August 30, 2008, in the County of Orange, in the Middle District of North Carolina, BRENDAN CANNELL, in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, the United States Postal Service, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in that BRENDAN CANNELL, on a PS Form 1583, United States Postal Service Application for Delivery of Mail Through Agent, stated that he was a person whose initials were A.B. and that A.B. wanted to have mail delivered to The UPS Store, 510 Meadowmont Village Circle, Chapel Hill, North Carolina, when in truth and in fact, as BRENDAN CANNELL then well knew, he was not a person whose initials were A.B. and A.B. did not want to have mail delivered to The UPS Store, 510 Meadowmont Village Circle, Chapel Hill, North Carolina; in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT FIVE

On or about March 16, 2009, in the County of Orange, in the Middle District of North Carolina, BRENDAN CANNELL, in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, the United States Postal Service, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in that BRENDAN CANNELL, on a PS Form 1583, United States Postal Service

Application for Delivery of Mail Through Agent, stated that he was a person whose initials were M.D. and that M.D. wanted to have mail delivered to The UPS Store, 1289 Fordham Blvd., Chapel Hill, North Carolina, when in truth and in fact, as BRENDAN CANNELL then well knew, he was not a person whose initials were M.D. and M.D. did not want to have mail delivered to The UPS Store, 1289 Fordham Blvd., Chapel Hill, North Carolina; in violation of Title 18, United States Code, Section 1001(a)(2).

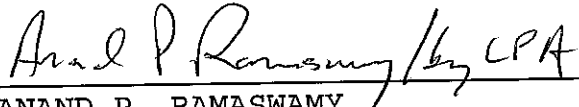
COUNT SIX


On or about March 16, 2009, in the County of Orange, in the Middle District of North Carolina, BRENDAN CANNELL, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: making a false statement in a matter within the jurisdiction of the United States Postal Service, in violation of Title 18, United States Code, Section 1001(a)(2), as alleged in Count Five and incorporated by reference herein, did knowingly possess and use, without lawful authority, a means of identification of another person, that is, the name and North

Carolina driver's license of a person whose initials are M.D.; in violation of Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL:

~~FOREPERSON~~


ANAND P. RAMASWAMY
ASSISTANT UNITED STATES ATTORNEY


ANNA MILLS WAGONER
UNITED STATES ATTORNEY