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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2016 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTINA ELIZABETH BANKSTON,
aka "Christina Elizabeth
McGill,"
aka "Troy Leatherby,"
aka "Jacky Jasper,"
aka "Greg Comeau,"
aka "Browbuster,"

Defendant.

CR No. 16-

CR16-0512

I N D I C T M E N T

[18 U.S.C. §§ 2261A(2)(B) and
2261(b)(5): Stalking; 18 U.S.C.
§§ 1030(a)(2)(C), (b),
(c)(2)(B)(ii): Unauthorized Access
to a Protected Computer to Obtain
Information; 18 U.S.C.
§§ 1030(a)(7)(B), (c)(3)(A):
Extortion by Threat to Obtain
Information and Impair
Confidentiality of Information of
a Protected Computer; 18 U.S.C.
§ 1028A(a)(1): Aggravated Identity
Theft]

The Grand Jury charges:

COUNTS ONE THROUGH SIX

[18 U.S.C. §§ 2261A(2)(B), 2261(b)(5)]

A. USE OF INTERSTATE COMMERCE FACILITY TO ENGAGE IN THREATENING
COURSE OF CONDUCT

1. Beginning on a date unknown to the Grand Jury, but no later
than March 9, 2014, and continuing to on or about September 5, 2014,
in Los Angeles County, within the Central District of California, and

1 elsewhere, defendant CHRISTINA ELIZABETH BANKSTON, also known as
2 ("aka") "Christina Elizabeth McGill," aka "Troy Leatherby," aka
3 "Jacky Jasper," aka "Greg Comeau," aka "Browbuster," ("defendant
4 BANKSTON"), with the intent to harass and intimidate Kristen Jenner
5 ("Victim Jenner"), Katherine Ellena ("Victim Ellena"), Caitlyn
6 Jenner, then known as Bruce Jenner ("Victim C. Jenner"), Jennifer
7 Stith ("Victim Stith"), Victim A, Victim B, and others known and
8 unknown to the Grand Jury (collectively, "the Victims,"), used
9 facilities of interstate commerce, including cellular telephone
10 networks, electronic mail ("email"), text messages, interstate wires,
11 and the Internet, to engage in a course of conduct, described in
12 paragraph 2 below, that caused, attempted to cause, and would have
13 been reasonably expected to cause, substantial emotional distress to
14 the Victims and their immediate family members.

15 B. DESCRIPTION OF COURSE OF CONDUCT

16 2. Defendant BANKSTON'S course of conduct included, among
17 other things, the following:

18 a. Between on or about March 9, 2014 and March 10, 2014,
19 defendant BANKSTON, using the name "Troy," an email account, and
20 multiple telephone numbers, sent 89 chat messages and 19 text
21 messages to Victim Jenner. In those messages, among other things
22 defendant BANKSTON, stating that defendant BANKSTON was located in
23 Beverly Hills, California, and knowing that Victim Jenner resided in
24 Los Angeles County, asked to meet Victim Jenner in person because
25 defendant BANKSTON claimed to have a "sex tape" of Victim Jenner
26 which defendant BANKSTON claimed to have sent to an online media
27 website.

1 b. On or about March 12, 2014, defendant BANKSTON sent
2 Victim Jenner six anonymous text messages, including:

3 i. "Can I eat you out," "Oh you can't block me
4 forever love."

5 ii. "Die! I feel special and honored to rock it! Love
6 u momma Kris."

7 c. On or about March 14, 2014, defendant BANKSTON sent
8 Victim Jenner 29 anonymous text messages from multiple telephone
9 numbers, including the following:

10 i. "Hey beautiful remember when you were getting all
11 those crazy calls from the uk and you posted it! Why won't you post
12 mine with me contacting you?," "Instagram me make me famous."

13 ii. "Kris put this on TMZ make me famous!!," "Kris we
14 have all your numbers now make me famous biiiiiitch."

15 iii. "Ohhh Kris I looked on the FBI most wanted list
16 and I'm not there! I'm disappointed in you! Put me on Instagram tho
17 ;):) goodnight you!"

18 d. On March 22, 2014, defendant BANKSTON, using multiple
19 telephone numbers, sent 34 anonymous text messages to Victim Jenner.
20 In those messages, among other things, defendant BANKSTON:

21 i. Stated that she had a "sex tape" of Victim Jenner
22 that defendant BANKSTON wanted to sell to an adult film studio.

23 ii. Stated, "Let's talk," "My bad lets stalk."

24 e. On or about March 24, 2014, at approximately 4:00
25 a.m., defendant BANKSTON used a telephone to call a friend of
26 Victim Jenner, and, impersonating Victim Jenner, falsely told Victim
27 Jenner's friend that something had been published about the friend on
28 the Internet.

1 f. On or about March 25, 2014, defendant BANKSTON, using
2 multiple phone numbers, sent 8 anonymous text messages to Victim
3 Jenner. In those messages, among other things, defendant BANKSTON
4 repeatedly referenced Victim Jenner's inability to "block" defendant
5 BANKSTON's communications to Victim Jenner, and stated, "This is
6 getting creepy [again]."

7 g. On or about March 26, 2014, defendant BANKSTON sent 11
8 anonymous text messages to Victim Jenner. In those messages, among
9 other things, defendant BANKSTON stated that defendant BANKSTON had
10 conducted an interview with a reporter from an online website about a
11 sex tape of Victim Jenner that defendant BANKSTON claimed to have.

12 h. On or about April 6, 2014, defendant BANKSTON, using
13 multiple telephone numbers, sent 7 anonymous text messages to
14 Victim Jenner. In those messages, among other things, defendant
15 BANKSTON asked Victim Jenner to call her and meet at a hotel room in
16 Beverly Hills, California, knowing that Victim Jenner lived in the
17 area.

18 i. On or about April 12, 2014, defendant BANKSTON, using
19 the name "Troy Leatherby" and multiple telephone numbers, sent 54
20 text messages to Victim Jenner. In those messages, among other
21 things, defendant BANKSTON:

22 i. Asked Victim Jenner to meet her at a hotel in the
23 Los Angeles area to "come fucc with me."

24 ii. Repeatedly referenced Victim Jenner's inability
25 to block telephone numbers.

26 iii. Stated that she wanted to make a "sex tape" with
27 Victim Jenner to sell for a million dollars.

1 iv. Made multiple references to wanting to see
2 Victim Jenner naked or engaged in sexual activity.

3 j. On or about April 13, 2014, defendant BANKSTON, using
4 the name "Troy" and multiple telephone numbers, sent 60 text messages
5 to Victim Jenner, including the following:

6 i. "I want eat you through you're sexy to [me]."

7 ii. "Me you and sex tape...ya? I'm in your area
8 today lets do it."

9 k. Between on or about April 16, 2014 and April 18, 2014,
10 defendant BANKSTON, using multiple telephone numbers, sent 23
11 anonymous text messages to Victim Jenner, including the following:

12 i. "Kris has her own personal stalker."

13 ii. "Heard you were in the hospital," "I'm on my way
14 to see you soon if you're home."

15 l. On or about April 19, 2014, defendant BANKSTON, using
16 multiple telephone numbers, sent 49 anonymous text messages to
17 Victim Jenner. In those messages, among other things, defendant
18 BANKSTON:

19 i. Stated, "Ahh kris you have a stalker lol."

20 ii. Told Victim Jenner that defendant BANKSTON had
21 obtained Victim Jenner's "password" from a named employee of a
22 restaurant at which Victim Jenner had eaten, and "now your fucked."

23 iii. Stated, "Change be a better person and then maybe
24 then we will stop ducking up your world you lousy useless bitch."

25 m. On or about April 27, 2014, defendant BANKSTON, using
26 multiple telephone numbers, sent two anonymous text messages and made
27 approximately 22 telephone calls to a person whom defendant BANKSTON
28 knew to be a friend of Victim Jenner. In those calls and text

1 messages, among other things, defendant BANKSTON, while impersonating
2 Victim Jenner, told the friend that Victim Jenner had cancer and
3 needed the telephone number of Victim Jenner's husband, Victim
4 C. Jenner, to get a ride to the hospital.

5 n. On or about April 27, 2014, defendant BANKSTON used a
6 telephone to cause Los Angeles County Sheriff's Department to send
7 emergency response personnel to Victim Jenner's residence by telling
8 an emergency service operator that defendant BANKSTON was Victim
9 Jenner and falsely stating that Victim Jenner's sister, whose true
10 first name defendant BANKSTON provided, was cutting her wrists at
11 Victim Jenner's residence as part of a suicide attempt.

12 o. On or about June 9, 2014, defendant BANKSTON used a
13 telephone to call Victim Ellena, whom defendant knew worked for
14 Victim Jenner. During the call, defendant BANKSTON asked for Victim
15 Ellena by Victim Ellena's first name, said that it had taken a long
16 time to find Victim Ellena's telephone number, laughed, and hung up.

17 p. Between on or about June 9, 2014 and June 10, 2014,
18 defendant BANKSTON, used the Internet to, on multiple occasions, gain
19 unauthorized access to and change the password for Victim Jenner's
20 Apple iCloud account. Using that account, among other things,
21 defendant BANKSTON:

22 i. Used an iCloud feature to locate Victim Jenner's
23 iPhone at Victim Jenner's residence in Los Angeles County.

24 ii. Impersonated Victim Jenner in a text message
25 conversation with Victim C. Jenner.

26 iii. Sent 24 texts messages from Victim Jenner's Apple
27 iCloud account to Victim C. Jenner, after Victim C. Jenner became
28 aware of the impersonation, including, the following:

1 (a) "U could try but u could never find me,"
2 "Dumb fuck," "u could never find me," "Dumb fuck," "Good luck I fuck
3 your wife," "And she loves it."

4 (b) "Kris hates blacks and we made it to TMZ bye
5 Bruce."

6 (c) "Tell [first name of Victim C. Jenner's
7 former spouse] she's a hot piece of ass and she's next."

8 iv. Impersonated Victim Jenner in a text message
9 conversation with Victim Jenner's daughter, Victim A, then a minor.

10 q. On or about June 10, 2014, defendant BANKSTON used the
11 Internet to gain unauthorized access to Victim Jenner's Instagram
12 account. Using that account, defendant BANKSTON publically posted,
13 under Victim Jenner's name and photograph, negative comments about
14 "blacks," and disparaging remarks about a member of Victim Jenner's
15 family.

16 r. On or about June 11, 2014, defendant BANKSTON sent ten
17 anonymous text messages to Victim Jenner. In those messages, among
18 other things, defendant BANKSTON described herself as "the best
19 hacker in the word," said that she would next hack into
20 Victim Jenner's Twitter account, and threatened to "release"
21 publically defendant BANKSTON's prior text message conversation with
22 Victim A, as well as "pics and emails."

23 s. On or about June 11, 2014, defendant BANKSTON sent six
24 anonymous text messages to Victim C. Jenner, including "After you
25 told me go fuck myself i decided to go fuck your wife instead."

26 t. On or about June 11, 2014, defendant BANKSTON used the
27 Internet to attempt to gain unauthorized access to and reset the
28 password for Victim Jenner's Apple iCloud account.

1 u. On or about June 11, 2014, defendant BANKSTON used a
2 telephone to call an employee at Instagram LLC. In the call,
3 defendant BANKSTON identified herself with Victim Jenner's name and
4 attempted to change the passwords of Victim Jenner's Instagram and
5 Facebook accounts.

6 v. Between on or about June 11, 2014 and June 12, 2014,
7 defendant BANKSTON used the Internet to gain unauthorized access to
8 an email account of Victim B, Victim Jenner's daughter. Using the
9 account, defendant BANKSTON read and copied private email messages
10 between Victim B and Victim B's husband.

11 w. On or about June 13, 2014, defendant BANKSTON used a
12 telephone to call Victim Ellena. During the call, defendant BANKSTON
13 referenced the names of Victim Ellena's mother, father, and brother,
14 and said that defendant BANKSTON was "coming after" Victim Ellena's
15 mother "next." Defendant BANKSTON then made several attempts to call
16 Victim Ellena's mother.

17 x. On or about June 19, 2014, defendant BANKSTON, using
18 the name "Greg Comeau," used a telephone to make three telephone
19 calls to Victim Jenner. During the calls, among other things,
20 defendant BANKSTON told Victim Jenner that someone had had broken
21 into Victim Jenner's "phone" and computer accounts, could view Victim
22 Jenner's emails, and was stalking Victim C. Jenner and others.

23 y. On or about June 19, 2014, defendant BANKSTON sent
24 seven anonymous text messages to Victim Jenner, including, "This is
25 the fun part about it," "No matter how much you change numbers we
26 find them," "Lollllllllll," and "So now we find and seek your home #."

27 ~~z. On or about June 20, 2014, defendant BANKSTON made~~
28 multiple telephone calls to Victim Stith, whom defendant BANKSTON

1 knew worked for Victim Jenner at an office. During the calls, among
2 other things, defendant BANKSTON told Victim Stith that Victim Stith
3 was being watched at the office and not to leave the office.

4 aa. On or about June 24, 2014, defendant BANKSTON sent
5 three anonymous text messages to Victim B, among other things,
6 falsely stating that she was pregnant by Victim B's husband.

7 bb. On or about June 24, 2014, defendant BANKSTON, using
8 the name "jacky jasper," sent 20 text messages to Victim C. Jenner,
9 including "I saw you getting coffee in your blue bike shorts today,"
10 and "I still wanna know if I can fuck your pretty wife."

11 cc. Between on or about July 19, 2014 and July 20, 2014,
12 defendant BANKSTON used the Internet to post on the website
13 lipstickalley.com a number of messages about Victim Jenner and
14 Victim Jenner's family under a public discussion thread that
15 defendant BANKSTON created. Those messages included, among other
16 things, the following:

17 i. An offer to provide, upon request, defendant
18 BANKSTON's June 10, 2014 text message conversation with Victim A,
19 representing it to be a conversation between Victim Jenner and
20 Victim A.

21 ii. A series of messages that identified and
22 published the telephone numbers for Victim Jenner's residence and
23 cellular telephone, Victim A, another daughter of Victim Jenner, and
24 one of Victim Jenner's friends.

25 dd. On or about July 31, 2014, defendant BANKSTON sent
26 Victim Jenner an email stating, "I am so in love with you, it's
27 crazy, you know me btw. Can you come to the Bay Area? I wanna fuck
28 you so bad."

1 ee. On or about August 4, 2014, defendant BANKSTON sent
2 series of an email messages to Victim Jenner and Victim Ellena.
3 Those messages included, among other things, the following:

4 i. An email to Victim Ellena stating, "Tell kris thx
5 for wiping my iPad now I can't use it. I'll expect a new one this
6 week."

7 ii. An email to Victim Ellena titled, "I'm tracking
8 this," that contained location and other information regarding
9 Victim Ellena's email address and phone service, and the statement
10 "Here's your ip...and info! I want my iPad."

11 iii. An email to Victim Jenner stating, "Call in extra
12 security tonight.... Btw I'm tracking you..Who's in Glendale? Look
13 somewhere on your car...There's a tracking device lol lol. Well you
14 do like the cameras don't you? I have private intamate shots of you
15 too :):) they will be published on lipstickalley tonight if I get no
16 call or ipad."

17 iv. An email to Victim Jenner titled "Your Stalker,"
18 that stated, "You want to see stalker I'm going to show you stalker
19 now fetch me a new iPad 1.5 hours till show time!!!"

20 ff. On or about August 6, 2014, using the name "Mr Troy,"
21 and the email address "Troyleatherby@mail.com," defendant BANKSTON
22 sent a series of emails to Victim Jenner and Victim Ellena. Those
23 emails included, the following:

24 i. An email to Victim Ellena titled, "Troy leatherby
25 I'm here," stating, "I'm here. I'm the one who put out the sex tape
26 rumors I am the one who broke into her iCloud. I am here from San
27 Francisco lets meet. Ive been on you guys since april tell the guy
28 who answered the phone at the house I'm here. Tell him I had a bad

1 connection. Tell everyone I'm in town!! Hahahah. Brace yourself
2 I'm here for my iPad. 6'4 green eyes and will see you and kris soon.
3 Thanks kat."

4 ii. An email to Victim Ellena stating, "There's no
5 use for you guys to keep changing numbers I am a hacker an work IT I
6 can find out your new number within days I've hacked the camera in
7 homes don't fuck with me just get me my iPad ill meet you anywhere
8 for it but you guys owe me an iPad. Katherine I've been in your
9 iCloud brace yourselves. I want my iPad ill meet anywhere to get
10 it."

11 iii. An email to Victim Ellena stating, "Clear the
12 fucking house I'm in the area. I'm now connected to KJ wireless
13 . . . I am IT I can see everything on this network. Don't play
14 matlock or Sherlock Holmes. You won't find me. Tel the boy who's
15 answering the house numbers I will duck him for lying to me. I don't
16 like games. You will learn soon. I'm withinn a 5 mi radius of
17 Kris's home. :)))".

18 iv. An email to Victim Jenner stating, I'm gonna duck
19 you right in your pussy hole you are mine and u am in love."

20 v. An email to Victim Ellena stating, "I'm going to
21 fuck you right in your pussy hole when I see you."

22 gg. On or about August 7, 2014, defendant BANKSTON sent by
23 email to Victim Ellena four audio files purporting to reflect
24 recordings of "Troy" speaking on the telephone. In these audio
25 files, among other things, defendant BANKSTON references stalking
26 Victim Jenner and her family over many months, including putting
27 tracking devices on Victim Jenner's vehicles, obtaining phone numbers
28 from restaurants that Victim Jenner had attended, using someone to

1 imitate Victim Jenner's voice on the telephone with Victim Jenner's
2 friends, seeking to obtain naked photographs of Victim Jenner,
3 traveling to Los Angeles County where Victim Jenner lived, and
4 hacking into Victim Jenner's iCloud and Instagram accounts.

5 hh. On or about August 8, 2014, using the name "Mr Troy,"
6 and the email address "Troyleatherby@hotmail.com," defendant
7 BANKSTON, knowing Victim Ellena was in San Francisco, sent an email
8 message to Victim Ellena stating, among other things, "I'm assuming
9 you're in the Bay Area now! Is Kris with you?"

10 ii. On or about August 10, 2014, defendant BANKSTON used
11 the Internet to post on the website lipstickalley.com a number of
12 messages under a public discussion thread that defendant BANKSTON
13 created titled, "The stalking of Kris Jenner." Those messages
14 included, among other things, statements about a stalker putting
15 tracking devices on Victim Jenner's car, breaking into and tracking
16 Victim Jenner's iPhone, and obtaining naked photographs of
17 Victim Jenner.

18 jj. On or about August 15, 2014, defendant BANKSTON,
19 knowing that Victim Ellena was located at the offices of E
20 Entertainment Television in Los Angeles, California, sent
21 Victim Ellena an email saying, "you're at e network I see you."

22 kk. On or about September 5, 2014, defendant BANKSTON told
23 agents from the Federal Bureau of Investigation that a person named
24 "Troy Leatherby" would be going to Victim Jenner's home the next day
25 and might "TNT the house or set it on fire," or commit "some kind of
26 massacre," knowing that this was false.

1 C. COUNTS

2 3. Defendant engaged in the course of conduct and used the
3 facilities of interstate commerce described in paragraph 2 above,
4 with the intent to harass and intimidate the following persons, and
5 caused, attempted to cause, and would have been reasonably expected
6 to cause, substantial emotional distress to that person and their
7 immediate family members.

8 COUNT: VICTIM:

- 9 ONE Victim Jenner
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11 TWO Victim Ellena
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13 THREE Victim C. Jenner
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15 FOUR Victim A
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17 FIVE Victim B
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19 SIX Victim Stith
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COUNT SEVEN

[18 U.S.C. §§ 1030(a)(2)(C), (c)(2)(B)(ii)]

On or about June 10, 2014, in Los Angeles County, within the Central District of California, and elsewhere, defendant CHRISTINA ELIZABETH BANKSTON, also known as ("aka") "Christina Elizabeth McGill," aka "Troy Leatherby," aka "Jacky Jasper," aka "Greg Comeau," aka "Browbuster," knowingly and intentionally accessed without authorization and in excess of authorization a protected computer, as that term is defined in Title 18, United States Code, Section § 1030(e)(2), namely, a server of Apple Inc., and thereby obtained information, namely, the contents of an iCloud account belonging to Kristen Jenner ("Victim Jenner") and the location of Victim Jenner's iPhone, in furtherance of criminal and tortious acts, to wit, stalking in violation of 18 U.S.C. §§ 2261A(2)(A) and 2261(b)(5), as alleged in Counts One through Six of this Indictment, and the California State Tort of Invasion of Privacy.

COUNT EIGHT

[18 U.S.C. §§ 1030(a)(2)(C), (c)(2)(B)(ii)]

On or about June 10, 2014, in Los Angeles County, within the Central District of California, and elsewhere, defendant CHRISTINA ELIZABETH BANKSTON, also known as ("aka") "Christina Elizabeth McGill," aka "Troy Leatherby," aka "Jacky Jasper," aka "Greg Comeau," aka "Browbuster," knowingly and intentionally accessed without authorization and in excess of authorization a protected computer, as that term is defined in Title 18, United States Code, Section § 1030(e)(2), namely, a server of Apple Inc., and thereby obtained information, namely, the contents of an iCloud account belonging to Kristen Jenner, and iMessage communications with Caitlyn Jenner, then known as Bruce Jenner and Victim A, in furtherance of criminal and tortious acts; to wit, stalking in violation of 18 U.S.C. §§ 2261A(2)(A) and 2261(b)(5), as alleged in Counts One through Six of this Indictment, and the California State Tort of Invasion of Privacy.

COUNT NINE

[18 U.S.C. §§ 1030(a)(2)(C), (b), (c)(2)(B)(ii)]

On or about June 11, 2014, in Los Angeles County, within the Central District of California, and elsewhere, defendant CHRISTINA ELIZABETH BANKSTON, also known as ("aka") "Christina Elizabeth McGill," aka "Troy Leatherby," aka "Jacky Jasper," "aka "Greg Comeau," aka "Browbuster," knowingly and intentionally attempted to access without authorization and in excess of authorization a protected computer, as that term is defined in Title 18, United States Code, Section § 1030(e)(2), namely, a server of Instagram, and thereby obtained information, namely, the contents of an Instagram account belonging to Kristen Jenner, in furtherance of criminal and tortious acts, to wit, stalking in violation of 18 U.S.C. §§ 2261A(2)(A) and 2261(b)(5), as alleged in Counts One through Six of this Indictment, and the California State Tort of Invasion of Privacy.

COUNT TEN

[18 U.S.C. §§ 1030(a)(2)(C), (c)(2)(B)(ii)]

On or about June 11, 2014, in Los Angeles County, within the Central District of California, and elsewhere, defendant CHRISTINA ELIZABETH BANKSTON, also known as ("aka") "Christina Elizabeth McGill," aka "Troy Leatherby," aka "Jacky Jasper," aka "Greg Comeau," aka "Browbuster," knowingly and intentionally accessed without authorization and in excess of authorization a protected computer, as that term is defined in Title 18, United States Code, Section § 1030(e)(2), namely, a server of AOL Inc., and thereby obtained information, namely, the contents of an AOL email account belonging to Victim B, in furtherance of criminal and tortious acts, to wit, stalking in violation of 18 U.S.C. §§ 2261A(2)(A) and 2261(b)(5), as alleged in Counts One through Six of this Indictment, and the California State Tort of Invasion of Privacy.

COUNT ELEVEN

[18 U.S.C. §§ 1030(a)(7)(B), (c)(3)(A)]

On or about August 6, 2014, in Los Angeles County, within the Central District of California, and elsewhere, defendant CHRISTINA ELIZABETH BANKSTON, also known as ("aka") "Christina Elizabeth McGill," aka "Troy Leatherby," aka "Jacky Jasper," aka "Greg Comeau," aka "Browbuster," with intent to extort money and other things of value, transmitted in interstate and foreign commerce an email to Katherine Ellena ("Victim Ellena"), containing a threat to obtain information from a protected computer without authorization and to impair the confidentiality of information obtained from a protected computer without authorization, namely, information from Victim Ellena's iCloud account.

COUNT TWELVE

[18 U.S.C. § 1028A(a)(1)]

On or about June 10, 2014, in Los Angeles County, within the Central District of California, and elsewhere, defendant CHRISTINA ELIZABETH BANKSTON, also known as ("aka") "Christina Elizabeth McGill," aka "Troy Leatherby," aka "Jacky Jasper," aka "Greg," aka "Browbuster," knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, that is, the username, password, and security answer of Kristen Jenner, during and in relation to Unauthorized Access to a Protected Computer to Obtain Information, a felony violation of Title 18, United States Code, Sections 1030(a)(2)(C), and (c)(2)(B)(ii), as charged in Count Seven of this Indictment.

COUNT THIRTEEN

[18 U.S.C. § 1028A(a)(1)]

On or about June 10, 2014, in Los Angeles County, within the Central District of California, and elsewhere, defendant CHRISTINA ELIZABETH BANKSTON, also known as ("aka") "Christina Elizabeth McGill," aka "Troy Leatherby," aka "Jacky Jasper," aka "Greg," aka "Browbuster," knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, that is, the username, password, and security answer of Kristen Jenner, during and in relation to Unauthorized Access to a Protected Computer to Obtain Information, a felony violation of Title 18, United States Code, Sections 1030(a)(2)(C), and (c)(2)(B)(ii), as charged in Count Eight of this Indictment.

COUNT FOURTEEN

[18 U.S.C. § 1028A(a)(1)]

On or about June 11, 2014, in Los Angeles County, within the Central District of California, and elsewhere, defendant CHRISTINA ELIZABETH BANKSTON, also known as ("aka") "Christina Elizabeth McGill," aka "Troy Leatherby," aka "Jacky Jasper," aka "Greg Comeau," aka "Browbuster," knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, that is, the name of Kristen Jenner, during and in relation to the attempted Unauthorized Access to a Protected Computer to Obtain Information, a felony violation of Title 18, United States Code, Sections 1030(a)(2)(C), (b), and (c)(2)(B)(ii), as charged in Count Nine of this Indictment.

COUNT FIFTEEN

[18 U.S.C. § 1028A(a)(1)]

Between on or about June 11, 2014 , in Los Angeles County, within the Central District of California, and elsewhere, defendant CHRISTINA ELIZABETH BANKSTON, also known as ("aka") "Christina Elizabeth McGill," aka "Troy Leatherby," aka "Jacky Jasper," aka "Greg Comeau," aka "Browbuster," knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, that is, the username, password, and security answer of Victim B, during and in relation to Unauthorized Access to a Protected Computer to Obtain Information, a felony violation of

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1 Title 18, United States Code, Sections 1030(a)(2)(C), and
2 (c)(2)(B)(ii), as charged in Count Ten of this Indictment.

3 A TRUE BILL

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5 151
6 Foreperson

7 EILEEN M. DECKER
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9 *Patricia A. Donahue*

10 PATRICIA A. DONAHUE
11 Assistant United States Attorney
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