

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	
)	Criminal No. 08-CR-10223-PBS
ALBERT GONZALEZ,)	
)	
Defendant.)	

RULE 112.4 CORPORATE DISCLOSURE STATEMENT

The United States of America, by and through its undersigned attorney, makes this filing pursuant to Local Rule 112.4 of the Local Rules of the United States District Court for the District of Massachusetts.

There are two broad classes of organizational victims in this case. First, the defendant and his co-conspirators hacked into, and attempted to hack into, computer networks operated by a large number of corporations. The following have been publically identified to date in this case.

- BJ's Wholesale Club, Inc.
- DSW, Inc.
- OfficeMax, Inc.
- Boston Market
- Barnes and Noble, Inc.
- Sports Authority
- TJX Companies, Inc.
- Forever 21, Inc.

Public records indicate that the following entities may own ten percent or more of one the organizational victims listed above.

- Waban, Inc.
- Schottenstien Stores Corporation
- Sun Capital Partners
- Pershing Square Capital Management
- Leonard Green and Partners
- Orient Star Holdings LLC

There is forensic and/or testimonial evidence that the defendant and his co-conspirators hacked into numerous other businesses, which have not yet been publicly identified. Should the Court so desire, this pleading can be supplemented by an in camera submission listing these entities.

Second, over 40 million credit/debit cards were stolen during the conspiracy alleged in Count one of the Information. As a consequence, hundreds of banks were victimized and potentially victimized as stolen credit card information was fraudulently used. As of this juncture, the government has not identified that list of banking institutions by name.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Stephen P. Heymann
STEPHEN P. HEYMANN
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent by mail to Rene Palomino, Jr., counsel for the defendant.

/s/ Stephen P. Heymann
STEPHEN P. HEYMANN
Assistant United States Attorney

Date: September 11, 2008