

STATE OF VIRGINIA

COUNTY OF NORFOLK

Affidavit

I, Special Agent Lavontay Johnson, being duly sworn, hereby depose and says:

I. Background and Experience of Myself

1. I am a Special Agent with the United States Secret Service,, assigned to the Norfolk Field Office. I have been employed by the USSS for about 5 years now. I am currently part of the Electronic Crimes Task Force, which focuses on investigating cyber focused financial crimes, data breaches, and the unauthorized access of protected computer systems.
2. I have completed extensive training in digital forensics, advanced computer intrusion investigations, and electronic evidence recovery. I have also participated in and executed numerous federal search and seizure warrants involving cybercrime targets and electronic evidence.

II. Purpose of Affidavit

3. I'm submitting this affidavit in support of an application for a search and seizure warrant for the following property seized from Roman Valeryevich Seleznev at the time of his arrest:

- Apple MacBook Pro laptop
- Three external hard drives
- Two SD memory cards
- One USB thumb drive

- One handwritten notebook

These items are currently secured in FBI evidence storage in Norfolk, Virginia at the moment..

III. Overview of Investigation

4. Since 2010, we have investigated a pretty large scale cybercrime ring responsible for stealing and selling credit card data. Roman Seleznev, who was operating under the alias “Track2,” ran an online operation trafficking over 1.7 million stolen card numbers, causing an estimated \$170 million in losses.
5. Seleznev was arrested in July 2014. At the time of his arrest, electronic devices believed to contain evidence of his criminal activity were seized.

IV. Proven Facts

6. Forensic evidence from infected U.S. POS systems shows stolen credit card data was sent to servers linked to Seleznev.
7. A cooperating witness identified “Track2” as Seleznev and provided chat logs and payment records supporting his involvement.
8. Subpoenaed crypto exchange records tied his email and wallet to the illegal sales. Metadata on a seized device confirmed this connection.
9. Surveillance footage shows Seleznev using a laptop to access stolen data marketplaces.
10. There is probable cause to believe the seized devices contain stolen card data, hacking tools, communications with co-conspirators, and financial records.

V. Items to be Searched and Seized

11. The following items are subject to forensic search and seizure under this warrant:

- Evidence of identity theft, wire fraud, and computer fraud
- Malware or other hacking tools
- Stolen payment card data
- Records of cryptocurrency transactions
- Communications related to trafficking of stolen data

VI. Conclusion

12. Based on all of the information above, I respectfully believe that there is probable cause to believe that violations of Access Device Fraud, Computer Fraud and Abuse, Wire Fraud, and Money Laundering have been committed by Roman Seleznev, and that evidence of these crimes is contained on the devices listed above.

13. I therefore request that the Court issue a search warrant authorizing the forensic examination of the seized electronic devices and documents.

Respectfully,

Special Agent Lavontay Johnson