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ATTORNEY WORK PRODUCT – DRAFT – CONFIDENTIAL

Chris Tarnovsky

- To date, the following Internet aliases and e-mails addresses have been identified for Chris Tarnovsky:

| Alias              | Associated E-mail Address  | Notes   |
|--------------------|--|---|
| Geo, Geo11         | <a href="mailto:geo@hotmail.com">geo@hotmail.com</a>   | This alias may be used by Steven Lamothe. The e-mail itself is an inactive account.   |
| Geo11              | <a href="mailto:geo@tfb.com">geo@tfb.com</a>   | Opened 16 October 2000 under Chris Bery; switched to Christopher Tarnovsky on 19 August 2002.   |
| Christogeo         | <a href="mailto:Chris.Tarnovsky@freeworld.nacamar.de">Chris.Tarnovsky@freeworld.nacamar.de</a> |   |
| Arthur Von Neumann | <a href="mailto:von@metro2000.net">von@metro2000.net</a>                                       |   |
| BG                 | <a href="mailto:von@m20.net">von@m20.net</a>   |   |
| Big Gun            | <a href="mailto:berny@8ung.at">berny@8ung.at</a>   |   |
| Chris Bery         | <a href="mailto:ChrisVon@s4.interpass.com">ChrisVon@s4.interpass.com</a>                       | Interpass was formerly an Ottawa-based ISP that offered over 50,000 56k dial-up access numbers at very low prices. The ISP is currently inactive. |
| Chris Geo          | ?  |   |
| Mike George        | ?  | This is allegedly the alias used when CGT surfed hacker sites on NDS' behalf.   |
| Nipper2000         | ?  | This alias was used to post P3 codes on a hacker website on 24 December 2000.   |
| Shrimp             | ?  |   |

- Using an AVT (Account Verification Technique) ICG found that [geo@tfb.com](mailto:geo@tfb.com) is an active e-mail address. The IP address, 68.7.237.197 traces back to the node "sd.cox.net." "SD" likely references San Diego County where Chris Tarnovsky is known to reside.
- Header information from Usenet posts by Geo11 using the [geo@hotmail.com](mailto:geo@hotmail.com) address show that they are associated with the IP address 24.92.210.58. assigned to Road Runner, a major Internet Service Provider (ISP Florida area. Road Runner provides both residential and commme service.

Note: The [geo@hotmail.com](mailto:geo@hotmail.com) e-mail address and Geo alias are f Usenet since there are no universal mechanisms in place t information. ICG believes it is quite possible that Christo at some point, have used this e-mail address on the Usene although users who use Google Groups to post to Usenet i

CASE NO.  
SA CV 03-950 DOC (JTLx)  
ECHOSTAR SATELLITE CORP., et al.,

vs.

NDS GROUP PLC, et al

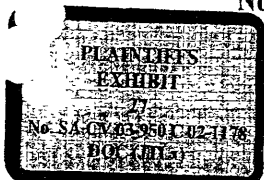
PLAINTIFF'S EXHIBIT 27

DATE \_\_\_\_\_ IDEN. \_\_\_\_\_

DATE \_\_\_\_\_ EVID. \_\_\_\_\_

BY \_\_\_\_\_

Deputy Clerk





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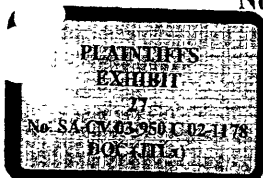
**Chris Tarnovsky**

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**Note:** The [geo@hotmail.com](mailto:geo@hotmail.com) e-mail address and Geo alias are fairly commonly used on Usenet since there are no universal mechanisms in place to verify user information. ICG believes it is quite possible that Christopher Tarnovsky might, at some point, have used this e-mail address on the Usenet groups. However, although users who use Google Groups to post to Usenet must verify an e-mail



## InfoSec Threat Management Solutions

address with Google prior to posting, Google Groups also archives Usenet messages from other sources, which do not necessarily verify key user information. Thus, at this time, we have been unable to determine whether Christopher Tarnovsky had previously used, or is currently using this e-mail address as an alias to post on the message boards. Nor have we been able to determine if any other individuals have used geo@hotmail.com on the message boards.

- To date, ICG has been unable to definitively determine the identity of the individual behind the Geo11 alias associated with geo@hotmail.com. However, ICG believes it is likely that this individual is Steven Lamothe of Holiday, Florida.
- Through traffic on a hacker website, ICG located the following posts to DR7.com in which Chris Tarnovsky, under the alias "Nipper," appears to have shared Echostar key codes. These posts appear to have been made in 2000, while Tarnovsky was an NDS employee:

Tarnovsky/Nipper Posts made on DR7 With Thanks From Dr7

Nipper = Tarnovsky

NiPpEr

Junior Member

Registered: Dec 1999

Location: cOlOrAdO

Posts: 4

HeRe ArE CuRrEnT KeYs ReTuRn SoOn ChArLiE:

7D,D9,27,FD,0A,F1,9B,ED

8C,D5,5C,27,A1,D8,08,E5

NiPpEr

Junior Member

Registered: Dec 1999

Location: cOlOrAdO

Posts: 4

LaLaLaLaLaLa LaLA LA lA

C2 81 B2 E4 64 C1 01 52 2B (KeY 1)

NiPpEr

Junior Member

Registered: Dec 1999

Location: cOlOrAdO

Posts: 4

wAs gOiNg tO tELl yOu a rHyMe bUt YoU pRol DoNt cArE tO dO aNYtHiN bUt

wAtCh tHe tUbE.

MeRrY cHrIsTmAs cHarLiE aNd tHe gAnG!

FB 43 F7 70 1F 27 8A C2 (70=7D iF eRroR!)

4F 9C BC 1B C6 DD 6F CC

(wRoTe eM dOwN sLoPpY bUt oNe oF tHeM iS tHe wOrKInG KeY)

NiPpEr-ClAuZ

ICG Inc.  
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Confidential

Post by DR7:  
quote:

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Thanks NiPpEr, the users appreciate your help and your always welcome here...please if you can make this a great x-mas for all, as we do appreciate your help  
DR7

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**Note:** ICG will attempt to develop a more detailed report that focuses solely on this and other related posts that implicate Chris Tarnovsky in sharing proprietary information with members of the hacker community.