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Attorneys for United States of America

Filed

JUL 2 - 2014

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN JOSE DIVISION

13 CR 14

00349

E.F.

HRL

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 CAMERON LACROIX,

18 Defendant.

CASE NO.

) VIOLATION: 18 U.S.C. §§ 1030(a)(5)(A) and  
) (c)(4)(B)(i) – Intentionally Causing Damage to a  
) Protected Computer; 18 U.S.C. §§ 982(a)(2)(B) and  
) 1030(i) – Criminal Forfeiture

) SAN JOSE VENUE

19  
20 INFORMATION

21 The United States Attorney charges:

22 At all times relevant to this Information, unless otherwise indicated:

23 Background

24 1. Cameron LACROIX, who was also known by his online monikers “cam0,” “@Freak,”  
25 and “leetjones,” lived in New Bedford, Massachusetts.

26 2. Zendesk, a company based in San Francisco, California, provided a helpdesk platform for  
27 numerous companies, including Twitter, also headquartered in San Francisco. When a Twitter user had  
28 an issue with his or her account and submitted a trouble ticket, it was stored and managed at Zendesk

1 and routed to a Twitter employee to be resolved.

2 3. Between February 16 and February 19, 2013, LACROIX identified and exploited a  
3 website vulnerability to create Zendesk accounts with elevated privileges. He used this heightened  
4 access to disable a security measure designed to ensure that only Twitter employees could view Twitter  
5 helpdesk information stored at Zendesk, such as support tickets, customer email addresses, and other  
6 contact information. LACROIX was thereby able to see all support tickets for any of Zendesk's  
7 customers, including Twitter. LACROIX then exported approximately one million Twitter support  
8 tickets to computers outside of Zendesk's network. Those support tickets included email addresses and  
9 contact information for each customer.

10 4. LACROIX identified the email addresses that were used to register Twitter accounts for  
11 Jeep and Corporation A. After compromising and taking control of those email addresses, he submitted  
12 password reset requests for those accounts; Twitter's responses were sent to the compromised email  
13 addresses, which LACROIX now controlled. LACROIX changed the passwords to Jeep and  
14 Corporation A's Twitter accounts, assumed control of those accounts, and proceeded to deface them  
15 with text and pictures. (For example, Corporation A's feed falsely reported that the company had been  
16 sold to its chief competitor.) LACROIX also deleted the incoming support tickets those companies  
17 attempted to submit to Zendesk reporting that their Twitter accounts had been hijacked.

18 5. Zendesk and Twitter incurred combined losses of over \$200,000 in responding to the  
19 attacks.

20 COUNT ONE: (18 U.S.C. §§ 1030(a)(5)(A) and (c)(4)(B)(i) – Intentionally Causing Damage to a  
21 Protected Computer)

22 6. Paragraphs 1 through 5 are realleged and incorporated as if fully set forth here.

23 7. On or about and between February 16 and 19, 2013, in the Northern District of  
24 California, the defendant,

25 CAMERON LACROIX,

26 knowingly caused the transmission of a program, information, code, and command, and as a result of  
27 such conduct intentionally caused damage without authorization to a protected computer belonging to  
28 Zendesk;

1 All in violation of Title 18, United States Code, Sections 1030(a)(5)(A) and (c)(4)(B)(i).

2 FORFEITURE ALLEGATION: (18 U.S.C. § 982(a)(2)(B) and 1030(i) – Forfeiture of Property  
3 Used to Commit the Offense and Proceeds Derived Therefrom)

4 8. Paragraphs 1 through 5 as well as the factual allegations contained in Count One are  
5 alleged and by this reference fully incorporated here for the purpose of alleging forfeiture pursuant  
6 to the provisions of 18 U.S.C. §§ 982(a)(2)(B) and 1030(i).

7 9. Upon conviction of the offense alleged in Count One of this Information, the  
8 defendant,

9 CAMERON LACROIX,

10 shall forfeit to the United States of America the following:

11 (a) Pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1030(i),  
12 any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly  
13 as a result of such offense; and

14 (b) Pursuant to Title 18, United States Code, Section 1030(i), any personal property  
15 that was used or intended to be used to commit or to facilitate the commission of such offense, including  
16 one red and black Gigaware 8GB thumb drive and one Toshiba laptop computer, both seized by law  
17 enforcement on May 8, 2013.

18 10. If any of said property, as a result of any act or omission of the defendant –

19 (a) cannot be located upon the exercise of due diligence;

20 (b) has been transferred or sold to or deposited with, a third person;

21 (c) has been placed beyond the jurisdiction of the Court;

22 (d) has been substantially diminished in value; or

23 (e) has been commingled with other property which cannot be subdivided  
24 without difficulty;

25 any and all interest defendant has in other property shall be vested in the United States and forfeited to  
26 the United States pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18,  
27 United States Code, Sections 982(b)(1), 1030(i)(2), and Rule 32.2 of the Federal Rules of Criminal

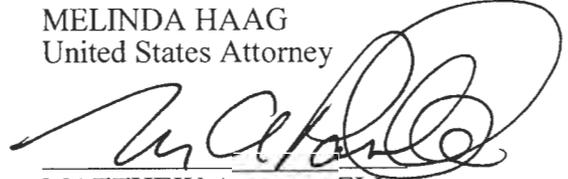
28 //

INFORMATION

1 Procedure.

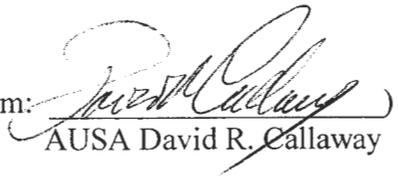
2 DATED: 7/2/14

MELINDA HAAG  
United States Attorney



MATTHEW A. PARRELLA  
Chief, Computer Hacking/Intellectual Property

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7 (Approved as to form:

  
AUSA David R. Callaway

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DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY:  COMPLAINT  INFORMATION  INDICTMENT  SUPERSEDING

OFFENSE CHARGED

18 U.S.C. 5 1030(a)(5)(A) and (c)(4)(B)(i) - Intentionally Causing Damage to a Protected Computer

- Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Up to 10 years imprisonment, \$250,000 fine (or twice the gross gain or gross loss), 3 year term of supervised release, \$100 special assessment, plus restitution

CR 14

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEFENDANT - U.S.

CAMERON LACROIX

DISTRICT COURT NUMBER

00349

EJD

HRL

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) [X] If not detained give date any prior summons was served on above charges
2) [ ] Is a Fugitive
3) [ ] Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) [ ] On this charge
5) [ ] On another conviction } [ ] Federal [ ] State
6) [ ] Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution

Has detainer been filed? [ ] Yes [ ] No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

[ ] This report amends AO 257 previously submitted

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

S/A Scott Hellman, FBI

[ ] person is awaiting trial in another Federal or State Court, give name of court

[ ] this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

[ ] this is a reprosecution of charges previously dismissed which were dismissed on motion of:

SHOW DOCKET NO.

[ ] U.S. ATTORNEY [ ] DEFENSE

[ ] this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

[ ] prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form MELINDA HAAG

[X] U.S. Attorney [ ] Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) DAVID R. CALLAWAY

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

[ ] SUMMONS [X] NO PROCESS\* [ ] WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

[ ] Arraignment [ ] Initial Appearance

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

c/o Behzad Mirhashem, 51 Sleeper St., 5th Floor, Boston, MA 02210

Date/Time: \_\_\_\_\_ Before Judge: \_\_\_\_\_

Comments: Defendant will submit request to transfer case to the District of Massachusetts per Rule 20, Fed. R. Crim. P.

United States District Court  
Northern District of California

Filed <sup>E-FILING</sup>

JUL 2 - 2014

CRIMINAL COVER SHEET

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

**Instructions:** Effective January 3, 2012, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

Case Name:

USA v. Cameron Lacoux

CR 14 00349

Case Number:

ED

HRL

Total Number of Defendants:

1

2-7

8 or more

Is This Case Under Seal?

Yes

No

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Yes

No

Venue (Per Crim. L.R. 18-1):

SF

OAK

SJ

EUR

MON

Is any defendant charged with a death-penalty-eligible crime?

Yes

No

Assigned AUSA (Lead Attorney):

David R. Callaway

Is this a RICO Act gang case?

Yes

No

Date Submitted:

July 2, 2014

Comments:

[Empty text box for comments]

Save

Print

Clear Form