

FILED

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WILLIAM T. WALSH
CLERK *WP*

2020R01165

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Criminal No. 22- 127-ES
:
v. : 18 U.S.C. § 1030(a)(7)(B)
: 18 U.C.C. § 875(d)
: 18 U.S.C. § 2
:
JUNIOR BARROS DE OLIVEIRA :

I N D I C T M E N T

The Grand Jury in and for the District of New Jersey, sitting at Newark
charges:

COUNTS ONE THROUGH FOUR
**(Extortionate Threat Involving Information Obtained From a Protected
Computer)**

1. In or about March 2020, defendant JUNIOR BARROS DE OLIVEIRA obtained unauthorized access to confidential customer information from more than 250,000 customers of a Brazilian subsidiary ("Victim 1-Brazil") of a United States company ("Victim 1"). Then, in or about September and October 2020, defendant JUNIOR BARROS DE OLIVEIRA repeatedly emailed the Chief Executive Officer and other employees of Victim 1 and Victim 1-Brazil, demanding payment in Bitcoin in exchange for defendant JUNIOR BARROS DE OLIVEIRA not selling or otherwise releasing the customer information to the public.

2. At all times relevant to this Indictment:
 - a. Defendant JUNIOR BARROS DE OLIVEIRA was a resident of Curitiba, Brazil and a citizen of Brazil.
 - b. Victim 1 was a U.S. corporation with headquarters in New Jersey.
 - c. Victim 1-Brazil was a Brazil-based subsidiary of Victim 1.
 - d. Bitcoin was a type of cryptocurrency. In general, cryptocurrency is a digital currency that operates separate from central banks. It is built using cryptographic protocols that ensure secure and anonymous transactions. On September 18, 2020, one bitcoin was worth approximately \$11,000.
 - e. A Bitcoin “wallet” is a digital wallet that stores Bitcoin and enables transactions in Bitcoin. A Bitcoin wallet both holds the digital currency but also ensures that only the owner of the wallet can access those coins.

3. On at least three occasions in or around March 2020, defendant JUNIOR BARROS DE OLIVEIRA gained unauthorized access and exceeded authorized access to protected computers of Victim 1-Brazil and obtained, without authorization, confidential customer information from more than 100,000 customers of Victim 1-Brazil.

4. On or about September 18, 2020, defendant JUNIOR BARROS DE OLIVEIRA, using an alias, sent an email to the Chief Executive Officer of

Victim 1, with an office in New Jersey. In the email, defendant JUNIOR BARROS DE OLIVEIRA stated:

Let's talk about a company "[Victim 1's first initial]" in Brazil

Recently I discover how to access [Victim 1's first initial]'s system, that allowed me to access information of ALL [REDACTED] clients! Well, I was able to access and download data of approximately 600.000 (0.6 mi) [REDACTED] clients.

I'm thinking about selling this data...are you interested in buying it? 😊

...

*I guess a fair price would be 300btc [Bitcoin] (0.0005btc/person). This offer expires in **48 hours!***

*Contact me **ASAP** so we can proceed on negotiating!*

5. On or about October 15, 2020, defendant JUNIOR BARROS DE OLIVEIRA forwarded the September 18, 2020 email to the same Victim 1 executive in New Jersey and to an executive with Victim 1-Brazil. Defendant JUNIOR BARROS DE OLIVEIRA also wrote in the forwarded email that his offer would now expire in 36 hours.

6. On or about October 20, 2020, defendant JUNIOR BARROS DE OLIVEIRA emailed a representative of Victim 1 in New Jersey and stated:

Hello [Redacted], thank you and It's very nice to see that you and [Victim 1 first initial] are aware of how important is to keep your user's data safe!.

Basically, I have access to all customer related data. . . I'll send just a little data so you can verify and we can keep user's privacy!

As I said before, there's about 600k customers already downloaded.

Of course I can and will send to you all the information about it how to prevent other people to access this data, and better yet, how to avoid this to happen again in the future! But we have to do it in steps.. I help you, you help me and so on!

. . .

Since I proved to you that I do have the data, I guess we can start we the transfer of 75 btc, 25% of the amount I asked. What do you think?

7. On or about October 31, 2020, defendant JUNIOR BARROS DE OLIVEIRA sent an email to a representative of Victim 1 and stated:

Dear [Redacted]

. . . I am very interested in helping you guys solve this security flaw, but as I said I will need to charge a consulting fee of 75 btc to start! (75 btc of 300 btc)

I guess you're very concerned that nobody get access to this data - that's why we need to fix this very soon! If you public notify about it, that could be very bad for your company stocks. Studies have found that stock prices can drop 7.5% after something like this happens.. that's about \$2 billion for a company with \$26 billion marketcap!

Since no data breach yet happened (I suppose), it's prudent to not do it. =) I'm very hopeful that together we can solve this very fast!

8. In this October 31, 2020 email, defendant JUNIOR BARROS DE OLIVEIRA also provided payment instructions to a Bitcoin “wallet” for payment.

9. On or about the dates set forth in the table below, in Essex County, in the District of New Jersey, and elsewhere, defendant

JUNIOR BARROS DE OLIVEIRA

did knowingly and with intent to extort from any person any money and other thing of value, transmit in interstate and foreign commerce any communication, that is, email messages, containing any threat to impair the confidentiality of information obtained from a protected computer without authorization and by exceeding authorized access:

<u>Count</u>	<u>Approximate Date of Emails</u>
1	September 18, 2020
2	October 15, 2020
3	October 20, 2020
4	October 31, 2020

All in violation of Title 18, United States Code, Sections 1030(a)(7)(B), 1030(c)(3)(A), and Section 2.

COUNTS FIVE THROUGH EIGHT
(Threatening Communications)

1. The allegations in paragraphs 1 through 8 of Counts One through Four of this Indictment are re-alleged here.

2. On or about the dates set forth in the table below, in Essex County, in the District of New Jersey, and elsewhere, the defendant

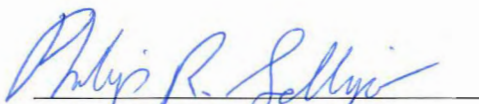
JUNIOR BARROS DE OLIVEIRA,

with intent to extort from any person, firm, association, and corporation any money and thing of value, did knowingly transmit in interstate and foreign commerce any communication, that is, email messages, containing any threat to injure the property and reputation of the addressee:

<u>Count</u>	<u>Approximate Date of Emails</u>
5	September 18, 2020
6	October 15, 2020
7	October 20, 2020
8	October 31, 2020

All in violation of Title 18, United States Code, Section 875(d) and Section

2.


PHILIP R. SELLINGER
United States Attorney



CASE NUMBER: 22-127-ES

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

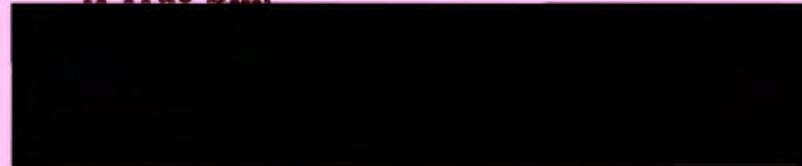
v.

JUNIOR BARROS DE OLIVEIRA

INDICTMENT FOR

18 U.S.C. §§ 1030, 875(d), 2

A True Bill.



PHILIP R. SELLINGER
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