

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

SEALED
INDICTMENT

- v. - :

19 Cr.

MAYUR RELE, :

Defendant. :

----- X

COUNT ONE

(Computer Fraud and Abuse - Intentional Damage)

The Grand Jury charges:

Background

1. At all times relevant to this Indictment, MAYUR RELE, the defendant, was a citizen of India and resided in a house in Clifton, New Jersey (the "Rele Residence"). At certain times relevant to this Indictment, RELE was a Senior Manager of Cloud and Infrastructure in the Information Technology Engineering department of an international technology company with its headquarters in New York, New York, engaged in the business of travel booking (the "Travel Company Victim"). At certain times relevant to this Indictment, RELE engaged in information technology work for an accounting firm based in Clifton, New Jersey (the "Accounting Firm").

Overview of the Computer Intrusion Schemes

2. From at least on or about August 25, 2017, up to and including on or about September 20, 2017, MAYUR RELE, the defendant, caused the credentials of a Travel Company Victim Data Center engineer in the Information Technology Operations department ("Travel Company Victim Employee-1") to access the Travel Company Victim's web servers located in Clifton, New Jersey ("Server-1") and New York, New York ("Server-2"). RELE then caused Server-2 to access Server-1, and then intentionally caused Petya ransomware to be installed on Server-1. As a result, certain of the Travel Company Victim's computers were infected with Petya ransomware, thereby impairing the availability and integrity of the Travel Company Victim's data, systems, and information and causing the Travel Company Victim to incur losses exceeding \$5,000 to remediate the damage and restore its system. RELE then caused certain logs from Server-1 and Server-2, among others, to be deleted in order to avoid detection.

3. From at least on or about September 15, 2017, up to and including on or about September 20, 2017, MAYUR RELE, the defendant, without authorization, caused a file that is used to organize and integrate data to be deleted from the Travel Company Victim's network that stored confidential and critical intellectual property, including source code and financial data

(the "Confidential Network") in New York, New York. As a result of this incident, the source code and financial data contained in the Confidential Network was not available to the Travel Company Victim, which resulted in losses of over \$5,000 in lost ticket sales and remediation costs. RELE then caused certain logs from another Travel Company Victim server involved in this incident ("Server-3"), among others, to be deleted in order to avoid detection.

Statutory Allegations

4. From at least on or about August 25, 2017, up to and including at least on or about September 20, 2017, in the Southern District of New York and elsewhere, MAYUR RELE, the defendant, knowingly and willfully caused the transmission of a program, information, code, and command, and as a result of such conduct, intentionally caused damage without authorization to a protected computer, and caused loss to one and more persons during any one-year period aggregating at least \$5,000 in value, to wit, RELE unlawfully caused Petya ransomware to be installed on a Travel Company Victim server and logs to be deleted from that server, and thereby impaired the availability and integrity of the Travel Company Victim's computer systems, and caused the Travel Company

Victim to incur losses exceeding \$5,000 to restore its system in New York, New York.

(Title 18, United States Code, Sections 1030(a)(5)(A), 1030(c)(4)(B), and 2.)

COUNT TWO

(Computer Fraud and Abuse - Intentional Damage)

The Grand Jury further charges:

5. The allegations set forth in paragraphs 1 and 3 are incorporated by reference as if set forth fully herein.

6. From at least on or about September 15, 2017, up to and including at least on or about September 20, 2017, in the Southern District of New York and elsewhere, MAYUR RELE, the defendant, knowingly and willfully caused the transmission of a program, information, code, and command, and as a result of such conduct, intentionally caused damage without authorization to a protected computer, and caused damage affecting ten and more protected computers during any one-year period, and caused loss to one and more persons during any one-year period aggregating at least \$5,000 in value, to wit, RELE unlawfully caused logs to be deleted from a server and files to be deleted from the Travel Company Victim's confidential network located in New York, New York, and thereby impaired the availability and integrity of the Travel Company's computer systems, and caused the Travel Company Victim to incur over \$5,000 in lost ticket sales and costs to

respond to the incident.

(Title 18, United States Code, Sections 1030(a)(5)(A),
1030(c)(4)(B), and 2.)

FORFEITURE ALLEGATIONS

7. As a result of committing the computer fraud and abuse offenses alleged in Counts One and Two of this Indictment, MAYUR RELE, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1030(i), any property, real or personal, constituting or derived from, any proceeds obtained directly or indirectly, as a result of said offenses, and any and all personal property that was used or intended to be used to commit or to facilitate the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

Substitute Assets Provision

8. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

subdivided without difficulty;
it is the intent of the United States, pursuant to Title 21,
United States Code, Section 853(p), and Title 28, United States
Code, Section 2461(c), to seek forfeiture of any other property
of the defendant up to the value of the above forfeitable
property.

(Title 18, United States Code, Section 1030; Title 21, United
States Code, Section 853; and Title 28, United States Code,
Section 2461.)


FOREPERSON



GEOFFREY S. BERMAN
United States Attorney

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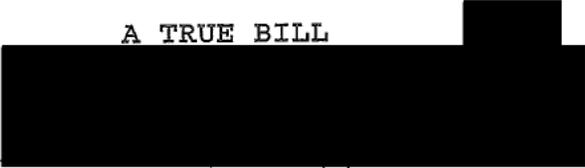
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(18 U.S.C. §§ 2, 1030(a)(5)(A),
1030(c)(4)(B).)

GEOFFREY S. BERMAN
United States Attorney.

A TRUE BILL


Foreperson.
