

SEALED BY ORDER  
OF COURT  
CR 18 00348

LHK

NC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

FILED

THE UNITED STATES OF AMERICA

AUG 02 2018

vs.

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

BRANDON CHARLES GLOVER, and  
VASILE MEREACRE,

INDICTMENT

COUNT ONE: (18 U.S.C. § 1030(b) – Conspiracy to Violate 18 U.S.C. §§ 1030(a)(7)(B) and (c)(3)(A))

COUNT TWO: (18 U.S.C. §§ 1030(a)(7)(B) and (c)(3)(A), 2 – Extortion Involving Computers)

A true bill.

  
Foreperson

Filed in open court this 2 day of August  
A.D. 2018

  
United States Magistrate Judge

Bail. \$ no bail arrest warrants as to both defendants



DOCUMENT NO. 1  
DISTRICT COURT  
CRIMINAL CASE

**SEALED BY ORDER OF COURT**

E-filing

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

ALEX G. TSE (CABN 152348)  
Acting United States Attorney

**FILED**  
AUG 02 2018  
SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

**CR 18 00348**

**LHK**  
**NC**

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRANDON CHARLES GLOVER, and  
VASILE MEREACRE,

Defendants.

No. )  
) **VIOLATIONS:** Title 18, United States Code, Section  
) 1030(b) – Conspiracy to Violate Title 18, United  
) States Code, Sections 1030(a)(7)(B) and (c)(3)(A);  
) Title 18, United States Code, Sections 1030(a)(7)(B)  
) and (c)(3)(A) – Extortion Involving Computers; Title  
) 18, United States Code, Section 2 – Aid and Abet.  
)  
)  
) **SAN JOSE VENUE**

INDICTMENT

The Grand Jury charges:

BACKGROUND

At all times relevant to this Indictment:

1. Lynda.com LLC was an online education company that offered video courses in software, creative, and business skills. On June 2, 2016, the company was acquired by the LinkedIn Corporation, which was headquartered in Sunnyvale, California.

2. “Bug Bounty” programs are services wherein individuals that report security vulnerabilities receive recognition and compensation. Bug bounty programs assist companies in discovering and

INDICTMENT

DOCUMENT NO. **CSA's INITIALS**  
**DH**

1 resolving security vulnerabilities so that they can be resolved before the general public is aware of them,  
2 thus preventing the wide-spread exploitation of the vulnerability.

3 3. LinkedIn maintained an invitation-only bug bounty program and accepted individuals, such  
4 as security researchers, into the program based upon the individual's reputation and previous work.  
5 LinkedIn established rules for participation in the program, and an individual would be disqualified from  
6 participation in the program based on a variety of factors, including making threats, demanding money  
7 exchange for security vulnerabilities, publicly disclosing security flaws without notifying the company  
8 first, modifying, copying, downloading, deleting or otherwise misusing other members' data, and  
9 accessing non-public member information without authorization.

10 4. HackerOne was a San Francisco-based company that operated bug bounty programs for  
11 corporations, including LinkedIn.

12 5. Brandon Charles Glover ("GLOVER") was a resident of Winter Springs, Florida.

13 6. Vasile Mereacre ("MEREACRE") was a resident of Toronto, Canada.

14  
15 COUNT ONE: (18 U.S.C. § 1030(b) – Conspiracy to Violate 18 U.S.C. §§ 1030(a)(7)(B) and (c)(3)(A))

16 7. The factual allegations at Paragraphs One through Six are realleged and incorporated as if  
17 set forth fully here.

18 8. Beginning in approximately December 2016 and continuing to approximately January 2017,  
19 in the Northern District of California and elsewhere, the defendants,

20  
21 BRANDON CHARLES GLOVER, and  
VASILE MEREACRE,

22 did knowingly conspire and agree with persons known and unknown to the Grand Jury to commit an  
23 offense under 18 U.S.C. §§ 1030(a)(7)(B) and (c)(3)(A), that is, with the intent to extort from a person  
24 money and other things of value, transmitted in interstate and foreign commerce communications  
25 containing a threat to impair the confidentiality of information obtained from a protected computer  
26 without authorization.

27 ///

28 ///

MANNER AND MEANS

1  
2 9. Defendants GLOVER and MEREACRE possessed and controlled and claimed to possess  
3 and control confidential databases and other data belonging to the victim corporations all the while  
4 knowing that the data had been stolen from the victim-corporations' Amazon Web Services accounts.  
5 The defendants' exerted possession and control over the data in order to induce payments from the  
6 victim-corporations.

7 10. The defendants used the email address "johndoughs@protonmail.com" to contact the  
8 victim-corporations to report security vulnerability and demand payment in exchange for deletion of the  
9 data. The defendants used false names to communicate with the victim-corporations, and, on several  
10 occasions, informed the victim-corporations that they had been paid by other victim-corporations for  
11 identifying security vulnerabilities. They also sent the victim-corporations a sample of the data in order  
12 for the victim-corporations to verify the authenticity of data.

13 11. After examining the sample data, the victim-corporations communicated with the  
14 defendants about payment in exchange for the deletion of the data. In some instances, the victim-  
15 corporations referred the defendants to HackerOne for payment pursuant to the victim-corporations' bug  
16 bounty program. In other instances, the victim-corporation stopped communicating with the defendants  
17 and did not pay them for the data.

DEFENDANTS' PLAN TO EXTORT LINKEDIN

18  
19 12. As part of the conspiracy, defendants GLOVER and MEREACRE devised a plan to  
20 extort LinkedIn by obtaining over 90,000 confidential Lynda.com user accounts, and exerting control  
21 over the accounts as a means to obtain money from LinkedIn.

22 13. The defendants used the email account "johndoughs@protonmail.com" to communicate  
23 with LinkedIn. They also established an account with HackerOne using the false name "William  
24 Loafmann" and provided false information, such as names, addresses, and a Social Security number, on  
25 Internal Revenue Service forms.

26 14. On December 11, 2016, the defendants, using the email account  
27 "johndoughs@protonmail.com," sent an email to the security team at LinkedIn notifying them about a  
28 "security flaw compromising databases of Lynda.com along with credit card payments and much more."

1 15. A LinkedIn executive responded a short time later requesting details so that they could  
2 investigate the matter.

3 16. “[J]ohndoughs@protonmail.com responded, stating the following:

4 Before I continue, I would like to say that this does not look good, I was able to  
5 access backups upon backups, me and my team would like a huge reward for this,  
6 [sic]. The things we found were some of the following, [L]ynda database, email  
7 names addresses, usernames, some passwords, payments, we also found backend  
code and many more. We also found partian [sic] [L]inkedin files. Before I continue,  
I would like to ask that you guys will promise to compensate for this find.

8 17. A LinkedIn executive and “johndoughs@protonmail.com” continued to communicate  
9 about the Lynda.com database, and the LinkedIn executive invited “johndoughs@protonmail.com” into  
10 join LinkedIn’s bug bounty program through HackerOne.

11 18. After the invitation was extended, “johndoughs@protonmail.com” told the LinkedIn  
12 executive that “[P]lease keep in mind, we expect a big payment as this was hard work for us, we already  
13 helped a big corp which paid close to 7 digits, all went well.”

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

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///



1 COUNT TWO: (18 U.S.C. §§ 1030(a)(7)(B) and (c)(3)(A), 2 – Extortion Involving Computers)

2 19. The factual allegations contained in Paragraphs One through Six are realleged and  
3 incorporated as if set forth fully here.

4 20. On or about December 11, 2016, in the Northern District of California and elsewhere, the  
5 defendants,

6 BRANDON CHARLES GLOVER and  
7 VASILE MEREACRE,

8 with the intent to extort from a person money and or other thing of value, transmitted in interstate and  
9 foreign commerce any communication containing any threat to impair the confidentiality of information  
10 obtained from a protected computer without authorization, to wit: the defendants possessed stolen  
11 customer data belonging to Lynda.com and contacted LinkedIn executives under the alias “John  
12 Doughs” asking to be paid for it.

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

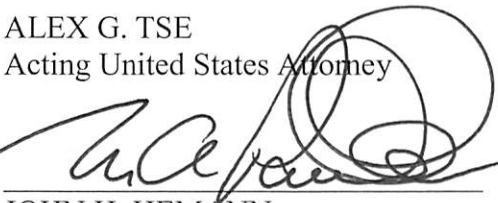
14  
15 DATED:

8-2-18

A TRUE BILL.

  
FOREPERSON

16  
17  
18  
19 ALEX G. TSE  
Acting United States Attorney

20  
21   
22 JOHN H. HEMANN  
Deputy Chief, Criminal Division

23  
24 (Approved as to form:

  
AUSA SUSAN KNIGHT

AO 257 (Rev. 6/78)

FILED BY ORDER OF COURT

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

BY:  COMPLAINT  INFORMATION  INDICTMENT  SUPERSEDING

OFFENSE CHARGED

Count One: (18 U.S.C. § 1030(b) - Conspiracy to Violate 18 U.S.C. §§ 1030(a)(7)(B) and (c)(3)(A))

Count Two: (18 U.S.C. §§ 1030(a)(7)(B) and (c)(3)(A), 2 - Extortion Involving Computers)

- Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Counts One and Two: 5 years' imprisonment, 3 years' supervised release, \$250K fine, \$100 special assessment

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

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEFENDANT - U.S.

BRANDON CHARLES GLOVER

DISTRICT COURT NUMBER

CR 18 00348

LHK

DEFENDANT

NC

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1)  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
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)

Special Agent Jeffrey Miller, 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:

U.S. ATTORNEY  DEFENSE

SHOW DOCKET NO.

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 ALEX G. TSE (Acting USA)

U.S. Attorney  Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) SUSAN KNIGHT

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS  NO PROCESS\*  WARRANT

Bail Amount: 0

If Summons, complete following:

Arraignment  Initial Appearance

Defendant Address:

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

Date/Time: Before Judge:

Comments:

Handwritten red mark resembling a triangle with a vertical line through it.



SEALED BY ORDER OF COURT

AO 257 (Rev. 6/78)

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

BY:  COMPLAINT  INFORMATION  INDICTMENT  SUPERSEDING

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

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

OFFENSE CHARGED

Count One: (18 U.S.C. § 1030(b) - Conspiracy to Violate 18 U.S.C. §§ 1030(a)(7)(B) and (c)(3)(A))

Count Two: (18 U.S.C. §§ 1030(a)(7)(B) and (c)(3)(A), 2 - Extortion Involving Computers)

- Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Counts One and Two: 5 years' imprisonment, 3 years' supervised release, \$250K fine, \$100 special assessment

DEFENDANT - U.S.

VASILE MEREACRE

DISTRICT COURT NUMBER

CR 18 00348 LHK

E-filing

DEFENDANT

NC

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1)  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
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

FILED AUG 02 2018

SUSAN Y. SOONG CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN JOSE

PROCEEDING

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

Special Agent Jeffrey Miller, 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:

U.S. ATTORNEY  DEFENSE

SHOW DOCKET NO.

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 ALEX G. TSE (Acting USA)

U.S. Attorney  Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) SUSAN KNIGHT

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS  NO PROCESS\*  WARRANT

Bail Amount: 0

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:

Date/Time: Before Judge:

Comments:

Handwritten number 2 in a triangle