

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION

FILED IN OPEN COURT
U.S.D.C. - Atlanta

MAR - 2 2021

JAMES N. HATTEN, Clerk
By:  Deputy Clerk

UNITED STATES OF AMERICA

v.

ROBERT PURBECK,
A.K.A. "LIFELOCK";
A.K.A. "STUDMASTER";
A.K.A. "STUDMASTER1"

Criminal Indictment

No. **3:21CR0004**

THE GRAND JURY CHARGES THAT:

BACKGROUND

At all times relevant to this Indictment:

1. Victim-1 is a medical clinic located in Griffin, Georgia, within the Northern District of Georgia. Victim-1 maintains a repository of personally identifiable information and confidential personal health information, to include patient records, full names, addresses, social security numbers, and birth dates. This information is confidential and stored on restricted, nonpublic servers located in Griffin, Georgia and elsewhere.
2. The City of Newnan is a city in Metro Atlanta and the county seat of Coweta County, Georgia, within the Northern District of Georgia.
3. As a part of its ordinary course of operations, the City of Newnan maintains a large repository of documents and reports, including police reports containing sensitive personally identifiable information, such as full names, addresses, social security numbers, and birth dates. This

information is confidential and stored on restricted, nonpublic servers located in Newnan, Georgia and elsewhere.

4. Victim-2 is a medical practice located in Locust Grove, Georgia, within the Northern District of Georgia. Victim-2 also maintains a repository of personally identifiable information and confidential personal health information, to include patient records, full names, addresses, social security numbers, and birth dates. This information is confidential and stored on restricted, nonpublic servers located in Locust Grove, Georgia and elsewhere.

5. Victim-3 is an orthodontist in Wellington, Florida. Victim-3 also maintains a repository of personally identifiable information and confidential personal health information, to include patient records, full names, addresses, social security numbers, and birth dates. This information is confidential and stored on restricted, nonpublic servers located in Wellington, Florida and elsewhere.

6. The defendant, ROBERT PURBECK, a.k.a. "Lifelock," a.k.a. "Studmaster," a.k.a. "Studmaster1," resides in or around Meridian, Idaho.

Victim-1 Data Breach

7. On or about June 23, 2017, the defendant, ROBERT PURBECK, a.k.a. "Lifelock," a.k.a. "Studmaster," a.k.a. "Studmaster1," purchased access credentials, namely a username and password, to a computer server belonging to Victim-1 on a criminal marketplace.

8. On or about June 25, 2017, PURBECK then used these stolen access credentials to access protected computers of Victim-1 without

authorization, maintained unauthorized access to those computers, and stole medical records and other documents that contained sensitive personally identifiable information of over 43,000 individuals, including names, addresses, birth dates, and social security numbers.

City of Newnan Data Breach

9. On or about February 9, 2018, the defendant, ROBERT PURBECK, a.k.a. "Lifelock," a.k.a. "Studmaster," a.k.a. "Studmaster1," purchased access credentials, namely a username and password, to a City of Newnan Police Department computer server on a criminal marketplace.

10. On or about the same day, PURBECK then used these stolen access credentials to access protected computers of the City of Newnan without authorization, maintained unauthorized access to those computers, and stole police reports and other internal documents that contained sensitive personally identifiable information of over 14,000 individuals, including names, addresses, birth dates, and social security numbers.

Victim-2 Data Breach

11. On or about April 28, 2018, the defendant, ROBERT PURBECK, a.k.a. "Lifelock," a.k.a. "Studmaster," a.k.a. "Studmaster1," purchased access credentials, namely a username and password, to a computer server belonging to Victim-2 on a criminal marketplace.

12. On or about the same day, PURBECK then used these stolen access credentials to access protected computers of Victim-2 without authorization, maintained unauthorized access to those computers, and stole medical records and other documents that contained sensitive

personally identifiable information of over 7,000 individuals, including names, addresses, birth dates, and social security numbers.

Victim-3 Data Breach and Attempted Extortion

13. On or about June 18, 2018, the defendant, ROBERT PURBECK, a.k.a. "Lifelock," a.k.a. "Studmaster," a.k.a. "Studmaster1," purchased access credentials, namely a username and password, to a computer server belonging to Victim-3 on a criminal marketplace.

14. PURBECK then used the stolen access credentials to access protected computers of Victim-3 without authorization, maintained unauthorized access to those computers, and stole medical records and other documents that contained sensitive personally identifiable information of over 1,800 individuals, including names, addresses, birth dates, and social security numbers.

15. From on or about July 3, 2018 through on or about July 9, 2018, PURBECK threatened, harassed, and attempted to extort Victim-3, demanding a ransom payment in Bitcoin. PURBECK threatened to disclose and sell the patient and personal information stolen from Victim-3 unless Victim-3 paid the ransom demand. PURBECK also identified the names and social security numbers of Victim-3's minor children and threatened to disclose and sell their personal information as well.

16. During the course of this attempted extortion, PURBECK sent numerous harassing e-mails and text messages to Victim-3 and Victim-3's patients.

COUNTS ONE THROUGH THREE**(Computer Fraud and Abuse - Unauthorized Access)**

17. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 16 of this Indictment as if fully set forth herein.

18. On or about the dates listed in Column A of the table below, in the Northern District of Georgia, and elsewhere, the defendant, ROBERT PURBECK, a.k.a. "Lifelock," a.k.a. "Studmaster," a.k.a. "Studmaster1," aided and abetted by others unknown to the Grand Jury, intentionally accessed a protected computer of each of the victims listed in Column B without authorization, and thereby obtained information from a protected computer, including names, addresses, birth dates, and social security numbers, for purposes of commercial advantage and private financial gain, with the value of such information exceeding \$5,000:

	A	B
Count	Date	Victim
1	June 25, 2017	Victim-1
2	February 9, 2018	City of Newnan
3	April 28, 2018	Victim-2

All in violation of Title 18, United States Code, Sections 1030(a)(2)(C), 1030(c)(2)(B)(i) and 1030(c)(2)(B)(iii) and Section 2.

COUNT FOUR
(Computer Fraud and Abuse - Extortion of Victim-3)

19. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 16 of this Indictment as if fully set forth herein.

20. From on or about June 18, 2018, and continuing through on or about July 9, 2018, in the Northern District of Georgia, Southern District of Florida, and elsewhere, the defendant, ROBERT PURBECK, a.k.a. "Lifelock," a.k.a. "Studmaster," a.k.a. "Studmaster1," aided and abetted by others unknown to the Grand Jury, with intent to extort from any person, namely Victim-3, any money and other things of value, namely funds in Bitcoin, transmitted in interstate and foreign commerce, including through the Northern District of Georgia, a communication containing a threat to obtain information from a protected computer without authorization and to impair the confidentiality of information obtained from a protected computer without authorization, all in violation of Title 18, United States Code, Sections 1030(a)(7)(B) and 1030(c)(3)(A) and Section 2.

COUNTS FIVE THROUGH EIGHT
(Wire Fraud)

21. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 16 of this Indictment as if fully set forth herein.

22. On or about the dates listed in Column A of the table below, in the Northern District of Georgia and elsewhere, the defendant, ROBERT

PURBECK, a.k.a. "Lifelock," a.k.a. "Studmaster," a.k.a. "Studmaster1," aided and abetted by others unknown to the Grand Jury, having knowingly devised and intending to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did with intent to defraud cause the transmission by means of wire communication in interstate and foreign commerce of certain writings, signs, signals, pictures, and sounds, that is, the wire transmission listed in Column B, issued from in or around Meridian, Idaho, to computer servers located in the Northern District of Georgia, as specified in Column C, for the purpose of executing such scheme and artifice:

	A	B	C
Count	Date	Wire Transmission	Victim
5	June 25, 2017	RDP Login	Victim-1
6	February 9, 2018	RDP Login	City of Newnan
7	April 28, 2018	RDP Login	Victim-2
8	July 3, 2018	E-Mail from PURBECK to Victim-3	Victim-3

All in violation of Title 18, United States Code, Section 1343 and Section 2.

COUNTS NINE THROUGH ELEVEN
(Access Device Fraud)

23. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 16 of this Indictment as if fully set forth herein.

24. On or about the dates listed in Column A of the table below, in the Northern District of Georgia, and elsewhere, the defendant, ROBERT

PURBECK, a.k.a. "Lifelock," a.k.a. "Studmaster," a.k.a. "Studmaster1," aided and abetted by others unknown to the Grand Jury, did knowingly and with intent to defraud, use and traffic in unauthorized access devices, namely access credentials consisting of a username and password, of the victims listed in Column B, and by such conduct, obtained things of value worth \$1,000 or more in a one-year period, said use and trafficking affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(2) and (c)(1)(A)(i) and Section 2.

	A	B
Count	Date	Victim
9	June 25, 2017	Victim-1
10	February 9, 2018	City of Newnan
11	April 28, 2018	Victim-2

FORFEITURE PROVISION

25. Upon conviction of one or more of the offenses alleged in Counts One through Four of this Indictment, the defendant, ROBERT PURBECK, a.k.a. "Lifelock," a.k.a. "Studmaster," a.k.a. "Studmaster1," shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(B) and Title 18, United States Code, Section 1030(i), any property, real or personal, constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violations and any personal property that was used or intended to be used to commit or to facilitate the commission of the violations, including, but not limited to, those items listed in Attachment "A," together with a personal forfeiture money judgment, that is, a sum of money in United States currency representing the amount of proceeds obtained as a result of each offense alleged in Counts One through Four of this Indictment.

26. Upon conviction of one or more of the offenses alleged in Counts Five through Eight of this Indictment, the defendant, ROBERT PURBECK, a.k.a. "Lifelock," a.k.a. "Studmaster," a.k.a. "Studmaster1," shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to said violations, including, but not limited to, those items listed in Attachment "A," and a money judgment representing the amount of proceeds obtained as a result of said violations alleged in Counts Five through Eight of this Indictment.


27. Upon conviction of one or more of the offenses alleged in Counts Nine through Eleven of this Indictment, the defendant, ROBERT PURBECK, a.k.a. "Lifelock," a.k.a. "Studmaster," a.k.a. "Studmaster1," shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained directly or indirectly as a result of said violations, including, but not limited, to a money judgment representing the amount of proceeds obtained as a result of the offenses, as alleged in Counts Nine through Eleven of this Indictment, and pursuant to Title 18, United States Code, Section 1029(c), any personal property used or intended to be used to commit said violations, including but not limited to, those items listed in Attachment "A."

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

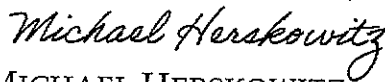
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

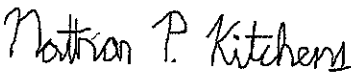
the United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b) and Title 18, United States Code, Section 1030(i), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

A True BILL


FOREPERSON

KURT R. ERSKINE
Acting United States Attorney


MICHAEL HERSKOWITZ
Assistant United States Attorney
Georgia Bar No. 349515


NATHAN KITCHENS
Assistant United States Attorney
Georgia Bar No. 263930

600 U.S. Courthouse
75 Ted Turner Drive SW
Atlanta, GA 30303
404-581-6000

Attachment A

- SEAGATE BACKUP PLUS HARD DRIVE P/N 2AWAP7-500 SN NA9W63A3; CORSAIR FLASH DRIVE SLIDER X1 128G;
- SEAGATE TOWER SN NA8B08G5 (HARD DRIVE);
- MICRO NICHE USB THUMB DRIVE;
- RAVEN TOWER BS14140564RVZ01B0;
- SEAGATE SN 6RW1D0Z6;
- 3 CELL PHONES:
 - Black Motorola Droid Razr XT912,
 - White Samsung Galaxy Prevail LTE SM-G360P, and
 - Black LH Smartphone LS740 SN 410CYWC0584857;
- RASBERRY PI COMPUTER;
- 1 THUMB DRIVE - American life USB drive;
- 1 GB MEMORY CARD - EMC Isolon Flash Drive 4 GB;
- 2 USB MEMORY DEVICES:
 - American life USB drive, and
 - EMC Isolon Flash Drive 4 GB;
- 2 STORAGE DEVICES WCC4E6VE56PR AND KUCJ05A156;
- ALCATEL CELL PHONE A574BL;
- IPHONE 7 A1660 AND IMPACT STRONG CASE;
- BLACK IPHONE 8 PLUS A1897 WITH OTTERBOX CASE;
- SONY LAPTOP SN #275268339019447;
- 4 MEMORY DEVICES:
 - 480 GB SanDisk Extreme 500,

- 8 GB PNY Attache USB 2.0,
- SanDisk Cruzer Micro 2 GB, and
- Porsche Driver's Selection Key Shaped USB Flash Drive;
- MAC BOOK PRO SN C02JKT67D853;
- HP Z240 TOWER SN ZVA6060RF1;
- BLACK IPHONE 8 A1905 WITH CASEMATE CASE;
- HP 2230 TOWER SN 2VA42217QC;
- HP LAPTOP ELITE BOOK;
- 12 HARD DRIVES;
- WCC4M5ZCLXNV MY CLOUD;
- 3 DISKS;
- BARRACUDA SN 3J80K884;
- WESTERN DIGITAL HARD DRIVE SN WCAZA3882835;
- HP LAPTOP SN 5CG3291267;
- TOSHIBA LATOP SN 37251406K;
- 2 SQUARE READERS;
- 5 THUMB DRIVES;
- 8GB SANDISK;
- 1 CD;
- IPHONE;
- 2 THUMB DRIVES, SEAGATE HARDRIVE SN 9VP924SV;
- BARACUDA SN 3T80KRM6;
- 2 MOTOROLA XT912 CELL PHONES - BLACK MOTOROLA DROID RAZOR XT912;

- SEAGATE H SN 9VY55295;
- 2 CD'S;
- THUMB DRIVE - PNY USB 34GB GRAY;
- HP LAPTOP SN: CNF0135R2C;
- DELL LAPTOP SN: F1TSYB1;
- K-NET TOWER;
- IPAD 16 GB SN: F5RKT7DEDFHW;
- KINDLE- BLACK AMAZON KINDLE D01400;
- APPLE LAPTOP SN: WQ024D5JATM;
- ACER ASPIRE LAPTOP SN: LXR4R0200203758A4 21601;
- SONY LAPTOP SN: C3LPQ45Y;
- MAXTOR HARD DRIVE SN: E1JNSF3E;
- MAXTOR HARD DRIVE S/N E1K3JWBE;
- 16 GIG MICRO SD CARD;
- DELL LAPTOP BITCOIN MINER- DELL LATITUDE E5400 S/N BVX1LK1;
- HP MINI LAPTOP S/N CNF005CHH7;
- SUPERDISK S/N AA9812154230M;
- CD CASH FLOW 202 C3122JK2322663LH;
- CANON COMPACT FLASH TM CARD FC 16M;
- CD C:/ BACKUP 0024B3N306005;
- CD A5D22C2225094;
- HP INVENT SN 25D626T1FF;
- SEAGATE SN 3JT0P7YM;

- SEAGATE SN 5MO2N7KQ;
- QUANTUM SN 172933813920;
- GALAXY 2D SN 6QF39MSF;
- HITACHI DESK STAR MODEL HDS722580VL5A80;
- SEAGATE SN 9QM48JBV;
- SEAGATE SN 9QM48C6F;
- MOBILE READER REGISTER;
- CARD READER;
- GIFT CARDS:
 - 12 American Express Credit
 - 1 Black Rock Coffee
 - 20 Blank
 - 1 Boost Mobile
 - 1 Buffalo Wild Wings
 - 3 Cabelas
 - 1 Coldstone
 - 2 Cracker Barrel
 - 1 Disney
 - 1 DXL
 - 611 eBay
 - 1 Gamestop
 - 8 Home Depot
 - 1 IHOP
 - 4 iTunes

- 20 Kroger Credit
- 1 Lyft
- 1 Mastercard Credit
- 2 Pita Pit
- 1 PlayStation
- 1 Red Robin
- 1 Sears
- 2 Southwest
- 9529 Starbucks
- 1 Subway
- 42 Target
- 4 Visa Credit
- 5 Visa Gift
- 1 Walgreens
- 1 Walmart
- 2 Whole Foods
- 1 Xbox
- 1 Dominos
- 33 Credit Cards issued to Robert Purbeck or Silk Alpaca