

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
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UNITED STATES OF AMERICA

v.

BARRETT LANCASTER BROWN

No. 3:12-CR-413-L

[Supersedes Indictments returned
on Dec. 4, 2012 and July 2, 2013]

The United States Attorney Charges:

SUPERSEDING INFORMATION

COUNT ONE

Accessory After the Fact to an
Unauthorized Access to a Protected Computer
(18 U.S.C. § 3 (18 U.S.C. §§1030(a)(5)(B) and 1030(c)(4)(A)(i)(I))

From in or about December 2011, through and including in or about March 2012, in the Dallas Division of the Northern District of Texas, the defendant **Barrett Lancaster Brown**, knowing that an offense against the United States had been committed, to wit, “o’s” unauthorized access to a protected computer, did receive, relieve, comfort, and assist an individual using the nickname “o” in order to hinder and prevent “o’s” apprehension, trial, and punishment, in that after “o” knowingly and intentionally accessed without authorization the computer network of Strategic Forecasting, Inc. (Stratfor), and recklessly caused damage; that is, the loss to persons during a 1-year period aggregating at least \$5,000 in value, **Barrett Lancaster Brown** assisted “o” with the specific purpose and plan

to hinder and prevent “o’s” apprehension, trial, and punishment, in that **Barrett Lancaster Brown** did (1) conceal the involvement and identity of “o,” (2) create confusion regarding the identity of the hacker “o” and the purpose of the hack, and (3) communicate with representatives of Stratfor in a manner that diverted attention away from the hacker “o”.

In violation of 18 U.S.C. § 3 (18 U.S.C. §§1030(a)(2)(C) and 1030(c)(2)(B)(iii).

COUNT TWO
Obstructing the Execution of a Search Warrant
Aid and Abet
(18 U.S.C. §§ 1501 and 2)

On or about March 6, 2012, in the Dallas Division of the Northern District of Texas, the defendant **Barrett Lancaster Brown**, aided and abetted by another person, did knowingly and willfully obstruct, resist, and oppose the Special Agents of the Federal Bureau of Investigation when they attempted to execute and executed a Search Warrant, cause number 3:12-MJ-110-BH, issued by a United States Magistrate Judge on March 6, 2012.

In violation of 18 U.S.C. §§ 1501 and 2.

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