

JUN 26 2013

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

BY   
DEPUTY CLERK

UNITED STATES OF AMERICA

v.

MICHAEL MANCIL BROWN

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NO. 3:13-00118

18 U.S.C. § 2

18 U.S.C. § 1343

18 U.S.C. § 1952(a)(3)

**INDICTMENT**

**COUNTS ONE THROUGH SIX**

THE GRAND JURY CHARGES THAT:

**The Scheme**

1. Beginning on or about August 20, 2012 and continuing until on or about November 5, 2012, in Williamson County, within the Middle District of Tennessee, and elsewhere the defendant,

**MICHAEL MANCIL BROWN,**

knowingly and with the intent to defraud, devised, intended to devise, attempted to execute, and did execute a scheme to defraud, and for obtaining money and property by means of false pretenses, representations, and promises, from Mitt Romney, a candidate for President of the United States in the 2012 election, from PricewaterhouseCoopers LLP, an accounting firm with offices in Franklin, Tennessee and elsewhere, and from others.

## **How the Scheme Worked**

2. In furtherance and as part of his scheme to defraud and to obtain money and property, MICHAEL MANCIL BROWN took or caused to be taken the following actions:

(a) On or about Monday, August 20, 2012, MICHAEL MANCIL BROWN printed a map from an Internet website showing driving directions from his residence in Franklin, Tennessee to the offices of PricewaterhouseCoopers LLP (hereafter "PwC") in Franklin, Tennessee.

(b) On or about Friday, August 24, 2012, MICHAEL MANCIL BROWN prepared a letter in which BROWN falsely stated that he had gained access to the PwC internal computer network and falsely stated that he had stolen tax documents for Willard M. Romney and Ann D. Romney for tax years prior to 2010. To prevent the public release of the alleged documents, Brown demanded US\$1 million converted to "Bitcoin" and instructed that this sum be deposited in a Bitcoin account for which he provided the account number 1HeF89wMjC48bWNgWvVo7Wu3RaLW8XVsE8. The letter also invited interested parties who wanted the Romney tax documents to be released promptly to contribute US\$ 1 million to a "Promote Full Release" Bitcoin account number 12AP6iCwRNFQqKLSH3A4b4hw3SL6RaNgB. The letter also bore the purported signature of Willard M Romney.

(c) On or about Friday, August 24, 2012, MICHAEL MANCIL BROWN also prepared a second letter addressed to "Interested Parties Worldwide" which essentially made the same claims and a demand for USD\$1 million in return for delivery of unencrypted copies of the alleged tax returns.

(d) On or about Friday, August 24, 2012, MICHAEL MANCIL BROWN caused to be sent an e-mail to the Hotmail email account of an acquaintance, P.H., asking to borrow P.H.'s computer

printer to print out a few pages and explaining that MICHAEL MANCIL BROWN's printer was out of ink.

(e) On or about Friday, August 24, 2012, MICHAEL MANCIL BROWN went to the residence of P.H. and used P.H.'s computer printer to print the letters described above in paragraphs 2(b) and 2(c).

(f) While at the residence of P.H., MICHAEL MANCIL BROWN requested and received approximately four to six padded manila envelopes.

(g) On or about Monday, August 27, 2012, MICHAEL MANCIL BROWN caused to be delivered to the Offices of PricewaterhouseCoopers LLP at 830 Crescent Centre Drive, Suite 260 in Franklin, Tennessee a package containing a copy of the letter described above in paragraph 2(b) and a SanDisk Cruzer 4 gigabyte flash drive on which was saved an encrypted file entitled "Romney1040-Collection.7z."

(h) On or about Thursday, August 30, 2012, MICHAEL MANCIL BROWN caused to be delivered to the Offices of the Williamson County Republican Party at 104 East Main Street in Franklin, Tennessee a package containing a copy of the letter described above in paragraph 2(c) and a SanDisk Cruzer 1 gigabyte flash drive on which was saved an encrypted file entitled "Romney1040-Collection.7z".

(i) On or about Thursday, August 30, 2012, MICHAEL MANCIL BROWN caused to be delivered to the Offices of the Williamson County Democratic Party at 112 East Fowlkes Street in Franklin, Tennessee a package containing a copy of the letter described above in paragraph 2(c) and a SanDisk Cruzer 4 gigabyte flash drive on which was saved an encrypted file entitled "Romney1040-Collection.7z."

(j) On or about Sunday, September 2, 2012, MICHAEL MANCIL BROWN caused to be posted to the website, Pastebin.com, a website which permits a user to store text for a period of

time, a statement that Willard M. Romney's tax returns purportedly were stolen on August 25, 2012, from the offices of PwC, that encrypted copies of the returns stored on a flash drive were sent to PwC, and the Republican and Democratic party offices in Franklin, TN.

(k) On or about Tuesday, September 4, 2012, MICHAEL MANCIL BROWN caused to be posted to the website, Pastebin.com, a statement containing the substance of the letter described above in paragraph 2(b).

(l) On or about Saturday, September 8, 2012, MICHAEL MANCIL BROWN caused to be posted to the website, Pastebin.com, a statement in which he expressed "Greetings from Dr. Evil" in which he responded to various questions raised by the press coverage of the claim of stolen Romney tax returns, and provided a link to download the file "Romney1040-Collection.7z."

(m) On or about Saturday, September 8, 2012, MICHAEL MANCIL BROWN caused to be posted to the website, 4shared.com, a photograph depicting the movie character "Dr. Evil" superimposed on a photograph of the entrance to the offices of PricewaterhouseCoopers in Franklin, Tennessee and an encrypted file entitled "Romney1040-Collection.7z."

(n) Between on or about Wednesday, September 5, 2012 and on or about Thursday, September 13, MICHAEL MANCIL BROWN visited approximately 300 websites that were discussing the purported theft of the Romneys' tax information from the offices of PricewaterhouseCoopers in Franklin, Tennessee.

(o) On or about Thursday, September 20, 2012, MICHAEL MANCIL BROWN caused a statement to be posted to the website Pastebin.com, again offering "Greetings from Dr. Evil" and asserting that a buyer had been found for the "product."

**Interstate Wires from the Middle District of Tennessee in Furtherance of the Scheme**

3. On or about the dates set forth below for each count, for purposes of attempting to execute and executing of the above-described scheme, the defendant,

**MICHAEL MANCIL BROWN,**

knowingly caused the interstate wire communications, as described in each count, to be made in furtherance of the execution and attempted execution of the scheme in the Middle District of Tennessee and elsewhere:

<b>Count</b>	<b>Date</b>	<b>Wire Communication</b>
1	August 24, 2012	MICHAEL MANCIL BROWN caused to be sent an e-mail to the Hotmail email account of an acquaintance, P.H., asking to borrow P.H.'s computer printer to print out a few pages and explaining that MICHAEL MANCIL BROWN's printer was out of ink.
2	September 2, 2012	MICHAEL MANCIL BROWN caused to be posted to the website, Pastebin.com, a statement claiming that "Romney's 1040 tax returns were taken from the PWC office 8/25/2012 by gaining access to the third floor via a gentleman working on the 3rd floor of the building," as described more completely above in paragraph 2(j).
3	September 4, 2012	MICHAEL MANCIL BROWN caused to be posted to the website, Pastebin.com, a statement containing the substance of the letter described above in paragraph 2(b).
4	September 8, 2012	MICHAEL MANCIL BROWN caused to be posted to the website, Pastebin.com, a statement purportedly from "Dr. Evil" explaining how the Romney's tax returns were stolen from the PWC office by gaining entry to the PWC building through social engineering, as described more completely above in paragraph 2(l).
5	September 8, 2012	MICHAEL MANCIL BROWN caused to be posted to the website, 4shared.com, a photograph depicting the movie character "Dr. Evil" superimposed on a photograph of the entrance to the offices of PricewaterhouseCoopers in Franklin, Tennessee and an encrypted file entitled "Romney1040-Collection.7z."

Count	Date	Wire Communication
6	September 20, 2012	MICHAEL MANCIL BROWN caused to be posted to the website, Pastebin.com, a statement purportedly from "Dr. Evil" claiming that "a deal has been sealed and the product delivered," as described more completely above in paragraph 2(o).

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

COUNT SEVEN THROUGH TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

1. The grand jury realleges and incorporates herein by reference the allegations contained in paragraphs 1 and 2 of Counts 1 through 6 of this Indictment.
2. On or about the dates set forth below for each count, in the Middle District of Tennessee and elsewhere, the defendant,


**MICHAEL MANCIL BROWN,**

used a facility of interstate commerce, to wit the Internet, with the intent to promote, manage, establish and carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, extortion in violation of the laws of the State of Tennessee in violation of Tennessee Code Annotated Section 39-14-112, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity, as described below for each count:

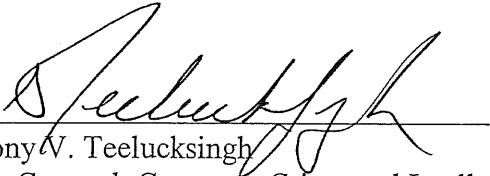
Count	Date	Use of Facility of Interstate Commerce
7	August 24, 2012	MICHAEL MANCIL BROWN caused to be sent an e-mail to the Hotmail email account of an acquaintance, P.H., asking to borrow P.H.'s computer printer to print out a few pages and explaining that MICHAEL MANCIL BROWN's printer was out of ink.
8	September 2, 2012	MICHAEL MANCIL BROWN caused to be posted to the website, Pastebin.com, a statement claiming that "Romney's 1040 tax returns were taken from the PWC office 8/25/2012 by gaining access to the third floor via a gentleman working on the 3rd floor of the building," as described more completely above in paragraph 2(j) of Counts One through Six.
9	September 4, 2012	MICHAEL MANCIL BROWN caused to be posted to the website, Pastebin.com, a statement containing the substance of the letter described above in paragraph 2(b) of Counts One through Six.
10	September 8, 2012	MICHAEL MANCIL BROWN caused to be posted to the website, Pastebin.com, a statement purportedly from "Dr. Evil" explaining how the Romney's tax returns were stolen from the PWC office by gaining entry to the PWC building through social engineering, as described more completely above in paragraph 2(l) of Counts One through Six.
11	September 8, 2012	MICHAEL MANCIL BROWN caused to be posted to the website, 4shared.com, a photograph depicting the movie character "Dr. Evil" superimposed on a photograph of the entrance to the offices of PricewaterhouseCoopers in Franklin, Tennessee and an encrypted file entitled "Romney1040-Collection.7z."
12	September 20, 2012	MICHAEL MANCIL BROWN caused to be posted to the website, Pastebin.com, a statement purportedly from "Dr. Evil" claiming that "a deal has been sealed and the product delivered," as described more completely above in paragraph 2(p) of Counts One through Six.

All in violation of Title 18, United States Code, Sections 2 and 1952(a)(3).

A TRUE BILL

  
FOREPERSON

MYTHILI RAMAN  
ACTING ASSISTANT ATTORNEY GENERAL

By:   
Anthony V. Teelucksingh  
Senior Counsel, Computer Crime and Intellectual Property Section  
Criminal Division, U.S. Department of Justice

Byron M. Jones  
Assistant United States Attorney  
For the Middle District of Tennessee