IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA v. BARRENCE MARK ANTHONY, Defendant.	Case No. 1:19-cr-166

STATEMENT OF FACTS

The United States and the defendant, BARRENCE MARK ANTHONY (hereinafter, "the defendant"), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. On or about December 8, 2016, in the Eastern District of Virginia and elsewhere, the defendant did knowingly access a protected computer without authorization in violation of Title 18, United States Code, Section 1030(a)(2)(C).

2. The Victim Company was a federal contractor that provided engineering services to its customers. On September 29, 2015, Victim Company was awarded a government contract to provide technology services for the maintenance and customization of the U.S. Army's Chaplain Corps Religious Support System (CCRSS). Victim Company was contracted to provide these services by building and managing the Financial Management System Sharepoint application, hosted on Amazon Web Services (AWS). The AWS servers that hosted the Financial System Sharepoint application are known as Amazon Machine Images (AMIs). As part of their contract, Victim Company also provided a support service desk for the Army's CCRSS users who numbered in excess of 9,000 individuals.

3. Until December 8, 2016, the defendant was a Systems Engineer for Victim Company which was located in the Crystal City neighborhood of Arlington, Virginia, which is in the Eastern District of Virginia. As part of his duties, the defendant had access to the network systems and passwords for the AWS infrastructure, which housed servers, operating systems, authentication systems, cyber security monitoring systems, routing networks, and applications services for the Army Chief of the Chaplain's Office in the Pentagon. The Pentagon is located in Arlington, Virginia, which is in the Eastern District of Virginia.

4. On December 8, 2016, the defendant was formally notified of his termination. The defendant, however, received advanced notice from a colleague that he was to be terminated and began a campaign of retaliation against Victim Company designed to damage critical infrastructure used by Victim Company in providing support for the U.S. Army Chaplain Corps.

5. For example, computer logs show that on December 7, 2016, the defendant used his knowledge of the master password for an encrypted file containing all other CCRSS passwords to delete all user and administrator accounts except for the defendant's from the AWS Management Portal. This action had the impact of leaving the defendant with sole control of the AWS system and locking out all other authorized users. Victim Company asked the defendant for the password so that other authorized personnel could access the system, but the defendant failed to provide the credentials.

6. Correspondence from Godaddy.com, a provider of domain names, dated December 7 and December 8, 2016, also show that the defendant changed the domain name registrant of chaplaincorps.net from Victim Company to "Anthony Enterprises." "Anthony Enterprises" had the mailing address for the defendant's residence and the email address

"Anthonyenterprises@yahoo.com. This email address was created and controlled by the defendant.

7. On the morning of December 8, 2016, 19 files belonging to Victim Company were deleted. Computer log files show that the defendant deleted those files. Two additional files were downloaded by the defendant from Victim Company's project folder which contained CCRSS AWS service account information and network diagram files.

8. On December 8, 2016, Victim Company orally notified the defendant that he was terminated from his employment and also sent a follow up email to the defendant expressly cautioning that "effective as of our conversation today at 1:30 pm, please note that any attempt to login to the CCRSS systems or AWS architecture is unauthorized access." The correspondence also reminded the defendant that the CCRSS and AWS systems and architecture are government systems.

9. On the evening of December 8, 2016, after the defendant had been terminated, sixteen backup images of the U.S. Army's CCRSS web application, which included the intellectual property of the servers and all associated servers and web applications was shared with a foreign AWS account. These backup images, or AMIs, were duplicates of server instantiation and its hosted applications that provide the information that allows the CCRSS to function. The foreign AWS account that illegally obtained these AMIs belonged to the defendant. The value of these AMIs exceeded $5,000.

10. Moreover, after Anthony was terminated, he initially refused to provide access to other Victim Company personnel and remained the only administrator account on Victim Company's network. On December 8, 2016, while the defendant was the sole individual with access to the networks, a sysprep command against a server that was part of the U.S. Army CCRSS

Web Application System was executed. Defendant's action resulted in the loss of all the information on the server causing Victim Company engineers to have to rebuild another test server. Computer logs also showed a login by the defendant to the Sharepoint application after he was terminated.

11. In addition to illegally obtaining the information contained in the AMIs, the defendant's failure to restore access to Victim Company personnel resulted in the disruption of a training course for Chaplain Corps students.

12. In an interview with law enforcement, the defendant admitted deleting files from the Sharepoint site, controlling access to Victim Company's network, and sharing the AMIs with his AWS account without authorization all in an effort to retaliate against Victim Company for his termination.

13. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

14. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

Date: May 21, 2019

By: _____
Nathaniel Smith III
Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, BARRENCE MARK ANTHONY, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

BARRENCE MARK ANTHONY
Defendant

I am the defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Bruce A. Johnson, Esq.
Attorney for BARRENCE MARK ANTHONY