

**IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY, OHIO
CIVIL DIVISION**

THE CITY OF COLUMBUS,
90 West Broad Street,
Columbus, Ohio 43215

Plaintiff,

v.

DAVID LEROY ROSS, JR.,
3783 Danube Drive,
Groveport, Ohio 43125

Defendant.

Case No.

Judge

DEMAND FOR JURY TRIAL

COMPLAINT

Now comes Plaintiff City of Columbus (“the City”), and for its Complaint against Defendant David Leroy Ross, Jr., states as follows:

1. The City is a municipal corporation organized, existing, and operating under the Constitution of the State of Ohio, the laws of the State of Ohio, the Charter of the City of Columbus, and the Codified Ordinances of the City of Columbus. The City is located in Franklin County as well as in adjacent counties.

2. Defendant David Leroy Ross, Jr., also known as “Connor Goodwolf,” is an individual who resides at 3783 Danube Drive, Groveport, Ohio 43125, in Franklin County, Ohio.

JURISDICTION AND VENUE

3. Jurisdiction is appropriate as these claims arose from events occurring in Ohio, The City is located in Ohio, and, at all times mentioned herein, Defendant both resided in and conducted business in Ohio.

4. Venue is appropriate as the facts underlying the following claims for relief occurred in Franklin County, Ohio.

FACTS

5. On July 18, 2024, the City became aware it was the victim of a massive cyber-attack. The City soon thereafter confirmed that a foreign cyber-criminal network, Rhysida, attempted to disrupt the City's IT infrastructure and stole some of the City's most sensitive databases containing individuals' personal information.

6. The City's investigation of the cyber-attack continues around the clock. The City has determined that the foreign cyber-criminals gained unauthorized access to the City's technology infrastructure, which included, but is not limited to, the criminals' theft of highly sensitive personal data from the City Attorney's Office prosecutor backup database and from the crime backup database.

7. On July 31, 2024, the foreign criminals advertised some portion of the City's stolen information for auction on the internet's dark web, a place for criminals to go and use bitcoin to purchase stolen information they would use to do harm to others.

8. On August 8, 2024, when the Rhysida auction failed in whole or in part, some of the City's stolen data was posted to the dark web.

9. Among the data stolen from the City and presumably posted to the dark web are two the backup prosecutor and crime databases. These databases contain large amounts of data gathered by the City prosecutors and the Columbus Division of Police pertaining to misdemeanor crimes prosecuted by the City's Attorney's office dating back to at least 2015. This data would potentially include sensitive personal information of police officers, as well as the reports submitted by arresting and undercover officers involved in the apprehension of the persons charged criminally by the City prosecutor's office.

10. These databases also contain the personal information of crime victims of all ages, including minors, and witnesses to the crimes the City prosecuted from at least 2015 to the present.

11. On August 13, 2024, Andrew Ginther, Mayor of the City of Columbus, gave a series of interviews detailing the broad outline of the facts of the cyber-attack as well as the City's response to date. Later that same day, the City was contacted by a reporter from the Columbus NBC affiliate seeking comment for stories to run that evening alleging that Defendant had taken it upon himself to access and download the City's stolen data from the dark web.

12. Defendant shared the stolen data he had recovered with the media. Media outlets used the stolen data to go door-to-door and otherwise contact individuals whose names were on the stolen data provided to them by Defendant.

13. From August 13, 2024 to date, Defendant has provided numerous interviews to local media outlets and has used the City's stolen data to reveal the personal information of countless innocent individuals—visitors to City Hall, victims of domestic violence and other misdemeanor offenses, and lists of individuals allegedly compiled to prevent their access to City buildings, just to name a few.

14. Defendant's actions of downloading from the dark web and spreading this stolen, sensitive information at a local level has resulted in widespread concern throughout the Central Ohio region.

15. Only individuals willing to navigate and interact with the criminal element on the dark web, who also have the computer expertise and tools necessary to download data from the dark web, would be able to do so. The dark web-posted data is not readily available to for public consumption. Defendant is making it so.

16. At various times throughout his interviews, Defendant has alluded to the existence of potentially even more troubling data having been exfiltrated by the foreign criminals, baiting the news reporters and public alike to continue to turn to him for more details as to the stolen data.

17. On the afternoon of August 28, 2024, the City was notified by several media contacts that Defendant showed them records stolen by the foreign criminals which Defendant claims to have pulled down from the dark web and that reveal the identities of undercover police officers, minor victims of crimes and more.

18. The irreparable harm that could be done by the readily-accessible public disclosure of this information locally by Defendant is a real and ongoing threat.

19. Defendant is threatening publicly to disclose and disseminate the City's stolen data to the local community in the form of a website he will himself create. This after Defendant went onto the dark web, downloaded the stolen data, and contacted media outlets to disclose that he has obtained and is threatening to share the City's stolen data with third parties who would otherwise have no readily available means by which to obtain the City's stolen data.

20. From at least August 13, 2024 to the present, Defendant has been contacting media, the entire time the criminal investigation by the City was ongoing, claiming to have access to and disclosing information stolen from the City by the criminal threat actors.

21. Defendant downloading from the dark web and sharing publicly the City's stolen confidential data interferes with the City's ongoing criminal investigation into the cyber-attack. His threats to spin up his own website where the public can readily access this information threatens the City Attorney's prosecutions and could lead to the exposure of the identity of undercover officers.

22. Improperly obtaining, using, and disclosing the City's stolen confidential data with flagrant disregard for any increased risk of harm to which Defendant could be exposing the City, its

police officers, (and in particular, undercover police officers), and their families, crime victims and their families, and witnesses and their families, harms the City.

FIRST CLAIM FOR RELIEF—O.R.C. § 2307, DAMAGES FOR CRIMINAL ACTS

23. The City incorporates the preceding paragraphs as if fully rewritten herein.

24. By his misconduct detailed throughout this Complaint, Defendant has violated and continues to violate numerous provisions of the Ohio Revised Code and the Columbus City Code and is liable in damages for his criminal acts.

25. Defendant has violated and continues to violate O.R.C. § 2923.04 by knowingly disseminating information gained from access to the law enforcement automated database and the Ohio law enforcement gateway.

26. Defendant has violated and continues to violate O.R.C. § 2913.51 by receiving stolen property.

27. Defendant has violated and continues to violate O.R.C. § 2921.04 by knowingly attempting to intimidate or hinder victims of crime in the prosecution of criminal charges and by intimidating witnesses to criminal acts.

28. Defendant has violated and continues to violate Columbus City Code § 2321.04 by knowingly attempting to intimidate or hinder victims of crime in the filing and prosecution of criminal charges and of witnesses in criminal cases in the discharge of their duty.

29. Defendant has violated and continues to violate Columbus City Code § 2317.31 by committing the criminal offenses identified above and causing a serious public inconvenience and alarm.

30. As a direct and proximate result of Defendant's criminal acts, the City has suffered and will continue to suffer both irreparable harm and damages.

SECOND CLAIM FOR RELIEF—INVASION OF PRIVACY

31. The City incorporates the preceding paragraphs as if fully rewritten herein.

32. By his misconduct detailed throughout this Complaint, Defendant has wrongfully intruded into, downloaded, and publically disseminated the private and confidential information of the City, its employees, and its citizens.

33. As a direct and proximate result of Defendant's invasion of privacy, the City has suffered and will continue to suffer both irreparable harm and damages.

THIRD CLAIM FOR RELIEF--NEGLIGENCE

34. The City incorporates the preceding paragraphs as if fully rewritten herein.

35. By his misconduct detailed throughout this Complaint, Defendant has failed to act as would a reasonably prudent person.

36. As a direct and proximate cause of Defendant's negligent acts and/or omissions, the City has suffered and will continue to suffer both irreparable harm and damages.

FOURTH CLAIM FOR RELIEF—CIVIL CONVERSION

37. The City incorporates the preceding paragraphs as if fully rewritten herein.

38. By his misconduct detailed throughout this Complaint, Defendant has wrongfully exercised dominion and control over the City's property and has wrongfully converted the same to Defendant's own use and benefit to the exclusion of and inconsistent with the City's ownership of its property.

39. As a direct and proximate cause of Defendant's conversion, the City has suffered and will continue to suffer both irreparable harm and damages.

RELIEF DEMANDED

WHEREFORE, Plaintiff City of Columbus demands that judgment be entered against Defendant David Leroy Ross, Jr., for the following relief:

a. That this Court order that Defendant is obligated to pay Plaintiff compensatory, statutory, exemplary, and punitive damages in an amount greater than \$25,000.00 and that shall be determined at trial;

b. That this Court issue a temporary restraining order, a preliminary injunction, and a permanent injunction enjoining and restraining Defendant and any person acting in concert or participation with Defendant from accessing, and/or downloading, and/or disseminating the City's stolen data;

c. Plaintiff further demands that this Court grant Plaintiff the following relief as permitted by law:

- (1) interest on all sums to which Plaintiff may be entitled;
- (2) attorneys' fees and costs and expenses of this action; and
- (3) all such further equitable and other relief this Court determines Plaintiff to be entitled.

Respectfully submitted,

/s/ Westley M. Phillips

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JURY DEMAND

Plaintiff respectfully request a trial by jury on all issues so triable.

Respectfully submitted,

/s/ Westley M. Phillips

Westley M. Phillips (0077728)

Attorney for Plaintiff City of Columbus