HUNTON ANDREWS KURTH LLP
Ann Marie Mortimer (State Bar No. 169077)
amortimer@HuntonAK.com
Jason J. Kim (State Bar No. 221476)
kimj@HuntonAK.com
Jeff R. R. Nelson (State Bar No. 301546)
jnelson@HuntonAK.com
550 South Hope Street, Suite 2000
Los Angeles, California 90071-2627
Telephone: (213) 532-2000
Facsimile: (213) 532-2020

Attorneys for Plaintiff
FACEBOOK, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND/SAN FRANCISCO DIVISION

FACEBOOK, INC., a Delaware corporation, Plaintiff, v. ALEXANDER ALEXANDROVICH SOLONCHENKO, also known as "Solomame," Defendant.	CASE NO.: 3:21-cv-08230 **COMPLAINT; DEMAND FOR JURY TRIAL**

Plaintiff Facebook, Inc. ("Facebook") asserts the following:

INTRODUCTION

1.   Between January 2018 and September 2019, Defendant Alexander Alexandrovich Solonchenko, also known as "Solomame," scraped publicly accessible information (Facebook user ID and phone number) for approximately 178 million Facebook users. Solonchenko used a computer program to deliver automated requests to Facebook computers, meanwhile pretending to be multiple Android devices connected to Facebook's Messenger mobile app.

2.   Beginning in October 2020, Solonchenko sold data on RaidForums.com ("RaidForums"). RaidForums is an online marketplace used to sell and distribute scraped, stolen, and leaked data. Since 2020, Solonchenko has sold stolen or scraped data from Ukraine's largest commercial bank, Ukraine's largest private delivery service, and a French data analytics company. In May 2021, Solonchenko also sold the data that he had scraped from Facebook between January 2018 and September 2019, namely, Facebook user IDs and phone numbers.

3.   Solonchenko's conduct violated Facebook's Terms of Service and Platform Terms. Facebook now seeks injunctive and other relief.

PARTIES

4.   Plaintiff Facebook, Inc., is a Delaware corporation with its principal place of business in Menlo Park, San Mateo County, California. Plaintiff owns and operates several products, including Facebook, Instagram, and Messenger.

5.   Solonchenko resides in Kirovograd, Ukraine. Solonchenko worked as a freelance computer programmer with experience working with several programming languages including Python, PHP, and Xrumer, which is a software used for spamming; automating tasks on Android emulators; and conducting affiliate marketing. Ex. 1. Until in or around June 2019, Solonchenko also sold shoes online under the business name "Drop Top."

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

6.   Solonchenko also scraped and sold data to make money. Specifically, since October 2020, Solonchenko used the aliases "solomame" and "barak_obama" on RaidForums to sell scraped and other data. Ex. 2. Defendant sold and distributed data scraped or stolen from different websites and companies, including financial institutions, logistic companies, and analytics companies located in Ukraine and elsewhere. On RaidForums, Solonchenko directed the potential buyers of data to contact him using the messaging service Telegram. Solonchenko used the Telegram accounts @not_a_wolf and @salampopolani. On the employment website freelancehunt.com, Solonchenko used the username "Alexander S," Skype ID "solomame," and email address aa_solonchenko@mail.ru. Ex. 3. Solonchenko used multiple email addresses, including solomame@icloud.com, weeeble@bk.ru, and grant2.grant2@yandex.ru; and phone number +38099497401. On August 7, 2017, Solonchenko registered the domain name theblackmask.top using the name "Aleksandr A Soloncheko" with email address aa_solonchenko@mail.ru, and phone number +38099497401. Ex. 4. Solonchenko listed his city, state, and country as Kirovograd, Kirovogradskaya, Ukraine. *Id.*

Figure 1: Solonchenko December 2019

3:21-cv-08230

COMPLAINT; DEMAND FOR JURY TRIAL

Hunton Andrews Kurth LLP
550 South Hope Street, Suite 2000
Los Angeles, California 90071-2627

JURISDICTION AND VENUE

7.   The Court has jurisdiction under 28 U.S.C. § 1332 over the cause of action alleged in this Complaint because complete diversity exists and the amount in controversy exceeds $75,000.

8.   Solonchenko used and controlled at least one Facebook account and thereby agreed to the Facebook Terms of Service. The Court has personal jurisdiction over Solonchenko because the Facebook Terms of Service contain a forum selection clause that requires this Complaint be brought in the U.S. District Court for the Northern District of California or a state court located in San Mateo County, and that Solonchenko submit to the personal jurisdiction of either of those courts for litigating this matter.

9.   The Court also has personal jurisdiction over Solonchenko because Solonchenko knowingly directed and targeted his conduct at California, including at Facebook, which has its principal place of business in California, and at Facebook users located in California. Facebook's claims arise directly from and relate to Solonchenko's activities described in this Complaint and activities in and directed at California.

10.   Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) as the threatened and actual harm to Facebook occurred in this District.

11.   Pursuant to Civil L.R. 3-2(c), this case may be assigned to either the San Francisco or Oakland division because Facebook is located in San Mateo County.

FACTUAL ALLEGATIONS

A.   Background on Facebook Products

12.   Plaintiff owns and operates Facebook, a social networking website and mobile application that enables its users to create their own personal profiles and connect with each other on their personal computers and mobile devices. Plaintiff owns and operates several products in addition to Facebook, including Instagram and Messenger (collectively "Facebook Products").

COMPLAINT; DEMAND FOR JURY TRIAL

Hunton Andrews Kurth LLP
550 South Hope Street, Suite 2000
Los Angeles, California 90071-2627

13.   To access Facebook and view certain user profiles, Facebook requires that each user create a Facebook account. To create a Facebook account, Facebook requires each user to register with a unique username and password.

14.   Registered users can create user profiles and include information about themselves, including their email address, phone numbers, and date of birth. Registered Facebook users can make connections on Facebook by becoming "Friends" with other Facebook users.

15.   Facebook provides its users with control over how to customize their profiles and how much personal information to include in their profile. In addition, Facebook's privacy settings provide users with control over how much profile information is viewable publicly and searchable, to other Facebook users, or to the users' Friends.

16.   Facebook Messenger is a messaging app and platform that allows direct messaging, video and voice calls, and the ability to share photos, videos, audio, and files, among other features. A Facebook account is required to use Messenger. Messenger included a feature called "Contact Importer" that allowed a user to upload their contacts from the address book on their mobile devices.

17.   Between in and around June 2015 and September 2019, Messenger Contact Importer included a functionality that would return a one-to-one list of any Facebook users that matched phone numbers uploaded from the address book on a user's mobile device ("CI matching function"). The feature allowed users to upload their contacts from mobile devices and identify their friends and others associated with the uploaded phone numbers. The CI matching function was limited by a user's privacy settings; that is, it only identified a user with a matching phone number if that user's privacy settings permitted them to be searched for by phone number. If a user's phone searchability setting was set to "Friends," only that user's Facebook "Friends" could find the user through the CI matching function. If on the other hand, a user's phone searchability setting allowed "everyone" to search for them by phone number, other

4   3:21-cv-08230

users could find that user using the CI matching function even if they were not "Friends" with that user on Facebook. Since September 2019, Messenger Contact Importer no longer returns one-to-one lists of matched phone numbers.

B.   Facebook's Terms of Service and the Platform Terms

18.   All Facebook users must agree to Facebook's Terms of Service (available at https://www.facebook.com/terms.php) and other rules, including the Platform Terms, that govern access to, and use of, Facebook and the Facebook Platform. Facebook's Terms of Service also govern the use of Facebook Messenger.

19.   Section 3.2.1 of the Facebook Terms of Service prohibits users from "do[ing] . . . anything unlawful, misleading, [ ] or fraudulent" or facilitating or supporting others in doing so.

20.   Section 3.2.3 of the Facebook Terms of Service prohibits "access[ing] or collect[ing] data from [Facebook] Products using automated means (without our permission) or attempt[ing] to access data you don't have permission to access."

21.   Section 1 of the Platform Terms state that they apply to the use of Facebook's APIs, code, technology, content, and services that enable the retrieval of data from Facebook computers and Facebook Products.

22.   Section 12(j) of the Platform Terms defines "Platform Data" as any information, data, or other content a user obtains from Facebook or Facebook Products through the Platform, as defined by section 12(i) of the Platform Terms, whether directly or indirectly.

23.   Section 3(a)(iv) of the Platform Terms prohibits the sale of Platform Data.

24.   Section 3(a)(v) of the Platform Terms prohibits "[p]lacing Platform Data on, or otherwise making Platform Data available to, a search engine or directory without [Facebook's] prior express written consent."

C.   Background on Phone Number Enumeration Scraping

25.   Phone lookup or finder features, such as whitepages.com, are programmed to provide available information about the user of a phone number. "Phone number

enumeration scraping" was the process of using automation software to (a) manufacture auto-generated lists of phone numbers and (b) upload the lists to websites with phone lookup or finder features, in order to scrape information associated with that phone number.

26. Phone number enumeration scraping in the context of Messenger Contact Importer generally involved the following steps:

a. A computer program would be used to auto-generate lists of phone numbers. These lists could be curated based on telephone area code and target densely populated areas that have a high number of mobile phone numbers.

b. The auto-generated lists of phone numbers were used to create files consistent with phone contacts on various simulated mobile devices (also known as Android or Apple iOS emulators). The emulators were programmed to mimic real mobile devices when connected to Facebook computers in order to use the Messenger Contact Importer function, which was restricted to logged-in authenticated Messenger users.

c. The emulators were used to upload the auto-generated phone contacts to Facebook computers through the Messenger Contact Importer feature. If a phone number on the auto-generated list matched a real phone number listed on a user's account, and if the user's phone searchability setting allowed "everyone" to search for the user by phone number, that user's Facebook ID and name were returned and could be scraped.

D. Defendant Agreed to Facebook's Terms of Service and Platform Terms

27. Between January 7, 2015, and October 13, 2021, Solonchenko created and used at least two Facebook accounts, and therefore, agreed to the Facebook Terms of Service.

3:21-cv-08230

COMPLAINT; DEMAND FOR JURY TRIAL

a. Solonchenko created a Facebook account on January 7, 2015, with the username "Mark Twen," and phone number +380994097401. The current email address associated with the account is grant2.grant2@yandex.ru.

b. Solonchenko created a Facebook account on August 31, 2020, with the username "Drop Top."

28. Between October 12, 2019, and October 13, 2021, Solonchenko created and controlled two Facebook apps and therefore agreed to the Platform Terms. The apps were named "klklkl" and "Mark's first app."

29. Between February 28, 2019, and July 23, 2019, Solonchenko created and controlled a Facebook Page named "Drop Top." Solonchenko's Facebook accounts – "Drop Top" and "Mark Twen" – were administrators of the Drop Top Facebook Page.

30. Between January 18, 2015, and October 13, 2021, Solonchenko created or controlled at least five Instagram accounts.

a. Solonchenko created an Instagram account on January 18, 2015, using the name "Экий Некий," username "ekyneky," and email address grant2.grant2@yandex.ru.

b. Solonchenko created an Instagram account on August 29, 2018, using the name "Noname nofame," username "nnnofame," and phone number +380994097401.

c. Solonchenko created an Instagram account on December 12, 2019, using the name "Mark Twen," username "grant2.grant2," and phone number +380994097401.

d. Solonchenko created an Instagram account on December 17, 2019, using the name "fetzer woodie," username "fetserwoodie8803," and email address aa_solonchenko@mail.ru.

e. Solonchenko created an Instagram account on February 28, 2019, using the name "Drop Top," username "dropoftop," phone number +3809947401, and email account solomame@icloud.com.

3:21-cv-08230

COMPLAINT; DEMAND FOR JURY TRIAL

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

E. Background on RaidForums

31.   RaidForums is an online marketplace where users of the forum openly discuss the collection and sale of scraped, stolen, and leaked data. Ex. 5. RaidForums was started in 2015 by a user with the online aliases "Omnipotent," and "Omni," who still operates the forum as an administrator. As of August 2, 2021, RaidForums had over 640,000 registered users participating in discussion topics dedicated to gaming, scraped, stolen, and leaked data, and hacking. *Id.* For example, in July 2021, public reports stated that scraped user profile information (name, gender, email, and telephone number) for 700 million LinkedIn users was offered for sale on RaidForums.[1]

F. Defendant Used Automated Means to Access and Scrape Data from Facebook

32.   Beginning no later than January 2018, Solonchenko used automated means to access Facebook computers and to scrape Facebook user IDs and phone numbers without Facebook's permission, in violation of Facebook's Terms of Service. Exs. 6 and 7. Solonchenko used phone number enumeration scraping of Messenger Contact Importer to scrape the user IDs and phone numbers of approximately 178 million Facebook users. Ex. 7.

33.   As described below in paragraph 38, on December 1, 2020, Solonchenko created a post on RaidForums in which he claimed that he scraped data from Facebook. Ex. 6. Specifically, Solonchenko wrote, "I collected this database [of Facebook user IDs and phone numbers] during 2018y, it's unique and nobody sales exact that leak (sic), I collected it by myself scanning [Facebook] day-by-day during a year (sic)." *Id.*

---

[1] *See* https://www.forbes.com/sites/leemathews/2021/06/29/details-on-700-million-linkedin-users-for-sale-on-notorious-hacking-forum/?sh=10d21a4e34a4

G. Defendant Sold Data Collected from Facebook on RaidForums in Violation of Facebook's Platform Terms

34.   On or about October 1, 2020, Solonchenko created an account on RaidForums using the username "Solomame." On January 18, 2021, Solonchenko changed his username on RaidForums from "Solomame" to "barak_obama." Ex. 2.

35.   Since October 1, 2020, Solonchenko has used RaidForums to sell and distribute data obtained from various businesses, including Nova Poshta, which is the largest private delivery company in Ukraine, and PrivatBank, which is the largest commercial financial institution in Ukraine. Solonchenko also used RaidForums to sell data scraped from Facebook in violation of Facebook's Terms of Service and Platform Terms.

36.   On October 24, 2020, as shown below in Figure 2, Solonchenko created a post on RaidForums in which he offered to sell a dataset of records of 18 million users or customers of a company called Nova Poshta, which was the largest private delivery company in Ukraine. Ex. 8. According to public reporting from February 2018, two customer datasets (one containing records for 500,000 customers and another containing records for 18 million customers) were leaked from Nova Poshta and were being sold on the internet.[2] Although Solonchenko denied being the person that scraped the data, stating "leak not made by me," he offered information about how others could scrape data from Nova Posta through one of its Application Platform Interfaces and offered to provide others with a "python script," or computer code, to scrape the data.

Figure 2: Text of Solonchenko October 24, 2020 RaidForums Post

October 24, 2020 at 09:19 PM

Hi there guys.
I'm just kinda new here. Wanna share you a little part of my archive.
Archive contains Cronos DB with phone, first name, last name, possibly city(don't remember for sure). 18 millions of records.
Leak not made by me, source is their mobile application.
I have an actual leak how to get such information by their API, can give you a python script for it, if someone needs it.
Thanks for your attention

---

[2] *See* https://www.unian.info/society/2386634-nova-poshta-postal-services-massive-customer-base-put-up-for-sale-in-darknet-media.html.

9   3:21-cv-08230

37.   On October 24, 2020, as shown below in Figure 3, Solonchenko created a post on RaidForums in which he offered to sell a dataset of records of over 10 million users or customers of a financial institution in Ukraine called PrivatBank. Ex. 9. As of 2021, PrivatBank, which was nationalized in 2016, is the largest commercial bank in Ukraine.[3] Solonchenko offered the PrivatBank records for "free" and wrote that he "[h]ope[d] [the records from PrivatBank] will help someone!"

Figure 3: Text of Solonchenko October 24, 2020 RaidForums Post

38.   On December 1, 2020, as shown below in Figure 4, Solonchenko created a post on RaidForums in which he wrote that he scraped data from Facebook in 2018 and offered to sell the complete dataset or portions of the dataset. Ex. 6. Specifically, Solonchenko wrote, "I collected this database during 2018y, it's unique and nobody sales exact that leak (sic). I collected it by myself scanning fb day-by-day during a year (sic)." Solonchenko invited those interested in purchasing the Facebook dataset to contact him on Telegram at @not_a_wolf. *Id.* Solonchenko also suggested that "Omni," the RaidForums' admin, could serve as the escrow agent to facilitate the sale of the Facebook data. Between December 3, 2020, and January 3, 2021, Solonchenko promoted the sale of this scraped data on RaidForums.

---

[3] *See* https://www.globalcapital.com/article/28wqcf0bsm4qob7dcmdxc/emerging-markets/em-cee/ukraine-central-bank-chief-shevchenko-on-independence-imf-cash-and-privatbank

December 01, 2020 at 03:18 AM
Hi there.
I collected this database during 2018y, it's unique and nobody sales exact that leak, I collected it by myself scanning fb day-by-day during a year.
You can buy just some country, part of country, whole database, I will wait for your proposals. I will send you free samples for your request for exact country you need.

Telegram: @not_a_wolf
Deals with middleman (Omni or Jaw) are welcome.

P.s. don't trust anyone saying he have 2019/2020 fb leak, the bug used for this data collection was fixed on the end of 2018.
Only facebook pages data can be updated using parser and it's actually works not for all profile (depends on publicity settings).

39.   On February 2, 2021, as shown below in Figure 5, Solonchenko created a post on RaidForums in which he offered to sell a dataset of records of 245 million users or customers from a French marketing analytics company called Acuity Data. Ex. 10. More specifically, Solonchenko wrote, "Item: Database of company called Acuity (acuity-data.com now part of liveramp) . . . Every string contains unique phone, totally 245 [million of] mixed landlines/mobiles (sic) phones."

Figure 5: Text of Solonchenko February 2, 2021 RaidForums Post

February 02, 2021 at 07:13 PM   This post was last modified: February 26, 2021 at 02:50 AM by barak_obama. Edited 1 time in total.
Item: Database of company called Acuity (acuity-data.com now part of liveramp)
Amount of strings: 245 millions
Every string contains unique phone, totally 245 mixed landlines/mobiles phones.
Records with same contactid means one familly.
Posting also a file to decrypt work field.

Contact me via PM or Telegram: @not_a_wolf
Price: 750$
Payment method: ESCROW or direct crypto payment (Btc, Eth, etc..)

Sample: https://mega.nz/file/JnBVjSQB#sTdB1PY_ag...IfdQEfaP7Y
And additional file:
https://mega.nz/file/YrhWXBpA#53JUvn5yJZ...0TP4XkUAYw

40.   On May 24, 2021, as shown below in Figure 6, Solonchenko created a post on RaidForums in which he offered to sell several databases of stolen data. Ex. 7. First, Solonchenko again offered to sell a dataset obtained from Acuity (described in

3:21-cv-08230

paragraph 39) at a reduced price. Second, Solonchenko offered a database of 186 million mobile phone records from an unidentified source.

41.   Further, Solonchenko offered to sell a dataset of about 180 million Facebook users. More specifically, Solonchenko wrote, "I also have some other DBs, consumers lists (sic), B2B dbs all over the world, phone dbs, [and] non-public fb data (180m for USA)." In fact, the dataset contained publicly accessible phone numbers and Facebook user IDs for approximately 178 million Facebook users, predominantly located in the United States. Solonchenko used phone number enumeration scaping of Messenger Contact Importer to obtain this dataset prior to September 2019.

Figure 6: Text of Solonchenko May 24, 2021 RaidForums Post

May 24, 2021 at 08:12 PM This post was last modified: June 08, 2021 at 12:47 AM by barak_obama. Edited 1 time in total.

Item 1: Database of company called Acuity (acuity-data.com now part of liveramp as I understand)
Amount of strings: 245 millions
Leaked: 07.2020
Every string contains unique phone, totally 245 mixed landlines/mobiles phones.
Records with same contactid means one familly.
Posting also a file to decrypt work field.

Sample: https://mega.nz/file/JnBVjSQB#sTdB1PY_ag...lfdQEfaP7Y
File to decrypt work field: https://mega.nz/file/YrhWXBpA#53JUvn5yJZ...0TP4XkUAYw
Price: 400$ (You can try negotiate if someone selling you same item cheaper)

Item 2: Database of USA Cellphones
Amount of strings: 186 millions
Leaked: 05.2020
Every string containts unique phone, about 90 millions of records have names as well. Also cellular data.

Sample: https://mega.nz/file/p3QTglhJ#v8hfRD_6te...embT1gFD0Y
Price: 150$

Originally bought both from greenmoon and I was reselling it. Thread recreated as I was out of work for some time.

I also have some other DBs, consumers lists, B2B dbs all over the world, phone dbs, non-public fb data (180m for USA).

Please PM me your contact if interested.

H.   Facebook's Anti-Scraping and Enforcement Efforts

42.   Facebook took several measures to limit phone number enumeration scraping. First, Facebook used technical anti-scraping measures to detect and disrupt unauthorized automated requests on its systems. Second, only an authenticated user could use Messenger Contact Importer.   In other words, in order to use Messenger

1 Contact Importer a person would first need to create a user account and then login to

2 Messenger using their account password. Third, between February 2018 and December

3 2018, Facebook set limits for the number of contacts that could be uploaded through

4 Messenger Contact Importer and the frequency at which those phone numbers could be

5 submitted. Finally, since September 2019, Messenger Contact Importer no longer

6 returns one-to-one lists of matched phone numbers.

7   43.   Further, Facebook has disabled Solonchenko's Facebook and Instagram

8 accounts and revoked his access to Facebook and Facebook Products.

9 **I.   Defendant's Acts Harmed Facebook**

10   44.   Solonchenko's violations of Facebook's Terms of Service and the Platform

11 Terms have harmed Facebook.

12   45.   Facebook has suffered damages attributable to the efforts and resources it

13 has used to investigate, remediate, and respond to Solonchenko's conduct as described

14 in this Complaint in an amount to be determined at trial, and in excess of $75,000.

15 **CAUSE OF ACTION**

16 (Breach of Contract)

17   46.   Facebook realleges and incorporates all preceding paragraphs here.

18   47.   Between January 2015 and October 21, 2021, Solonchenko created and

19 used multiple Facebook accounts and agreed to Facebook's Terms of Service.

20   48.   Between October 12, 2019, and October 21, 2021, Solonchenko created

21 and controlled two Facebook apps and agreed to the Platform Terms.

22   49.   The Facebook Terms of Service and Platform Terms constitute an

23 agreement between Solonchenko and Facebook.

24   50.   Facebook has performed all conditions, covenants, and promises required

25 of it in accordance with its agreements with Solonchenko.

26   51.   Solonchenko breached section 3.2.3 of the Facebook Terms of Service by

27 using automated means to access and collect data from Facebook, namely Facebook

28 user IDs and phone numbers, without Facebook's permission.

Hunton Andrews Kurth LLP
550 South Hope Street, Suite 2000
Los Angeles, California 90071-2627

52.   Solonchenko breached section 3.2.1 of the Facebook Terms of Service because his conduct was misleading because he used an Android emulator and the phone enumeration scraping technique to communicate with Facebook computers which misrepresented to Facebook who was using Messenger Contact Importer.

53.   Solonchenko's violation of the Facebook Terms of Service caused Facebook to incur damages in an amount to be determined at trial, and in excess of $75,000.

PRAYER FOR RELIEF

Facebook seeks judgment awarding the following relief:

(a)   An injunction restraining Solonchenko from accessing Facebook and Facebook Products;

(b)   An injunction restraining Solonchenko from selling or distributing data of any kind obtained from Facebook or Facebook Products, or purportedly obtained from Facebook or Facebook Products;

(c)   Damages in an amount to be determined at trial;

(d)   Pre-judgment and post-judgment interest; and

(e)   All other equitable or legal relief the Court deems just and proper.

PLAINTIFF RESPECTFULLY DEMANDS A JURY TRIAL.

Dated: October 21, 2021   **HUNTON ANDREWS KURTH LLP**

By: ____/s/ *Ann Marie Mortimer*____
         Ann Marie Mortimer
         Jason J. Kim
         Jeff R. R. Nelson
      Attorneys for Plaintiff
      FACEBOOK, INC.

      Platform Enforcement and Litigation
      Facebook, Inc.
         Jessica Romero
         Michael Chmelar
         Jimmy Doan

EXHIBIT 1

Freelancers › Alexander S. ✔
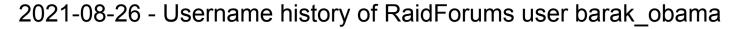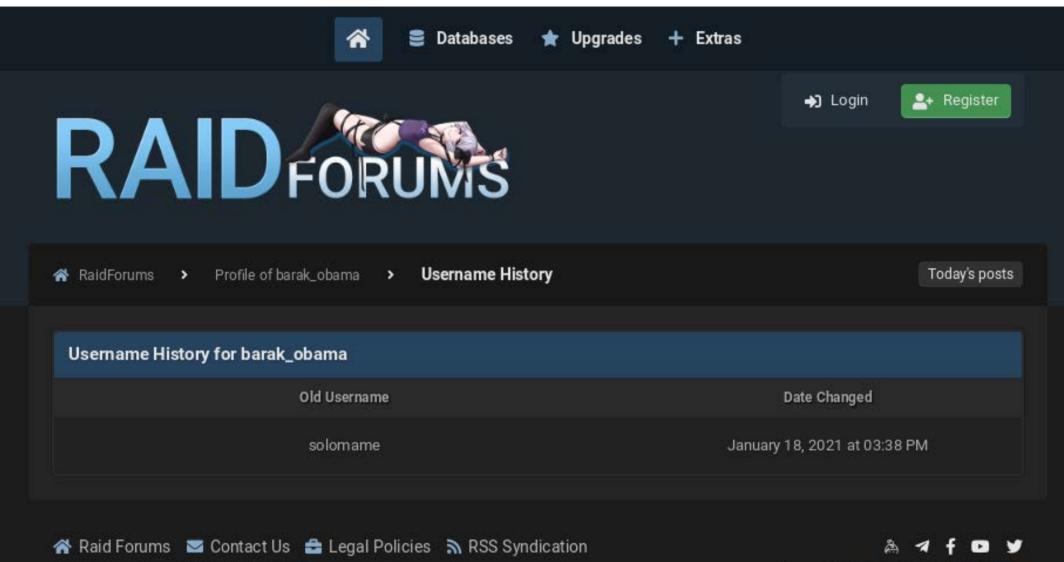
ℹ **Suggest** Alexander work on your next project or register a freelancer profile and get started **earn** just now.

- 👤 Profile
- ⭐ Rating
- ✔ Verification
- 📄 Resume
- 🛠 Habits
- 🖼 Portfolio **1**
- 👍 Reviews **22** **3**
- 🗒 Activity

[💬 Personal message]

[💰 Offer a job]

🇺🇦 Ukraine
🇺🇦 on vacation
👍 2 years ago
🏠 on the service for 7 years

🕐 6 days 1 hour ago
🔒 1 The safe is complete
👥 19 customers
⇄ **Customer profile**

Rating

Successful projects	Average rating	Rating
88%		**415**

Creating a turnkey site ◆4
1216 place with 5997

Python ◆1
496th place with 3416

Verified data

ℹ Viewing verification information is only available **registered** users.

Resume

I do not like long and pathetic resumes, briefly about me:
1. I work with Python, Php, Django, bootstrap, Html5 / css, Zennoposter, Xrumer, and also with other highly specialized combines, frameworks and decisions.
2. I develop software for automation, parsers, autoreggers, including automating tasks on Android emulators.
3. I do mailings, sell my software and develop new ones. I have experience working with: Telegram, WhatsApp, Viber. Need to make a combine from autoreger to mailer? Need automation of certain functions - checkers, parsers? All these questions should definitely be redirected to me, since I've been doing this for the last 3 years, merging traffic on my projects.
4. I deal with traffic, work with affiliate programs, conduct business activities in practice and can give real work experience.
5. I run advertising campaigns in CPA networks, I am a professional in the field of development of bot traffic recognition systems, as well as in the generation of the same bot traffic.
6. I only go to freelance to check the PM a few times a day, if you need my advice, or you have a project / proposal - please send contacts, on which it is convenient for you to communicate. The rest of the time I do projects and family, so you save your time.
7. Development of specific web engines (as an example - the engine for a network of sites of intimate services), bots Telegram, Viber, WhatsApp.
I am always happy to give a detailed answer to your questions / your problem, if I have experience in this.

Skills and abilities

Programming
- PHP
- Databases
- Web programming
- Software protection and security
- Applied programming
- System programming
- Testing and QA

Services
- HTML and CSS layout
- Integration of payment systems
- Online shopping and e-commerce
- CMS installation and configuration
- Collection of information
- Content manager
- Marketing researches
- Teaching
- Software and server settings
- Data Processing
- Work with customers
- Creating a turnkey site
- Website maintenance

Audio and video
- Audio and video editing

Promotion
- SEO-audit of sites
- Contextual advertising
- Search Engine Optimization (SEO)
- Search Reputation Management (SERM)
- Sales and generation of leads
- Promotion on social networks (SMM)
- Advertising on social media
- Teaser advertising

Outsourcing and consulting
- Business consulting
- Consulting
- Customer management and CRM
- Project management

Translations
- English
- Localization of software, sites and games

Working with texts
- Copywriting
- Writing articles
- Rewriting

Portfolio

[All works **1**] [Development of bots **1**]

Bot exchanger   1 June
⚙ Development of bots

Feedback and compliments about completed projects **22** **3**

[For the last 6 months **1**] More than 6 months ago **16**

👎 **Sparsit a small forum**
Took the project and just stopped communicating

Quality	⭐☆☆☆☆☆☆☆☆☆
Professionalism	⭐☆☆☆☆☆☆☆☆☆
Cost	⭐☆☆☆☆☆☆☆☆☆
Contact	⭐☆☆☆☆☆☆☆☆☆
Term	⭐☆☆☆☆☆☆☆☆☆

June 5   2003

👤 Igor G. | Safe 🗓

Activity

Recent bets **16**	Budget	Added	Terms	Rate
⏱ Sparsit a small forum	2000	26 May	2 days	🗓
⏳ Realization of parsing functionality with the site on our site	19 000 ₽	25 May	1 day	🗓
⏳ Functionality for downloading sites	20 000 ₽	25 May	7 days	🗓
⏳ Piercing contacts with LINKEDIN	1000 ₴	25 May	3 days	🗓
⏳ Online store parsing (Headless Chromium - Selenium and Puppeteer)	20 000 ₽	25 May	4 days	🗓
⏳ Parsing information from blockchains	1500 ₽	25 May	1 day	🗓
⏳ Mail base	10,000 ₴	25 May	1 day	🗓
⏳ Parsing Linkedin	7500 ₽	25 May	1 day	🗓
⏳ Parsing chat telegrams	700 ₴	25 May	1 day	🗓
⏳ Parsing data from the site	1000 ₴	25 May	1 day	🗓

Freelance
- Freelance projects 🟢 🔴
- All freelancers
- Freelance work
- Profile verification
- Profile Plus
- Freelancer's Day 🎁
- Customer reviews

- Competitions 🟢 🔴
- All customers
- Safe
- Business Safe
- Freelance card
- Reviews of freelancers
- Sitemap

Permanent job
- All vacancies 🟢 🔴
- Remote work
- About vacancies
- Post a vacancy

Useful Information
- Registration
- Blog 🟡
- We are in the press
- Ideas and suggestions
- FOP registration
- Bonus program
- Terms of use

- Forgot your password? 🔑
- Knowledge base
- Prior statistics
- Partners and promotions
- Our team
- Confidentiality
- Freelancehunt - 15 years

We are in networks
f ⧉ ✈
in ▶ 🐦

We accept payment

Made in Ukraine © 2005–2021 ❤ v26,561 😊

✉ support@freelancehunt.com

🇺🇦 Українська 🇷🇺 Русский 🇬🇧 English

Page URL: https://freelancehunt.ua/freelancer/solomame.html

EXHIBIT 2

2021-08-26 - Username history of RaidForums user barak_obama

🏠   ☰ Databases   ★ Upgrades   + Extras

➡ Login   👤 Register

🏠 RaidForums   >   Profile of barak_obama   >   **Username History**   Today's posts

Username History for barak_obama

Old Username	Date Changed
solomame	January 18, 2021 at 03:38 PM

🏠 Raid Forums   ✉ Contact Us   💼 Legal Policies   🔊 RSS Syndication

Current time: August 26, 2021, 11:08 AM

Powered By Omnipotent, © 2015-2021

EXHIBIT 3

Alexander S. ✔ 🎨

⭐ 391 👍 22 👎 3

1 day

Good day.

I am interested in your proposal, I am ready to take it even tomorrow.

On this site - in the first place in their specialty (which can be seen in the rating and opposite my message).

Regarding the promotion in social networks, I have a fairly extensive stock of knowledge, I have been doing it since 2011, from the zismo forum.

Skype: solomame

Email: aa_solonchenko@mail.ru

December 29, 2013

EXHIBIT 4

Q Inspect: theblackmask.top

Domain Profile   Screenshot History   **Whois History**   Hosting History   SSL Profile

2017-08-08 - (4 years ago)

Domain	theblackmask.top
Record Date	2017-08-08
Registrar	
Server	whois.nic.top
Created	
Updated	
Expires	
Unique Emails	• abuse-contact@publicdomainregistry.com • aa_solonchenko@mail.ru

```
Domain Name: theblackmask.top
Registry Domain ID: D20160807G10001G_74989100-TOP
Registrar WHOIS Server: whois.publicdomainregistry.com
Registrar URL: http://publicdomainregistry.com
Updated Date: 2017-08-07T00:02:39Z
Creation Date: 2016-08-06T22:49:48Z
Registry Expiry Date: 2018-08-06T22:49:48Z
Registrar: PDR Ltd
Registrar IANA ID: 303
Registrar Abuse Contact Email: abuse-contact@publicdomainregistry.com
Registrar Abuse Contact Phone: +1.2013775952
Domain Status: clientTransferProhibited https://www.icann.org/epp#clientTransferProhibited
Domain Status: autoRenewPeriod https://www.icann.org/epp#autoRenewPeriod
Registry Registrant ID: di_59460522
Registrant Name: Aleksandr A Solonchenko
Registrant Organization: Private Person
Registrant Street: Gogolya 84
Registrant City: Kirovograd
Registrant State/Province: Kirovogradskaya
Registrant Postal Code: 25006
Registrant Country: UA
Registrant Phone: +380.994097401
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: aa_solonchenko@mail.ru
Registry Admin ID: di_59460522
Admin Name: Aleksandr A Solonchenko
Admin Organization: Private Person
Admin Street: Gogolya 84
Admin City: Kirovograd
Admin State/Province: Kirovogradskaya
Admin Postal Code: 25006
Admin Country: UA
Admin Phone: +380.994097401
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: aa_solonchenko@mail.ru
Registry Tech ID: di_59460522
Tech Name: Aleksandr A Solonchenko
Tech Organization: Private Person
Tech Street: Gogolya 84
Tech City: Kirovograd
Tech State/Province: Kirovogradskaya
Tech Postal Code: 25006
Tech Country: UA
Tech Phone: +380.994097401
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: aa_solonchenko@mail.ru
Name Server: dns5.parkpage.foundationapi.com
Name Server: dns6.parkpage.foundationapi.com
DNSSEC: unsigned
URL of the ICANN Whois Inaccuracy Complaint Form: https://www.icann.org/wicf/
```

Historical Records

7 records found

EXHIBIT 5

🏠 | 👥 Member List | 🗄 Databases | ⭐ Upgrades | 🔍 Search | ➕ Extras

RAIDFORUMS

🔔 0 ✉ 0 🗄 96 🎨

🏠 **RaidForums**

Today's posts

RaidForums Shoutbox ➕

🏠 General | 👥 Raiding Related | 🔒 Cracking | 🗄 **Leaks** | 🛒 Marketplace | 📄 Tutorials | 💻 Tech | 🌐 Other

❌ Staff

🗄 Leaks

🎮 **Games**
All game leaks go here.
● Garry's Mod ● Minecraft

Red Dead Redemption 2 Cra...
by tubwater123456
3 hours ago

🗄 **Databases**
Database dumps are posted here.
● Official 🔒 Removed Content

OFFNews.bg (Full DB 156,5...
by EmailCracker
14 minutes ago

💼 **Leaks Market**
A place to buy/sell/trade databases and leaks.

4,3M Unique Bulgarian Ema...
by EmailCracker
24 minutes ago

☰ **Dehashed Combolists**
Combolists are posted here.
🔒 Combolist Removed Content

Poshmark.com 6.3M Dehash ...
by thelastsupper
9 minutes ago

📦 **HackTheBox**
This forum is reserved for leaking/buying/selling/trading HackTheBox Flags, this is a online game that tests your hacking skills.

HTB Writer [Discussion]
by Blockchainer
4 minutes ago

💬 Latest Posts

🔄 New posts are available!

General | NSFW

[2020] Amazon SE GiftCard Meth...
by vainilla - Less than 1 minute ago
268

Extremely fast Portscanner
by workstation - Less than 1 minute ago
48

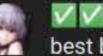[HF LEAK] Make Money With Shop...
by MRHYPER - Less than 1 minute ago
490

Is AES256 sufficient for passw...
by Courvix - 2 minutes ago
8

✅✅✅✅✅One of the best books of ...
by Tom56 - 2 minutes ago
5

🔰📥 BIN AMAZON PRIME📥🔰
by xlolxAY - 2 minutes ago
11

Morison Store Cheap Torrent Tr...
by Morrison - 3 minutes ago
1
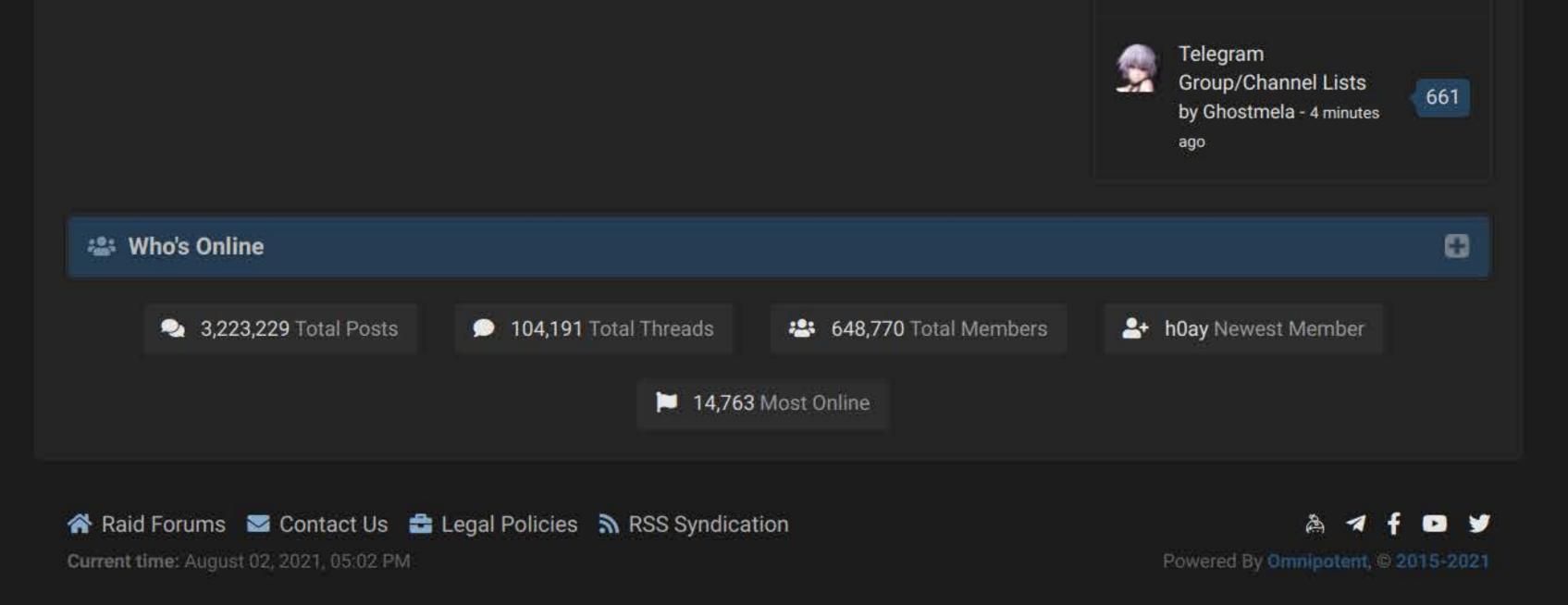
How to make a mining botnet (M...
by MRHYPER - 3 minutes ago
334

[Exclusive] Huge List of free ...
by Tom56 - 4 minutes ago
6

Telegram Group/Channel Lists
by Ghostmela - 4 minutes ago
661

👥 Who's Online ➕

💬 **3,223,229** Total Posts | 💬 **104,191** Total Threads | 👥 **648,770** Total Members | 👤➕ **h0ay** Newest Member

🚩 **14,763** Most Online

🏠 Raid Forums | ✉ Contact Us | 💼 Legal Policies | 📡 RSS Syndication

👤 ✈ f ▶ y

Current time: August 02, 2021, 05:02 PM

Powered By Omnipotent, © 2015-2021

EXHIBIT 6

2020-12-01 - Solonchenko RaidForums Post

solomame

Advanced User

Posts	62
Threads	2
Joined	Oct 2020
Reputation	32

December 01, 2020 at 03:18 AM   #1

Hi there.
I collected this database during 2018y, it's unique and nobody sales exact that leak, I collected it by myself scanning fb day-by-day during a year.
You can buy just some country, part of country, whole database, I will wait for your proposals. I will send you free samples for your request for exact country you need.

Telegram: @not_a_wolf
Deals with middleman (Omni or Jaw) are welcome.

P.s. don't trust anyone saying he have 2019/2020 fb leak, the bug used for this data collection was fixed on the end of 2018.
Only facebook pages data can be updated using parser and it's actually works not for all profile (depends on publicity settings).

List of countries:

```
YEMEN - 2,3 M
URUGUAY - 1,5 M
UK - 11,2 M
UAE - 4 M
TURKEY - 9 M
TUNIS - 1 M
SWITZERLAND - 2 M
SWEDEN - 1,1 M
SPAIN - 10,2 M
SINGAPORE - 3,5 M
RUSSIA - 8,3 M
```

I have data for all other countries, but about 1 million or less.

Here you can download free public sample:

https://mega.nz/file/pioQSToQ#tgAyU9t8PF...RTeP4UApW0

(Sample made in JSON with base64-encoded locations, you can request ANY formatting of output file you are paying for, request data for only males or any other filter. I wi... ...se the event format you need)

Write me on telegram (https://t.me/not_a_wolf) or PM me here on raidforums.

EXHIBIT 7

SELLING USA Consumers & Phones DB's | 245 Millions + 186 millions phones | Others
by barak_obama - May 24, 2021 at 08:12 PM

Pages (2): 1 2 Next »

♦ barak_obama

M.V.P User ●

Posts	34
Threads	1
Joined	Oct 2020
Reputation	132

May 24, 2021 at 08:12 PM This post was last modified: June 08, 2021 at 12:47 AM by barak_obama. Edited 1 time in total.

Item 1: Database of company called Acuity (acuity-data.com now part of liveramp as I understand)
Amount of strings: 245 millions
Leaked: 07.2020
Every string contains unique phone, totally 245 mixed landlines/mobiles phones.
Records with same contactid means one familly.
Posting also a file to decrypt work field.

Sample: https://mega.nz/file/JnBVjSQB#sTdB1PY_ag...lfdQEfaP7Y
File to decrypt work field: https://mega.nz/file/YrhWXBpA#53JUvn5yJZ...0TP4XkUAYw
Price: 400$ (You can try negotiate if someone selling you same item cheaper)

Item 2: Database of USA Cellphones
Amount of strings: 186 millions
Leaked: 05.2020
Every string containts unique phone, about 90 millions of records have names as well. Also cellular data.

Sample: https://mega.nz/file/p3QTglhJ#v8hfRD_6te...embT1gFD0Y
Price: 150$

Originally bought both from greenmoon and I was reselling it. Thread recreated as I was out of work for some time.

I also have some other DBs, consumers lists, B2B dbs all over the world, phone dbs, non-public fb data (180m for USA).

Please PM me your contact if interested.

🖉 PM   🔍 Find

EXHIBIT 8

NovaPoshta 2018 Leak (Ukraine UA) 19kk strings
by barak_obama - October 24, 2020 at 09:19 PM

barak_obama

M.V.P User ●

Posts	20
Threads	0
Joined	Oct 2020
Reputation	192

1 YEAR OF SERVICE

October 24, 2020 at 09:19 PM

#1

Hi there guys.
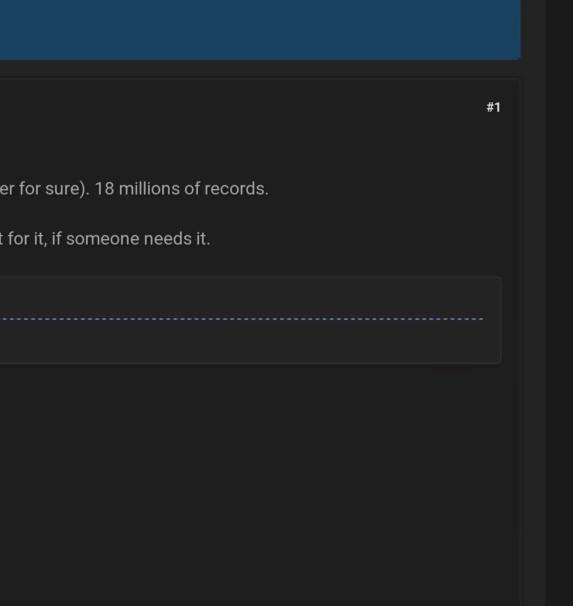I'm just kinda new here. Wanna share you a little part of my archive.
Archive contains Cronos DB with phone, first name, last name, possibly city(don't remember for sure). 18 millions of records.
Leak not made by me, source is their mobile application.
I have an actual leak how to get such information by their API, can give you a python script for it, if someone needs it.
Thanks for your attention

Database

- -

You must register or login to view this content.

EXHIBIT 9

PrivatBank UA (Ukraine) DATABASE 10,4 KK OF RECORDS

by barak_obama - October 24, 2020 at 11:02 PM

barak_obama

M.V.P User

Posts	20
Threads	0
Joined	Oct 2020
Reputation	192

1 YEAR OF SERVICE

October 24, 2020 at 11:02 PM

#1

Hi there.
Database is 2018 as i can remember.
14 xlsx files with 10,4 millions of records in it.
Leak is not mine. Don't ask me questions please, it's free.
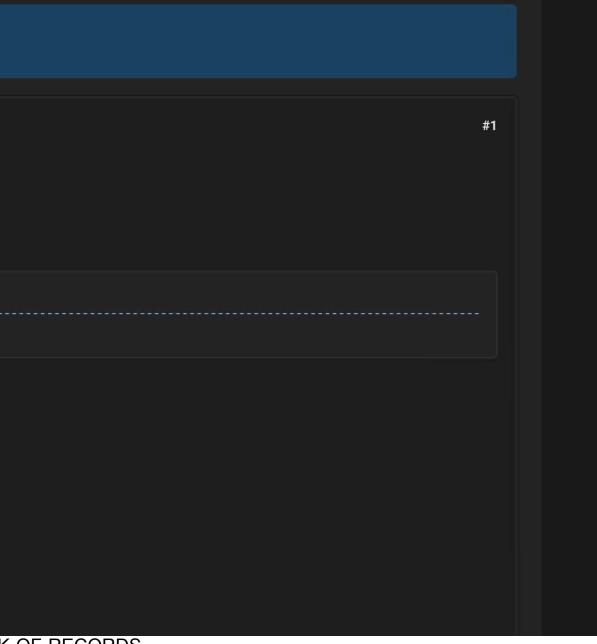Hope this will help someone! 😃

Database

You must register or login to view this content.

URL: https://rfmirror.com/Thread-PrivatBank-UA-Ukraine-DATABASE-10-4-KK-OF-RECORDS

EXHIBIT 10

2021-02-02 - Solonchenko RaidForums Post

February 02, 2021 at 07:13 PM This post was last modified: February 26, 2021 at 02:50 AM by barak_obama. Edited 1 time in total.

Item: Database of company called Acuity (acuity-data.com now part of liveramp)
Amount of strings: 245 millions
Every string contains unique phone, totally 245 mixed landlines/mobiles phones.
Records with same contactid means one familly.
Posting also a file to decrypt work field.

Contact me via PM or Telegram: @not_a_wolf
Price: 750$
Payment method: ESCROW or direct crypto payment (Btc, Eth, etc..)

Sample: https://mega.nz/file/JnBVjSQB#sTdB1PY_ag...IfdQEfaP7Y
And additional file:
https://mega.nz/file/YrhWXBpA#53JUvn5yJZ...0TP4XkUAYw

Q Find