

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS BAY  
TRANSPORTATION AUTHORITY

Plaintiff

v.

Civil Action No. 08-11364-GAO

ZACK ANDERSON, RJ RYAN,  
ALESSANDRO CHIESA, and the  
MASSACHUSETTS INSTITUTE OF  
TECHNOLOGY

Defendants

**SUPPLEMENTAL DECLARATION OF IEUAN G. MAHONY**

1. I am a partner at Holland & Knight, LLP, representing the Massachusetts Bay Transportation Authority ("MBTA") in this matter. The following supplements my earlier Declaration in this matter.

**The Defendants' Delay In Providing The Actual DEFCON Presentation Materials**

2. By email dated Friday, August 8 at 8:13 PM I notified counsel for the MIT Undergrads and counsel for MIT (collectively, "Defendants' Counsel") of the hearing scheduled for today. I stated to the MIT Undergrads' counsel that "I urge you strongly to advise your clients to provide us with all presentation material and al other materials they may with to circulate concerning the MBTA's Fare Media Systems." I noted that the August 8 Undergrad-to-MBTA Report (attached as Exhibit 1 to the Declaration of Scott Henderson) "does not appear to comprise all (or perhaps any) DEFCON presentation materials." *See* attached Exhibit 1 (emphasis added).

3. By email dated Friday, August 8 at 8:17 PM I provided a copy Defendants' Counsel with a copy of the Court's Order of yesterday. *See* Exhibit 2. I had previously left

**FILED**  
In Open Court  
USDC, Mass.  
Date 8/9/08  
By JARRET LOWE II  
Deputy Clerk

detailed voice-mail messages with Defendants' Counsel, in order to begin attorney-to-attorney discussions in this matter.

4. By email dated Friday, August 8 at 8:31 PM, I asked Defendants' Counsel, Marcia Hofman (for the MIT Undergrads) and Jay Wilcoxson (in-house counsel for MIT) to confirm whether they had received my voice-mail messages and email, and whether they planned to attend the hearing. *See* Exhibit 3.

5. Shortly after I sent Exhibit 3, at approximately 8:35, I reached Attorney Wilcoxson. During our discussion, among other points, I urged Attorney Wilcoxson to do what he could to convince the MIT Undergrads to immediately provide us with any materials they intended to disclose or present concerning the MBTA's systems at issue.

6. After our discussion, by email dated Friday, August 8 at 8:52 PM, Attorney Wilcoxson confirmed that MIT would be represented by counsel at this hearing. *See* Exhibit 4.

7. Shortly after my discussion with Attorney Wilcoxson, at approximately 9:00, I reached Marcia Hofman, from the Washington DC office of the Electronic Frontier Foundation (the "EFF"). Attorney Hofman confirmed that she was representing the MIT Undergrads. Attorney Hofman's colleague from the San Francisco office of the EFF, Kurt Opsahl, also participated in this call.

8. During our discussion, among other points, I urged Attorney Hofman and Attorney Opsahl to provide us with any materials their clients intended to disclose or present at the DEFCON Conference concerning the MBTA's systems at issue. During this call, we also discussed a proposed Order in this matter, revised as suggested by the Court during the Friday hearing.

9. Shortly after this call, by email dated Friday, August 8 at 9:55 PM, I forwarded a revised Order, and indicated further interest in discussing a negotiated solution. *See* Exhibit 5.

10. Counsel for the MIT Undergrads then called me, at approximately 11:30, to discuss the MBTA's position, the MBTA's view of the "responsible disclosure" doctrine, and possible discussions toward a negotiated solution. Counsel also indicated an interest in postponing today's hearing.

11. By email dated Saturday, August 9 at 1:30 AM, I reminded Counsel for the MIT Undergrads that the MBTA still had not received any presentation materials. I noted that "the decision to continue to withhold these materials makes me concerned." *See* Exhibit 6.

12. By email dated Saturday, August 9 at 4:38 AM, Counsel for the MIT Undergrads forwarded to me an 87 page set of slides, that purports to constitute the DEFCON presentation of the MIT Undergrads. A copy of this slide deck is attached as Exhibit 7. I have hand-numbered the pages, as the formatting of the document does not allow the addition of page numbers. I provide a color copy to the Court, and black and white copies to Defendants' Counsel.

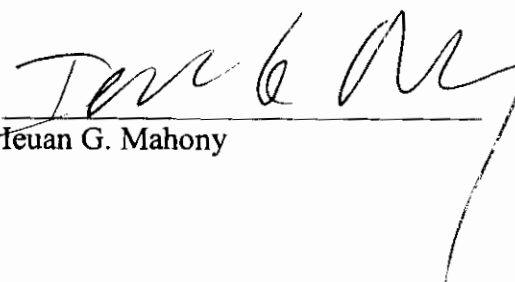
13. In their email of Saturday, August 9 at 4:38 am (Exhibit 8), Counsel for the MIT Undergrads informed the MBTA that this slide deck had already been distributed at the DEFCON Conference.

14. By emails dated Saturday, August 9 at 5:15 and 5:26 AM, I asked Defendants' Counsel to state when these materials had been provided to DEFCON, when they had been distributed, and whether the defendants' knew of the MBTA's requests to review these materials before they were distributed at DEFCON. *See* Exhibit 9.

15. I met with Scott Henderson of the MBTA and Daniel Terryn, Technical Software Manager of Scheidt & Bachmann this morning at Logan Airport at 6:00 to seek to review these

Presentation Materials (Ex. 7) before they flew to Las Vegas on an 8:00 flight. There was insufficient time to prepare Declarations concerning these materials, and the MBTA will rely on oral argument.

Signed under the penalties of perjury this 9<sup>th</sup> day of August, 2008.

  
\_\_\_\_\_  
Jeuan G. Mahony

# 5533212\_v1

# **Exhibit 1**

**Mahony, Ieuan (BOS - X75835)**

---

**From:** Mahony, Ieuan (BOS - X75835)  
**Sent:** Friday, August 08, 2008 8:13 PM  
**To:** 'marcia@eff.org'  
**Cc:** 'jaren@mit.edu'; William Mitchell; 'Scott Darling'; Mahony, Ieuan (BOS - X75835)  
**Subject:** FW: Pleadings

**Attachments:** MahonyDeclaration.pdf; Complaint.pdf; Disclosure.pdf; Fosterdeclarataion.pdf; KelleyDeclaration.pdf; MemoinSupport.pdf; Order.pdf; SullivanDec.pdf; SullivanDeclaration.pdf; TROMotion.pdf

Marcia:

Per my recent voice-mail to you, I understand from your communications with Bill Mitchell, and from Mr. Anderson's voice-mail to Scott Henderson, that you are representing the defendants Zack Anderson, RJ Ryan, and Alessandro Chiesa. This matter presents the following issues from our end:

**(1) Pleadings Filed**

I have attached the pleadings filed today. An email will follow with the exhibits, and the Order that issued in the case.

**(2) Hearing Tomorrow**

The Order sets a further hearing for tomorrow at 11:00 on the Seventh floor, Courtroom 20, at the John Joseph Moakley U.S. Courthouse, 1 Courthouse Way, Boston 02210.

**(3) DEFCON Presentation Materials.**

As you may know, the MBTA has requested that your clients present a complete set of materials they intend to present at the DEFCON Conference. Late today, the MBTA received a 4 page (excluding the cover sheet) document entitled "Prepared for the Massachusetts Bay Transit Authority: Fare Collection Vulnerability Assessment Report" dated August 8, 2008. We have reviewed this document and it does not appear to comprise all (or perhaps any) DEFCON presentation materials.

In a voice-mail to Scott Henderson this evening, Mr. Anderson suggested that he had distributed a CD of materials at the DEFCON Conference for this presentation. Mr. Anderson stated, however, that he was unable to send these materials due to poor internet. Mr. Anderson later called and left a message for Mr. Henderson informing him that, on the advice of counsel, Mr. Anderson was not providing further information to the MBTA on the presentation.

I urge you strongly to advise your clients to provide us with all presentation materials and all other materials they may wish to circulate concerning the MBTA's Fare Media Systems. I see no basis for withholding this information.

**(4) Negotiated Order**

The papers I have attached include a proposed Order. The Judge discussed revisions to this Order with us this afternoon. If you believe that the Order, with revisions, may provide a basis for discussing a negotiated resolution, by way of a form of consent judgment, please let me know. I left with your voice-mail my cell and work numbers. I have included them below as well.

I will call again later this evening to answer any questions you may have. I will also again urge you to immediately provide all presentation materials.

Thank you

Ieuan Mahony

**Holland Knight**

**Ieuan G. Mahony**  
Partner

Holland & Knight LLP

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Boston, MA 02116-3889

Main 617-523-2700  
Direct 617-573-5835  
Cell 781-789-4230  
Fax 617-523-6850  
Email [jeuan.mahony@hklaw.com](mailto:jeuan.mahony@hklaw.com)

[www.hklaw.com](http://www.hklaw.com)

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MahonyDeclarati  
on.pdf (13 KB)



Complaint.pdf  
(106 KB)



Disclosure.pdf  
(19 KB)



Fosterdeclaratai  
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KelleyDeclaratio  
n.pdf (78 KB)



MemoinSupport.  
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Order.pdf (13  
KB)



SullivanDec.pdf  
(14 KB)



SullivanDeclarati  
on.pdf (13 KB)...



TROMotion.pdf  
(14 KB)

## **Exhibit 2**



**Mahony, leuan (BOS - X75835)**

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**From:** Mahony, leuan (BOS - X75835)  
**Sent:** Friday, August 08, 2008 8:17 PM  
**To:** 'marcia@eff.org'; 'jaren@mit.edu'  
**Cc:** William Mitchell; 'Scott Darling'; Mahony, leuan (BOS - X75835)  
**Subject:** FW: Activity in Case 1:08-cv-11364-GAO Massachusetts Bay Transportation Authority v. Anderson et al Motion Hearing

Counsel:

Below is the Order that entered this evening. Again, the hearing is set for **tomorrow, Saturday, August 9, at 11:00.**

leuan Mahony

---

**From:** ECFnotice@mad.uscourts.gov [mailto:ECFnotice@mad.uscourts.gov]  
**Sent:** Friday, August 08, 2008 6:21 PM  
**To:** CourtCopy@mad.uscourts.gov  
**Subject:** Activity in Case 1:08-cv-11364-GAO Massachusetts Bay Transportation Authority v. Anderson et al Motion Hearing

**This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.**

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**United States District Court**

**District of Massachusetts**

**Notice of Electronic Filing**

The following transaction was entered on 8/8/2008 at 6:21 PM EDT and filed on 8/8/2008

**Case Name:** Massachusetts Bay Transportation Authority v. Anderson et al  
**Case Number:** 1:08-cv-11364  
**Filer:**  
**Document Number:** No document attached

**Docket Text:**

**Electronic Clerk's Notes for proceedings held before Judge Douglas P. Woodlock: Motion Hearing held on 8/8/2008 in courtroom 20 re [2] MOTION for Temporary Restraining Order filed by Massachusetts Bay Transportation Authority: Pltff informs the Court that the parties are aware of today's proceedings; Court hears initial argument; a Further Hearing as to [2]**

**MOTION for Temporary Restraining Order is set for 8/9/2008 11:00 AM in Courtroom 20 before Judge Douglas P. Woodlock. The pltff is to inform the deft's of said hearing and advise them to have counsel present; pltff is further Ordered to file a supplemental affidavit by 8/9/08. (Digital Recording)(Interpreter: Mahoney and Darling for the pltff)(Attorneys present: Mahoney and Darling for the pltff) (Lovett, Jarrett)**

**1:08-cv-11364 Notice has been electronically mailed to:**

leuan-Gael Mahony ieuan.mahony@hklaw.com, yvette.cooks@hklaw.com

Maximillian J. Bodoïn max.bodoïn@hklaw.com

**1:08-cv-11364 Notice will not be electronically mailed to:**

## **Exhibit 3**

**Mahony, Ieuan (BOS - X75835)**

---

**From:** Mahony, Ieuan (BOS - X75835)  
**Sent:** Friday, August 08, 2008 8:31 PM  
**To:** 'jaren@mit.edu'  
**Cc:** 'marcia@eff.org'; William Mitchell; 'Scott Darling'; Mahony, Ieuan (BOS - X75835)  
**Subject:** RE: Pleadings

Jay and Marcia:

Judge Woodlock was interested in (i) knowing whether parties planned to attend the hearing tomorrow, and (ii) receiving assurance that counsel in fact received notice concerning this hearing. I have left you each voice-mail and a number of email in this regard.

I will try you again this evening, and tomorrow morning before the hearing, but I would appreciate a confirmation (a) that you have received my communications; and (b) as to whether you plan to attend the hearing. Marcia, we would have no objection to your attending and being heard telephonically, in light of your presence at the DEFCON Conference.

Let me know  
Thanks  
Ieuan

**Holland & Knight**

**Ieuan G. Mahony**

Partner  
Holland & Knight LLP

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Direct 617-573-5835  
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Per my recent voice-mail to you, I understand from your communications with Bill Mitchell, and from Mr. Anderson's voice-mail to Scott Henderson, that you are representing the defendants Zack Anderson, RJ Ryan, and Alessandro Chiesa. This matter presents the following issues from our end:

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I have attached the pleadings filed today. An email will follow with the exhibits, and the Order that issued in the case.

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I urge you strongly to advise your clients to provide us with all presentation materials and all other materials they may wish to circulate concerning the MBTA's Fare Media Systems. I see no basis for withholding this information.

**(4) Negotiated Order**

The papers I have attached include a proposed Order. The Judge discussed revisions to this Order with us this afternoon. If you believe that the Order, with revisions, may provide a basis for discussing a negotiated resolution, by way of a form of consent judgment, please let me know. I left with your voice-mail my cell and work numbers. I have included them below as well.

I will call again later this evening to answer any questions you may have. I will also again urge you to immediately provide all presentation materials.

Thank you

Ieuan Mahony

**Holland Knight**

**Ieuan G. Mahony**

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## **Exhibit 4**

**Mahony, Ieuan (BOS - X75835)**

---

**From:** Mahony, Ieuan (BOS - X75835)  
**Sent:** Friday, August 08, 2008 8:52 PM  
**To:** 'jaren@mit.edu'  
**Cc:** marcia@eff.org; WMitchell@mbta.com; SDarling@mbta.com; rgmorgan@mit.edu; Mahony, Ieuan (BOS - X75835)  
**Subject:** RE: Pleadings

Thanks Jay.

---

**From:** Jaren D. Wilcoxson [mailto:jaren@mit.edu]  
**Sent:** Friday, August 08, 2008 8:52 PM  
**To:** Mahony, Ieuan (BOS - X75835)  
**Cc:** marcia@eff.org; WMitchell@mbta.com; SDarling@mbta.com; rgmorgan@mit.edu  
**Subject:** Re: Pleadings

Received and MIT plans to attend.

Jaren D. Wilcoxson  
Counsel  
Office of the General Counsel  
Massachusetts Institute of Technology  
77 Massachusetts Avenue, Room 12-090  
Cambridge, MA 02139  
tel: 617-253-7724  
fax: 617-258-0267  
jaren@mit.edu

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Sent from my Verizon Wireless BlackBerry

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**From:** <ieuan.mahony@hklaw.com>  
**Date:** Fri, 8 Aug 2008 20:31:06 -0400  
**To:** <jaren@mit.edu>  
**CC:** <marcia@eff.org>; <WMitchell@mbta.com>; <SDarling@mbta.com>; <ieuan.mahony@hklaw.com>  
**Subject:** RE: Pleadings

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Let me know  
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Ieuan

## Holland Knight

### Ieuan G. Mahony

Partner  
Holland & Knight LLP

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## **Exhibit 5**

## **Mahony, leuan (BOS - X75835)**

---

**From:** Mahony, leuan (BOS - X75835)  
**Sent:** Friday, August 08, 2008 9:55 PM  
**To:** 'marcia@eff.org'; 'kurt@eff.org'  
**Cc:** 'jaren@mit.edu'; William Mitchell; 'Scott Darling'; Mahony, leuan (BOS - X75835)  
**Subject:** MBTA, MIT Students, and MIT - Revised Proposed Order

**Attachments:** Redline.doc; #5530720v3\_Active\_ - MBTA - MIT Students - Propose.DOC



Redline.doc (69 #5530720v3\_Active\_ - MBTA - MI.  
KB)

Kurt and Marcia:

As we discussed, I have attached a proposed Order, that I've revised based on comments made by Judge Woodlock during the hearing today. I've included a clean version of this revised Order, and a redline showing the changes from the original proposed Order.

As we discussed, it may be that the parties have interests that are similar: both seeking to act within the CFAA, and resolve possible security issues. I think this proposed Order, particularly as revised, reflects these interests; I recognize, however, that certain elements of the Complaint may be incorrect from your perspective, or arise from misunderstandings. If the proposed Order sufficiently captures the parties' joint interests, but the specific language is off, we should work together to correct the language. Or if the tone or substance of the Complaint needs re-balancing through a joint solution, we should work on that as well. I understand, though, that our discussion was in the nature of "brainstorming," and that none of us is committing to a solution at this point.

Finally, I agreed to inform Judge Woodlock and his clerk of your wish to attend the hearing telephonically, and to state my recommendation that you be permitted to attend in that manner.

Let me know your thoughts. I'll be offline for 1.5 hours or so, then available until 12:30 or so. I'll be available tomorrow morning from 6:30 eastern until 10:30 for the hearing.

Thanks  
leuan

## **Holland - Knight**

**leuan G. Mahony**

Partner

Holland & Knight LLP

10 St. James Ave.

Boston, MA 02116-3889

Main 617-523-2700

Direct 617-573-5835

Fax 617-523-6850

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## **Exhibit 6**

**Mahony, leuan (BOS - X75835)**

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**From:** Mahony, leuan (BOS - X75835)  
**Sent:** Saturday, August 09, 2008 1:30 AM  
**To:** 'marcia@eff.org'; 'kurt@eff.org'; 'jennifer@eff.org'  
**Cc:** 'Swope, Jeffrey'; 'jaren@mit.edu'; William Mitchell; 'Scott Darling'; Mahony, leuan (BOS - X75835)  
**Subject:** MBTA v Anderson et al

Kurt, Marcia, and Jennifer:

Per our 11:30 call, I will be available for another hour or so tonight. I have not circulated your inquiry about possible willingness to postpone the hearing. Please let me know if you wish us formally to consider this as a request.

I note that we still do not have your clients' presentation materials. I am inclined to object to any discussion of a postponement, as the decision to continue to withhold these materials makes me concerned. As I stated during our 9:00, and 11:30 calls this evening, I see no basis for continuing to withhold this information.

With that said, we remain interested in discussing an amicable resolution. Once I have finished the Supplemental Declaration I discussed, I will begin work on a proposed Consent Judgment and format for your review.

leuan

## Holland Knight

**leuan G. Mahony**

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[www.hklaw.com](http://www.hklaw.com)

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## **Exhibit 7**



# Anatomy of a Subway Hack

Russell Ryan

Zack Anderson

Alessandro Chiesa

For updated slides and code, see: <http://web.mit.edu/zacka/www/subway/>

1

# **what this talk is:**

## Pen-testing a subway system



**what this talk is not:**

evidence in court  
(hopefully)

3

# **You'll learn how to**

- **Generate stored-value fare cards**
- **Reverse engineer magstripes**
- **Hack RFID cards**
- **Use software radio to sniff**
- **Use FPGAs to brute force**
- **Tap into the fare vending network**
- **Social engineer**
- **WARCART!**

J

**AND THIS IS VERY ILLEGAL!**

So the following material is for educational use only.

5

4

# Boston T System Vulnerabilities



## Legend

-  network vulnerabilities
-  social engineering weakness
-  confidential information
-  open locks

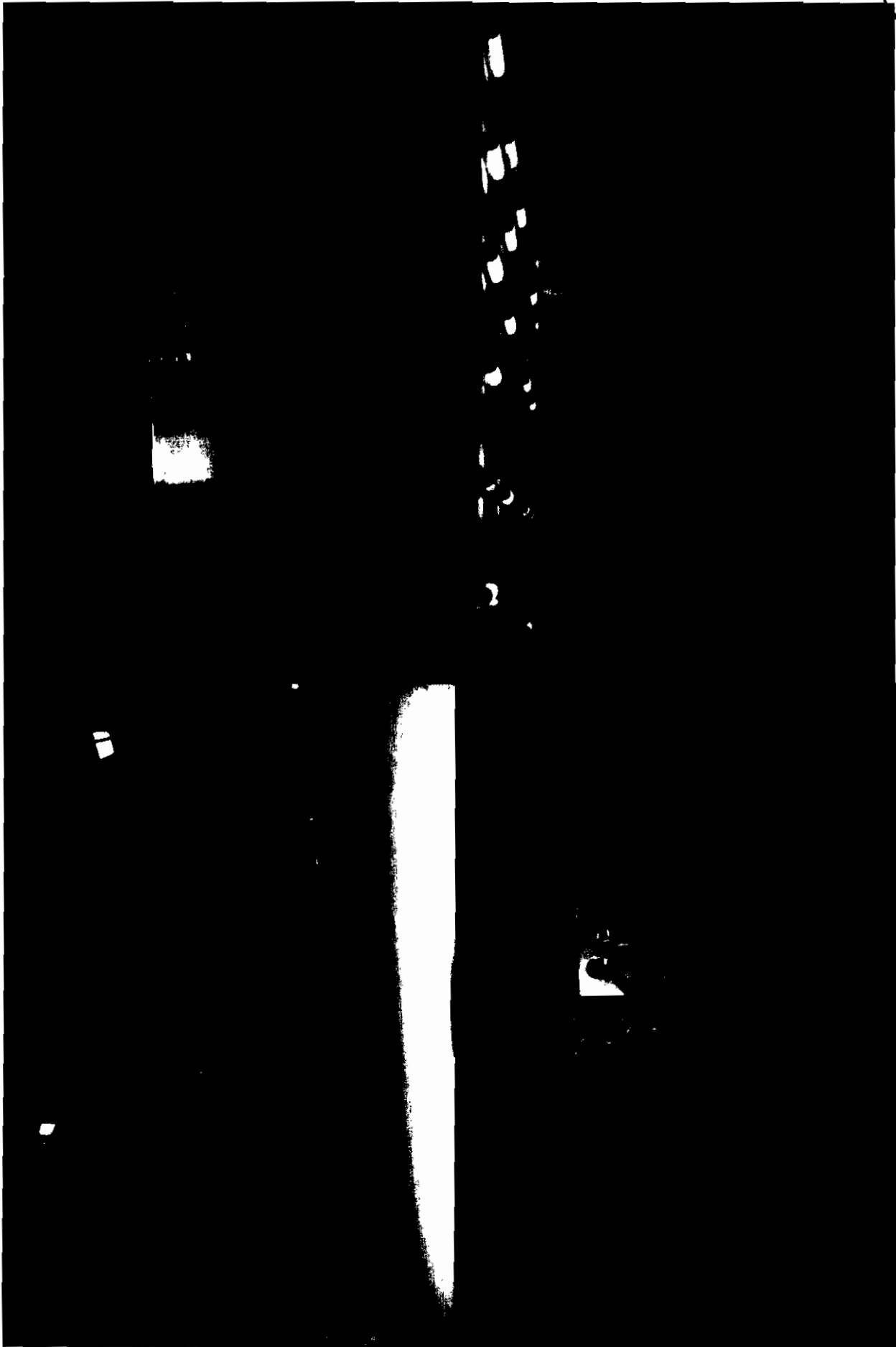
(x)



**ATTACK  
PHYSICAL  
SECURITY**

8

**there is almost always a free way to get in**





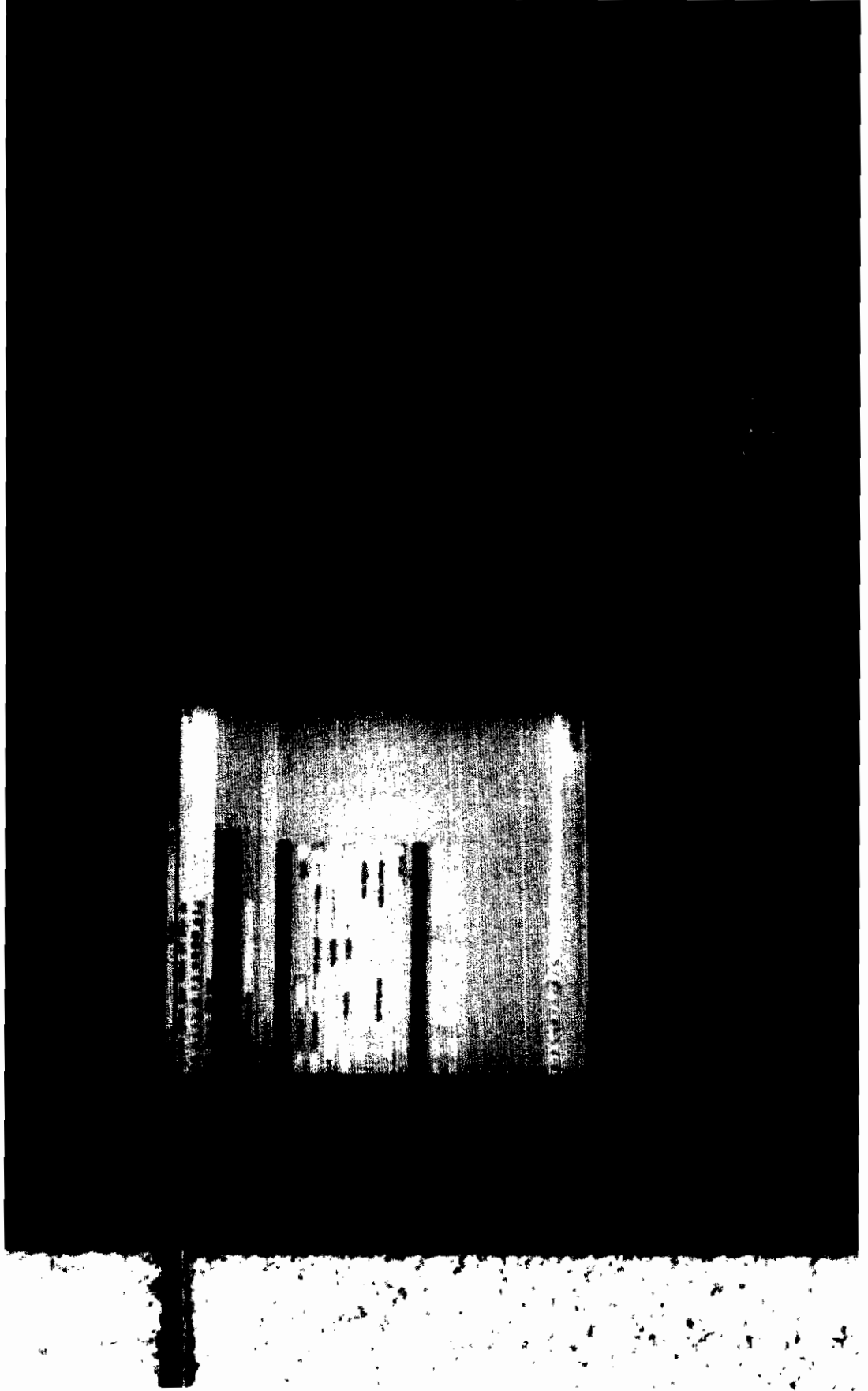
# **turnstile control boxes open... almost everywhere**



5

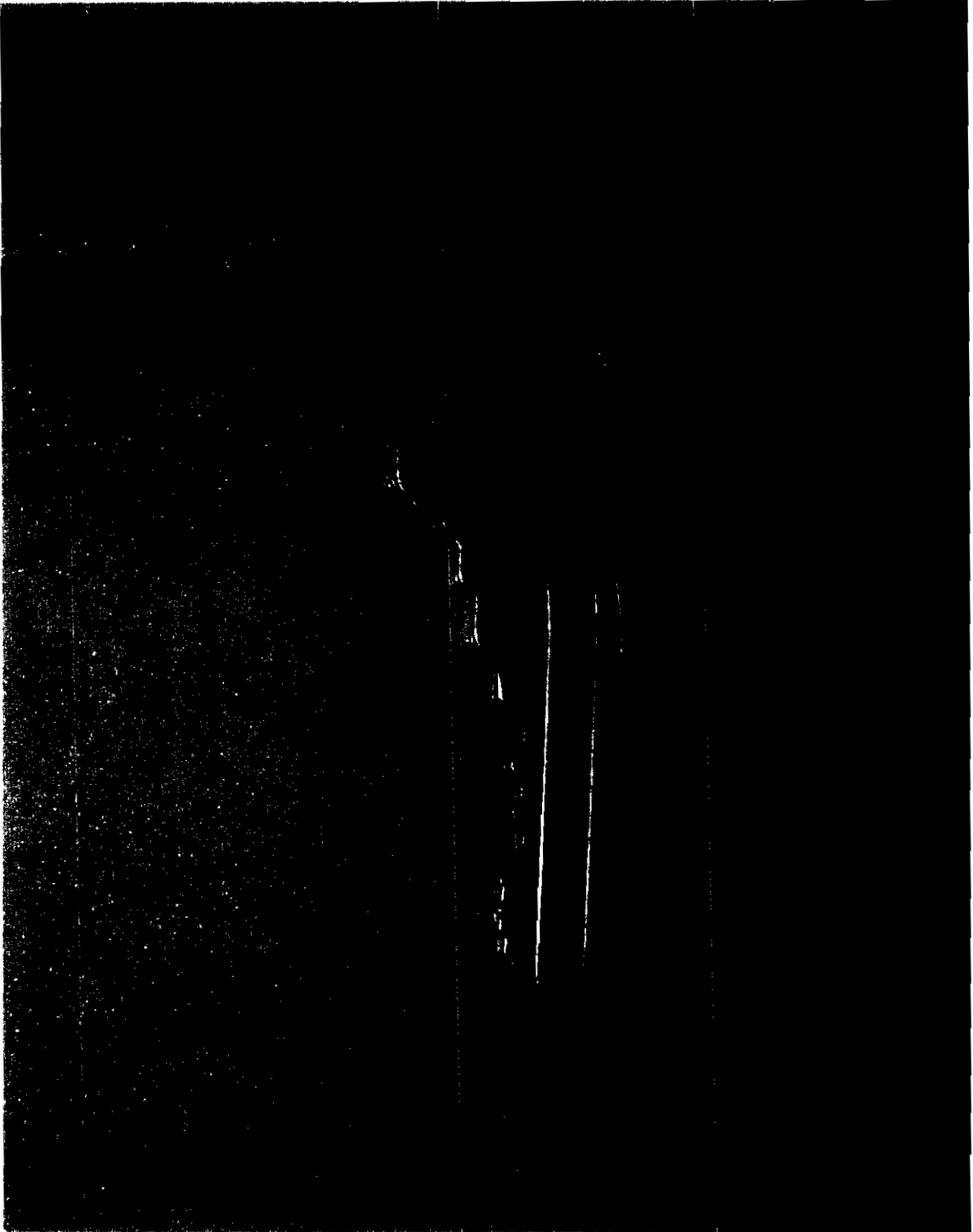
10

# computer screens visible through windows



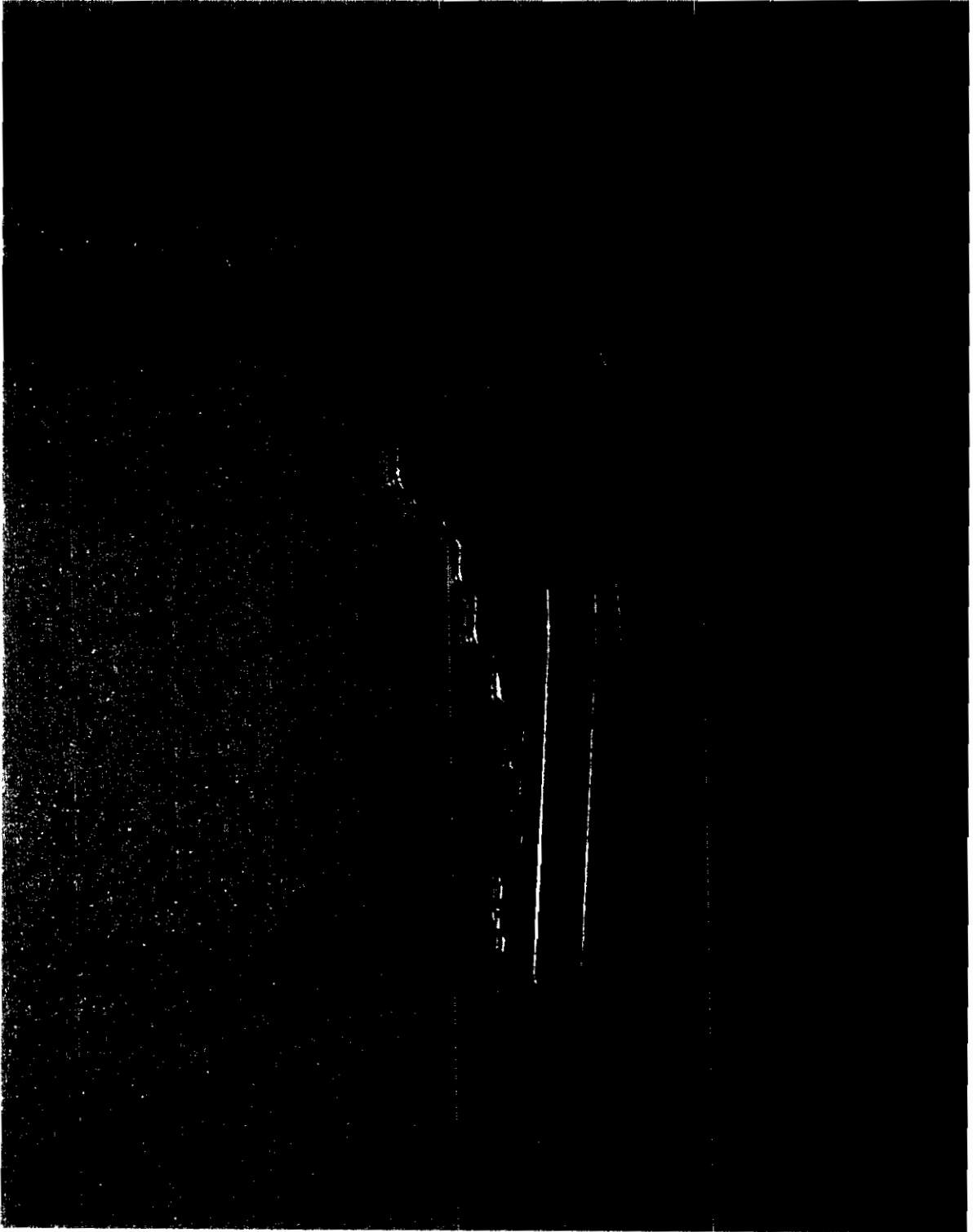
11

# door keys left in open boxes

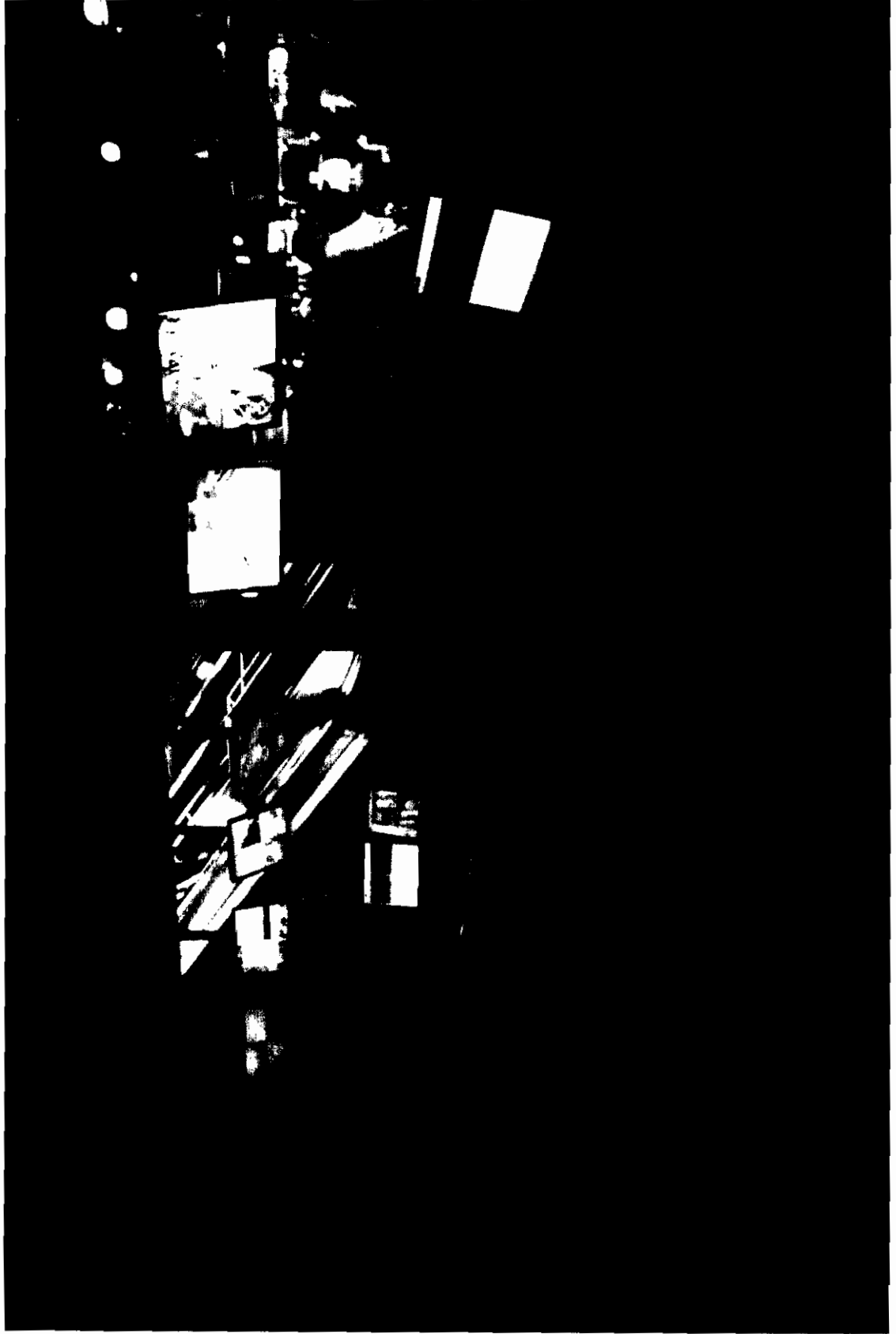


(12)

# door keys left in open boxes

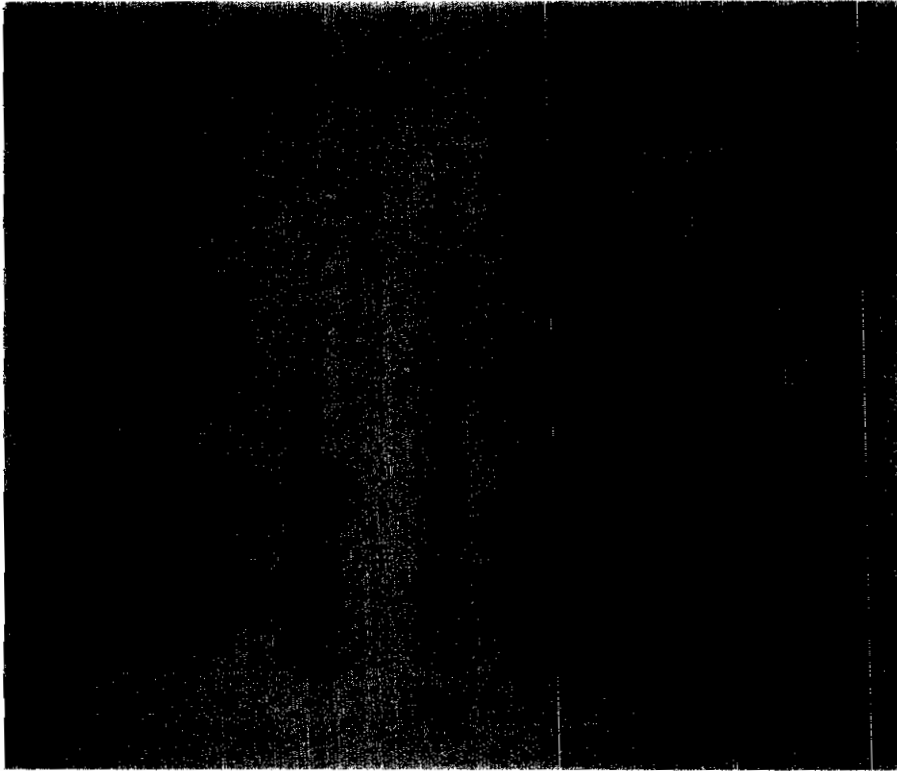


# state-of-the-art surveillance... often unattended



13

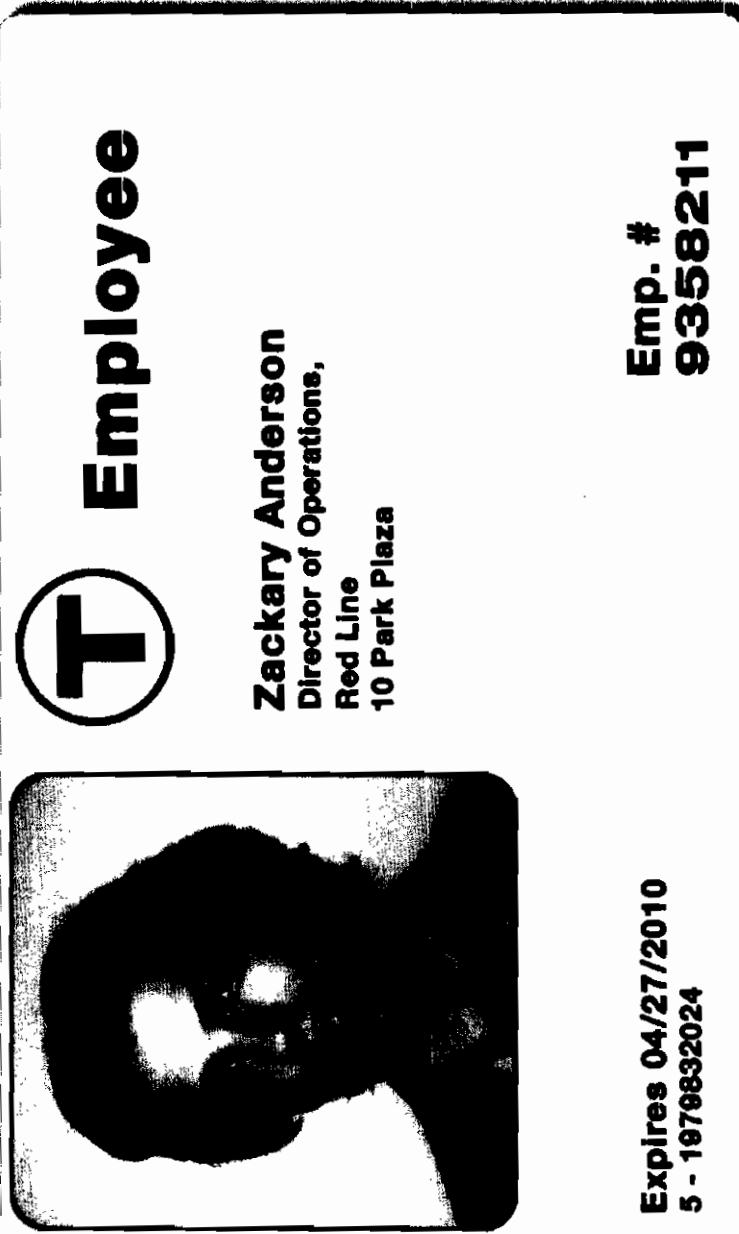
# documents left in the open



CONFIDENTIAL AND PROPRIETARY INFORMATION  
DO NOT DISCLOSE TO THE PUBLIC

(T)

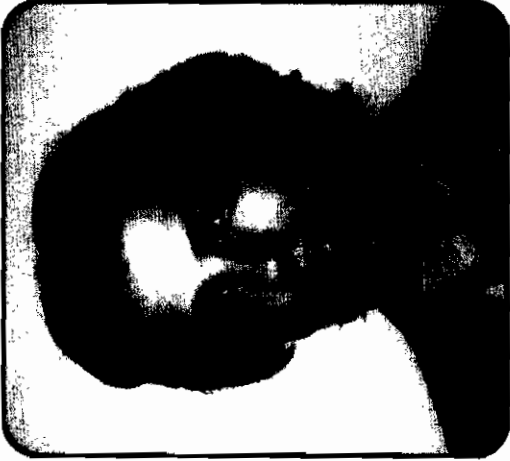
51



**T** **Employee**

**Zackary Anderson**  
 Director of Operations,  
 Red Line  
 10 Park Plaza

**Emp. # 9358211**

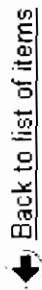


**Expires 04/27/2010**  
**5 - 1979832024**



Sign in

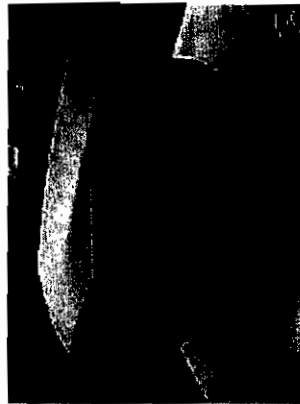
Categories ▾ Motors Express Stores



Listed in category: [Computers & Networking](#) > [Printers](#)

### Fargo DTC515 Thermal Card Printer

Bidder or seller of this item? [Sign in](#) for your status



1 of 2

[View larger picture](#)

Current bid: **US \$79.99**

Your maximum bid:

US \$

[Place Bid >](#)

(Enter US \$80.99 or more)

End time:

**Jun-29-08 19:43:35 PDT (2 days 1 hour)**

Shipping costs:

**US \$30.12**  
UPS Ground  
Service to 02142, United States

Ships to:

United States  
Minneapolis, Minnesota, United States

Item location:

History:

[1 bid](#)

High bidder:

[1\\*\\*\\*0 \(804 ★\)](#)

You can also:

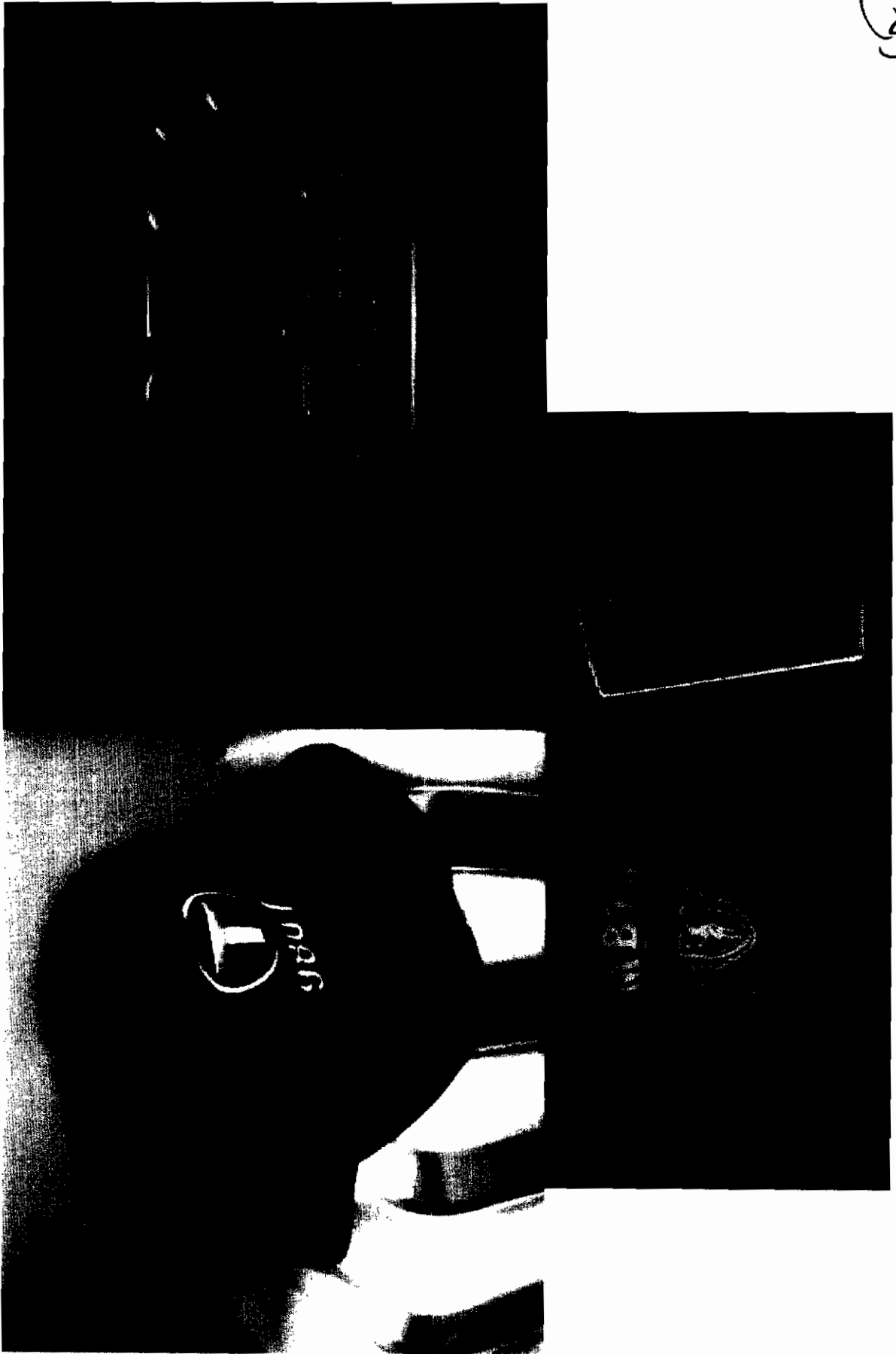
[Watch This Item](#)

Get [SMS](#) or [IM alerts](#) | [Email to a friend](#)

16



# what we found on Ebay



(X)

81



**ATTACK  
THE  
MAGGARD**

**pick the hardware**

(b)



**\$5<**

Homebrew reader

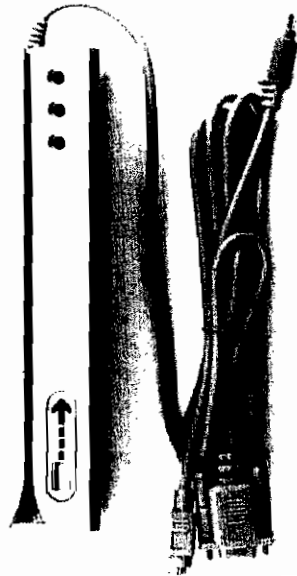
With inserts, can read 3-tracks  
[stripesnoop.sourceforge.net](http://stripesnoop.sourceforge.net)

**\$139.95**

Spark Fun Electronics

3-Track Lo-Co

Includes source code

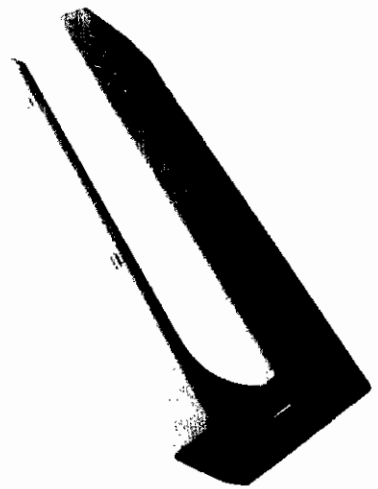


**\$300**

MSR206 or MAKStripe

3-Track Hi/Lo-Co

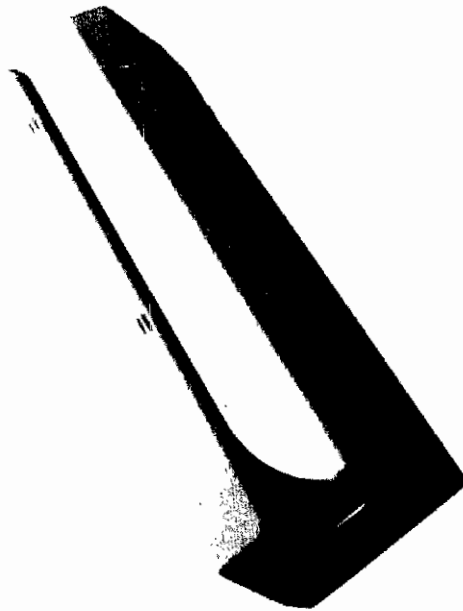
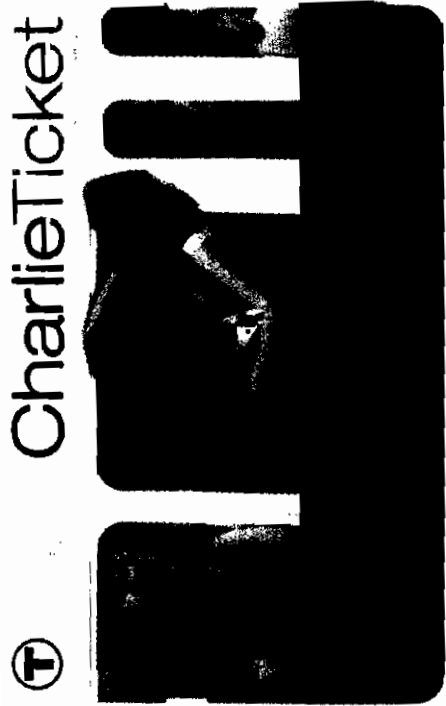
Works with our GPL'd software



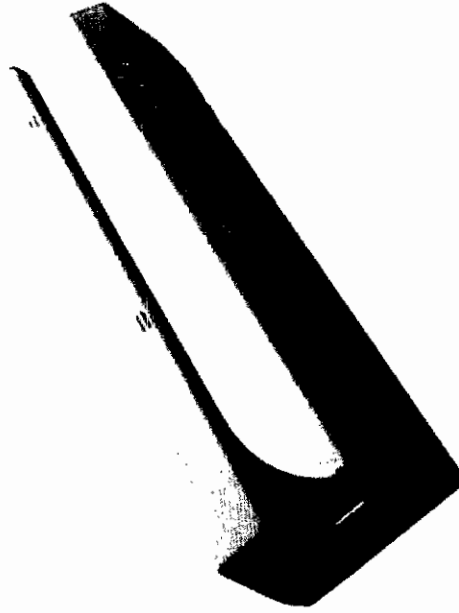
70



12



22



EC9010402AC9D00000005B800C80150342248A  
84EBD132BE1028000200000002025D0000FD60

23

Is value stored on the card?

**try a cloning attack**

52



If yes, then  
**you now have free subway  
rides for life**

25

25

Oh,  
**but you want more than that,  
eh?**

# **reverse engineering**

## The Charlie Ticket

26

# **reverse engineering**

**Everybody talks about it,  
But where do you start?**

- 1) Make a guess about what's in the data
- 2) Change a single variable; see what changes
- 3) Repeat many times with varying data
- 4) Compare similar and dissimilar data
- 5) Ignore constant regions
- 6) Build/use tools

2x

# **reverse engineering**

## **Isolate Variables method**

To locate a single variable:

- Group data by that variable
- Ignore global similarities (between different groups)
- Ignore differences within groups

*Resulting locations are probably where the data is stored*

28

EC901 0402AC9D 000000005B8 00C8

---

0150342 248 A84EBD 132 BE 1

---

028 0002 000000002025D0000 FD60

---

29

EC901 0402AC9D 000000005B8 00C8

const ticket # ticket type value  
 (ticket / pass) (in cents)

0150342 248 A84EBD 132 BE 1

time const time last last const  
 reader station (approx)  
 used used

028 0002 000000002025D0000 FD60

last trans # of const checksum  
 (in nickels) uses (approx)

23

# **forging** The Charlie Ticket

(S)



EC901 0402AC9D 000000005B8 00C8

const ticket # ticket type value  
 (ticket / pass) (in cents)

0150342 248 A84EBD 132 BE 1

time const time last last const  
 reader station (approx)  
 used used

028 0002 000000002025D000 FD60

last trans # of const checksum  
 (in nickels) uses (approx)

32

EC901 0402AC9D 000000005B8 FE4C

---

const	ticket #	ticket type	value
		(ticket / pass)	(in cents)

0150342 248 A84EBD 132 BE 1

---

time	const	time	last	last	const
			reader	station	(approx)
			used	used	

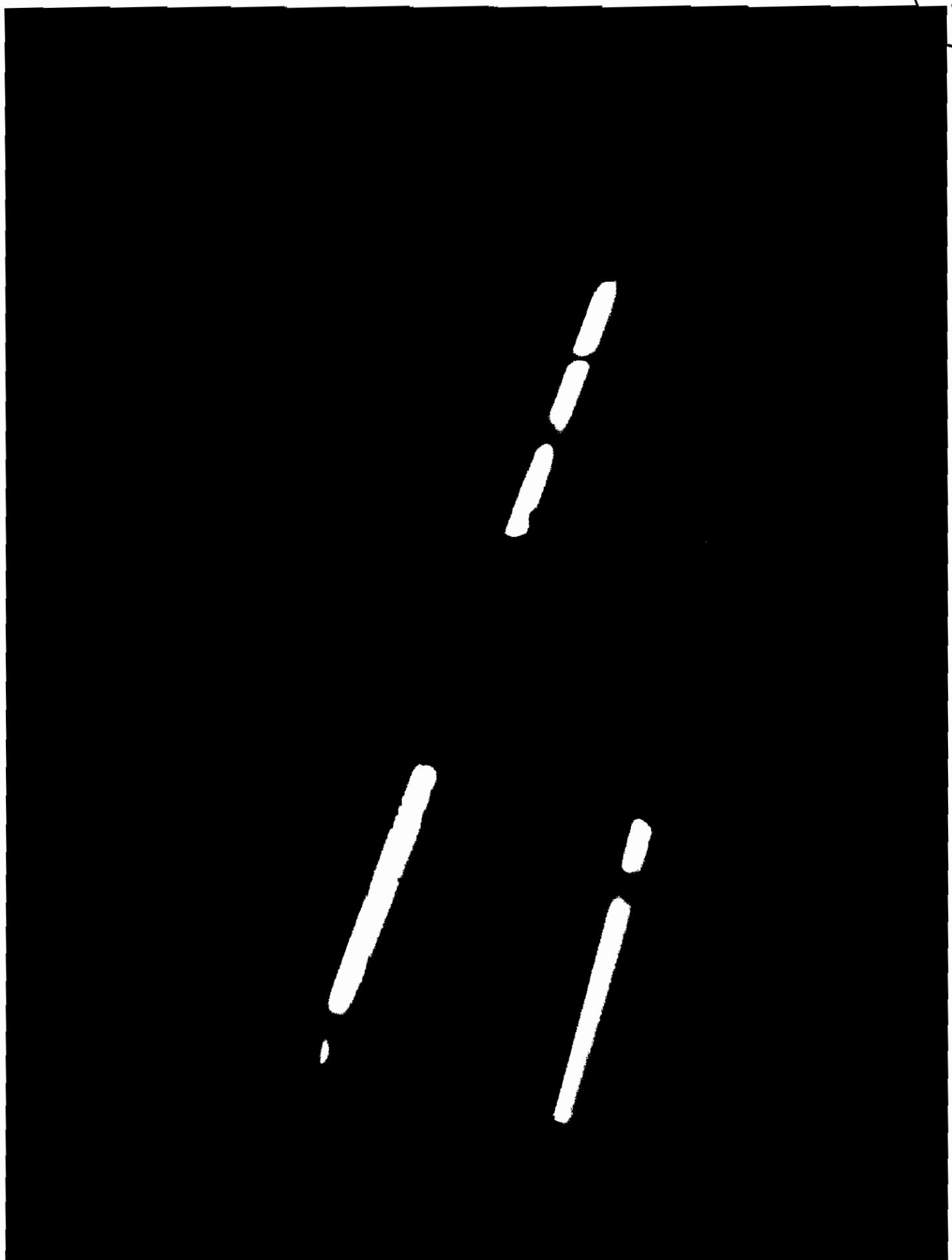
028 0002 000000002025D0000 FC90

---

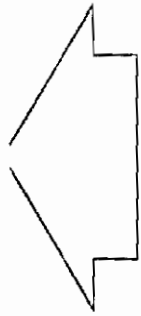
last trans	# of	const	checksum
(in nickels)	uses	(approx)	

33

33



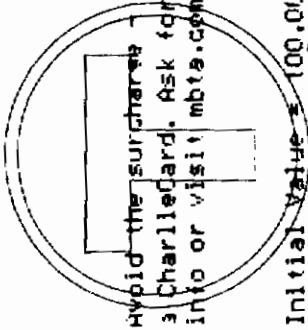
35



Stored Value  
CharlieTicket

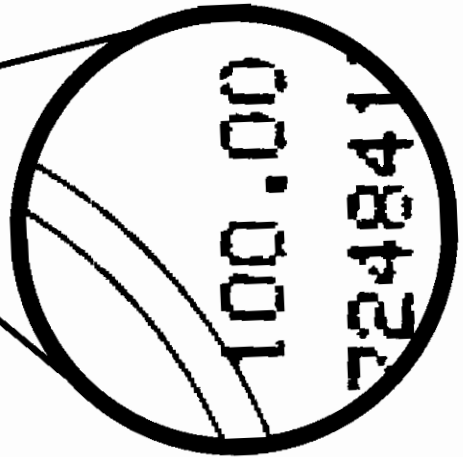
Device: 201144

Schedule & Fare Information: 817-222-3200 Website: www.mbta.com © MBTA



Initial Value: 100.00  
Ticket-No: J-072484133  
Cash  
06/29/2008 06:45 PM

Subject to applicable tariff regulations and conditions of use. Ticket may be confiscated for misuse. Not replaceable if lost or stolen. Non-refundable.



Massachusetts Bay Transportation Authority

=



+

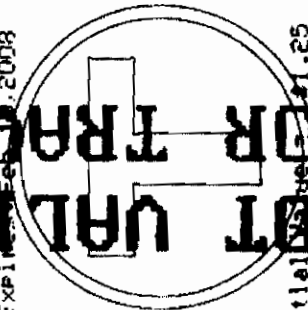


83

ADULT  
Stored Value  
CharlieTicket

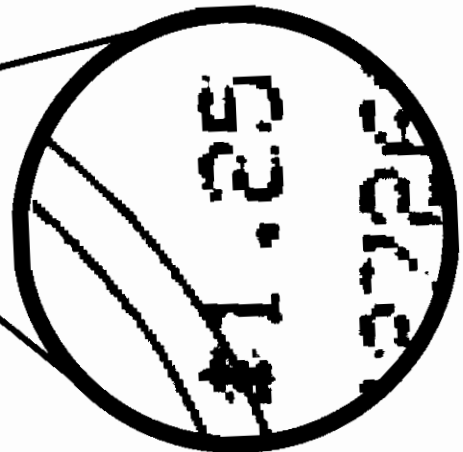
Device: 201144

Schedule & Fare Information: 817-222-3200 Website: www.mbta.com © MBTA



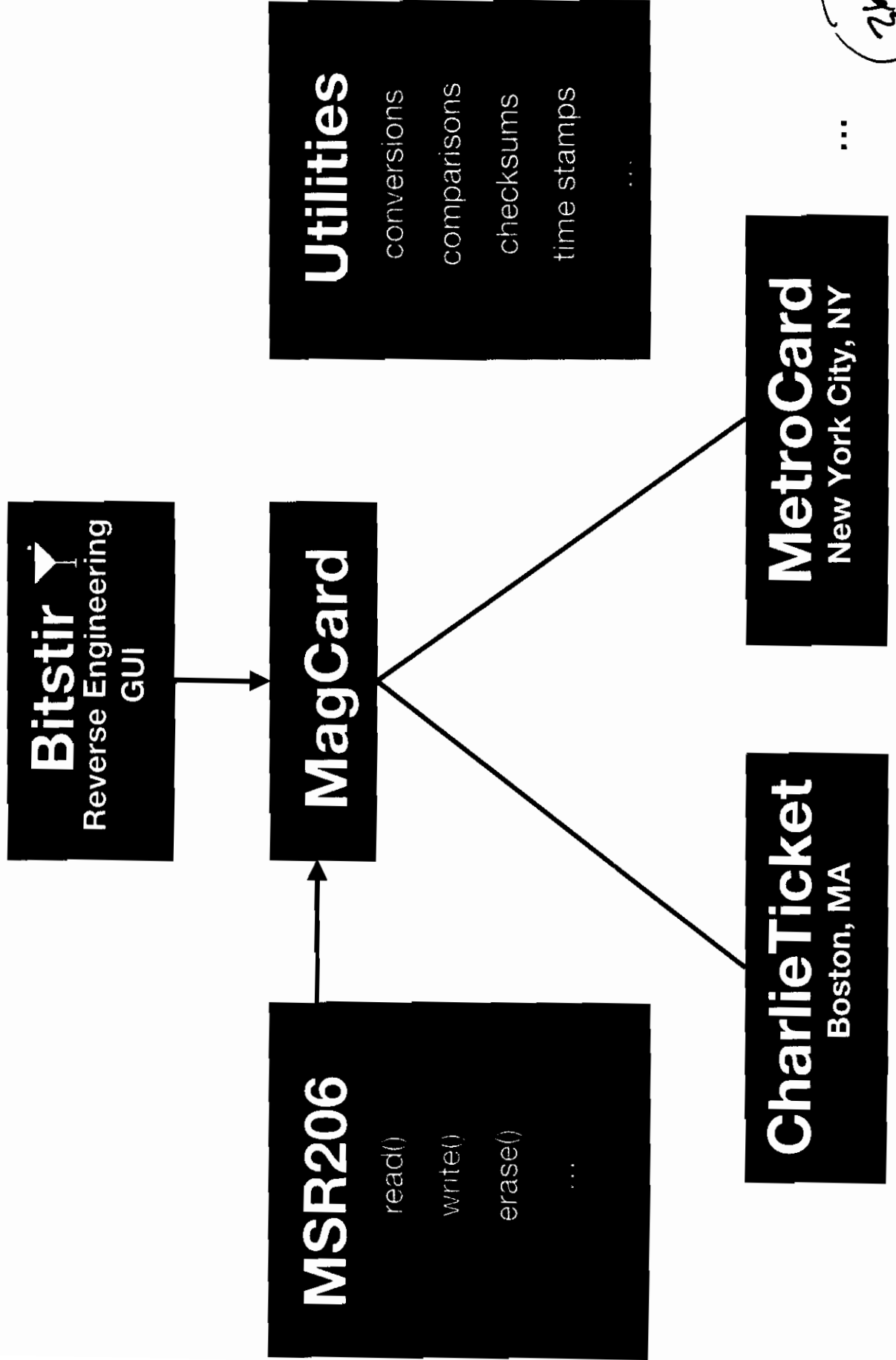
Initial Value: \$1.25  
Ticket-No: JF034278680  
Cash  
08/25/2006 01:37 PM

Subject to applicable tariff regulations and conditions of use. Ticket may be confiscated for misuse. Not replaceable if lost or stolen. Non-refundable.



Massachusetts Bay Transportation Authority

# MagCard Reverse-Engineering Framework



# Demo: MagCard and Reverse Engineering Toolkit

---

- ◆ wrote Python libraries for analyzing magcards
- ◆ integrated with the MSR206 reader/writer
- ◆ GUI helps visualize and organize data



15

# **what about other subways?**

- Most subway fare collection systems in US are made by two major integrators
- **Scheidt & Bachmann** made Boston T, San Francisco Bart, Long Island Railroad, Seattle Sound Transit, London Silverlink, etc. systems
- **Cubic Transportation** made NYC MTA, Washington DC WMATA, Chicago CTA, Shanghai Metro, etc. systems

Are they hackable? Yes!

25

159



**ATTACK  
THE  
RFID**

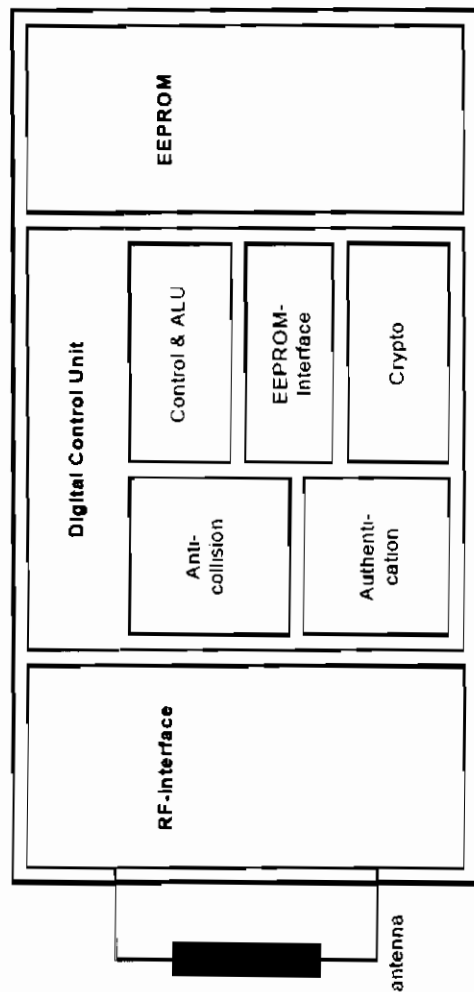


# learn about your RFID card

40

# MIFARE Classic

- 13.56MHz RFID smartcard
- End-to-end proprietary “crypto” (Crypto-1)
- 1K memory & unique identifier on card
- Over 500 million tags in use

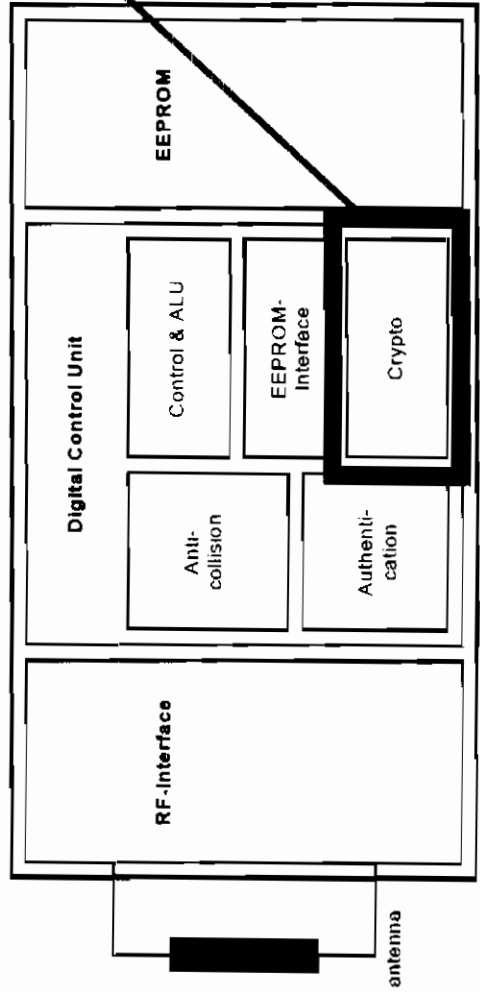


41

# Crypto-1 Cryptanalysis

Crypto-1 reverse engineered by Karsten Nohl, University of Virginia, 2007:

- Etched and inspected silicon wafer using high-powered imagery.
- Found and reconstructed crypto portions from over 10k gates.
- Found vulnerabilities in the cipher and implementation



# security of the MIFARE card

## Mutual 3-pass authentication



sector? key A or B?

read key

random-challenge

answer, random-challenge

verify

answer

answer

verify

answer

Each sector two keys

Non-linear filter functions

13

# security of the MIFARE card

## Mutual 3-pass authentication



sector? key A or B?

read key

random-challenge

answer, random-challenge

verify

answer

answer

verify

answer

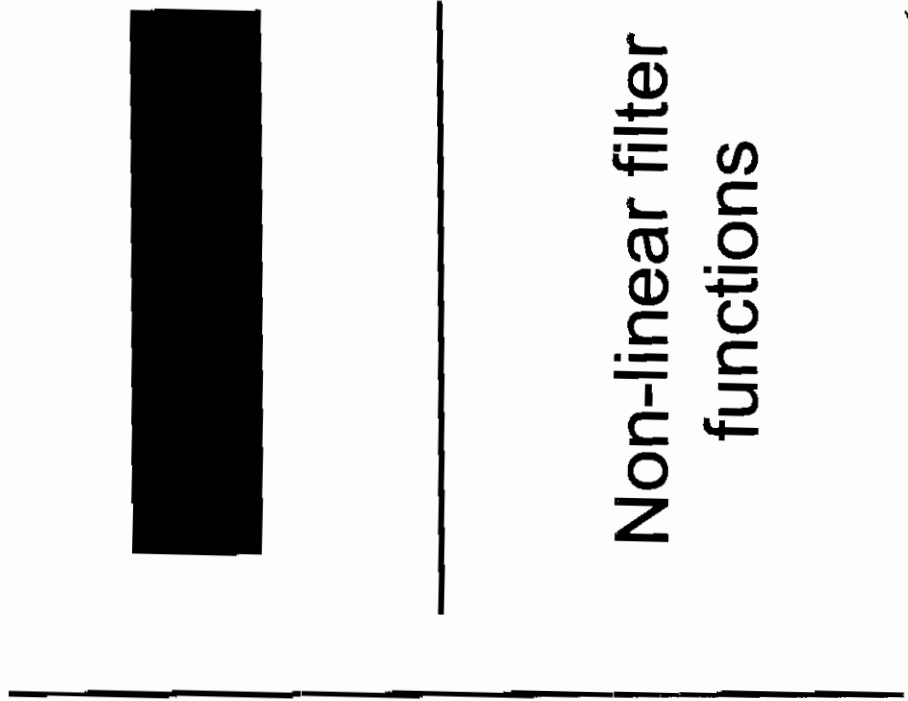


Non-linear filter functions

34

# security of the MIFARE card

---



Non-linear filter  
functions

(JIS)

# security of the MIFARE card



(b)(7)(F)



to execute these attacks we need to interact with the card

# **choose your hardware**





**\$50**

MiFare RFID Reader/Writer

Comes with source code

Hard to hack, but doable



**\$220**

OpenPCD + OpenPICC

Open design 13.56MHz RFID reader + emulator

Free schematics ([www.openpcd.org](http://www.openpcd.org))

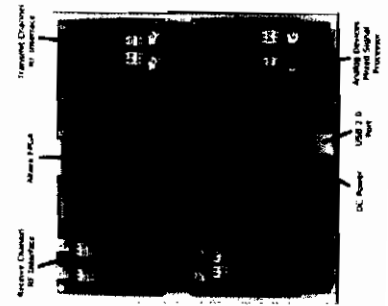


**\$700**

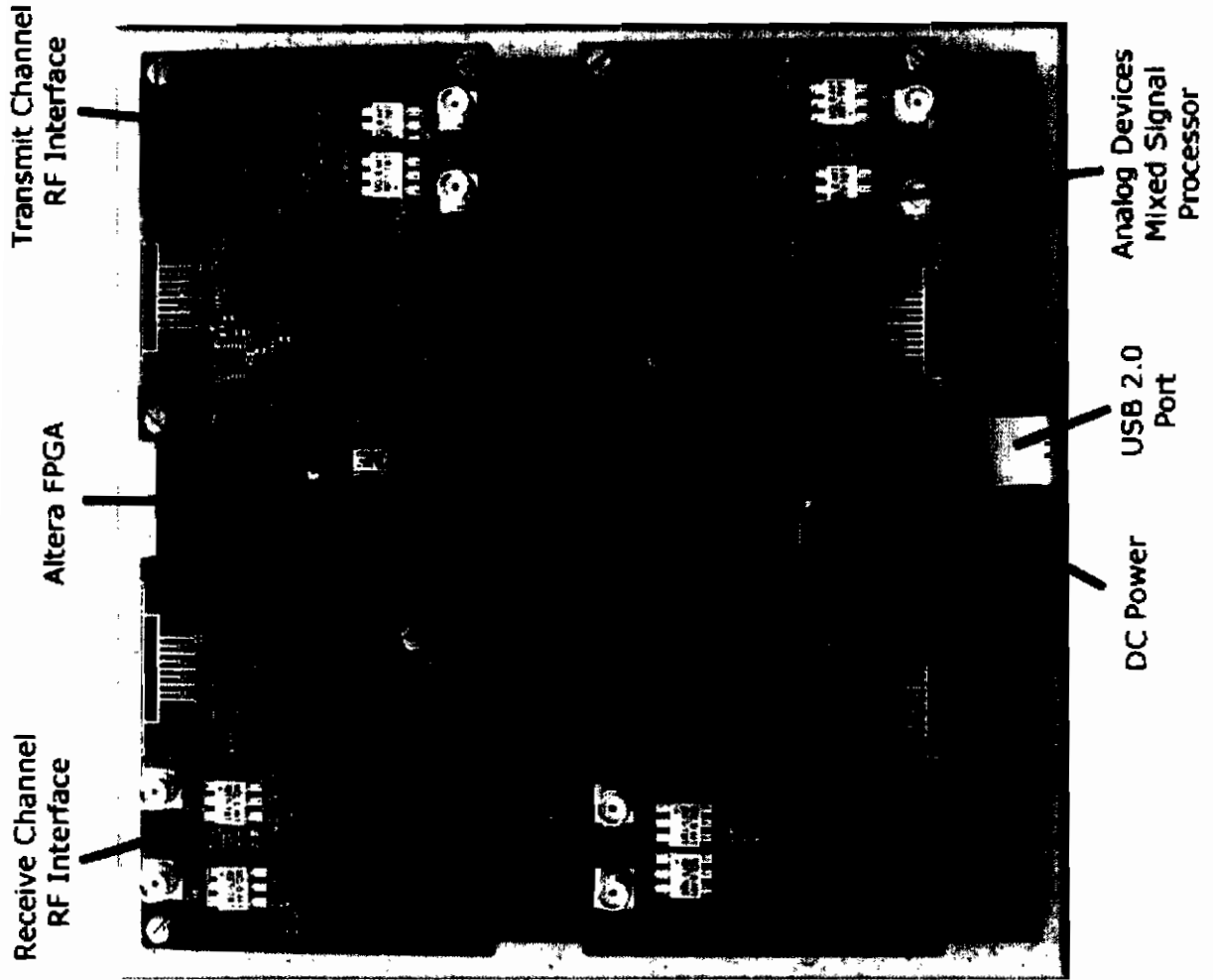
USRP

Full control over signal input/output

Works with GNU Radio + our plugin



97



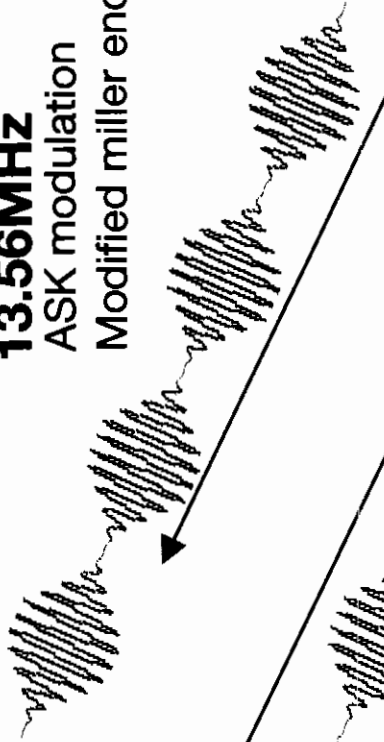
49

USRP

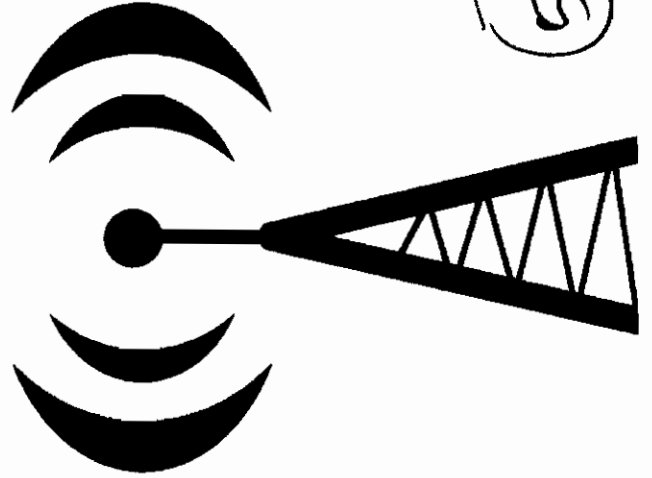
# card/reader communication



**13.56MHz**  
 ASK modulation  
 Modified miller encoding



**13.56MHz**  
 +/- 847kHz  
 OOK modulation  
 Manchester encoding



(5)

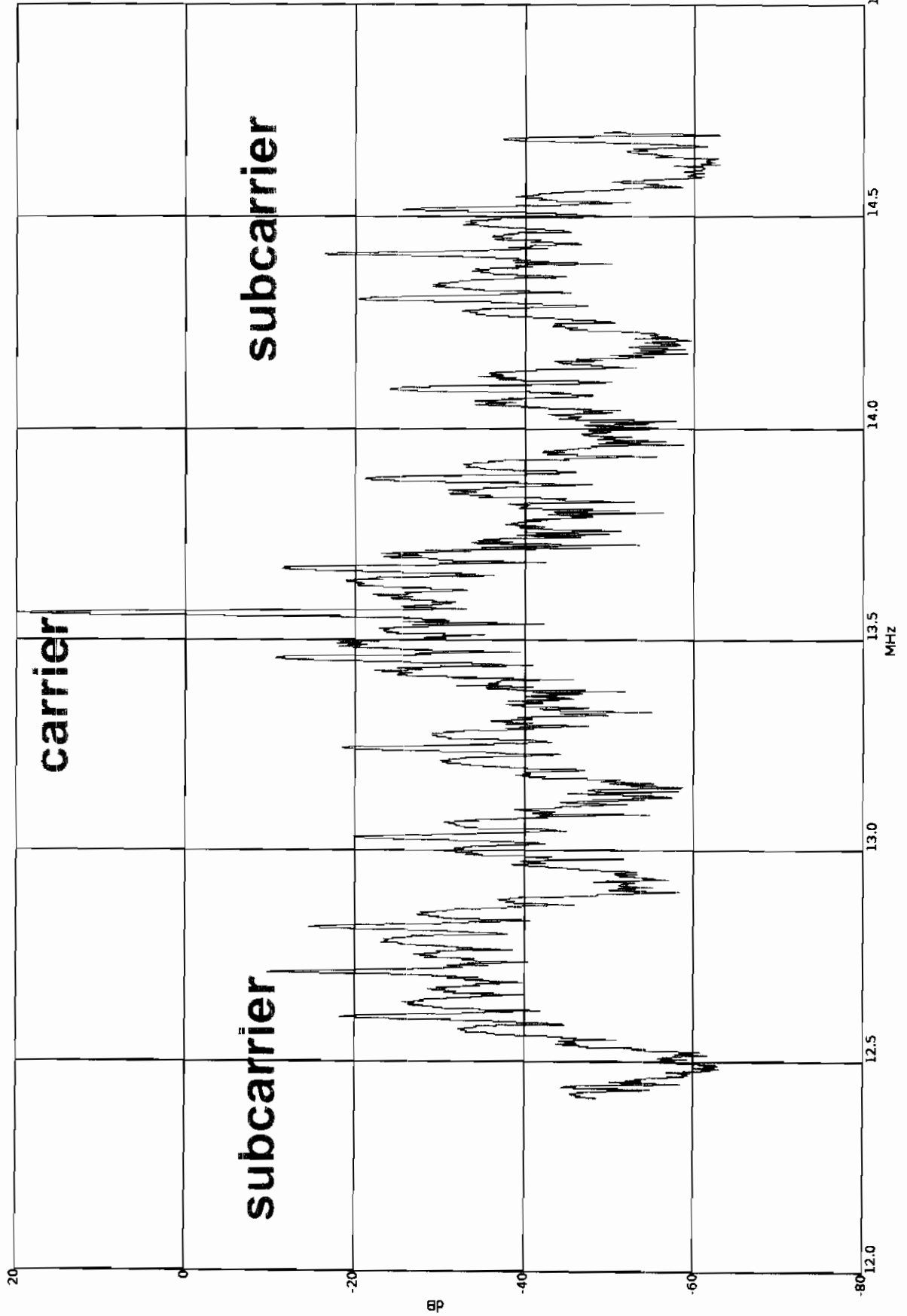
5

# GNU radio RFID toolchain

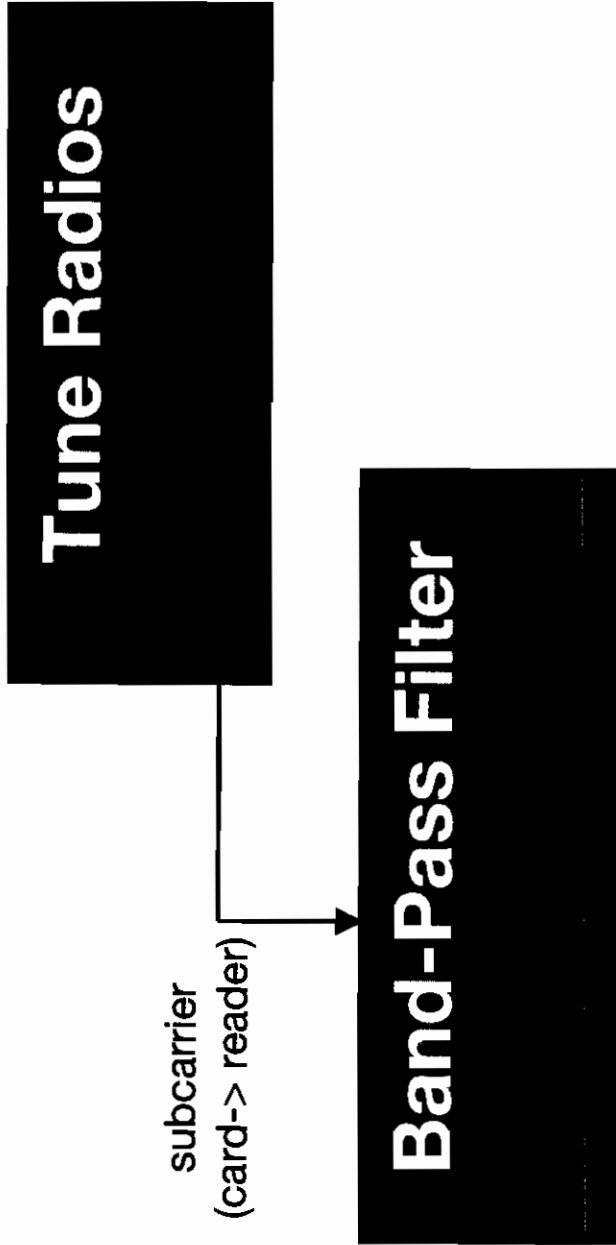
Tune Radios

52

# charlie card + reader FFT



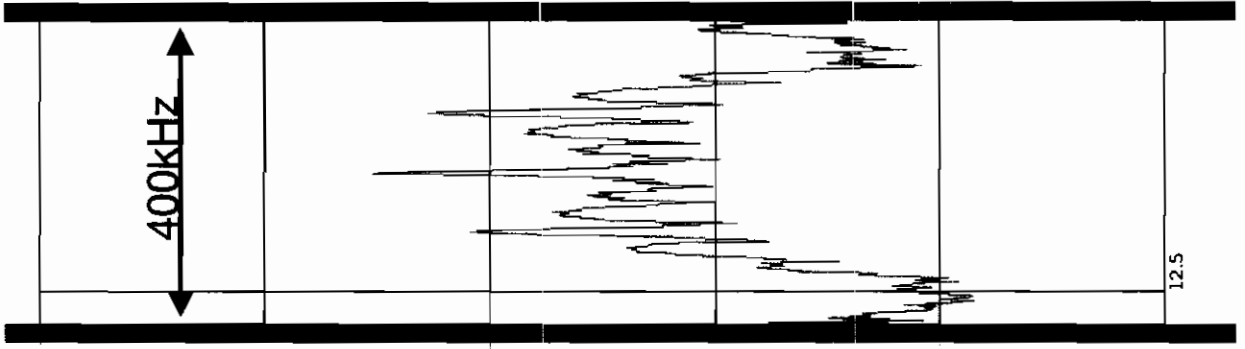
# GNU radio RFID toolchain



53

54

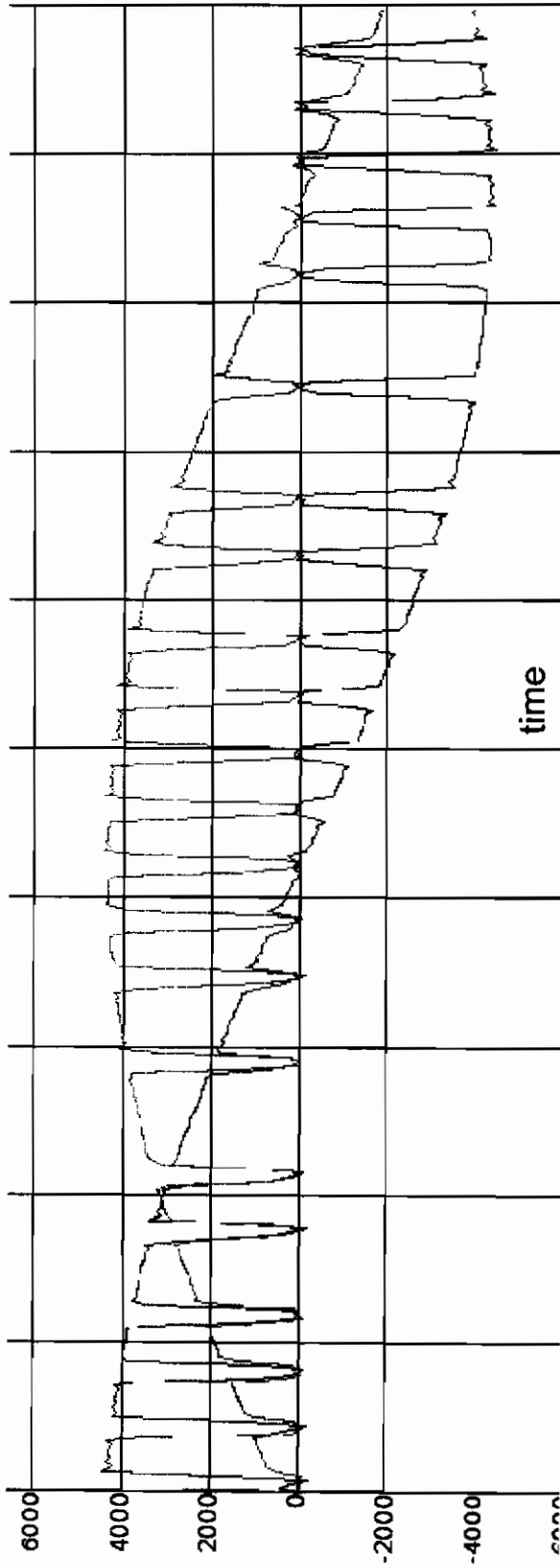
# charlie card + reader FFT



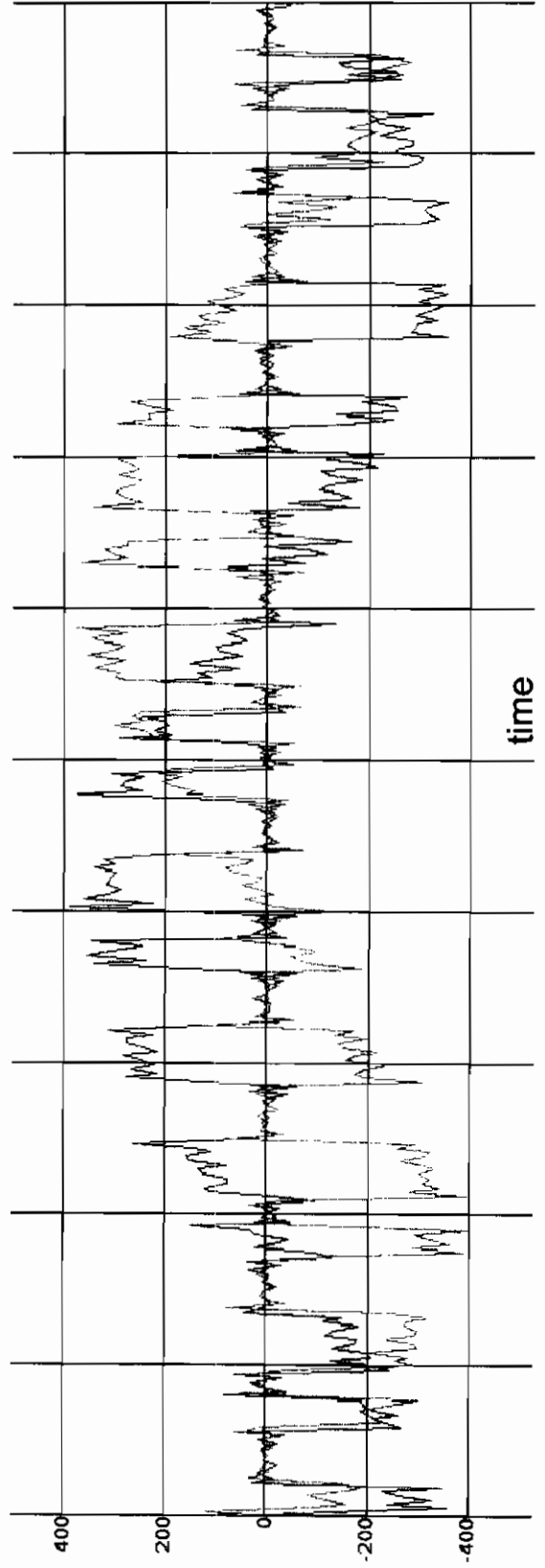
## Band Pass Filter

55

# 13.56MHz reader -> card transmission

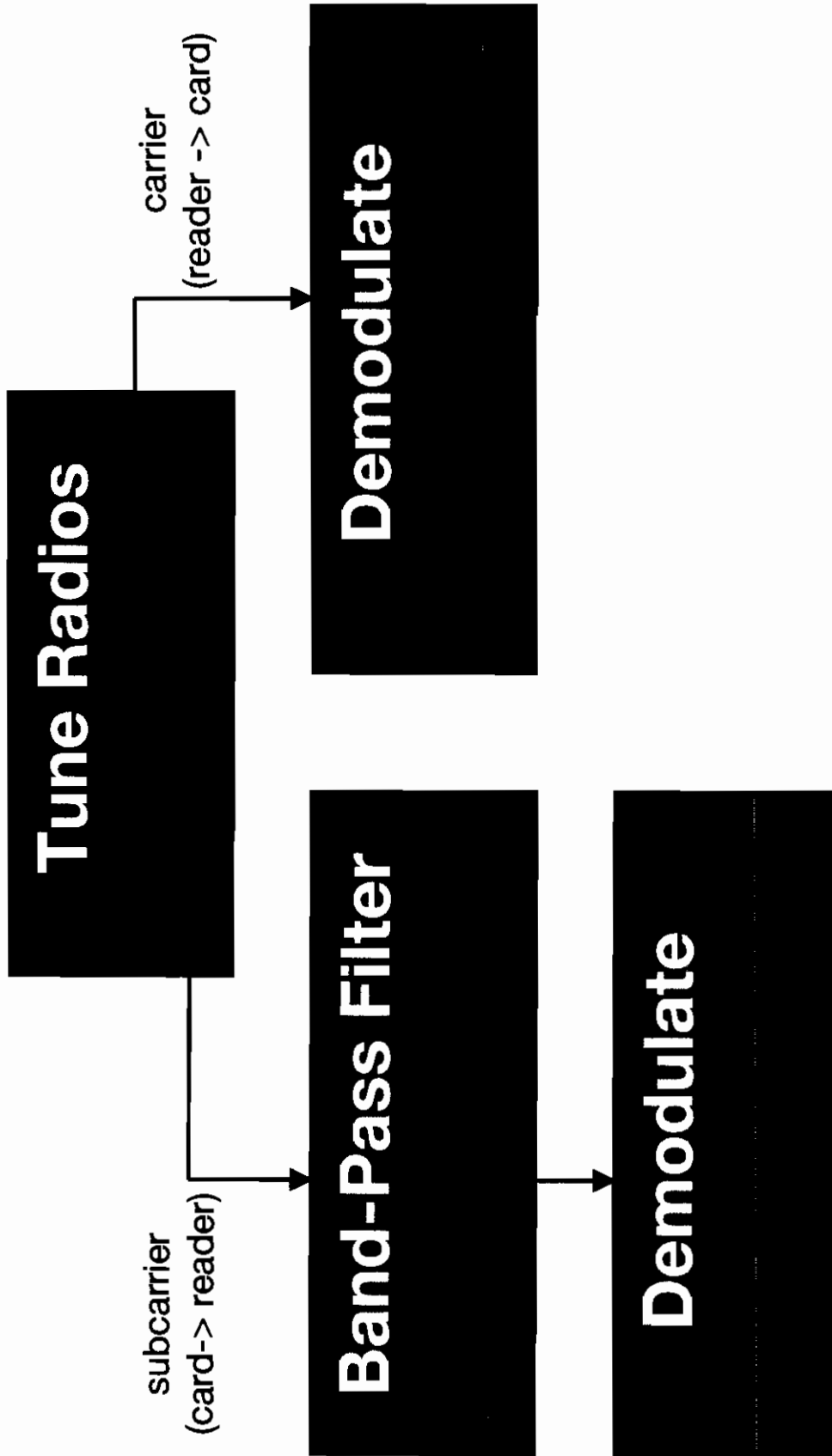


# 12.71MHz card -> reader transmission



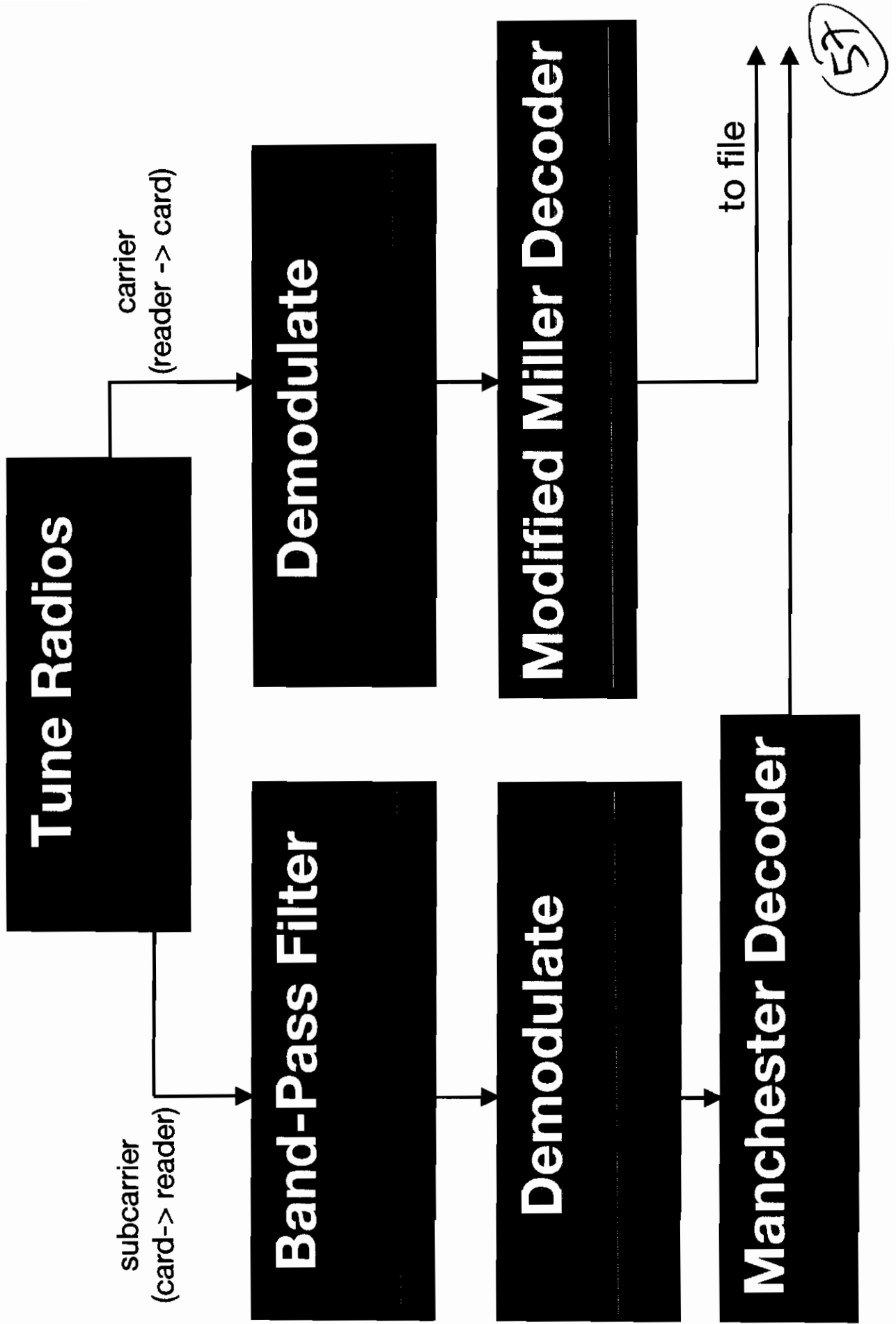


# GNU radio RFID toolchain

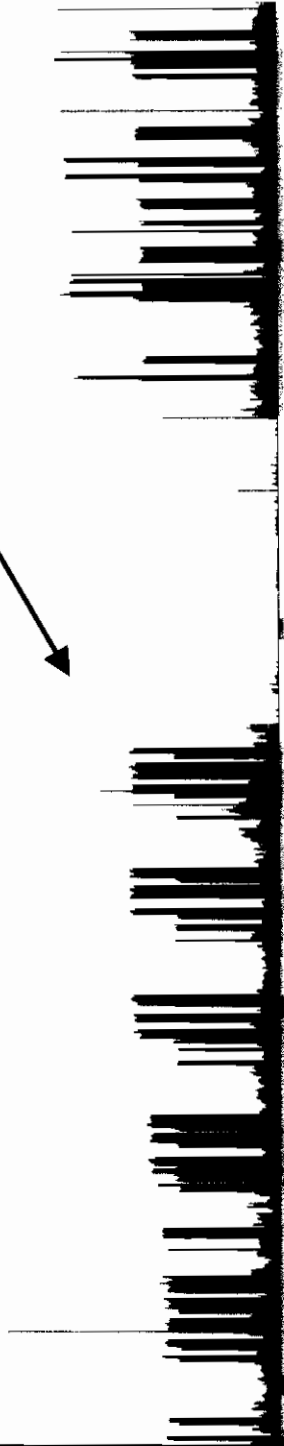


56

# GNU radio RFID toolchain



challenge/response pairs



# sniffing the turnstile

85

# attacks on the MIFARE card

Goal: get secret key (can clone card with it)

**Brute Force**

59

# attacks on the MIFARE card

Goal: get secret key (can clone card with it)

Brute Force

Manipulate PRG Timing

69

# attacks on the MIFARE card

Goal: get secret key (can clone card with it)

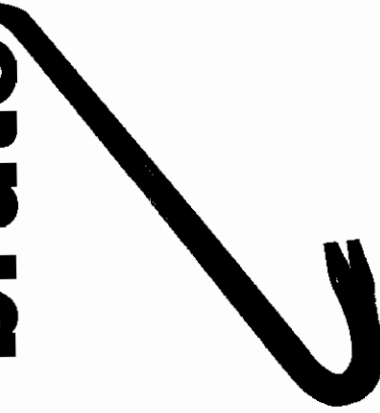
Brute Force

Manipulate PRG Timing

Algebraic Attacks

when all else fails

**brute force it**

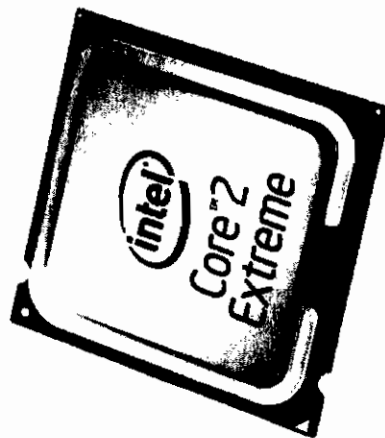


62

# Why Brute Force with an FPGA?

Because it's fast!

microprocessor



- General purpose device
- Finite instruction set  
(Uh, oh. Sounds RISCy)
- 1-8 parallelizations

FPGA



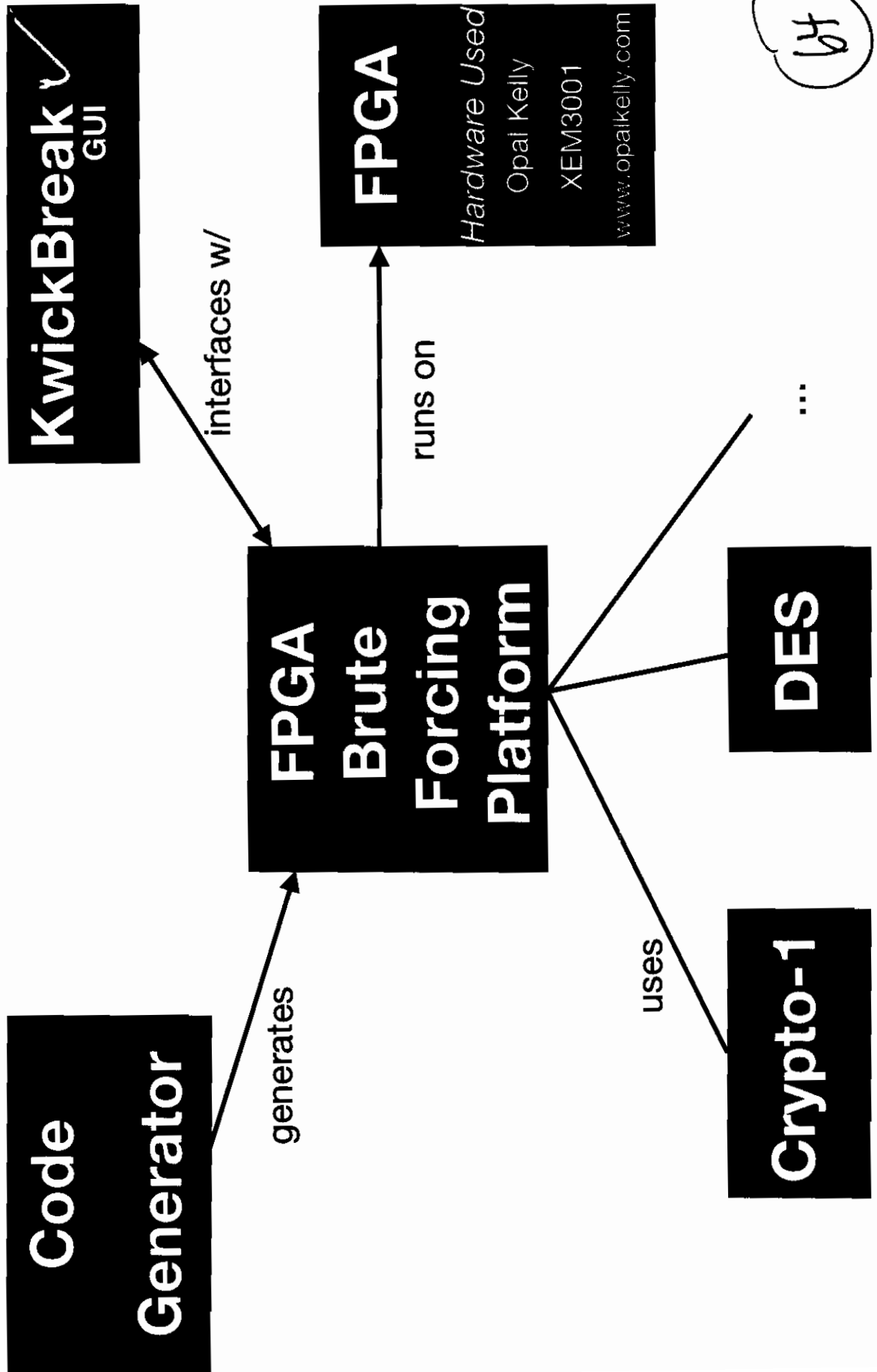
- Dedicated logic
- Hardware description language defines hardware
- Hundreds of parallelizations

63

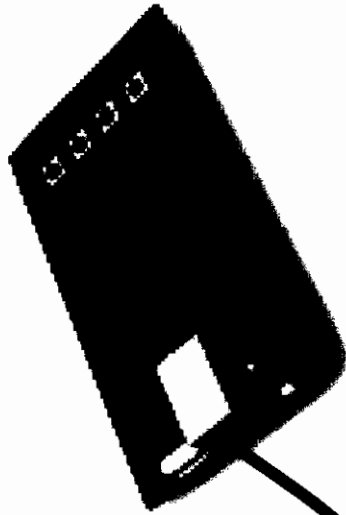
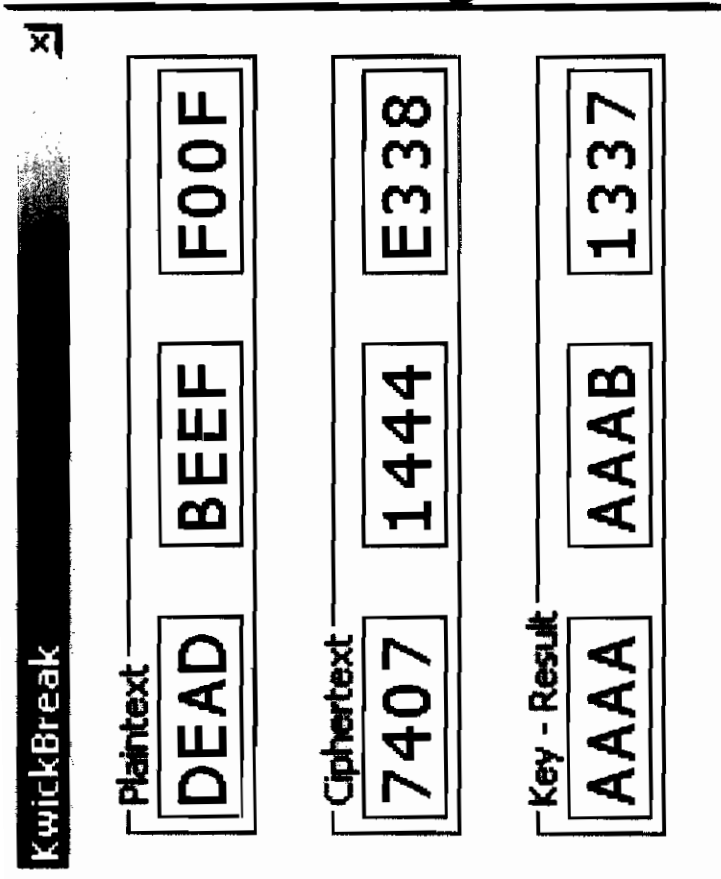


# KwickBreak FPGA Brute-Forcer

Executes known plaintext attack to recover key



65



# writing a (trivial) XOR module

```
module xorPlugin(  
    input wire clk,  
    input wire [47:0] key,  
    input wire [47:0] plaintext,  
    output reg [47:0] encrypted,  
    output reg ready);  
  
    always @(posedge clk) begin  
        ready <= 1;  
        encrypted <= key ^ plaintext;  
    end  
endmodule
```

99

# writing a (trivial) XOR module (cont)

```
./kwickbreakGenerator.py
```

```
>>>
```

```
Please enter your plugin module name, as written.
```

```
xorPlugin
```

```
Output filename (and path)
```

```
xorBruteForceUtil.v
```

```
How many cores would you like on the chip?
```

```
50
```

```
If you have a pipelined design, how many clock delays for valid data?
```

```
0
```

```
xorBruteForceUtil.v successfully written!
```

Now just create a new project in Xilinx ISE,  
load the files, and synthesize

**Done!**



# **Subways using MiFare Classic**

- Boston (CharlieCard)
- London (Oyster Card)
- Netherlands (OV-Chipkaart)
- Minneapolis
- South Korea (Upass)
- Hong Kong
- Beijing
- Madrid (Sube-T)
- Rio de Janeiro (RioCard)
- New Delhi
- Bangkok

and more

9

19



**ATTACK  
THE  
NETWORK**

# **network security**

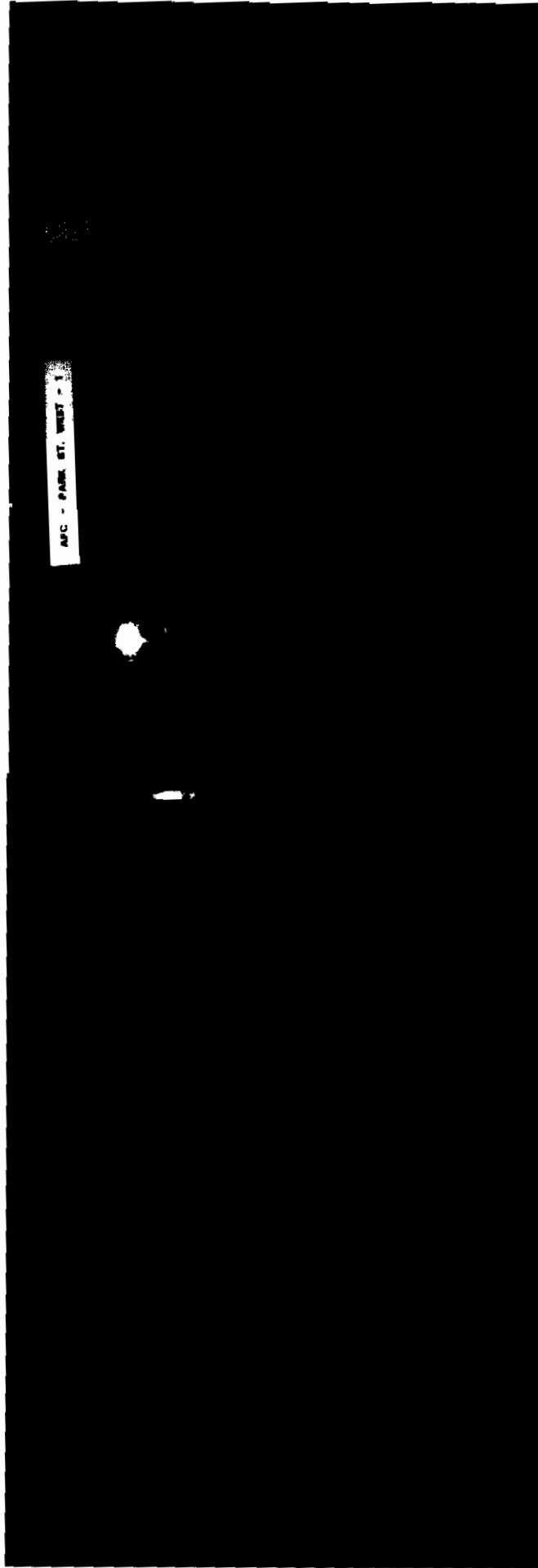
---

- Performed site surveys of T stations and offices (no WiFi found)
- Performed wireless device audit
- Found unguarded network switches

OK

# fiber switches in unlocked room

connect fare vending machines to the internal network



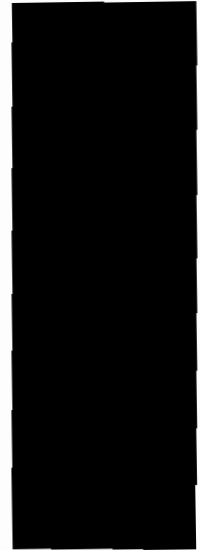
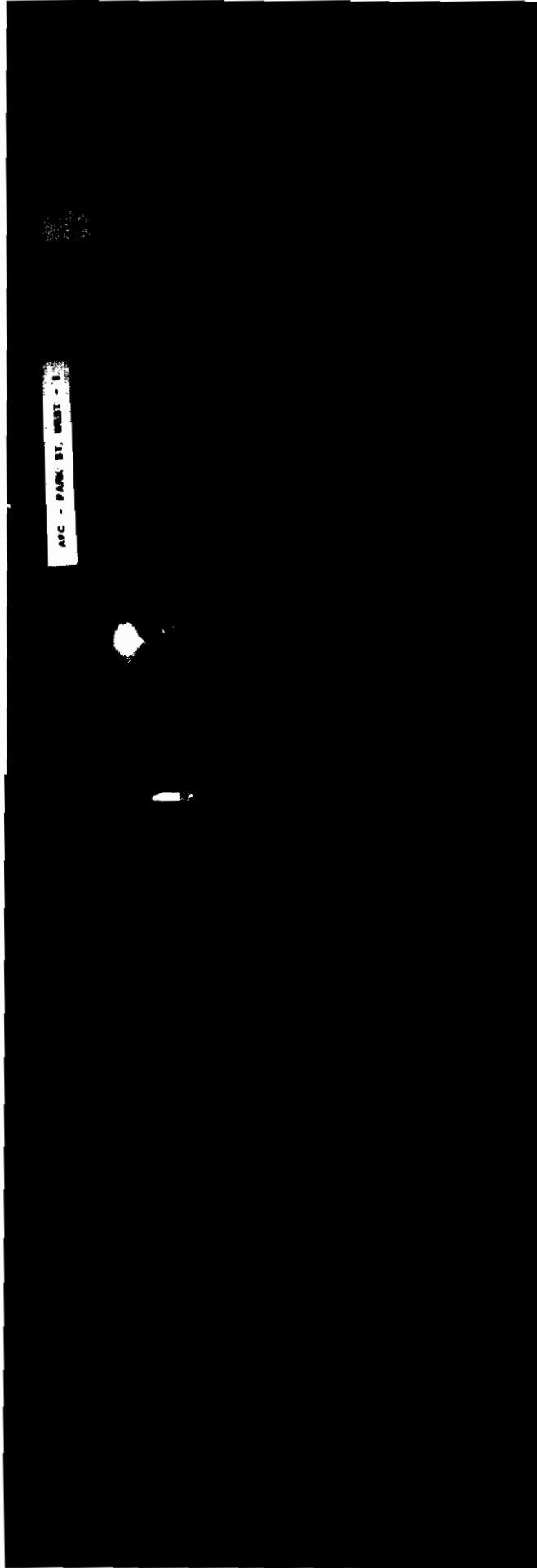
AFC - PARK ST. WEST - 1

17



# fiber switches in unlocked room

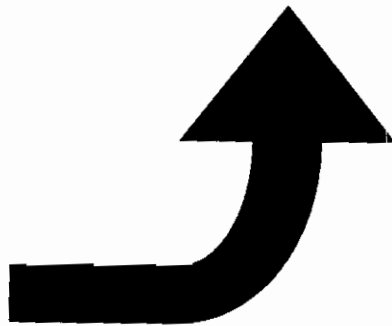
connect fare vending machines to the internal network



72

# Social Engineering

Executed the “PHANTOM MEETING” attack



Gained access to internal network drops and computers

---

Nobody suspected a thing as we walked into offices and conference rooms...

So we took it up a notch.

73

**first there was wardialing**

**c.1983 - 2000 - 2001 - 2002 - 2006 - 2007 - 2008**

HY

**then there was wardriving**

c.1983 - **2000** - 2001 - 2002 - 2006 - 2007 - 2008

57

**then there was warwalking**

c.1983 - 2000 - **2001** - 2002 - 2006 - 2007 - 2008

9

**then there was warflying  
and warboating**

c.1983 - 2000 - 2001 - 2002 - 2006 - 2007 - 2008

92

# then there was **war-rocketing**

c.1983 - 2000 - 2001 - 2002 - **2006** - 2007 - 2008

(78)

**then there was warballooning**

c.1983 - 2000 - 2001 - 2002 - 2006 - 2007 - 2008

(b)(5)



# and now... **warcarting**

c.1983 - 2000 - 2001 - 2002 - 2006 - 2007 - 2008

80

**WatCart**

**Pan/Tilt Mechanism**

attachments include antennas or a smoke grenade launcher

**19dBi WiFi Antenna**

directional

**Two Laptops**

for control and data logging

**12dBi WiFi Antenna**

omnidirectional

**Scanner**

to pick up various communications

**25-1300 MHz Antenna**

general coverage, great for picking up the police

**Control Box**

w/ key switch for activation

**Antenna Switch Box**

To toggle between antennas and radios

**CCD Camera**

trip documentation

**Flash Drive Dropper**

for U3 hacksaws

**Lights**

2M candlepower for night operations

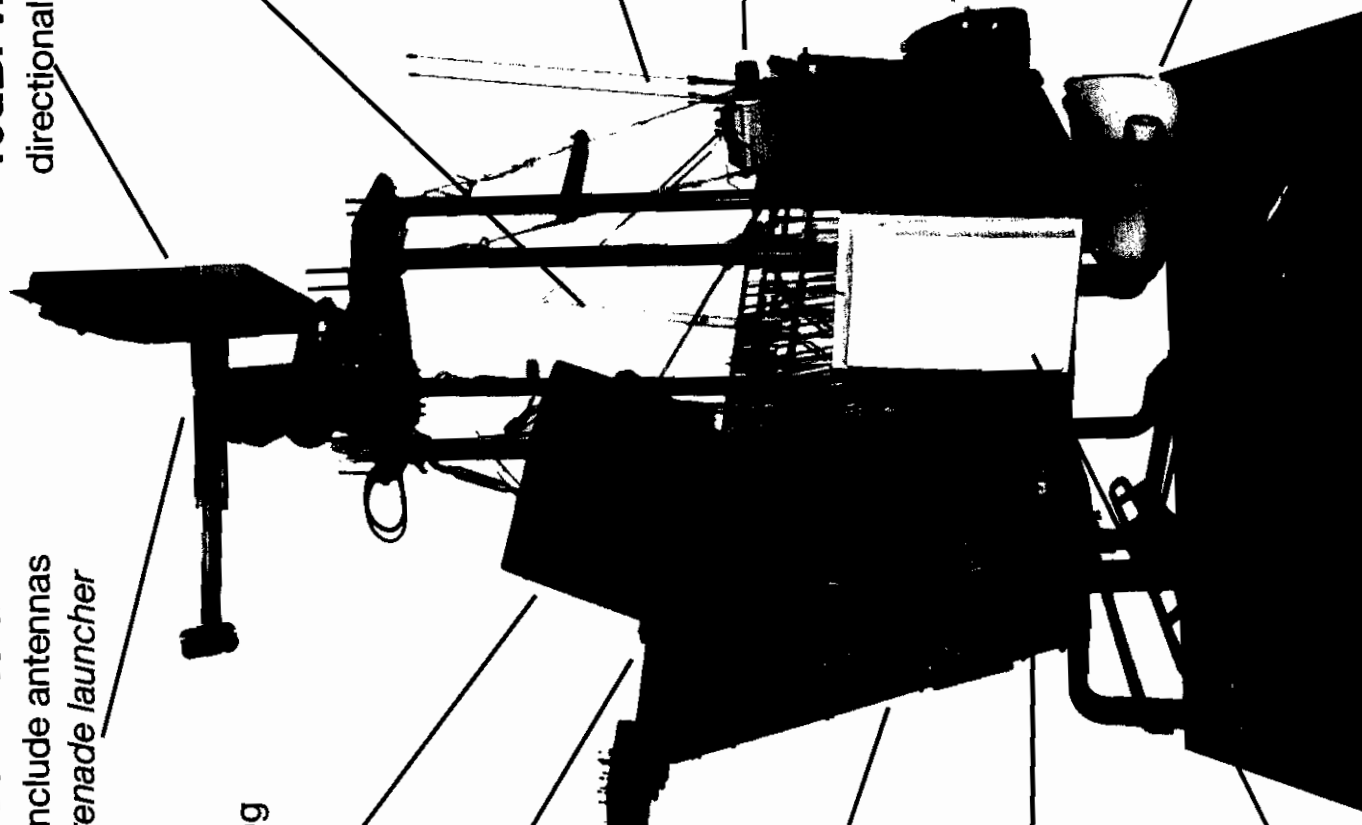
**900 MHz Antenna**

directional, great for cordless phones

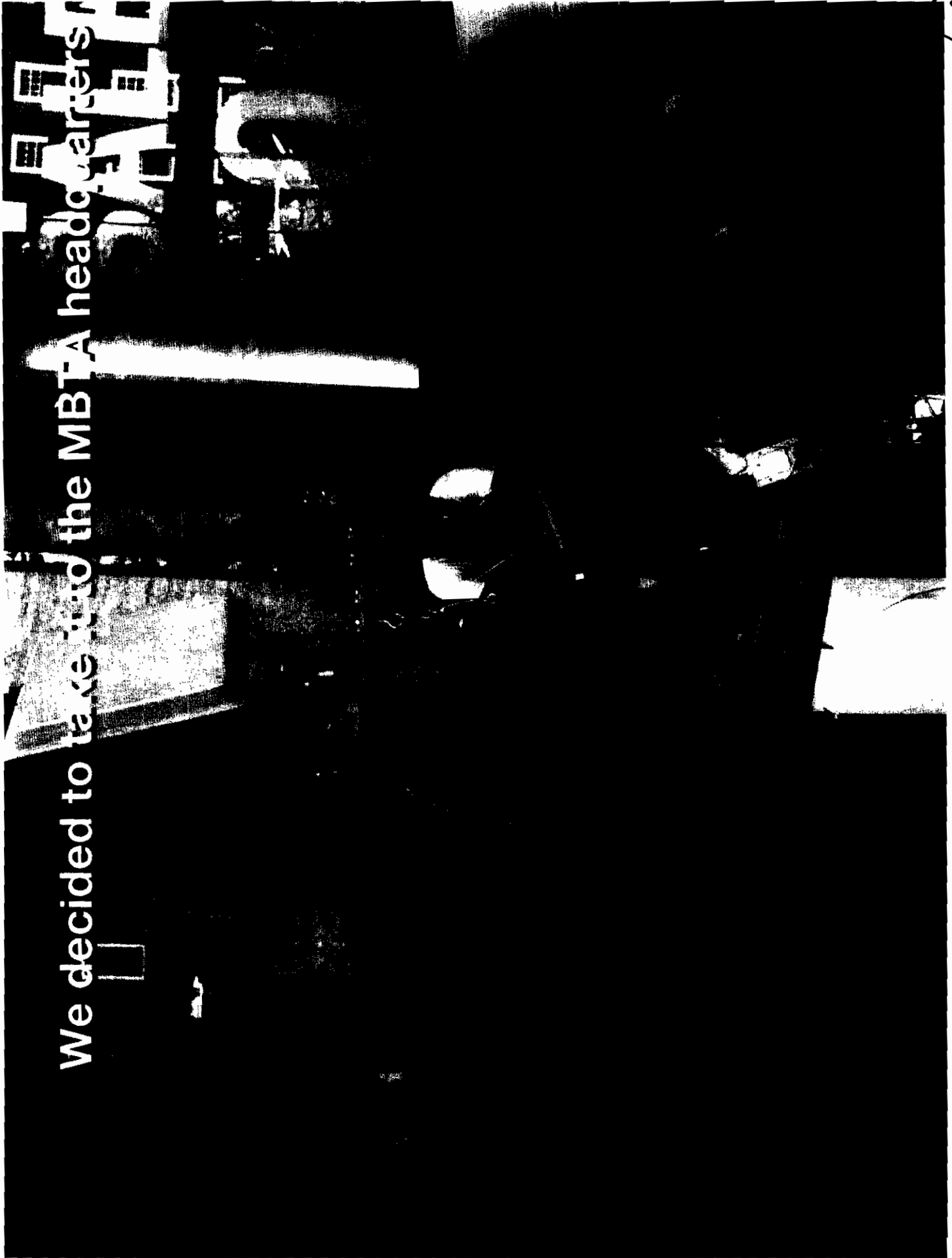
**PA Speaker**

For announcements and intimidating music

18



We decided to take into the MBTA head offices



(8)

And then we ran into some problems with the police



That's one of the WarCart's  
smoke grenades, by the way

83

So to avoid ending up like this



We turned back

84

88

# contributions

# contributions

---

- 1) **Exploited** physical security holes
- 2) **Reverse engineered** the CharlieTicket
- 3) Wrote code to analyze & generate magcards
- 4) Wrote a **toolchain** for analyzing 13.56MHz RFID transactions using the USRP+GNUradio
- 5) **Attacked** problems with the MIFARE Classic cards
- 6) Wrote **brute forcer-generator** to crack keys on an FPGA
- 7) Developed software to **reduce MQ to SAT**, allowing key recovery
- 8) Wrote code to **read and clone MIFARE** cards (given the key)

86

## **Exhibit 8**



**Mahony, leuan (BOS - X75835)**

---

**From:** Marcia Hofmann [marcia@eff.org]  
**Sent:** Saturday, August 09, 2008 4:38 AM  
**To:** Mahony, leuan (BOS - X75835)  
**Cc:** kurt@eff.org; jennifer@eff.org; jaren@mit.edu  
**Subject:** Re: MBTA v Anderson et al

**Attachments:** defcon-16-anderson-ryan-cheisa.pdf



defcon-16-anderson-ryan-cheisa..

Dear Ieuan:

Attached please find the presentation slides that our clients submitted to DEFCON.

As we discussed on the phone earlier today, the tone of this presentation is geared toward the DEFCON audience. To be clear, our clients do not intend to disclose information that would enable the audience to duplicate the research, and the presentation will omit key details to ensure responsible disclosure.

While we remain open to discussing the content of the presentation, please note that these slides have been included in a CD distributed to DEFCON attendees.

We will try to give you a call as early as possible tomorrow in light of the time difference. We will aim for 9:00 ET/6:00 PT.

Best regards,

Marcia

--

Marcia Hofmann, Staff Attorney  
Electronic Frontier Foundation  
454 Shotwell Street  
San Francisco, CA 94110

tel: (415) 436-9333 x. 116 | fax: (415) 436-9993 marcia@eff.org | <http://www.eff.org>

Join EFF today! <http://www.eff.org/support>

ieuan.mahony@hklaw.com wrote:

> Kurt, Marcia, and Jennifer:  
> Per our 11:30 call, I will be available for another hour or so  
> tonight. I have not circulated your inquiry about possible  
> willingness to postpone the hearing. Please let me know if you wish  
> us formally to consider this as a request.  
>  
> I note that we still do not have your clients' presentation materials.  
> I am inclined to object to any discussion of a postponement, as the  
> decision to continue to withhold these materials makes me concerned.  
> As I stated during our 9:00, and 11:30 calls this evening, I see no  
> basis for continuing to withhold this information.  
>  
> With that said, we remain interested in discussing an amicable  
> resolution. Once I have finished the Supplemental Declaration I  
> discussed, I will begin work on a proposed Consent Judgment and format  
> for your review.  
>  
> Ieuan

>  
>  
> \*Holland + Knight\*  
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> \*Ieuan G. Mahony\*  
> Partner  
> Holland & Knight LLP  
> 10 St. James Avenue  
> Boston, MA 02118  
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> Cell 781-789-4230  
> Fax 617 523 6850  
> Email ieuan.mahony@hklaw.com  
>  
> www.hklaw.com  
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> work product privilege that may be available to protect confidentiality.  
>  
>

## **Exhibit 9**

**Mahony, Ieuan (BOS - X75835)**

---

**From:** Mahony, Ieuan (BOS - X75835)  
**Sent:** Saturday, August 09, 2008 5:15 AM  
**To:** 'Marcia Hofmann'  
**Cc:** kurt@eff.org; jennifer@eff.org; jaren@mit.edu; 'Swope, Jeffrey'; William Mitchell; Scott Darling; Mahony, Ieuan (BOS - X75835)  
**Subject:** RE: MBTA v Anderson et al

Marcia:

I am circulating this now. Given the time, and Scott's flight, I am not sure how close a review of the substance we will have by the hearing.

I have the following two requests, and would appreciate a response as far in advance of the hearing as you are able:

- (1) Please let me know the time at which the slide deck was first distributed to DEFCON attendees.
- (2) Please let me know the relationship, if any, between (a) the point in time the MIT Undergrads understood the MBTA wanted an opportunity to view these materials; and (b) the point in time when the materials were distributed at DEFCON.

I will wait for your call, and would appreciate a response to the above two questions.

Ieuan

-----Original Message-----

From: Marcia Hofmann [mailto:marcia@eff.org]  
Sent: Saturday, August 09, 2008 4:38 AM  
To: Mahony, Ieuan (BOS - X75835)  
Cc: kurt@eff.org; jennifer@eff.org; jaren@mit.edu  
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Best regards,

Marcia

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Electronic Frontier Foundation  
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Join EFF today! <http://www.eff.org/support>

ieuan.mahony@hklaw.com wrote:

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>

**Mahony, Ieuan (BOS - X75835)**

---

**From:** Mahony, Ieuan (BOS - X75835)  
**Sent:** Saturday, August 09, 2008 5:26 AM  
**To:** 'Swope, Jeffrey'  
**Cc:** 'Marcia Hofmann'; kurt@eff.org; jennifer@eff.org; jaren@mit.edu; William Mitchell; Scott Darling; Mahony, Ieuan (BOS - X75835)  
**Subject:** RE: MBTA v Anderson et al

Jeffrey:

I make the following request of you, again, as far in advance of the hearing as you are able:

- (1) Please state when MIT first become aware of this slide deck?
- (2) Please state whether MIT at any point had access to a copy of this slide deck? If so, when?

Thank you

Ieuan

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**To:** 'Marcia Hofmann'  
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**Subject:** RE: MBTA v Anderson et al

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