

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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| UNITED STATES OF AMERICA | : | CRIMINAL NO. <u>08-</u> |
| v. | : | DATE FILED: <u> </u> |
| CHRISTINA HELLMANN | : | VIOLATIONS: |
| JASON LEE EDWARDS | : | 18 U.S.C. § 1343 (wire fraud - |
| | : | 7 counts) |
| | : | 18 U.S.C. § 2 (aiding and abetting) |
| | : | Notice of forfeiture |

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

BACKGROUND

At all times material to this indictment:

1. Integrated Graphics, Inc., d/b/a ICD Global (hereinafter, "ICD"), was a corporation registered under the laws of Pennsylvania with its primary place of business in Downingtown, Pennsylvania. ICD was, among other things, an advertising and marketing company. In the course of that work, ICD invested significant time and resources to develop proprietary technology that acquired data to enable its clients to direct the most appropriate content and advertising at potential customers.

2. Defendant CHRISTINA HELLMANN was an employee of ICD, working as a sales representative, from at least in or about February 2006 until her employment was terminated on or about July 24, 2007. Soon thereafter, defendant HELLMANN was hired to perform essentially a similar job as a sales representative for "Competitor #1," a company based

in Devon, Pennsylvania, that offered marketing services to clients. Defendant HELLMANN maintained an electronic mail account at Yahoo! (the “Yahoo! account”), the servers for which were located in California.

3. Defendant JASON LEE EDWARDS was an employee of ICD, working as a computer programmer, from at least in or about May 2006 until his employment was terminated in or about mid-December 2007. Defendant EDWARDS maintained an electronic mail account at Google (the “Gmail account”), the servers for which were located in California.

THE SCHEME

4. From in or about August 2007 through in or about December 2007, defendants

CHRISTINA HELLMANN and JASON LEE EDWARDS

devised and intended to devise a scheme to defraud ICD, and a scheme to defraud ICD of the intangible right to the honest services of defendant EDWARDS, and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

It was part of the scheme that:

5. Defendant CHRISTINE HELLMANN asked and directed defendant JASON LEE EDWARDS to obtain proprietary technology and information of ICD in order to facilitate defendant HELLMANN’s efforts to convince one or more clients of ICD to transfer their marketing accounts from ICD to Competitor #1.

8. Without authorization and with the intent to harm ICD’s business,

defendant JASON LEE EDWARDS downloaded proprietary technology and information from ICD computers and transmitted those items to defendant CHRISTINE HELLMANN through a series of electronic mail communications, which traveled to and from the Eastern District of Pennsylvania via computer servers located, among other places, in California.

9. On or about each of the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, defendants

**CHRISTINA HELLMANN
and
JASON LEE EDWARDS,**

for the purpose of executing the scheme described above, and aiding and abetting its execution, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below, each transmission constituting a separate count:

| COUNT | DATE | DESCRIPTION |
|-------|-----------------|---|
| 1 | August 21, 2007 | Defendant JASON LEE EDWARDS transmitted an electronic mail message from the Gmail account to defendant CHRISTINA HELLMANN at the Yahoo! account informing defendant HELLMANN that an ICD official was meeting in a few days with a representative of "Company A," a potential ICD client known to the grand jury. |
| 2 | August 24, 2007 | Defendant JASON LEE EDWARDS transmitted an electronic mail message, with a file attached, from the Gmail account to defendant CHRISTINA HELLMANN at the Yahoo! account containing contact information for the clients and potential clients of an ICD sales representative. |

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| 3 | November 9, 2007 | Defendant JASON LEE EDWARDS transmitted an electronic mail message, with a file attached, from the Gmail account to defendant CHRISTINA HELLMANN at the Yahoo! account containing "code & images and the like" relating to the Internet website for "Company B," an ICD client known to the grand jury. |
| 4 | November 13, 2007 | Defendant JASON LEE EDWARDS transmitted an electronic mail message, with a file attached, from the Gmail account to defendant CHRISTINA HELLMANN at the Yahoo! account containing proprietary material developed by ICD in the course of its marketing work for Company B, including its operation of an Internet website for Company B. |
| 5 | December 12, 2007 | Defendant CHRISTINA HELLMANN transmitted an electronic mail message from the Yahoo! account to defendant JASON LEE EDWARDS at the Gmail account explaining that defendant HELLMANN had caused a representative of Company B to request certain information from ICD in order to facilitate the transfer of Company B's marketing account from ICD to Competitor #1. |
| 6 | December 13, 2007 | Defendant JASON LEE EDWARDS transmitted an electronic mail message from the Gmail account to defendant CHRISTINA HELLMANN at the Yahoo! account in which he stated that he would have to continue transferring information to defendant HELLMANN "really, really on the sly" because he had just received an electronic mail message, which was attached from an ICD representative ordering ICD employees not to "supply any files (code or otherwise)" to Company B, Competitor #1, or defendant HELLMANN because this would be a direct conflict of interest with ICD's business. |

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| 7 | December 14, 2007 | After receiving the electronic mail message described above in Count Six, defendant CHRISTINA HELLMANN transmitted an electronic mail message from the Yahoo! account to defendant JASON LEE EDWARDS at the Gmail account requesting that defendant EDWARDS obtain for her the information necessary to complete the transfer of Company B's account from ICD to Competitor #1. |
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All in violation of Title 18, United States Code, Sections 1343, 1346, and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1343 set forth in this indictment, defendants

**CHRISTINA HELLMANN
and
JASON LEE EDWARDS**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, including, but not limited to the sum of at least \$20,000.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other

property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C).

A TRUE BILL:

FOREPERSON

LAURIE MAGID
Acting United States Attorney