

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

GEORGE N. TURNER

No.

Violations: Title 18, United States Code,  
Sections 1030(a)(5)(A), 2511(1)(a), and  
2511(1)(c)

**COUNT ONE**

The SPECIAL JANUARY 2014 GRAND JURY charges:

1. At times material to this indictment:
  - a. Company A was headquartered in the Northern District of Illinois, and had customers located throughout the United States.
  - b. Defendant George N. Turner was employed by Company A as the manager of information technology from in or about October 2007, through on or about March 7, 2014.
  - c. Defendant George N. Turner was employed as a contractor by Company A to provide information technology support to Company A from on or about March 7, 2014, through on or about March 31, 2014.
  - d. Individual JR was employed as the President and Chief Executive Officer of Company A.
  - e. Individual RB was employed as the Vice President of Finance of Company A.

f. Company A maintained computer servers in Northbrook, Illinois, which were used in and affecting interstate commerce, and on which it stored information related to its business, including the email accounts of Company A employees.

g. From in or about October 2007, through on or about March 31, 2014, during his full-time and contract employment at Company A, and with authorization from Company A, defendant George N. Turner had access to Company A's computer network and servers, including Company A's email server. After on or about March 31, 2014, defendant Turner no longer was authorized to access Company A's computer network and servers, including Company A's email server.

2. On or about May 12, 2014, at Northbrook, in the Northern District of Illinois, Eastern Division, and elsewhere,

GEORGE N. TURNER,

defendant herein, knowingly caused the transmission of a program, information, code, and command, and as a result of such conduct, intentionally caused damage without authorization to a protected computer, namely, Company A's computer servers, which offense caused a loss aggregating at least \$5,000 in value to Company A during a one-year period;

In violation of Title 18, United States Code, Sections 1030(a)(5)(A) and 1030(c)(4)(B)(i).

**COUNT TWO**

The SPECIAL JANUARY 2014 GRAND JURY further charges:

1. Paragraph 1 of Count One is incorporated here.

2. From on or about April 6, 2014, through on or about July 3, 2014, at Northbrook, in the Northern District of Illinois, Eastern Division, and elsewhere,

GEORGE N. TURNER,

defendant herein, did intentionally intercept and endeavor to intercept, an electronic communication, namely, emails sent to and from Individual RB's Company A email account;

In violation of Title 18, United States Code, Section 2511(1)(a).

**COUNT THREE**

The SPECIAL JANUARY 2014 GRAND JURY further charges:

1. Paragraph 1 of Count One is incorporated here.
2. From on or about April 6, 2014, through on or about July 3, 2014, at

Northbrook, in the Northern District of Illinois, Eastern Division, and elsewhere,

GEORGE N. TURNER,

defendant herein, did intentionally intercept and endeavor to intercept, an electronic communication, namely, emails sent to and from Individual JR's Company A email account;

In violation of Title 18, United States Code, Section 2511(1)(a).

**COUNT FOUR**

The SPECIAL JANUARY 2014 GRAND JURY further charges:

1. Paragraph 1 of Count One is incorporated here.

2. On or about July 3, 2014, at Northbrook, in the Northern District of Illinois, Eastern Division, and elsewhere,

GEORGE N. TURNER,

defendant herein, did intentionally disclose, and endeavor to disclose, the contents of an electronic communication to another person, knowing and having reason to know that the information was obtained through the interception of an electronic communication, in violation of Title 18, United States Code, Section 2511(1), namely, by sending to other persons Company A payroll information intercepted from Individual RB's Company A email account;

In violation of Title 18, United States Code, Section 2511(1)(c).

**COUNT FIVE**

The SPECIAL JANUARY 2014 GRAND JURY further charges:

1. Paragraph 1 of Count One is incorporated here.

2. On or about July 3, 2014, at Northbrook, in the Northern District of Illinois, Eastern Division, and elsewhere,

GEORGE N. TURNER,

defendant herein, did intentionally disclose, and endeavor to disclose, the contents of an electronic communication to another person, knowing and having reason to know that the information was obtained through the interception of an electronic communication, in violation of Title 18, United States Code, Section 2511(1), namely, by sending to other persons Company A executive bonus information intercepted from Individual RB's Company A email account;

In violation of Title 18, United States Code, Section 2511(1)(c).

**COUNT SIX**

The SPECIAL JANUARY 2014 GRAND JURY further charges:

1. Paragraph 1 of Count One is incorporated here.

2. On or about July 3, 2014, at Northbrook, in the Northern District of Illinois, Eastern Division, and elsewhere,

GEORGE N. TURNER,

defendant herein, did intentionally disclose, and endeavor to disclose, the contents of an electronic communication to another person, knowing and having reason to know that the information was obtained through the interception of an electronic communication, in violation of Title 18, United States Code, Section 2511(1), namely, by sending to other persons Company A pricing information intercepted from Individual JR's Company A email account;

In violation of Title 18, United States Code, Section 2511(1)(c).

**COUNT SEVEN**

The SPECIAL JANUARY 2014 GRAND JURY further charges:

1. Paragraph 1 of Count One is incorporated here.

2. On or about July 15, 2014, at Northbrook, in the Northern District of Illinois, Eastern Division, and elsewhere,

GEORGE N. TURNER,

defendant herein, did intentionally disclose, and endeavor to disclose, the contents of an electronic communication to another person, knowing and having reason to know that the information was obtained through the interception of an electronic communication, in violation of Title 18, United States Code, Section 2511(1)(c), namely, by sending to other persons Company A payroll information intercepted from Individual RB's Company A email account;

In violation of Title 18, United States Code, Section 2511(1)(c).

**FORFEITURE ALLEGATION**

The SPECIAL JANUARY 2014 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 1030(a)(5), 2511(1)(a), and 2511(1)(c), as set forth in this indictment, defendant George N. Turner shall forfeit to the United States of America any personal property used and intended to be used to commit and to facilitate the commission of the offense, as provided in Title 18, United States Code, Sections 1030(i)(1)(A) and 2513, and Title 28, United States Code, Section 2461.

2. The property to be forfeited includes, but is not limited to the following specific property:

- a. an ASUS UX31A laptop, bearing no serial number, and
- b. a Hewlett-Packard Folio 9470 laptop, bearing serial number CNU316BS06.

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY