

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

UNITED STATES OF AMERICA : CRIMINAL NO.

V. : DATE FILED:

LARS JEPSEN : VIOLATIONS: 18 U.S.C. § 1030(a)(5)(A)
(knowingly causing the transmission of
: information or code and as a result of such
: conduct intentionally causing damage to a
: protected computer) – 1 count

: 18 U.S.C. § 1028(a)(7) (knowingly using
the means of identification of another
person with intent to commit a violation
of federal law) – 1 count

Notice of forfeiture

INDICTMENT

THE GRAND JURY CHARGES:

1. At all times material to this Indictment, Company A was in the business of buying and selling used cars.
2. Company A conducted its business using a website, telephones, and physical locations in Pennsylvania and other mid-Atlantic states.
3. Company A used a Voice Over Internet Protocol (VOIP) telephone and its computers, include those that ran the VOIP system were located in Media, Pennsylvania.
4. Defendant LARS JEPSEN was employed by Company A as an Information Technology specialist, servicing computers and servers. In particularly, he had responsibility for the VOIP network.

5. On or about June 23, 2014, defendant LARS JEPSEN performed service upon the computer of another employee of Company A. In order to do that, JEPSEN needed to obtain the employee's username and password. The same username and password that permitted access to the computer permitted access to the computer network of Company A

6. On or about June 26, 2014, Company A terminated Defendant JEPSEN's employment.

7. On or about July 3, 2014, defendant LARS JEPSEN drove from his home in Deptford, New Jersey to Allentown, Pennsylvania.

8. On or about July 3, 2014, defendant LARS JEPSEN connected his laptop computer to an open Internet access point (an open WiFi connection) in Allentown, Pennsylvania, and using the username and password of the other Company A employee, accessed the computer network of Company A.

9. On or about July 3, 2014, defendant LARS JEPSEN, having gained access to the network of Company A, accessed the VOIP telephone system and deleted data necessary to run that system. As a result, Company A did not have telephone service.

10. On or about July 3, 2014, at Allentown, in the Eastern District of Pennsylvania and elsewhere, defendant

LARS JEPSEN

knowingly caused the transmission of a program, information, code, and command, and as a result of such conduct, intentionally caused damage without authorization to the protected computers of Company A.

11. As a result of this conduct, Company A suffered a loss on July 3, 2014 of more than \$5,000 in the cost to respond to this offense, conduct a damage assessment, to restore

the system to its condition prior to the offense, as well as the loss of revenue and other consequential damages because of the interruption of telephone service.

In violation of Title 18, United States Code, Section 1030(a)(5)(A)

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

1. Paragraphs 1 through 9 of Count One are incorporated by reference.
2. On or about July 3, 2014, at Allentown in the Eastern District of Pennsylvania,
defendant

LARS JEPSEN

in and affecting interstate commerce, used, without lawful authority, a means of identification of another person, that is the username and password of the other Company A employee, with the intent to commit, and to aid or abet the commission, and in connection with the commission of another offense, that is the sending of code to the protected computers of Company A and thereby causing damage without authorization, as charged in Count One, in violation of Title 18, United States Code, Section 1030(a)(5)(A).

In violation of Title 18, United States Code, Section 1028(a)(7).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1028(a)(7) and 1030(a)(5)(A), as set forth in this indictment, defendant

LARS JEPSEN

shall forfeit to the United States of America any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including, but not limited to:

One ASUS K52F laptop computer, Serial Number 15G29N005501

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):


- (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 18, United States Code, Section 982(b), 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 18 United States Code, Sections 982(a)(2)(B), 1028(h) and 1030(i)(1)(A).

A TRUE BILL:

GRAND JURY FOREPERSON



ZANE DAVID MEMEGER
UNITED STATES ATTORNEY