

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

STEVEN ADDISON

No.

Violation: Title 18, United States
Code, Section 1343

The UNITED STATES ATTORNEY charges:

1. At times material to this information:
 - a. Defendant STEVEN ADDISON was an Enterprise Operations Specialist at Company A. Company A was a company that provided an online restaurant reservation service, with headquarters in San Francisco, California. ADDISON was located at Company A's office in Chicago, Illinois.
 - b. Company A offered a reservation website and a mobile application that allowed its users to make reservations at restaurants in Chicago, Illinois, among other places. Users provided certain identifying information such as their names, phone numbers, and email addresses, and were permitted to make reservations at no cost.
 - c. Reserve was also an online restaurant reservation service that began operating in Chicago from in or about April 2015. Reserve was a competitor of Company A. Users of the Reserve platform also provided their names, phone numbers, and email addresses to make a reservation, and were permitted to make reservations at no cost.
 - d. Restaurants paid a fee to participate in Company A's or Reserve's online restaurant reservation service and held tables for those customers that made reservations through one of these services.

2. Beginning in or about November 2017, and continuing until in or about February 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

STEVEN ADDISON,

defendant herein, participated in a scheme to defraud by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described below.

3. It was part of the scheme that ADDISON fraudulently made reservations on Reserve's online reservation system using fake names, email addresses, and phone numbers in order to cause a loss to Reserve and its Chicago restaurant customers.

4. It was further part of the scheme that, in or about November 2017, ADDISON discovered that Reserve's software did not prevent reservations from users that entered a fake email address, such as an email address with an invalid domain name, or a fake phone number, such as a phone number with an invalid area code.

5. It was further part of the scheme that ADDISON used fake names, email addresses, and phone numbers on Reserve's application to make over 300 reservations at Chicago restaurants constituting approximately 1,200 seats. For example, ADDISON made reservations using the fake names "Hans Gruber," "Richard Ashcroft," and "Jimmy Smits," email addresses such as "billygala@hotmail.com," and phone numbers such as "199-999-99999."

6. It was further part of the scheme that ADDISON also made multiple reservations under the same guest name at different Chicago restaurants for the exact same date and time using the Reserve reservation service. For example, ADDISON made reservations under the same fake guest name at six different Chicago restaurants for a party of four at 6:00 p.m. on November 25, 2017.

7. It was further part of the scheme that defendant ADDISON knew that these fake reservations would result in no diners appearing for the reservation and lost sales to the restaurants.

8. It was further part of the scheme that defendant ADDISON made multiple fake reservations on potentially busy days when he knew restaurants would suffer more losses. For example, ADDISON made twenty-two fake reservations on New Year's Eve and twenty-four fake reservations on Valentine's Day.

9. It was further part of the scheme that ADDISON, through his fake reservation scheme, intended to demonstrate to Chicago restaurants that Reserve had a purportedly inferior reservation system. ADDISON committed these acts on his own accord and did not personally profit from the scheme.

10. On or about December 26, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

STEVEN ADDISON,

defendant herein, for the purpose of executing the above-described scheme, did knowingly cause to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely an interstate electronic communication for a reservation under a fake name, email address, and phone number for a party of four at Restaurant A made from Bradenton, Florida, through Reserve's servers, and accessed by Restaurant A in Chicago, Illinois;

In violation of Title 18, United States Code, Section 1343.

UNITED STATES ATTORNEY