

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 20-
	:	
TIMOTHY YOUNG	:	18 U.S.C. § 1343
	:	18 U.S.C. § 2

INFORMATION

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

BACKGROUND

1. At all times relevant to this Information:

a. Defendant TIMOTHY YOUNG ("YOUNG") was a resident of Nebraska and an employee with the Victim Company.

b. The "Victim Company" was a data analytics and risk assessment firm based on New Jersey. The Victim Company served customers worldwide, including entities providing insurance and financial services, as well as government entities. The Victim Company maintained a network that housed, among other things, significant amounts of personally identifiable information.

GOAL OF THE SCHEME TO DEFRAUD

2. The goal of the scheme and artifice to defraud was for defendant YOUNG to enrich himself by fraudulently obtaining and selling information that belonged to the Victim Company.

MANNER AND MEANS OF THE SCHEME TO DEFRAUD

3. It was part of the scheme and artifice to defraud that defendant YOUNG obtained data and information that belonged to the Victim Company without the authorization of the Victim Company.

4. It was further part of the scheme and artifice to defraud that defendant YOUNG then attempted to sell the data and information that belonged to the Victim Company without the authorization of the Victim Company.

THE CHARGE

5. From in or about March 2019 through in or about May 2019, in the District of New Jersey, and elsewhere, the defendant,

TIMOTHY YOUNG,

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud the Victim Company and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, to wit, a March 8, 2019, electronic message from a location outside of New Jersey to a location in New Jersey.

In violation of Title 18, United States Code, Sections 1343 and 2.

FORFEITURE ALLEGATION

1. The allegations contained in this Information are incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense charged in this Information, the government will seek forfeiture from defendant YOUNG, in accordance with Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Section 1343.

3. If by any act or omission of defendant YOUNG any of the property subject to forfeiture herein:

- 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 subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of defendant YOUNG up to the value of the property described in this forfeiture allegation.


CRAIG CARPENITO
UNITED STATES ATTORNEY

CASE NUMBER: _____

**United States District Court
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UNITED STATES OF AMERICA

v.

TIMOTHY YOUNG

INFORMATION FOR

18 U.S.C. §§ 1343 and 2

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