UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

July 2002 Grand Jury

UNITED STATES OF AMERICA,	Criminal Case No. 00CR3833J
Plaintiff,	I N D I C T M E N T
	(Superseding)
v.	Title 18, U.S.C.,
JEROME T. HECKENKAMP,	Sec. 1030(a)(5)(A) - Intentionally
	Damaging a Protected Computer;
Defendant.	Title 18, U.S.C.,
	Sec. 1030(a)(5)(B) - Unauthorized
	Access into a Computer Recklessly
	Causing Damage; Title 18, U.S.C.,
	Sec. 1030(a)(2)(c) - Unlawfully
	Obtaining Information from a
	Protected Computer; Title 18,
	U.S.C., Sec. 2511(1)(a) -
	Intercepting Electronic
	Communications

The grand jury charges:

Count 1

Beginning on or about October 12, 1999, up to and including December 9, 1999, within the Southern District of California, and elsewhere, defendant JEROME T. HECKENKAMP, using a computer located outside of California, did knowingly cause the transmission of programs, information, codes and commands and, as a result of such

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conduct, intentionally caused damage without authorization to a protected computer located within California, to wit: defendant JEROME T. HECKENKAMP knowingly transmitted programs, codes and commands to the computer system used by Qualcomm Incorporated, San Diego, California, a computer system that was then used in interstate and foreign commerce and communication, and that as a result of such conduct, defendant JEROME T. HECKENKAMP intentionally caused damage without authorization and that damage caused a loss aggregating at least $5,000 during a one-year period; in violation of Title 18, United States Code, Section 1030(a)(5)(A).

Count 2

Beginning on or about October 12, 1999, up to and including December 9, 1999, within the Southern District of California, and elsewhere, defendant JEROME T. HECKENKAMP, using a computer located outside of California, did intentionally access a protected computer without authorization and, as a result of such conduct, recklessly caused damage to a protected computer located within California, to wit: defendant JEROME T. HECKENKAMP did intentionally access without authorization the computer system used by Qualcomm Incorporated, San Diego, California, a computer system that was then used in interstate and foreign commerce and communication, and that as a result of such conduct, defendant JEROME T. HECKENKAMP recklessly caused damage and that damage caused a loss aggregating at least $5,000 during a one-year period; in violation of Title 18, United States Code, Section 1030(a)(5)(B).

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Count 3

On or about December 3, 1999, within the Southern District of California, and elsewhere, defendant JEROME T. HECKENKAMP, did intentionally access a computer without authorization and exceed authorized access and thereby obtained information from a protected computer and the conduct involved an interstate communication; to wit, defendant JEROME T. HECKENKAMP accessed the Qualcomm computer system and obtained user names and passwords from the computer known as "hollin" at Internet Protocol address 192.35.156.37; in violation of Title 18, United States Code, Section 1030(a)(2)(C).

Count 4

On or about December 3, 1999, within the Southern District of California, and elsewhere, defendant JEROME T. HECKENKAMP, did intentionally access a computer without authorization and exceed authorized access and thereby obtained information from a protected computer and the conduct involved an interstate communication; to wit, defendant JEROME T. HECKENKAMP accessed the Qualcomm computer system and obtained user names and passwords from the computer known as "xing" at Internet Protocol address 129.46.2.42; in violation of Title 18, United States Code, Section 1030(a)(2)(C).

Count 5

On or before December 3, 1999, within the Southern District of California, and elsewhere, defendant JEROME T. HECKENKAMP did intentionally intercept and endeavor to intercept an electronic communication; to wit, defendant JEROME T. HECKENKAMP installed an unauthorized computer code that was designed to intercept electronic communications containing computer user names and passwords on a Qualcomm computer known as "hollin" at Internet Protocol address

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192.35.156.37, and did thereby obtain computer user names and passwords; in violation of Title 18, United States Code, Section 2511(1)(a).

Count 6

On or about December 2, 1999, within the Southern District of California, and elsewhere, defendant JEROME T. HECKENKAMP did intentionally intercept and endeavor to intercept an electronic communication; to wit, defendant JEROME T. HECKENKAMP installed an unauthorized computer code that was designed to intercept electronic communications containing computer user names and passwords on a Qualcomm computer known as "gondor" at Internet Protocol address 192.35.156.23; in violation of Title 18, United States Code, Section 2511(1)(a).

Count 7

On or before December 2, 1999, within the Southern District of California, and elsewhere, defendant JEROME T. HECKENKAMP did intentionally intercept and endeavor to intercept an electronic communication; to wit, defendant JEROME T. HECKENKAMP installed an unauthorized computer code that was designed to intercept electronic communications containing computer user names and passwords on a Qualcomm computer known as "lorien" at Internet Protocol address 192.35.156.156, and did thereby obtain computer user names and passwords; in violation of Title 18, United States Code, Section 2511(1)(a).

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Count 8

On or about December 2, 1999, within the Southern District of California, and elsewhere, defendant JEROME T. HECKENKAMP did intentionally intercept and endeavor to intercept an electronic communication; to wit, defendant JEROME T. HECKENKAMP installed an unauthorized computer code that was designed to intercept electronic communications containing computer user names and passwords on a Qualcomm computer known as "ithilien" at Internet Protocol address 192.35.156.192; in violation of Title 18, United States Code, Section 2511(1)(a).

Count 9

On or before December 3, 1999, within the Southern District of California, and elsewhere, defendant JEROME T. HECKENKAMP did intentionally intercept and endeavor to intercept an electronic communication; to wit, defendant JEROME T. HECKENKAMP installed an unauthorized computer code that was designed to intercept electronic communications containing computer user names and passwords on a computer known as "depeche" at Internet Protocol address 24.30.134.159, and did thereby obtain computer user names and passwords; in violation of Title 18, United States Code, Section 2511(1)(a).

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Count 10

On or before December 3, 1999, within the Southern District of California, and elsewhere, defendant JEROME T. HECKENKAMP did intentionally intercept and endeavor to intercept an electronic communication; to wit, defendant JEROME T. HECKENKAMP installed an unauthorized computer code that was designed to intercept electronic communications containing computer user names and passwords on a Qualcomm computer known as "xing" at Internet Protocol address 129.46.2.42, and did thereby obtain computer user names and passwords; in violation of Title 18, United States Code, Section 2511(1)(a).

DATED: September 5, 2002.

A TRUE BILL:

Mary Powell
Foreperson

CAROL C. LAM
United States Attorney

By: *Barbara Major*
BARBARA L. MAJOR
Assistant U.S. Attorney

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