

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

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NT

UNITED STATES OF AMERICA  
  
v.  
  
ANASTASIO N. LAOUTARIS

NO. 3:13-CR-00386-B  
  
(Supersedes Indictment of  
October 2, 2013)

SUPERSEDING INDICTMENT

The Grand Jury charges:

At all times material to this Indictment:

INTRODUCTION

1. Locke Lord Bissell & Liddell, L.L.P. ("Locke Lord") was an international law firm with offices in numerous cities in the United States and around the world, including Houston and Dallas. Computers in the various Locke Lord offices worldwide were connected by means of a Wide Area Network (WAN).
2. The Locke Lord office in Dallas was located at 2200 Ross Avenue, Suite 2200, Dallas, Texas, in the Northern District of Texas.
3. The Locke Lord WAN used Windows Active Directory, a directory service that provided a central location for network administration and security. A component of the Active Directory service resided on servers located in the various firm offices, including the Dallas office. These servers, referred to as "domain controllers," kept information on and controlled the users and computer resources assigned to that particular office

“domain.” The domain controllers in the Dallas office were designated DALGANDC01 and DALGNDC02. Among other functions, Active Directory authenticated a user in the “domain” signing on to the firm network, identified what other resources on the network the user was authorized to access, and identified the e-mail (Microsoft Exchange) server and the mailbox (e-mail account) on that server the user was authorized to access.

4. The defendant, Anastasio N. Laoutaris, was employed by Locke Lord as a Senior Systems Engineer from March 2006 through August 19, 2011. After his departure from the firm on August 19, 2011, Laoutaris was not authorized to access the Locke Lord network.

COUNT ONE

Computer Intrusion Causing Damage  
(18 U.S.C. § 1030(a)(5)(A) and (c)(4)(B)(i))

On or about December 1, 2011, in the Dallas Division of the Northern District of Texas and elsewhere, defendant Anastasio N. Laoutaris, did knowingly cause the transmission of a computer program, code, and command, and as a result of such conduct, intentionally caused damage without authorization to a protected computer used in and affecting interstate commerce and communication, that is, one or more computers owned by Locke Lord LLC that hosted the Active Directory service and data for Locke Lord employees assigned to the Dallas office, with such damage causing loss to Locke Lord during the one-year period beginning on or about December 1, 2011, including loss resulting from the course of conduct affecting protected computers, aggregating at least \$5,000 in value, and affecting 10 or more protected computers, during such one-year period.

In violation of (18 U.S.C. § 1030(a)(5)(A) and (c)(4)(B)(i)).

COUNT TWO

Computer Intrusion Causing Damage  
(18 U.S.C. § 1030(a)(5)(A) and (c)(4)(B)(i))

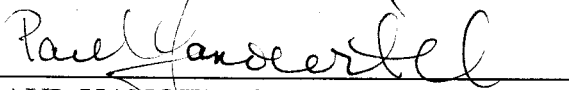
On or about December 5, 2011, in the Dallas Division of the Northern District of Texas and elsewhere, defendant Anastasio N. Laoutaris, did knowingly cause the transmission of a computer program, code, and command, and as a result of such conduct, intentionally caused damage without authorization to a protected computer used in and affecting interstate commerce and communication, that is, one or more computers owned by Locke Lord LLC that hosted the Active Directory service and data, and that operated as an Exchange electronic mail server for electronic mailboxes, of Locke Lord employees assigned to the Dallas office, with such damage causing loss to Locke Lord during the one-year period beginning on or about December 5, 2011, including loss resulting from the course of conduct affecting protected computers, aggregating at least \$5,000 in value, and affecting 10 or more protected computers, during such one-year period.

In violation of (18 U.S.C. § 1030(a)(5)(A) and (c)(4)(B)(i)).

A TRUE BILL:

  
FOREPERSON

JOHN R. PARKER  
ACTING UNITED STATES ATTORNEY

A handwritten signature in cursive script, appearing to read "Paul Yanowitch", is written over a horizontal line.

PAUL YANOWITCH

Assistant United States Attorney

Illinois State Bar No. 6188269

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THE UNITED STATES OF AMERICA

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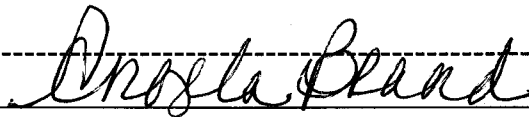
18 U.S.C. § 1030(a)(5)(A) and (c)(4)(B)(i)  
Computer Intrusion Causing Damage

2 Counts

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A true bill rendered

DALLAS



FOREPERSON

Filed in open court this 19 day of February, 2015

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Clerk

ON BOND since 10/08/2013



UNITED STATES DISTRICT/MAGISTRATE JUDGE

Criminal Case Pending: 3:13-CR-386-B