

KEVIN V. RYAN (CSBN 118321)
United States Attorney

ORIGINAL
FILED
04 JUN 29 PM 1:15
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

CR

No. 4 - 02187

SI

Plaintiff,

v.

LAURENT CHAVET,

Defendant.

VIOLATIONS: 18 U.S.C. §§ 1030(a)(4) & 1030(c)(3)(A) – Unauthorized Access of a Protected Computer with Intent to Defraud and Obtaining Something of Value; 18 U.S.C. §§ 1030(a)(5)(A)(ii), 1030(a)(5)(B)(i) & 1030(c)(4)(B) – Reckless Damage to a Protected Computer Causing Loss Aggregating At Least \$5,000

SAN FRANCISCO VENUE

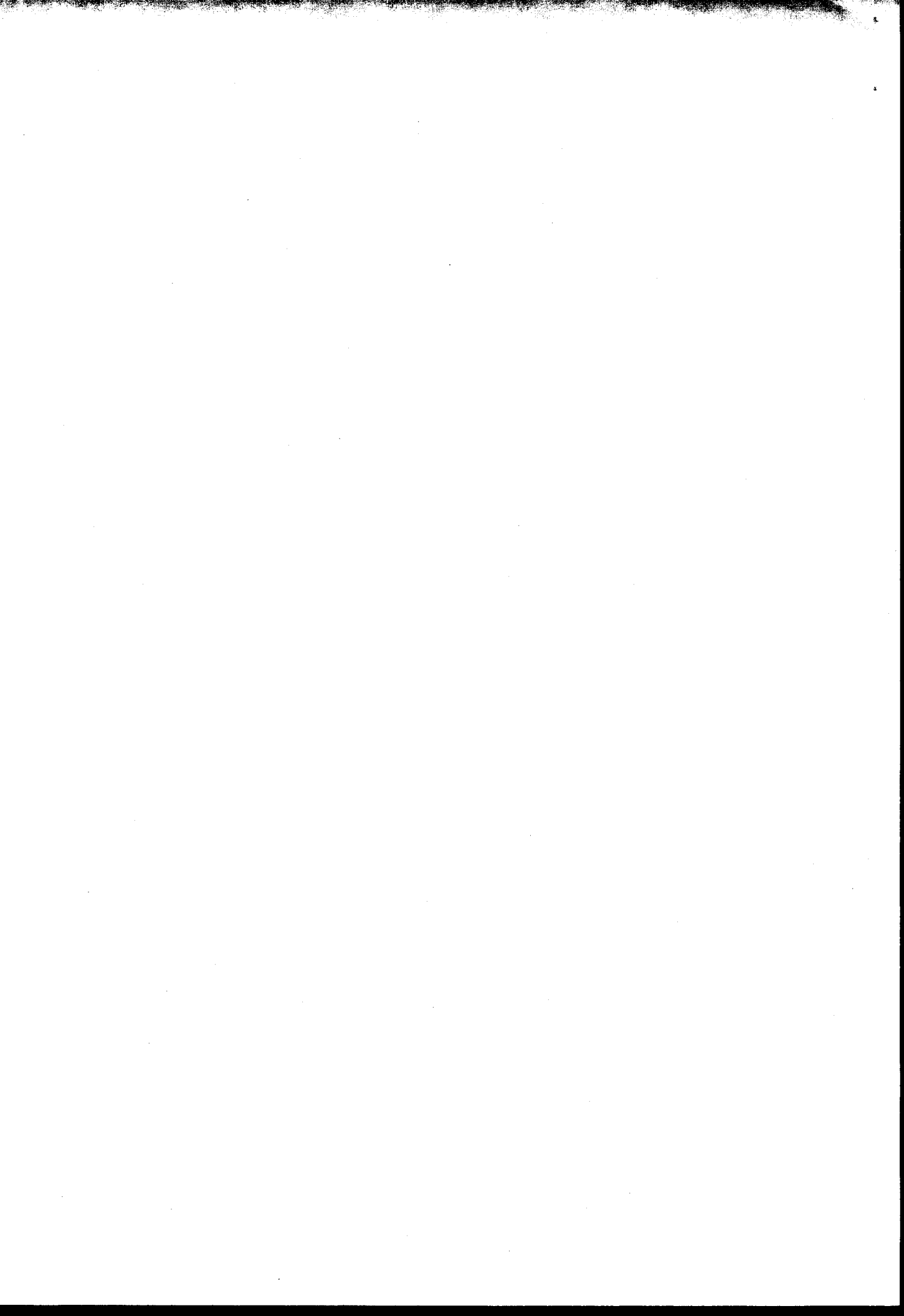
INDICTMENT

The Grand Jury charges:

At all times relevant to this Indictment:

1. The AltaVista Company (AltaVista) provided World Wide Web search capability to users of the Internet. The Internet was a worldwide network of computer systems operated by governmental entities, corporations, universities and other entities. The World Wide Web was a functionality of the Internet that allowed users of the Internet to share information. Information on the World Wide Web was displayed on web sites. Each web site was identified and accessed by means of a unique address known as a Uniform Resource Locator (URL).

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2. In order to provide World Wide Web search capability to its users, AltaVista maintained a bank of 32 computers, which it named Trek1 through Trek32, respectively. The Trek computers were programmed using source code developed by AltaVista to "scour" the World Wide Web and to store information on themselves about new or modified URLs.

3. AltaVista assigned usernames and confidential passwords to designated employees whose jobs required them to access Alta Vista's computers for legitimate employment purposes. Non-employees and former employees of AltaVista were not authorized to access Alta Vista's computers.

4. The defendant LAURENT CHAVET was employed by AltaVista as a computer engineer from approximately June 1999 to approximately February 2002.

COUNT ONE: (18 U.S.C. §§ 1030(a)(4) & 1030(c)(3)(A) – Unauthorized Access of a Protected Computer with Intent to Defraud and Obtaining Something of Value)

5. The facts alleged in paragraphs 1 through 4 are realleged and incorporated herein as if set forth in full.

6. On or about March 28, 2002, in the Northern District of California and elsewhere, the defendant

LAURENT CHAVET

did knowingly and with intent to defraud, access a protected computer belonging to AltaVista, to wit, the computer known as "repository2," without authorization and by exceeding authorized access, and by means of such conduct did further the intended fraud and obtain something of value, to wit, source code belonging to AltaVista.

All in violation of Title 18, United States Code, Sections 1030(a)(4) and 1030(c)(3)(A).

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COUNT TWO:

(18 U.S.C. §§ 1030(a)(5)(A)(ii), 1030(a)(5)(B)(i) & 1030(c)(4)(B) –
Reckless Damage to a Protected Computer Causing Loss Aggregating At
Least \$5,000)

7. The facts alleged in paragraphs 1 through 4 are realleged and incorporated herein
as if set forth in full.

8. On or about June 1, 2002, in the Northern District of California and elsewhere, the
defendant

LAURENT CHAVET

did intentionally access a protected computer without authorization and as a result of such
conduct recklessly caused damage, in that the defendant intentionally accessed the Trek
computers, and, as a result of such conduct, recklessly caused damage to those computers, which
damage caused losses aggregating at least \$5,000 in value during a one-year period.

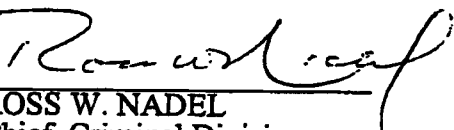
All in violation of Title 18, United States Code, Sections 1030(a)(5)(A)(ii), 1030(a)(5)(B)(i)
and 1030(c)(4)(B).

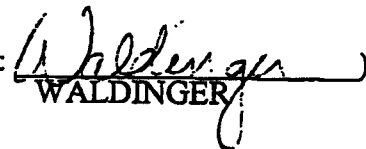
DATED:

A TRUE BILL.

FOREPERSON

KEVIN V. RYAN
United States Attorney


ROSS W. NADEL
Chief, Criminal Division

Approved as to form: 
WALDINGER

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DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

COMPLAINT INFORMATION INDICTMENT SUPERSEDING

OFFENSE CHARGED

18 U.S.C. §§ 1030(a)(4) & (A) - Unauthorized Access of a Computer
18 U.S.C. §§ 1030(a)(5)(A)(ii), (B)(i) & 1030(c)(4)(B) - Reckless Access to a Protected Computer

Petty
 Minor
 Misdemeanor
 Felony

Maximum term of imprisonment of 5 years, fine, 3 years of supervised release, and \$100 special assessment.

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

LAURENT CHAVET

DISTRICT COURT NUMBER

CR 04-0218

04 JUN 29 PM 1:18
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PROCEEDING

Complainant Agency, or Person (& Title, if any)

FEDERAL BUREAU OF INVESTIGATION

Person is awaiting trial in another Federal or State court, give name of court

Person/proceeding is transferred from another court per (circle one) FRCrP 20, 21 or 40. Show court

Is there a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y Defense

Prosecution relates to a pending case involving this same defendant

Proceedings or appearance(s) before U.S. Magistrate regarding defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE CASE NO.

Office of Person providing Information on this FORM

KEVIN V. RYAN

U.S. Att'y Other U.S. Agency

Asst. U.S. Att'y assigned)

KYLE F. WALDINGER

DEFENDANT

IS NOT IN CUSTODY

1) Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges

2) Is a Fugitive

3) Is on Bail or Release from (show District)

IS IN CUSTODY

4) On this charge

5) On another conviction

6) Awaiting trial on other charges

Fed'l State

If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

Month/Day/Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

Summons: SUMMONS NO PROCESS* WARRANT

Bail Amount: \$50,000

If Summons, complete following:

Arraignment Initial Appearance

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time:

Before Judge:

Comments:

