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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
EMILIO HERRERA,  
  
Defendant.

CR No **17CR00667-PSG**  
I N F O R M A T I O N

[18 U.S.C. § 1030(a)(2)(C),  
(c)(2)(B)(ii), (iii): Unauthorized  
Access to a Protected Computer to  
Obtain Information]

The United States Attorney charges:

[18 U.S.C. § 1030(a)(2)(C), (c)(2)(B)(ii), (iii)]

1. Apple Inc. ("Apple"), located in Cupertino, California, operates computers used by subscribers all over the world in interstate and foreign commerce and communications. One of the services that Apple provides to its customers is "iCloud," a "cloud" computing back-up system for subscriber data. Photographs and videos taken on Apple iPhones and other digital devices can be automatically backed up to the iCloud, making them accessible to users on the Internet.

2. Google, Inc. ("Google"), located in Mountain View, California, operates computers used by subscribers all over the world in interstate and foreign commerce and communications. One of the

1 services that Google provides to its customers is Gmail, an e-mail  
2 service.

3 3. Between on or about April 27, 2013, and August 31, 2014, in  
4 Los Angeles County, within the Central District of California, in  
5 Cook County, within the Northern District of Illinois, and elsewhere,  
6 defendant EMILIO HERRERA, intentionally and in furtherance of  
7 tortious acts, namely, the California State torts of Invasion of  
8 Privacy and Intrusion upon Seclusion, accessed without authorization  
9 and in excess of authorization Apple iCloud and Gmail accounts, which  
10 were maintained on protected computers as that term is defined in  
11 Title 18, United States Code, Section 1030(e)(2)(B), belonging to  
12 more than 550 victims, including male and female celebrities residing  
13 within the Central District of California, and thereby obtained

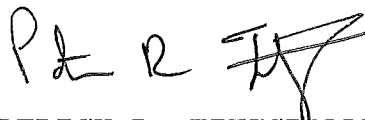
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1 iCloud backups, photographs, and other private information, the value  
2 of which exceeded \$5,000.

3 SANDRA R. BROWN  
4 Acting United States Attorney

5 

6 PATRICK R. FITZGERALD  
7 Assistant United States Attorney  
8 Chief, National Security Division

9 STEPHANIE S. CHRISTENSEN  
10 Assistant United States Attorney  
11 Chief, Cyber and Intellectual  
12 Property Crimes Section

13 RYAN WHITE  
14 Assistant United States Attorney  
15 Deputy Chief, Cyber & Intellectual  
16 Property Crimes Section

17 VICKI CHOU  
18 Assistant United States Attorney  
19 Cyber and Intellectual Property  
20 Crimes Section