

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR UNAUTHORIZED
ACCESS TO A PROTECTED COMPUTER AND RECKLESSLY
CAUSING DAMAGE AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

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CRIMINAL NO. 20 : 5 0

v.

*

SECTION: **SECT. L MAG 3**

CARLOS DAVID IRIAS

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VIOLATIONS: 18 U.S.C. § 1030(a)(5)(B)
18 U.S.C. § 1030(c)(4)(A)

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The United States Attorney charges that:

COUNT 1

On or about November 2, 2018, in the Eastern District of Louisiana and elsewhere, the defendant, **CARLOS DAVID IRIAS**, a resident of Cutler Bay, Florida, and formerly an employee of Company A, an entity headquartered in New Orleans, Louisiana, that developed and distributed specialized urological medical devices including scopes and laser fibers, intentionally accessed and attempted to access a protected computer without authorization, to wit: **IRIAS** accessed a secured cloud-based computer system Company A used to develop and store marketing-related materials, including email contact lists, marketing templates, and brochures, exported the contents to a server under his control, and deleted the information from the cloud-based system, and as a result of such conduct recklessly caused damage during a 1-year period from the defendant's course of conduct affecting a protected computer aggregating at least \$5,000 in value, namely impairing the integrity and availability of data and causing loss to Company A in the form of costs

Fee _____
Process _____
Dktd _____
CtRmDep _____
Doc. No _____

associated with responding to the offense, conducting a damage assessment, and restoring data, in violation of Title 18, United States Code, Sections 1030(a)(5)(B) and 1030(c)(4)(A).

NOTICE OF FORFEITURE

1. The allegations contained in Count 1 of this Bill of Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1030(a)(5)(B) and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Count 1, defendant, **CARLOS DAVID IRIAS**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense as a result of the violations of Title 18, United States Code, Section 1030(a)(5)(B).

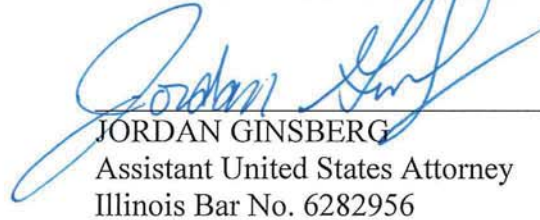
3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, sold to, or deposited with, a third person;
- 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 18, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property;

All in violation of Title 18, United States Code, Section 1030(a)(5)(B) and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

PETER G. STRASSER
UNITED STATES ATTORNEY



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New Orleans, Louisiana
May 6, 2020