

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	Case No.
)	
v.)	Violations: Title 18, United States
)	Code, Sections 1030(a)(5)(A), and
AARON LOCKNER)	1030(c)(4)(B)(i)
)	

The SPECIAL MAY 2021 GRAND JURY charges:

1. At times material to this indictment:
 - a. Company A was a health care provider that operated clinics in Illinois, including Oak Lawn, Illinois, and other states to meet with and treat patients. Company A's servers were stored in Lombard, Illinois.
 - b. Company B was an information technology company that had offices in Illinois and had an agreement with Company A to provide information security and technology services for Company A.
 - c. Defendant was employed by Company B and as part of his employment defendant worked on information security and technology for Company A. As part of his duties with Company B, defendant had information needed to access Company A's computer network.
 - d. Defendant sought and was denied an information technology employment position with Company A in approximately February 2018.
 - e. Defendant was terminated by Company B in approximately March 2018.

2. On or about April 16, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

AARON LOCKNER,

defendant herein, knowingly caused the transmission of a program, information, code, and command, and as a result of such conduct, intentionally caused damage without authorization to a protected computer, belonging to Company A, which caused loss to one or more persons during a one-year period from the defendant's course of conducting affecting protected computers aggregating at least \$5,000 in value during a one-year period, and also caused the modification or impairment, or potential modification or impairment, of the medical examination, diagnosis, treatment, or care of one or more individuals;

In violation of Title 18, United States Code, Sections 1030(a)(5)(A), (c)(4)(A)(i)(I), (c)(4)(A)(i)(II), and (c)(4)(B)(i).

FORFEITURE ALLEGATION

1. The allegations contained in this indictment are incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1030(i).

2. Upon conviction of the computer fraud offense in violation of Title 18, United States Code, Section 1030, set forth in this Indictment, defendant

AARON LOCKNER

shall forfeit to the United States of America:

a. pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1030(i), any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense; and

b. pursuant to Title 18, United States Code, Section 1030(i), any personal property that was used or intended to be used to commit or to facilitate the commission of such offense. The property to be forfeited includes, but is not limited to: A sum of money equal to the proceeds derived from or obtained as a result of such offense.

3. If any of the property described above, 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 or sold to, or deposited with, a third party;

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

divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b) and 1030(i).

All pursuant to Title 18, United States Code, Sections 982(a)(2)(B), 982(b) and 1030(i), and Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

Signed by Steven J. Dollear on behalf of the
UNITED STATES ATTORNEY