

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,)	
)	
v.)	Criminal No.
)	
DWAYNE F. CROSS,)	18 U.S.C. § 1030(a)(2)(B)
)	(Unauthorized Computer Access)
Defendant.)	
_____)	

INFORMATION

The United States of America informs the Court that

COUNT ONE: Unauthorized Computer Access
[18 U.S.C. § 1030(a)(2)(B)]

From in or about February 2003, and continuing through in or about June 2007, in the District of Columbia, the defendant, DWAYNE F. CROSS, intentionally accessed a computer without authorization and exceeded his authorized access to that computer, and thereby obtained information from a department and agency of the United States; that is, defendant CROSS, while a contract employee of the U.S. Department of State, accessed the federal agency's Passport Information Electronic Records System (PIERS) database without authorization and obtained information from the State Department pertaining to the imaged confidential passport application files of various celebrities, actors, musicians, comedians, models, politicians, athletes, members of the media, family members, friends, associates, and other individuals.

All in violation of Title 18, United States Code, Sections 1030(a)(2)(B) and (c)(2)(A) (Class A Misdemeanor).

Respectfully submitted,

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Chief
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By:



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