

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

UNITED STATES OF AMERICA,	)	
	)	
v.	)	No.
	)	
WILLIAM A. CELEY,	)	18 U.S.C. § 1030(a)(2)(B)
	)	(Unauthorized Computer Access)
Defendant.	)	
_____	)	

**INFORMATION**

The United States of America informs the Court that

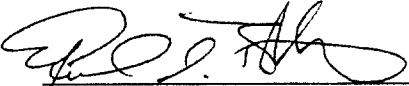
**COUNT ONE: Unauthorized Computer Access**  
[18 U.S.C. § 1030(a)(2)(B)]

From on or about June 22, 2004, and continuing though on or about July 15, 2004, in the District of Columbia, the defendant, WILLIAM A. CELEY, 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 CELEY, 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 and their families, actors, models, musicians, athletes, record producers, family members, a politician, and other individuals identified in the press.

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

Respectfully submitted,

WILLIAM M. WELCH II  
Chief  
Public Integrity Section

By:   
ARMANDO O. BONILLA  
Trial Attorney  
Public Integrity Section  
Criminal Division  
U.S. Department of Justice  
1400 New York Ave., NW – 12th Floor  
Washington, DC 20005  
T: 202-616-2983  
F: 202-514-3003  
email: [armando.bonilla@usdoj.gov](mailto:armando.bonilla@usdoj.gov)

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