

looking for another job. They had a general conversation over a cup of coffee. Ludwig maintains he has not received e-mail from Cheley or through anyone else from Cheley. (p. 141-2).]

@mid-August, 2001 - MS and Stanton, with the knowledge of McNichols, decide to immediately self-disclose NN's PFTA account situation to the IDOI, recognizing that an immediate remedy to the account imbalance had to be obtained.

8/15/01 – David Cheley terminated from NN. At the time of this termination he attempts to take the following Near North proprietary information:

- Near North Employee Benefits Enrollment Systems along with the system's hidden web administrative tools and specially-designed versions of this web-based application for Near North clients including Carlson, LTD, Xpedior and other clients; and custom designed Adobe Acrobat forms for Near North's entire Employee Benefits Technology Division;
- a complete copy of Near North's BenefitsAccents, (Near North's benefit communication web site service), which files included all of the "Best Practices" templates that were developed and refined by Near North personnel over a three-year period, including proprietary documents used to systematically collect data and client information;
- copies of the source code developed to generate automatic e-mails to clients on the status of enrollment elections. This event-specific, e-mail function is not widely available in the employee benefit enrollment system market;
- a copy of the customized source code written for enrollment in a universal life insurance product. This source code was custom written to show examples based on income and family status. This feature was not available from the insurance carrier and was specifically designed by Near North to increase enrollment;
- a complete listing of all Near North Employee Benefits Technology Division's deployed websites, their Active Server Page (ASP), HTML, Visual Basic (VB), JAVA codes and component objects, and the related external IP addresses;
- a copy of the specially-developed application for Near North National Title known as the Commercial Transaction Management System (CTMS) web-based application files;
- a copy of Near North's Settlement Planning Associates website and its HTML codes;
- a confidential Near North employee database including names, addresses, phone numbers, social security numbers, and salary information for Near North associates;
- a complete list of Near North's data network user IDs and passwords including confidential administrator accounts.

8/17/01 – Matt Walsh resigns from NN.

Saturday, August 18, 2001

08/18/01,22:07, Cheley hacks into RAS (Dial-In Server), 3129889608,0.6 minutes
08/18/01,22:08, Cheley hacks into RAS (Dial-In Server), 3129889608,2.3 minutes
08/18/01,22:19, Cheley hacks into RAS (Dial-In Server), 3129889608,6.3 minutes
08/18/01,22:30, Cheley hacks into RAS (Dial-In Server), 3129889608,1.7 minutes
08/18/01,22:37, Cheley hacks into RAS (Dial-In Server), 3129889608,76.1 minutes

Sunday, August 19, 2001

08/19/01,00:00, Cheley hacks into RAS (Dial-In Server), 3129889608,9.6 minutes
08/19/01,07:52, Cheley hacks into RAS (Dial-In Server), 3129889608,19.9 minutes
08/19/01,08:18, Cheley hacks into RAS (Dial-In Server), 3129889608,5.1 minutes