

STATE OF NEW YORK
COUNTY COURT

COUNTY OF ALBANY

THE PEOPLE OF THE STATE OF NEW YORK

-against-

INDICTMENT

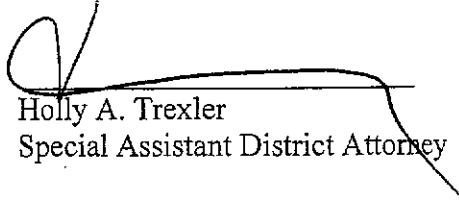
No. 34

TONI F. NATALIE a/k/a TONI F. FOLEY,
Defendant.

The Grand Jury of Albany County, New York, accuse the above named defendant of the commission of:

COUNT ONE:

Computer Trespass, in violation of Section 156.10 (2) of the Penal Law of the State of New York, a Class E Felony, in that the defendant on or about August 23, 2010, at approximately 6:13 pm, at 80 State Street, 7th Floor, in the City of Albany, County of Albany, State of New York, did knowingly use or caused to be used, or accessed a computer, computer service, or computer network without authorization and he or she thereby knowingly gained access to computer material to wit: at the aforesaid date, time and place, the defendant did, access a computer/computer network without authorization and knowingly gained access to the computer material of NXIVM from IP Address 173.86.169.21 by using the username and password assigned to Mary Jane Pino, a previous NXIAN student/coach, without authorization from persons provided with such authority to authorize access to the computer/computer network. Said defendant gained access to "Calendar/index.php" and "magreps/index.php" which contains a list of NXIVM training sessions and other events and associated data intended for NXIVM clients and members only as well as the Magnificence Report.


Holly A. Trexler
Special Assistant District Attorney

February 27, 2015

-continued on page two-

STATE OF NEW YORK
COUNTY COURT

COUNTY OF ALBANY

THE PEOPLE OF THE STATE OF NEW YORK

-against-


INDICTMENT
No.

TONI F. NATALIE a/k/a TONI F. FOLEY,
Defendant.

The Grand Jury of Albany County, New York, accuse the above named defendant of the commission of:

COUNT TWO:

Computer Trespass, in violation of Section 156.10 (2) of the Penal Law of the State of New York, a Class E Felony, in that the defendant on or about October 5, 2010, at approximately 3:19 pm, at 80 State Street, 7th Floor, in the City of Albany, County of Albany, State of New York, did knowingly use or caused to be used, or accessed a computer, computer service, or computer network without authorization and he or she thereby knowingly gained access to computer material to wit: at the aforesaid date, time and place, the defendant did, access a computer/computer network without authorization and knowingly gained access the computer material of NXIVM from IP Address 74.46.62.199 by using the username and password assigned to Mary Jane Pino, a previous NXIAN student/coach, without authorization from persons provided with such authority to authorize access to the computer/computer network. Said defendant gained access to the "Because" testimonial video at "GET/sales/because.m4v HTTP/1.1"


Holly A. Trexler
Special Assistant District Attorney

February 27, 2015

-continued on page three-

STATE OF NEW YORK
COUNTY COURT

COUNTY OF ALBANY

THE PEOPLE OF THE STATE OF NEW YORK

-against-


INDICTMENT
No.

TONI F. NATALIE a/k/a TONI F. FOLEY,
Defendant.

The Grand Jury of Albany County, New York, accuse the above named defendant of the commission of:

COUNT THREE:

Computer Trespass, in violation of Section 156.10 (2) of the Penal Law of the State of New York, a Class E Felony, in that the defendant on or about January 5, 2011, at approximately 12:10 pm, at 80 State Street, 7th Floor, in the City of Albany, County of Albany, State of New York, did knowingly use or caused to be used, or accessed a computer, computer service, or computer network without authorization and he or she thereby knowingly gained access to computer material to wit: at the aforesaid date, time and place, the defendant did, access a computer/computer network without authorization and knowingly gained access the computer material of NXIVM from IP address 74.46.60.59 by using the username and password assigned to Mary Jane Pino, a previous NXIAN student/coach, without authorization from persons provided with such authority to authorize access to the computer/computer network. Said defendant gained access to "Calendar/index.php" which contains a list of NXIVM training sessions and other events and associated data intended for NXIVM clients and members only.



Holly A. Trexler
Special Assistant District Attorney

February 27, 2015

-continued on page four-

STATE OF NEW YORK
COUNTY COURT

COUNTY OF ALBANY

THE PEOPLE OF THE STATE OF NEW YORK

-against-

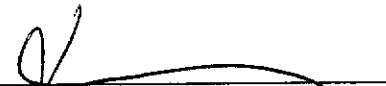
INDICTMENT
No.

TONI F. NATALIE a/k/a TONI F. FOLEY,
Defendant.

The Grand Jury of Albany County, New York, accuse the above named defendant of the commission of:

COUNT FOUR:

Computer Trespass, in violation of Section 156.10 (2) of the Penal Law of the State of New York, a Class E Felony, in that the defendant on or about March 15, 2011, at approximately 10:47 pm, at 80 State Street, 7th Floor, in the City of Albany, County of Albany, State of New York, did knowingly use or caused to be used, or accessed a computer, computer service, or computer network without authorization and he or she thereby knowingly gained access to computer material to wit: at the aforesaid date, time and place, the defendant did, access a computer/computer network without authorization and knowingly gained access the computer material of NXIVM from IP Address 74.47.145.18 by using the username and password assigned to Mary Jane Pino, a previous NXIAN student/coach, without authorization from persons provided with such authority to authorize access to the computer/computer network. Said defendant gained access to "Calendar/index.php" and "magreps/index.php" and "contact.php" which contains a list of NXIVM training sessions and other events and associated data intended for NXIVM clients and members only as well as the Magnificence Report.


Holly A. Trexler
Special Assistant District Attorney

February 27, 2015

-continued on page five-

STATE OF NEW YORK
COUNTY COURT

COUNTY OF ALBANY

THE PEOPLE OF THE STATE OF NEW YORK

-against-

BARBARA J. BOUCHEY,

Defendant.

INDICTMENT

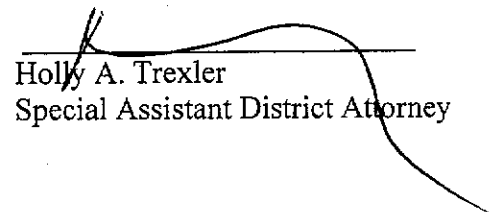
No. 31-7323

Index No. DA-172-15

The Grand Jury of Albany County, New York, accuse the above named defendant of the commission of:

COUNT FIVE:

Computer Trespass, in violation of Section 156.10 (2) of the Penal Law of the State of New York, a Class E Felony, in that the defendant on or about January 8, 2014, at approximately 2:05 am, at 80 State Street, 7th Floor, in the City of Albany, County of Albany, State of New York, did knowingly use or caused to be used, or accessed a computer, computer service, or computer network without authorization and he or she thereby knowingly gained access to computer material to wit: at the aforesaid date, time and place, the defendant did, access a computer/computer network without authorization and knowingly gained access the computer material of NXIVM from IP Address 24.203.50 by using the username and password assigned to Svetlana Kotlin, a previous NXIAN student, without authorization from persons provided with such authority to authorize access to the computer/computer network. Said defendant gained access to "calendar1/index.php" and the Coach Tree at "GET/comm/tools/1coachtree1rpt.php HTTP/1.1" which contains a list of upcoming NXIVM training sessions and other events and associated data intended for NXIVM clients and members only as well as a list of coaches.


Holly A. Trexler
Special Assistant District Attorney

February 27, 2015

-continued on page six-

STATE OF NEW YORK

COUNTY COURT

COUNTY OF ALBANY

THE PEOPLE OF THE STATE OF NEW YORK

-against-

INDICTMENT
No.

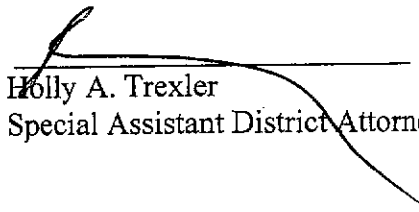
JOSEPH J. O'HARA,

Defendant.

The Grand Jury of Albany County, New York, accuse the above named defendant of the commission of:

COUNT SIX:

Computer Trespass, in violation of Section 156.10 (2) of the Penal Law of the State of New York, a Class E Felony, in that the defendant on or about March 16, 2011, at approximately 12:56 pm, at 80 State Street, 7th Floor, in the City of Albany, County of Albany, State of New York, did knowingly use or caused to be used, or accessed a computer, computer service, or computer network without authorization and he or she thereby knowingly gained access to computer material to wit: at the aforesaid date, time and place, the defendant did, access a computer/computer network without authorization and knowingly gained access the computer material of NXIVM from IP Address 96.236.44.171 by using the username and password assigned to Mary Jane Pino, a previous NXIAN student/coach, without authorization from persons provided with such authority to authorize access to the computer/computer network. Said defendant gained access to "magreps/1index.php," the Magnificence Report.


Holly A. Trexler
Special Assistant District Attorney

February 27, 2015

-continued on page seven-

STATE OF NEW YORK
COUNTY COURT

COUNTY OF ALBANY

THE PEOPLE OF THE STATE OF NEW YORK

-against-

INDICTMENT
No.

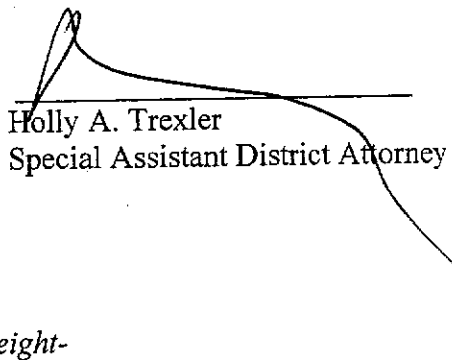
JOSEPH J. O'HARA,

Defendant.

The Grand Jury of Albany County, New York, accuse the above named defendant of the commission of:

COUNT SEVEN:

Computer Trespass, in violation of Section 156.10 (2) of the Penal Law of the State of New York, a Class E Felony, in that the defendant on or about March 16, 2011, at approximately 2:55 pm, at 80 State Street, 7th Floor, in the City of Albany, County of Albany, State of New York, did knowingly use or caused to be used, or accessed a computer, computer service, or computer network without authorization and he or she thereby knowingly gained access to computer material to wit: at the aforesaid date, time and place, the defendant did, access a computer/computer network without authorization and knowingly gained access the computer material of NXIVM from IP Address 96.236.44.171 by using the username and password assigned to Mary Jane Pino, a previous NXIAN student/coach, without authorization from persons provided with such authority to authorize access to the computer/computer network. Said defendant gained access to "Calendar/index.php" contains a list of upcoming NXIVM training sessions and other events and associated data intended for NXIVM clients and members only.


Holly A. Trexler
Special Assistant District Attorney

February 27, 2015

-continued on page eight-

**STATE OF NEW YORK
COUNTY COURT**

COUNTY OF ALBANY

PEOPLE OF THE STATE OF NEW YORK

-against-

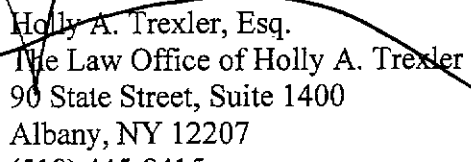
**ANNOUNCEMENT OF
READINESS**

**TONI NATALIE A/K/A TONI FOLEY,
BARBARA BOUCHEY, JOSEPH O'HARA
Defendants.**

PLEASE TAKE NOTICE, that an Albany County Grand Jury returned a four count indictment charging the above-named defendants with Computer Trespass. This indictment was filed with the Clerk's Office on February 27, 2015. The Clerk's Office assigned the case Indictment No. 34. The People are ready for trial on each and every count contained therein.

DATED: February 27, 2015

Yours, etc,


Holly A. Trexler, Esq.
The Law Office of Holly A. Trexler
90 State Street, Suite 1400
Albany, NY 12207
(518) 445-8415