

Attorney-Client Privilege Communication
September 1, 2003

Timeline (Civil and Criminal through August 2003)

2/13/01 (date of bonus checks)- There have been statement by Segal in connection with the extortion of early bonus payments in 2001 by Ludwig on behalf of himself, Walsh, and Berry. After Segal consented, within the same day Wlash, Berry, and Ludwig had a meeting. MS surmises that Ludwig got cold feet and told them that he was going to return his check. Walsh and Berry asked to see him and indicated that MS should not tell Ludwig that they talked to MS. They gave some double talk about Ludwig stating that they had thicker skins, but Ludwig was not of the same character. Ludwig subsequently came to my office and threw the check back on MS's desk, indicating that he didn't want to be part of such a plan or words close to extortion. In Ludwig's deposition he partially refers to the incident but does no become specific. Subsequent to that deposition, by accident in a conversations with Harney I was told that Ludwig went to payroll a short period of time after the check was on my desk. There he told Janine Pinter that he lost his bonus check in his coat at a restaurant. He requested her to issue a new check.

6/7/01 – Jeff Ludwig terminated from NN.

7/24/01 - Walsh and Berry, via e-mail, discussed contacting U.S. Attorney designate Patrick Fitzgerald in New York to talk to him, apparently about investigating Mike Segal and the PFTA problem with the Near North Insurance Brokerage account.

7/25/01 – Cheley e-mail to his wife indicates that he will receive an employment contract from DHS within a week.

8/2/01 – Lori Shaw resigns from NN.

8/3/01- Dana Berry resigns from NN.

8/8/01 – Tim Gallagher resigns from NN. At the time of his resignation Gallagher misappropriates copies of NN proprietary information:

- CRM/ Vantive Reports containing Near North's Competitive Intelligence Broker records and Sales Representative Lead Information
- Near North's "VIP files" from Marie Heindricks, manager of the Personal Lines Department at Near North. The VIP files are related to Near North's highest profile accounts. (These documents are shown to Segal when he was arrested on 1/26/02. This document also shows up later as part of the F.B.I. investigation and provides the basis for news stories in @November, 2002 used as a the basis on John Kass columns in the Chicago Tribune.)

@8/8/01 – Cheley meets with Ludwig for 2 ½ hours. [In his deposition Ludwig states that he has had two or three contacts with Cheley since Ludwig left NN. Ludwig was aware at the time of these contacts that NN had litigation pending against Bachrach and USI. (p. 15). Ludwig said he "had two exchanges with Cheley in early September, early to mid-September, and it might have gone into October." (p. 74). Ludwig had three conversations with Cheley after Ludwig was terminated. "Three times that I recall. Once on the street on North Michigan Avenue and two separate occasions somewhere in the area of September or October of 2001." Ludwig "bumped into Cheley by happenstance" at the end of the week that Cheley was terminated. Cheley was

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

8/20/01 – Cheley begins working at Kemper on behalf of new employer DHS & Associates. (On April 24, 2002, Cheley will tell Kroll investigators that he started accessing Near North’s secure website immediately after he started working for Kemper as a contractor and accessed Near North’s network at least twice a day since beginning at Kemper.)

8/20/01 - Segal sends an e-mail to Stanton and others indicating that Near North was contacting attorney Zack Stamp (“Stamp”) to have Stamp represent Near North in a self-reporting procedure before the Illinois Department of Insurance.

8/21/01 - Segal e-mailed Stanton and others twice, discussing Near North’s retention of Stamp to represent Near North, the facts supporting Near North’s presentation and the plans for making the self-reporting presentation to the Illinois Department of Insurance.

8/23/01- Near North self-reported to the Illinois Department of Insurance, pursuant to 215 ILCS 5/155.5, certain accounting problems, and the actions taken by Near North to correct the problems and clarify Near North’s reporting obligations.

Between 8/20 & 8/29/01 – On information and belief, while illegally accessing Near North’s network, Cheley accessed Mike Segal’s e-mail account and attorney-client privilege communications being stored there. This account contained e-mail regarding Near North’s self-reporting to the Illinois Department of Insurance (IDOI) and the company’s retention of Zack Stamp to represent it before the IDOI. This belief is founded on Cheley’s admissions on April 24, 2002. (See entry for 8/18/01).

8/29/01 - Walsh contacted Near North’s CFO McNichols and stated, “I heard you guys have everything covered with the State, but the Feds won’t be so easy.” Near North’s first public acknowledgement of its contact with the Illinois Department of Insurance did not occur until October 29, 2001.

8/29/01 – Joe Messina sends MS an e-mail supporting MS and critical of Walsh and Berry. (On September 20, 2001, Walsh calls Messina and verbally abuses and threatens Messina for his derogatory comments about Walsh. Messina immediately determines that someone has been intercepting his e-mails to MS.)

9/01 to 1/20/02 – NN begins challenging the conduct of Walsh, Berry and Gallagher related to their departure from NN. Negotiations continue until January 20, 2002 between Rakowski and Novoselsky for NN and Brandfonbrenner for Gallagher, Walsh and Berry. Brandfonbrenner asserts that his clients are not bound by their agreements with NN due to NN’s violations of the PFTA regulations.

9/4/01 – Ludwig begins at USI.

9/08/01 8:50 AM Walsh calls Calling Card (888-271-5734) for 2 minutes
9/08/01 9:33 AM Walsh calls Calling Card for 3 minutes
9/08/01 10:16 AM Walsh calls Calling Card for 2 minutes
9/08/01 10:31 AM Walsh calls Calling Card for 20 minutes
9/08/01 10:52 AM Walsh calls Calling Card for 3 minutes
9/08/01 11:15 AM Walsh calls Calling Card for 2 minutes
9/08/01 11:56 AM Walsh calls Calling Card for 6 minutes
9/08/01 12:05 PM Walsh calls Marisa-Homme Thielen at home (703-698-4433) for 1 minute

9/08/01 12:58 PM Walsh calls Calling Card for 2 minutes
 9/08/01 1:02 PM Walsh calls Calling Card for 2 minutes

 9/09/01 11:44 AM Walsh calls Calling Card for 11 minutes
 9/09/01 1:51 PM Walsh calls Calling Card for 1 minute
 9/09/01 1:53 PM Walsh calls Calling Card for 3 minutes
 9/09/01 2:14 PM Walsh calls Calling Card for 11 minutes
 9/09/01 3:50 PM Walsh calls Calling Card for 24 minutes

 9/10/01 8:06 AM Walsh calls Calling Card for 68 minutes
 9/10/01 9:20 AM Walsh calls Calling Card for 3 minutes
 9/10/01 12:09 PM Walsh calls Calling Card for 2 minutes
 9/10/01 4:47 PM Walsh calls Calling Card for 2 minutes
 9/10/01 6:51 PM Walsh calls Laurence Marx at cell phone (312-720-0500) for 1 minute
 9/10/01 6:53 PM Walsh calls Laurence Marx at cell phone for 1 minute
 9/10/01 7:21 PM Walsh calls Joe Messina at DMI office (312-559-9340) for 1 minute
 9/10/01 7:44 PM Walsh calls Calling Card for 1 minute
 9/10/01 7:44 PM Walsh calls Calling Card for 2 minutes
 9/10/01 9:05 PM Walsh calls Calling Card for 1 minute
 9/10/01 9:07 PM Walsh calls Calling Card for 4 minutes
 9/10/01 9:53 PM Walsh calls Calling Card for 3 minutes
 9/10/01 10:07 PM Walsh calls Calling Card for 3 minutes

 9/11/01 4:54 AM Walsh calls Calling Card for 36 minutes
 9/11/01 5:30 AM Walsh calls Calling Card for 8 minutes
 9/11/01 7:31 AM Walsh calls Calling Card for 4 minutes
 9/11/01 7:36 AM Walsh calls Calling Card for 7 minutes
 9/11/01 8:01 AM Walsh calls Calling Card for 2 minutes
 9/11/01 12:30 PM Walsh calls Marisa-Homme Thielen at cell (703-801-5310) for 1 minute
 9/11/01 1:21 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
 9/11/01 1:24 PM Walsh calls Marisa-Homme Thielen at work (703-312-4303) for 1 minute

 9/12/01 7:48 AM Walsh calls Marisa-Homme Thielen at cell for 1 minute
 9/12/01 12:13 PM Walsh calls Marisa-Homme Thielen at cell for 3 minutes
 9/12/01 5:09 PM Walsh calls Calling Card for 2 minutes
 9/12/01 5:15 PM Walsh calls Calling Card for 21 minutes
 9/12/01 8:23 PM Walsh calls Calling Card for 1 minute
 9/12/01 8:23 PM Walsh calls Calling Card for 3 minutes

 9/13/01 7:52 AM Walsh calls Calling Card for 53 minutes
 9/13/01 8:45 AM Walsh calls Calling Card for 17 minutes
 9/13/01 9:02 AM Walsh calls Marisa-Homme Thielen at cell for 1 minute
 9/13/01 4:10 PM Walsh calls Marisa-Homme Thielen at cell for 24 minutes
 9/13/01 4:36 PM Walsh calls Marisa-Homme Thielen at cell for 16 minutes
 9/13/01 4:53 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
 9/13/01 4:54 PM Walsh calls Marisa-Homme Thielen at cell for 7 minutes
 9/13/01 5:53 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes

9/13/01 5:55 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/13/01 6:00 PM Walsh calls Marisa-Homme Thielen at cell for 11 minutes
9/13/01 7:11 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes

9/14/01 8:03 AM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/14/01 8:14 AM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/14/01 5:52 PM Walsh calls Marisa-Homme Thielen at cell for 3 minutes
9/14/01 5:56 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/14/01 6:59 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes

9/15/01 7:46 AM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/15/01 9:06 AM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/15/01 11:15 AM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/15/01 11:47 AM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/15/01 4:24 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/15/01 6:51 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute

9/16/01 7:30 AM Walsh calls Marisa-Homme Thielen at cell for 7 minutes
9/16/01 7:36 AM Walsh calls Marisa-Homme Thielen at cell for 6 minutes
9/16/01 7:43 AM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/16/01 7:44 AM Walsh calls Marisa-Homme Thielen at home (703-698-4433)
for 19 minutes
9/16/01 9:48 AM Walsh calls Marisa-Homme Thielen at cell for 3 minutes
9/16/01 10:46 AM Walsh calls Marisa-Homme Thielen at cell for 4 minutes
9/16/01 12:16 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/16/01 2:14 PM Walsh calls Marisa-Homme Thielen at cell for 11 minutes
9/16/01 2:27 PM Walsh calls Marisa-Homme Thielen at cell for 18 minutes

9/17/01 7:28 AM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/17/01 5:33 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/17/01 5:51 PM Walsh calls Marisa-Homme Thielen at cell for 40 minutes

9/18/01 5:58 AM Walsh calls Trish LaPerch at office for 1 minute
9/18/01 7:26 AM Walsh calls Marisa-Homme Thielen at cell for 20 minutes
9/18/01 7:46 AM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/18/01 1:49 PM Walsh calls Marisa-Homme Thielen at cell for 3 minutes
9/18/01 4:11 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/18/01 4:37 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/18/01 5:05 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/18/01 5:57 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/18/01 7:16 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/18/01 8:22 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/19/01 8:08 AM Walsh calls Marisa-Homme Thielen at cell for 3 minutes
9/19/01 8:30 AM Walsh calls Russell DeLuca at DMI office (312-559-9341) for
2 minutes
9/19/01 9:05 AM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/19/01 3:56 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/19/01 4:42 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/19/01 8:38 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute

9/20/01 4:42 AM Walsh calls Marisa-Homme Thielen at cell for 4 minutes

9/20/01 6:54 AM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/20/01 7:16 AM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/20/01 3:51 PM Walsh calls Russell DeLuca at DMI office for 1 minute
9/20/01 3:55 PM Walsh calls Russell DeLuca at DMI office for 2 minutes
9/20/01 4:04 PM Walsh calls the Near North toll free number (800-859-6719) for 1 minute
9/20/01 4:08 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/20/01 5:19 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/20/01 5:21 PM Walsh calls Marisa-Homme Thielen at cell for 9 minutes
9/20/01 5:40 PM Walsh calls Marisa-Homme Thielen at cell for 4 minutes
9/20/01 5:56 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/20/01 5:58 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/20/01 6:46 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/21/01 7:20 AM Walsh calls Marisa-Homme Thielen at cell for 21 minutes

9/21/01 12:56PM Cheley (dcheley@hotmail.com) email to Walsh
9/21/01 1:23PM Walsh email to Cheley
9/21/01 1:57PM Cheley email to Walsh
9/21/01 2:20PM Walsh email to Cheley

9/21/01 2:44PM Cheley (from his cell phone) calls Walsh's AON office (312-565-6260) for 13 minutes

9/21/01 3:42PM Cheley email to Walsh
9/21/01 3:56PM Chrisanne Blankenship-Billings emails to Walsh about Cheley
9/21/01 4:04PM Walsh emails Chrisanne Blankenship-Billings' email Walsh calls Berry

9/21/01 4:36 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/21/01 5:16 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute

9/22/01 9:44 AM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/22/01 12:06 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/22/01 3:43 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/22/01 5:43 PM Walsh calls Marisa-Homme Thielen at cell for 3 minutes

9/23/01 10:16 AM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/23/01 10:43 AM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/23/01 11:11 AM Walsh calls Marisa-Homme Thielen at cell for 3 minutes
9/23/01 12:13 PM Walsh calls Marisa-Homme Thielen at cell for 3 minutes
9/23/01 4:11 PM Walsh calls Marisa-Homme Thielen at cell for 13 minutes
9/23/01 5:07 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/23/01 5:43 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/23/01 6:00 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes

9/24/01 7:43 AM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/24/01 7:55 AM Walsh calls 312-342-7600 for 2 minutes (Most likely Tim Gallagher's cell phone)
9/24/01 7:59 AM Walsh calls 312-342-7600 for 2 minutes
9/24/01 5:57 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/24/01 7:46 PM Walsh calls Marisa-Homme Thielen at cell for 7 minutes
9/24/01 7:53 PM Walsh calls Marisa-Homme Thielen at home for 22 minutes

9/25/01 7:10 AM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/25/01 8:08 AM Walsh calls Marisa-Homme Thielen at cell for 19 minutes
9/25/01 5:02 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/25/01 5:33 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/25/01 6:38 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/25/01 8:12 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute

9/26/01 6:14 AM Walsh calls Marisa-Homme Thielen at cell for 2 minutes

9/26/01 9:53AM Walsh sends email to Cheley

9/26/01 9:53AM Walsh forwards his email to Cheley Walsh calls both Berry and Gallagher

9/26/01 11:26AM Cheley responds to Walsh's email

9/26/01 7:06 PM Walsh calls 312-342-7500 for 1 minute
9/26/01 7:06 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/26/01 7:11 PM Walsh calls 312-342-7500 for 1 minute

9/27/01 5:37 AM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/27/01 4:04 PM Walsh calls Calling Card #2 (800-331-5336) for 7 minutes
9/27/01 5:19 PM Walsh calls Calling Card #2 for 11 minutes
9/27/01 7:07 PM Walsh calls Calling Card #2 for 2 minutes
9/27/01 8:05 PM Walsh calls Calling Card #2 for 3 minutes

9/28/01 8:43 AM Walsh calls Marisa-Homme Thielen at cell for 1 minute
9/28/01 5:14 PM Walsh calls Calling Card #2 for 2 minutes
9/28/01 6:44 PM Walsh calls Calling Card #2 for 33 minutes
9/28/01 7:23 PM Walsh calls Calling Card #2 for 3 minutes

9/29/01 9:10 AM Walsh calls Calling Card #2 for 3 minutes
9/29/01 9:32 AM Walsh calls Calling Card #2 for 5 minutes
9/29/01 9:50 AM Walsh calls Calling Card #2 for 1 minute
9/29/01 11:25 AM Walsh calls Calling Card #2 for 2 minutes
9/29/01 11:50 AM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/29/01 3:08 PM Walsh calls Calling Card #2 for 12 minutes
9/29/01 5:19 PM Walsh calls Calling Card #2 for 10 minutes
9/29/01 5:31 PM Walsh calls Calling Card #2 for 11 minutes

9/30/01 11:48 AM Walsh calls Calling Card #2 for 2 minutes
9/30/01 11:50 AM Walsh calls Marisa-Homme Thielen at home for 38 minutes
9/30/01 1:09 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
9/30/01 2:59 PM Walsh calls Calling Card #2 for 3 minutes
9/30/01 4:23 PM Walsh calls Calling Card #2 for 10 minutes
9/30/01 4:38 PM Walsh calls Calling Card #2 for 2 minutes

@ 10/01 – S.A. Patrick Murphy is contacted by Matt Walsh who received an unsolicited e-mail from an unknown third-party that contained confidential Near North information. Murphy maintains that the unidentified sender sent the e-mail to a large number of recipients, not just Walsh. Murphy told Walsh to talk to his attorney, Brandfonbrenner, about it. Murphy could not recall if Walsh described the contents of the e-mail, or if Walsh sent a copy of the e-mail to

Murphy. In September 2002, both Walsh and Brandfonbrenner tell Murphy that they no longer have copies of the correspondence. Murphy thought that in October, 2001, Walsh received one or two such e-mails containing NN confidential information.

10/1/01 10:39 AM Walsh calls Eric Brandfonbrenner at direct office line of Grippo & Eldon (312-704-7773) for 4 minutes

10/01/01 11:03AM Cheley (Lisa Chen) email to Walsh
10/01/01 1:07PM Lisa Chen email to Walsh
10/01/01 2:15PM Walsh forwards Lisa Chen email to Berry
10/01/01 2:18PM Walsh forwards Lisa Chen email to Berry
10/01/01 3:46PM Walsh forwards 9/21/01 Dave Cheley email to Berry

10/2/01 7:53 AM Walsh calls Calling Card for 1 minute
10/2/01 7:54 AM Walsh calls Calling Card for 63 minutes
10/2/01 8:57 AM Walsh calls Calling Card for 3 minutes

10/02/01 9:13AM Lisa Chen email to Walsh
10/02/01 9:17AM Walsh email to Lisa Chen
10/02/01 9:27AM Lisa Chen email to Walsh
10/02/01 9:56AM Lisa Chen email to Walsh
10/02/01 9:59AM Walsh forwards Lisa Chen email to Berry
10/02/01 10:02AM Walsh email to Lisa Chen
10/02/01 10:03AM Walsh forwards Dave Cheley and Lisa Chen emails to Berry
10/02/01 10:16AM Lisa Chen email to Walsh
10/02/01 10:22AM Walsh forwards Lisa Chen email to Berry
10/02/01 12:07AM Walsh email to Lisa Chen
10/02/01 12:32AM Lisa Chen email to Walsh

10/2/01 3:10 PM Walsh calls Calling Card for 3 minutes
10/2/01 3:13 PM Walsh calls Calling Card for 1 minute
10/2/01 6:06 PM Walsh calls Calling Card for 6 minutes
10/2/01 8:44 PM Walsh calls Calling Card for 1 minute
10/2/01 8:44 PM Walsh calls Calling Card for 6 minutes
10/2/01 8:50 PM Walsh calls Calling Card for 3 minutes

10/3/01 5:51 AM Walsh calls Calling Card for 2 minutes

10/03/01 9:50AM Lisa Chen email to Walsh

10/3/01 10:13 AM Walsh calls Calling Card for 2 minutes

10/03/01 10:27AM Walsh forwards Lisa Chen email to Berry
10/03/01 11:37AM Lisa Chen email to Walsh

10/3/01 11:38 AM Walsh calls Calling Card for 2 minutes
10/3/01 4:56 PM Walsh calls Calling Card for 2 minutes
10/3/01 5:37 PM Walsh calls Calling Card for 2 minutes
10/3/01 5:57 PM Walsh calls 917-613-3305 for 4 minutes

10/4/01 7:45 AM Walsh calls Calling Card for 5 minutes

10/4/01 7:50 AM Walsh calls Marisa-Homme Thielen at home for 7 minutes
10/4/01 8:02 AM Walsh calls Calling Card for 5 minutes

10/04/01 10:20AM Lisa Chen email to Walsh
10/04/01 11:47AM Walsh forwards Lisa Chen email to Berry

10/4/01 4:09 PM Walsh calls Calling Card for 2 minutes
10/4/01 4:17 PM Walsh calls Calling Card for 20 minutes
10/4/01 4:44 PM Walsh calls Calling Card for 11 minutes
10/4/01 4:54 PM Walsh calls Calling Card for 7 minutes
10/4/01 5:01 PM Walsh calls Calling Card for 14 minutes
10/4/01 6:37 PM Walsh calls Calling Card for 1 minute
10/4/01 6:37 PM Walsh calls Calling Card for 1 minute
10/4/01 6:38 PM Walsh calls Calling Card for 1 minute
10/4/01 6:39 PM Walsh calls Calling Card for 1 minute

10/5/01 5:33 AM Walsh calls Trish LaPerch at office for 1 minute
10/5/01 1:39 PM Walsh calls Calling Card for 1 minute
10/5/01 1:47 PM Walsh calls FBI Main Number (312-431-1333) for 1 minute
10/5/01 4:48 PM Walsh calls Calling Card for 3 minutes
10/5/01 5:52 PM Walsh calls Calling Card for 1 minute
10/5/01 6:02 PM Walsh calls Calling Card for 4 minutes
10/5/01 6:07 PM Walsh calls Calling Card for 1 minute
10/5/01 6:08 PM Walsh calls Calling Card for 7 minutes
10/5/01 6:16 PM Walsh calls Calling Card for 1 minute
10/5/01 6:17 PM Walsh calls Calling Card for 18 minutes
10/5/01 6:36 PM Walsh calls Calling Card for 1 minute
10/5/01 6:38 PM Walsh calls Calling Card for 17 minutes

10/6/01 7:19 AM Walsh calls Calling Card for 3 minutes
10/6/01 9:10 AM Walsh calls Calling Card for 2 minutes
10/6/01 10:39 AM Walsh calls Calling Card for 4 minutes
10/6/01 10:54 AM Walsh calls Calling Card for 2 minutes
10/6/01 10:56 AM Walsh calls Marisa-Homme Thielen at home for 5 minutes
10/6/01 11:28 AM Walsh calls Calling Card for 2 minutes
10/6/01 11:30 AM Walsh calls Marisa-Homme Thielen at home for 24 minutes
10/6/01 11:57 AM Walsh calls Marisa-Homme Thielen at home for 29 minutes
10/6/01 4:20 PM Walsh calls Calling Card for 2 minutes

10/7/01 12:21 PM Walsh calls Calling Card for 2 minutes
10/7/01 3:28 PM Walsh calls Calling Card for 35 minutes
10/7/01 4:04 PM Walsh calls Calling Card for 2 minutes
10/7/01 4:16 PM Walsh calls Calling Card for 5 minutes
10/7/01 5:24 PM Walsh calls Calling Card for 2 minutes
10/7/01 6:59 PM Walsh calls Calling Card for 2 minutes

10/8/01 7:49 AM Walsh calls Calling Card for 30 minutes
10/8/01 9:46 AM Walsh calls Calling Card for 3 minutes

10/8/01 1:36AM Lisa Chen email to Walsh
10/8/01 1:45AM Walsh forwards Lisa Chen email to Berry

10/8/01 4:30 PM Walsh calls Calling Card for 33 minutes
10/8/01 5:04 PM Walsh calls Calling Card for 2 minutes
10/8/01 5:12 PM Walsh calls 847-322-2340 cell phone for 1 minute
10/8/01 5:12 PM Walsh calls Calling Card for 7 minutes

Tuesday, October 2, 2001

10/02/01,21:59, Cheley hacks into RAS (Dial-In Server), 3129889608,5 minutes
10/02/01,22:15, Cheley hacks into RAS (Dial-In Server), 3129889608,25.1 minutes

Matt Walsh's cell phone does not reflect any usage between the dates of 10/9/01 Walsh calls 10/18/01

10/19/01 – MS learns that Walsh had been soliciting the Standard Parking account in violation of his Confidentiality/Non-Solicitation Agreement with NN.

10/19/01 4:42 PM Walsh calls Marisa-Homme Thielen at home for 1 minute
10/19/01 4:43 PM Walsh calls Marisa-Homme Thielen at home for 1 minute
10/19/01 4:48 PM Walsh calls Marisa-Homme Thielen at home for 4 minutes
10/19/01 4:52 PM Walsh calls Marisa-Homme Thielen at home for 1 minute
10/19/01 4:54 PM Walsh calls Michael Wolf at APCOA Standard Parking (312-274-2070) for 1 minute
10/19/01 4:55 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
10/19/01 4:56 PM Walsh calls Marisa-Homme Thielen at home for 78 minutes
10/19/01 6:16 PM Walsh calls Michael Wolf (847-835-1748) for 2 minutes
10/19/01 6:19 PM Walsh calls 847-322-2340 cell phone for 3 minutes
10/19/01 7:25 PM Walsh calls Marisa-Homme Thielen at home for 10 minutes
10/20/01 10:23 AM Walsh calls 847-322-2340 cell phone for 1 minute
10/20/01 10:24 AM Walsh calls 847-322-2340 cell phone for 1 minute
10/20/01 10:25 AM Walsh calls 847-322-2340 cell phone for 1 minute
10/20/01 10:46 AM Walsh calls Calling Card for 2 minutes
10/20/01 10:59 AM Walsh calls Calling Card for 1 minute
10/20/01 11:42 AM Walsh calls Calling Card for 1 minute
10/20/01 11:45 AM Walsh calls Calling Card for 1 minute
10/20/01 11:46 AM Walsh calls Calling Card for 1 minute
10/20/01 11:47 AM Walsh calls Calling Card for 16 minutes

10/21/01 8:58 AM Walsh calls Calling Card for 2 minutes
10/21/01 9:55 AM Walsh calls Calling Card for 5 minutes
10/21/01 10:01 AM Walsh calls Calling Card for 2 minutes
10/21/01 12:17 PM Walsh calls Calling Card for 1 minute
10/21/01 12:17 PM Walsh calls Calling Card for 1 minute
10/21/01 12:18 PM Walsh calls Calling Card for 1 minute
10/21/01 6:20 PM Walsh calls Calling Card for 1 minute
10/21/01 6:22 PM Walsh calls Calling Card for 1 minute
10/21/01 6:36 PM Walsh calls Calling Card for 1 minute
10/21/01 6:37 PM Walsh calls Calling Card for 1 minute

10/22/01 6:35 AM Walsh calls Calling Card for 1 minute
10/22/01 6:39 AM Walsh calls Calling Card for 2 minute
10/22/01 6:53 AM Walsh calls Calling Card for 1 minute

10/22/01 7:03 AM Walsh calls Calling Card for 1 minute
10/22/01 7:04 AM Walsh calls Calling Card for 1 minute
10/22/01 7:07 AM Walsh calls Calling Card for 1 minute
10/22/01 7:08 AM Walsh calls Calling Card for 1 minute

10/24/01 – Gallagher actively soliciting NAR account through the use of Ron Meyer, of AON as a “straw man” – in violation of his Confidentiality/Non-Solicitation Agreement with NN.

10/24/01 11:53 AM Walsh calls Michael Wolf at APCOA Standard Parking (312-274-2070) for 1 minute
10/24/01 1:07 PM Walsh calls Calling Card for 2 minutes
10/24/01 2:29 PM Walsh calls Calling Card for 2 minutes
10/24/01 2:43 PM Walsh calls 312-342-7500 for 1 minute
10/24/01 2:47 PM Walsh calls Calling Card for 1 minute
10/24/01 2:48 PM Walsh calls 411 for 2 minutes
Automatically connected to 312-280-5600 (main Near North number)
10/24/01 2:52 PM Walsh calls Trish LaPerch at office for 1 minute
10/24/01 3:42 PM Walsh calls Calling Card for 32 minutes
10/24/01 4:31 PM Walsh calls Calling Card for 2 minutes
10/24/01 5:16 PM Walsh calls Calling Card for 2 minutes
10/24/01 5:21 PM Walsh calls 847-322-2340 cell phone for 3 minutes

10/25/01 8:06 AM Walsh calls Calling Card for 1 minute
10/25/01 8:32 AM Walsh calls Calling Card for 6 minutes
10/25/01 8:41 AM Walsh calls Calling Card for 6 minutes
*** 10/25/01 4:40 PM Walsh calls Michael Wolf at APCOA Standard Parking (312-274-2070) for 1 minute
10/25/01 5:16 PM Walsh calls Calling Card for 2 minutes
*** 10/25/01 5:20 PM Walsh calls Michael Wolf at APCOA Standard Parking (312-274-2070) for 5 minutes
10/25/01 5:33 PM Walsh calls 847-322-2340 cell phone for 1 minute
*** 10/25/01 5:38 PM Walsh calls 312-274-2198 (APCOA Standard Parking) for 2 minutes
10/25/01 5:39 PM Walsh calls Calling Card for 2 minutes
10/25/01 6:57 PM Walsh calls Calling Card for 2 minutes
10/25/01 8:10 PM Walsh calls Calling Card for 2 minutes

10/26/01 - McNichols illegally taped a meeting with Segal, Stanton and others regarding Near North’s self-reporting to the IDOI. This tape recording was turned over to Silets in March 2002, but does not have the F.B.I. lead in to the tape. (NN doesn’t learn about tape until March 2002). There is no evidence that a taint team was used to insure that the investigation wasn’t tainted by the McNichols tape.

10/26/01 1:51 PM Walsh calls Trish LaPerch at home (212-769-1439) for 2 minutes
10/26/01 1:54 PM Walsh calls Calling Card for 2 minutes
10/26/01 3:11 PM Walsh calls 312-274-2070 for 1 minute (APCOA Standard Parking)
10/26/01 3:38 PM Walsh calls 411 for 3 minutes
Automatically connected to 312-431-1333 (FBI Main Number)

10/26/01 3:46 PM Walsh calls 312-342-7600 for 1 minute (Possibly Tim Gallagher's cell phone)
 10/26/01 3:48 PM Walsh calls Michael Wolf at APCOA Standard Parking (312-274-2070) for 1 minute
 10/26/01 3:53 PM Walsh calls Calling Card #2 for 34 minutes
 10/26/01 4:26 PM Walsh calls Marisa-Homme Thielen at home for 5 minutes
 10/26/01 4:37 PM Walsh calls 312-925-0359 for 1 minute
 10/26/01 4:44 PM Walsh calls 312-342-7600 for 1 minute (Possibly Tim Gallagher's cell phone)
 10/26/01 5:39 PM Walsh calls Marisa-Homme Thielen at cell for 1 minute
 10/26/01 6:28 PM Walsh calls Marisa-Homme Thielen at home for 14 minutes
 10/26/01 6:50 PM Walsh calls Marisa-Homme Thielen at home for 1 minute
 10/27/01 6:58 AM Walsh calls Marisa-Homme Thielen at cell for 3 minutes
 10/27/01 7:19 AM Walsh calls Marisa-Homme Thielen at cell for 6 minutes
 10/27/01 9:22 AM Walsh calls Marisa-Homme Thielen at cell for 13 minutes
 10/27/01 11:32 AM Walsh calls Marisa-Homme Thielen at cell for 20 minutes
 10/27/01 11:52 AM Walsh calls Marisa-Homme Thielen at home for 25 minutes
 10/27/01 2:01 PM Walsh calls Marisa-Homme Thielen at home for 15 minutes
 10/27/01 4:02 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
 10/27/01 5:47 PM Walsh calls Marisa-Homme Thielen at cell for 16 minutes

 10/28/01 10:18 AM Walsh calls Marisa-Homme Thielen at cell for 1 minute
 10/28/01 10:19 AM Walsh calls Marisa-Homme Thielen at home for 24 minutes
 10/28/01 5:05 PM Walsh calls Marisa-Homme Thielen at cell for 3 minutes

10/29/01 – Crain's Chicago article by Greg Hinz, "Regulator reviewing Near North." Article discloses NN's self-disclosure letter to IDOI in August 2001. The article discusses an October 19, 2001 letter from Director Shapo that indicates that NN's self-disclosure may prompt a fuller examination of the company and possible administrative action.

10/29/01 – MS learns that Walsh and Gallagher had been soliciting the Jupiter account in violation of their Confidentiality/Non-Solicitation Agreement with NN.

10/29/01 5:51 AM Walsh calls Marisa-Homme Thielen at cell for 1 minute
 10/29/01 5:56 AM Walsh calls 312-342-7600 for 1 minute
 10/29/01 9:28 AM Walsh calls 914-707-8768 for 0 minutes (Sony?)
 10/29/01 9:56 AM Walsh calls 917-370-9132 for 0 minutes (Sony?)
 10/29/01 10:11 AM Walsh calls 914-707-9288 for 0 minutes (Sony?)
 10/29/01 10:18 AM Walsh calls Marisa-Homme Thielen at cell for 1 minute
 10/29/01 10:19 AM Walsh calls FBI Main Number (312-431-1333) for 4 minutes
 10/29/01 10:21 AM Walsh calls 914-707-9423 for 0 minutes (Sony???)
 10/29/01 10:25 AM Walsh calls Eric Brandfonbrenner at direct office for 2 minutes
 10/29/01 10:26 AM Walsh calls John Kass assistant at Chicago Tribune (312-222-3400) for 1 minute
 10/29/01 10:27 AM Walsh calls John Kass direct line at Chicago Tribune (312-222-4214) for 1 minute
 10/29/01 10:31 AM Walsh calls 312-245-1022 for 5 minutes
 10/29/01 10:36 AM Walsh calls 312-245-1022 for 2 minutes
 10/29/01 10:38 AM Walsh calls 914-245-3290 for 1 minute

10/29/01 10:42 AM Walsh calls Bellagio Hotel in Las Vegas (702-693-7444) for 3 minutes (Possible Trish LaPerch conversation)
10/29/01 10:42 AM Walsh calls Bellagio Hotel in Las Vegas (702-693-7111) for 3 minutes (Possible Trish LaPerch conversation)
10/29/01 10:44 AM Walsh calls 917-370-9123 for 0 minutes (Sony???)
10/29/01 10:57 AM Walsh calls cell phone 312-543-6163 for 3 minutes
10/29/01 11:26 AM Walsh calls 917-370-9129 for 0 minutes (Sony???)
10/29/01 11:31 AM Walsh calls cell phone 847-274-2494 for 1 minute
10/29/01 11:41 AM Walsh calls Michael Wolf at APCOA Standard Parking (312-274-2070) for 1 minute
10/29/01 12:10 PM Walsh calls FBI Main Number (312-431-1333) for 2 minutes
10/29/01 12:13 PM Walsh calls FBI Main Number for 2 minutes

10/29/01 12:35PM Lisa Chen email to Walsh

10/29/01 2:53 PM Walsh calls Michael Schwartz at APCOA Standard Parking (312-274-2080) for 3 minutes
10/29/01 2:58 PM Walsh calls FBI Main Number for 2 minutes
10/29/01 3:14 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes
10/29/01 3:58 PM Walsh calls 914-707-9218 for 0 minutes (Sony???)
10/29/01 4:09 PM Walsh calls APCOA Standard Parking (312-274-2198) for 9 minutes
10/29/01 4:37 PM Walsh calls APCOA Standard Parking (312-274-2198) for 1 minute
10/29/01 4:38 PM Walsh calls Michael Schwartz at APCOA Standard Parking for 1 minute
10/29/01 4:39 PM Walsh calls Michael Schwartz at APCOA Standard Parking for 2 minutes
10/29/01 9:09 PM Walsh calls Marisa-Homme Thielen at cell for 2 minutes

10/30/01 – Cheley illegally accesses NN e-mail.

10/30/01 10:19 AM Walsh calls FBI Main Number for 2 minutes
10/30/01 10:26 AM Walsh calls FBI Main Number for 1 minute
10/30/01 10:28 AM Walsh calls Marisa-Homme Thielen at cell for 1 minute

10/31/01 – Cheley illegally accesses NN e-mail.

Wed Oct 31 15:53:00 2001 36456cc0f44c908286256af60050d9ba[1]

10/31/01 4:21 PM Walsh calls Calling Card for 2 minutes
10/31/01 4:23 PM Walsh calls APCOA Standard Parking (312-274-2198) for 6 minutes
10/31/01 4:34 PM Walsh calls Michael Schwartz at APCOA Standard Parking for 1 minute
10/31/01 4:39 PM Walsh calls APCOA Standard Parking (312-274-2198) for 1 minute
10/31/01 5:09 PM Walsh calls Calling Card for 3 minutes
10/31/01 7:33 AM Walsh calls Michael Schwartz at APCOA Standard Parking for 3 minutes
10/31/01 7:39 AM Walsh calls Calling Card for 35 minutes
10/31/01 8:14 AM Walsh calls Calling Card for 6 minutes

10/31/01 8:19 AM Walsh calls Calling Card for 21 minutes

11/1/01 6:28 AM Walsh calls Calling Card for 2 minutes

11/01/01 – Cheley illegally accesses NN e-mail three different times. Attorney-Client Privilege communications contained in accessed materials.

Cheley Hacking of Near North systems

Thu Nov 1 11:38:56 2001	9012b0c5e894e7a686256af7004fcd02[1]
Thu Nov 1 11:39:20 2001	9e504990828ca08786256af70005e314[1]
Thu Nov 1 11:40:52 2001	fc9ac4b7744a4bbe86256af700515f5b[1]
Thu Nov 1 11:42:24 2001	0db048ce7635781e86256af70051e296[1]
Thu Nov 1 14:34:08 2001	ac71d6a9e56ee77588256af7005ab97f[1]
Thu Nov 1 14:35:36 2001	d2286fe03e021ffb85256af70060e1ec[1]
Thu Nov 1 14:36:10 2001	814e18cc962313bf86256af7005e411d[1]1
Thu Nov 1 14:55:50 2001	0692276ead15fd2986256af7006d4e47[1]
Thu Nov 1 14:57:40 2001	40a7c31452d7d8cd86256af70054d32d[1]

11/1/01 4:09 PM Walsh calls Calling Card for 2 minutes

11/1/01 4:23 PM Walsh calls Calling Card for 1 minute

Cheley continues hacking of Near North systems

Thu Nov 1 16:32:18 2001	85492bbe660533c288256af7006bca3a[1]
Thu Nov 1 16:32:48 2001	a0350fae3fa7c94888256af70070726c[1]
Thu Nov 1 16:33:54 2001	4ce6cd52a8f3e67886256af700654787[1]
Thu Nov 1 16:37:06 2001	814e18cc962313bf86256af7005e411d[1]

11/1/01 4:42 PM Walsh calls Calling Card for 18 minutes

11/1/01 6:10 PM Walsh calls Calling Card for 7 minutes

11/1/01 6:30 PM Walsh calls Pat Murphy FBI Cell Phone (312-907-8833) for 9 minutes

11/2/01 1:01 PM Walsh calls Calling Card for 3 minutes

11/02/01 – Cheley illegally accesses NN e-mail and scans MS e-mail logs. Attorney-Client Privilege communications contained in accessed materials.

Fri Nov 2 13:36:58 2001	NotesMail[1]2
Fri Nov 2 13:37:04 2001	msegal[1]1.nsf
Fri Nov 2 13:37:10 2001	d381f63594305e4d86256a61004770df[1]11
Fri Nov 2 13:37:58 2001	a9b47ebe3563df0d86256af80063848c[1]
Fri Nov 2 13:38:46 2001	4fcc8b5a33b658fb86256af800601ed5[1]
Fri Nov 2 13:40:00 2001	e5ddaa9f5375fbbf86256af8005fe62e[1]
Fri Nov 2 13:40:14 2001	b48e0ea9b1a2e4a786256af8005ca212[1]
Fri Nov 2 13:40:34 2001	6df6baf5983a5d0386256af8005bd038[1]
Fri Nov 2 13:40:54 2001	1feedbb51bdaf63386256af800579d5f[1]
Fri Nov 2 13:41:08 2001	1feedbb51bdaf63386256af800579d5f[2]
Fri Nov 2 13:41:28 2001	0c67cb8787a3efdd86256af800557e3f[1]
Fri Nov 2 13:41:34 2001	3de64cad98b7b66386256af800548168[1]
Fri Nov 2 13:42:18 2001	(\$Sent)[1]8
Fri Nov 2 13:42:24 2001	f686f991db5320b486256af8005edded[1]
Fri Nov 2 13:43:28 2001	c38dc76e21645f7686256af8005cf48c[1]
Fri Nov 2 13:43:36 2001	20c88b1f4f8396d786256af8005cad69[1]

Fri Nov 2 13:43:44 2001 60d536e206268a8386256af8005706d7[1]
 Fri Nov 2 13:43:48 2001 080fe96e45cdffd886256af80054eae0[1]
 Fri Nov 2 13:43:58 2001 280e5d418cc3963c86256af800529dcb[1]

11/2/01 3:13 PM Walsh calls Calling Card for 2 minutes
 11/2/01 3:14 PM Walsh calls FBI Main Number for 4 minutes

11/3/01 1:09 PM Walsh calls Calling Card for 2 minutes

11/4/01 12:57 PM Walsh calls Calling Card for 5 minutes
 11/4/01 3:46 PM Walsh calls Calling Card for 3 minutes
 11/4/01 4:02 PM Walsh calls Calling Card for 7 minutes

11/5/01 5:53 PM Walsh calls Fireman's Fund Insurance Company (415-899-2000) for 15 minutes
 11/5/01 6:11 PM Walsh calls Calling Card for 3 minutes

11/6/01 7:22 AM Walsh calls Calling Card for 2 minutes

11/06/01 – Cheley illegally accesses NN e-mail and scans MS e-mail logs. Attorney-Client Privilege communications contained in accessed materials.

Tue Nov 6 09:13:58 2001 886375b1e6eba42b88256afb0061590f[1]
 Tue Nov 6 09:14:44 2001 886375b1e6eba42b88256afb0061590f[1]1
 Tue Nov 6 09:15:14 2001 9b2298dbc6b3f1c186256afb0076f597[1]
 Tue Nov 6 09:16:14 2001 581461eea9d7ba6e86256afb006df849[1]
 Tue Nov 6 09:16:22 2001 b17b0fce27c734cf86256afb00779526[1]
Tue Nov 6 09:17:04 2001 5f7e1905d0de2ae986256afb007df5d8[1]
Tue Nov 6 09:17:22 2001 68339fb142ec2b1386256afb007bfe4b[1]
 Tue Nov 6 09:17:32 2001 71119ca427aa72f386256afb00774107[1]
 Tue Nov 6 09:17:48 2001 47f3451d7ebace2386256afb0064b696[1]
 Tue Nov 6 09:17:56 2001 b2ec111732c466e786256afb005633fb[1]
 Tue Nov 6 09:18:42 2001 1f39fa1353026e8c86256afb007680fb[1]
Tue Nov 6 09:19:34 2001 ae4654593a1e75e886256af4004a0ced[1]
 Tue Nov 6 09:20:08 2001 a579f10724c69fe48625676f006b78b0[1]
 Tue Nov 6 09:20:32 2001 e45413254f639cd686256afb00530397[1]
 Tue Nov 6 09:20:46 2001 2acb9466e418438786256afb00765715[1]
Tue Nov 6 09:21:00 2001 868612003c0eea6f86256afc004c935a[1]

11/6/01 4:03 PM Walsh calls Calling Card for 1 minute
 11/6/01 10:08 PM Walsh calls Calling Card for 2 minutes

11/7/01 7:06 AM Walsh calls Calling Card for 2 minutes
 11/7/01 7:21 AM Walsh calls Calling Card for 1 minute
 11/7/01 7:25 AM Walsh calls Calling Card for 13 minutes
 11/7/01 7:41 AM Walsh calls Calling Card for 2 minutes
 11/7/01 12:41 AM Walsh calls Calling Card for 2 minutes
 11/7/01 3:40 PM Walsh calls Calling Card for 1 minute
 11/7/01 3:41 PM Walsh calls Calling Card for 2 minutes
 11/7/01 4:02 PM Walsh calls Calling Card for 1 minute
 11/7/01 4:49 PM Walsh calls Attorney David Mendelsohn (312-368-7272) for 2 minutes

11/8/01 7:29 AM Walsh calls Calling Card for 2 minutes
 11/8/01 1:04 PM Walsh calls Calling Card for 1 minute
 11/8/01 1:05 PM Walsh calls Calling Card for 1 minute
 11/8/01 1:06 PM Walsh calls Calling Card for 1 minute
 11/8/01 5:10 PM Walsh calls Calling Card for 28 minutes
 11/8/01 5:37 PM Walsh calls Calling Card for 30 minutes

11/8/01 - Cheley illegally accesses NN e-mail Near North systems

Thu Nov 8 18:31:54 2001 6a315864080dcdab86256afd005d00d4[1]
 Thu Nov 8 18:33:34 2001 7c8c9d59d166c77c86256afc0051e812[1]
 Thu Nov 8 18:34:18 2001 5e3548b30bf3d16586256af80051965f[1]
 Thu Nov 8 18:36:36 2001 83f096cb8abde8af86256afe00810b0e[1]

11/8/01 6:37 PM Walsh calls Calling Card for 5 minutes

11/8/01 - Cheley continues illegal access to Near North systems

Thu Nov 8 18:37:02 2001 24f01e909700f92b88256afe0078119f[1]
 Thu Nov 8 18:37:20 2001 3056d6bc88eed0b886256afe00796950[1]
Thu Nov 8 18:39:38 2001 4d669f6f1f1075f586256afe00541a7e[1]
 Thu Nov 8 18:40:14 2001 e0cc6c9022102e4686256afd007fae41[1]
 Thu Nov 8 18:40:16 2001 e0cc6c9022102e4686256afd007fae41[1]1
 Thu Nov 8 18:40:22 2001 940f54bc96bec8be88256afd007cfa12[1]
 Thu Nov 8 18:41:52 2001 b1bbb7b567f2077786256afc005caae3[1]
 Thu Nov 8 18:42:00 2001 46dbb11b4a9c7c8486256afc00561e32[1]
 Thu Nov 8 18:42:22 2001 d381f63594305e4d86256a61004770df[2]4
 Thu Nov 8 18:42:26 2001 c912fbd0b5f1c4ce86256afc00552145[1]
 Thu Nov 8 18:42:42 2001 a86a240c4444979986256afb006e2247[1]
 Thu Nov 8 18:45:02 2001 a2fba84c47429b3f86256afd007f74df[1]
 Thu Nov 8 18:45:18 2001 dc680d92497f5f8486256afd007759cb[1]
 Thu Nov 8 18:47:06 2001 (\$Sent)[1]9
 Thu Nov 8 18:47:06 2001 (\$Sent)[1]4
 Thu Nov 8 18:47:20 2001 72bc7d25d6beb2dc86256afc0060c4a4[1]
 Thu Nov 8 18:47:30 2001 87ee04aa756e183086256afc0058d990[1]
 Thu Nov 8 18:47:46 2001 efe799fd41cbe3f886256afc005bd5a5[1]
 Thu Nov 8 18:48:00 2001 c38c3910c46c72b086256afc0058c16f[1]
 Thu Nov 8 18:48:16 2001 (\$Sent)[1]3
 Thu Nov 8 18:50:44 2001 (\$Sent)[2]1
 Thu Nov 8 18:51:12 2001 0dc1c5fb2a87cb9d86256af800742ad4[1]
 Thu Nov 8 18:51:36 2001 3bdf08f6c21516786256af80052cc4c[1]

11/9/01 11:46 AM Walsh calls Calling Card for 3 minutes

***11/9/01 2:40 PM Walsh calls 914-697-2424 for 1 minute

11/9/01 4:19 PM Walsh calls Calling Card for 21 minutes
 11/9/01 4:40 PM Walsh calls Calling Card for 19 minutes
 11/9/01 5:05 PM Walsh calls Calling Card for 4 minutes
 11/9/01 5:14 PM Walsh calls Calling Card for 1 minute

11/10/01 9:41 AM Walsh calls Calling Card for 2 minutes

11/10/01 11:20 AM Walsh calls Calling Card for 2 minutes

11/10/01 11:26 AM Walsh calls Calling Card for 2 minutes

11/10/01 2:46 PM Walsh calls Calling Card for 3 minutes

11/11/01 3:27 PM Walsh calls Calling Card for 2 minutes

11/11/01 4:39 PM Walsh calls John Brennan (847-299-0532) for 2 minutes

11/12/01 7:36 AM Walsh calls Calling Card for 5 minutes

11/12/01 – Cheley illegally accesses NN e-mail. Attorney-Client Privilege communications contained in accessed materials.

Mon Nov 12 12:33:34 2001	46ef8028e466a2b986256b02005c8827[1]
Mon Nov 12 12:33:48 2001	2308f0f460244bb386256b02005bd090[1]
Mon Nov 12 12:34:06 2001	471b888f41711a3986256b020053f20f[1]
Mon Nov 12 12:34:42 2001	d7f4500ba0fca30c86256b00007b2bd6[1]
Mon Nov 12 12:35:06 2001	eec6097a29b3183a86256b000067eb52[1]
Mon Nov 12 12:35:36 2001	03b2fdd6d7eefbbd86256b02005c3f4e[1]
Mon Nov 12 12:35:50 2001	964c4aa7316ead7886256b02005eb12b[1]
Mon Nov 12 12:36:18 2001	642411bc8a1dc3c586256b02005e6e08[1]
Mon Nov 12 12:36:36 2001	2a1e44a368128cae86256b02005e388a[1]
Mon Nov 12 12:36:58 2001	cf0cc21d434f738b86256b02005ceece[1]
Mon Nov 12 12:37:06 2001	6d53e67db2598bd886256b02005c6aff[1]
Mon Nov 12 12:37:18 2001	1d5a233cb335b87e86256b020052f272[1]
Mon Nov 12 12:38:10 2001	3d75b97bea1a862f86256b020050a1d9[1]
Mon Nov 12 12:38:24 2001	7a019dba5427625686256aff006ec97c[1]
Mon Nov 12 12:38:34 2001	0460e84065c8099186256b0200507eff[1]

11/12/01 4:43 PM Walsh calls 847-322-2340 cell phone for 2 minutes

11/12/01 4:50 PM Walsh calls Calling Card for 40 minutes

11/12/01 6:37 PM Walsh calls Calling Card for 7 minutes

11/12/01 8:11 PM Walsh calls Marisa-Homme Thielen at home for 6 minutes

*** 11/13/01 3:57 PM Walsh calls 914-697-2424 for 4 minutes

*** 11/13/01 4:03 PM Walsh calls 914-697-2424 for 2 minutes

11/13/01 4:05 PM Walsh calls Calling Card for 3 minutes

11/13/01 4:27 PM Walsh calls Calling Card for 16 minutes

11/14/01 5:16 AM Walsh calls Calling Card for 2 minutes

11/14/01 5:17 AM Walsh calls Calling Card for 2 minutes

*** 11/14/01 6:06 AM Walsh calls 914-697-2424 for 1 minute

*** 11/14/01 6:07 AM Walsh calls 914-697-2424 for 2 minutes

*** 11/14/01 9:17 AM Walsh calls 914-707-8882 for 0 minutes

11/14/01 – Cheley illegally accesses NN e-mail twice and then uses his Yahoo e-mail account. Attorney-Client Privilege communications contained in accessed materials.

Wed Nov 14 13:36:32 2001	db047e3bcb98058c86256b0400538dd4[1]
Wed Nov 14 13:38:18 2001	bbfca898dd44610786256b040066d500[1]
Wed Nov 14 13:38:28 2001	a1d416201cebd1886256b04006081c2[1]
Wed Nov 14 13:38:50 2001	b8a4172b09febacd86256b040055cee7[1]
Wed Nov 14 13:39:16 2001	55ca35ad73f775e086256b0400541cd5[1]
Wed Nov 14 13:39:24 2001	5307e0d5e9ae046286256b040055a957[1]
Wed Nov 14 13:39:44 2001	b1ad0efe96b441f986256b040051405b[1]
Wed Nov 14 13:39:58 2001	7f71ef60296c559286256b04000e83ab[1]
Wed Nov 14 13:40:10 2001	3b834acc590f600286256b040055057c[1]

Wed Nov 14 13:40:38 2001	9d5a3028bbba9cd886256b040053f945[1]
Wed Nov 14 13:40:54 2001	e382f9a23dc81fc386256b040051cc56[1]
Wed Nov 14 13:41:10 2001	30a343a831df9ff086256b040051b4af[1]
Wed Nov 14 13:41:16 2001	c605e6ed709a4d1b86256b040051b439[1]
Wed Nov 14 13:41:24 2001	5c5458f11b8b6a7f86256b0400641905[1]1
Wed Nov 14 13:41:30 2001	5c5458f11b8b6a7f86256b0400641905[1]
Wed Nov 14 13:41:42 2001	fb26ea6798cd86a86256b040052dc9b[1]
Wed Nov 14 13:42:30 2001	fb7c8478d8d0e57a86256b020062bee6[1]

*** 11/14/01 4:42 PM Walsh calls 917-370-9184 for 0 minutes
 11/14/01 5:07 PM Walsh calls Calling Card for 2 minutes
 *** 11/14/01 5:12 PM Walsh calls 917-370-9125 for 0 minutes
 11/14/01 5:43 PM Walsh calls Calling Card for 2 minutes
 *** 11/14/01 9:06 PM Walsh calls 914-707-9464 for 0 minutes

11/15/01 8:51 AM Walsh calls 917-370-9227 for 0 minutes
 11/15/01 9:29 AM Walsh calls 917-370-9314 for 0 minutes
 11/15/01 9:37 AM Walsh calls 917-370-9368 for 0 minutes
 11/15/01 9:49 AM Walsh calls 917-370-9219 for 0 minutes
 11/15/01 12:44 PM Walsh calls 847-322-2340 cell phone for 1 minute
 11/15/01 12:56 PM Walsh calls Michael Wolf at APCOA Standard Parking (312-274-2070) for 3 minutes
 11/15/01 1:29 PM Walsh calls 914-707-9826 for 0 minutes
 11/15/01 2:03 PM Walsh calls Calling Card for 3 minutes
 11/15/01 2:24 PM Walsh calls 312-342-7600 for 1 minute
 11/15/01 2:27 PM Walsh calls 914-707-9618 for 0 minutes
 11/15/01 2:28 PM Walsh calls 914-707-9695 for 0 minutes
 11/15/01 3:29 PM Walsh calls 914-707-9779 for 0 minutes
 11/15/01 3:35 PM Walsh calls 914-707-9646 for 0 minutes
 11/15/01 3:49 PM Walsh calls 914-707-9639 for 0 minutes
 11/15/01 6:43 PM Walsh calls Calling Card for 2 minutes
 11/15/01 6:44 PM Walsh calls 312-342-7600 for 1 minute
 11/15/01 6:47 PM Walsh calls 847-322-2340 cell phone for 1 minute
 11/15/01 8:42 PM Walsh calls Calling Card for 2 minutes

11/16/01 8:27 AM Walsh calls FBI Main Number for 2 minutes
 11/16/01 8:28 AM Walsh calls FBI Main Number for 2 minutes
 11/16/01 8:55 AM Walsh calls FBI Main Number for 5 minutes
 11/16/01 3:12 PM Walsh calls Walsh callsm McNichols personal cell phone (773-480-7536) for 1 minute
 11/16/01 3:20 PM Walsh calls Trish LaPerch office for 1 minute
 11/16/01 4:12 PM Walsh calls Calling Card for 1 minute
 11/16/01 4:37 PM Walsh calls Calling Card for 9 minutes
 11/16/01 4:46 PM Walsh calls Calling Card for 12 minutes

11/17/01 10:56 AM Walsh calls Marisa-Homme Thielen at home for 19 minutes
 11/17/01 3:13 PM Walsh calls Calling Card for 3 minutes

11/18/01 8:46 AM Walsh calls Calling Card for 2 minutes

11/19/01 7:49 AM Walsh calls Marisa-Homme Thielen at home for 54 minutes

11/19/01 – Cheley illegally accesses NN e-mail. Attorney-Client Privilege communications contained in accessed materials.

Mon Nov 19 14:28:12 2001 6b835dc7eb04a04586256b090067abe6[1]1
Mon Nov 19 14:28:20 2001 9b764338cb52079886256b090067ab06[1]
Mon Nov 19 14:28:26 2001 21cf1833c55dc2fa86256b09006683cf[1]
Mon Nov 19 14:29:06 2001 c00a6a7875daac4c86256b0900668d4d[1]
Mon Nov 19 14:29:14 2001 e3fdc76aa3c4762f86256b090065ea25[1]
Mon Nov 19 14:29:22 2001 2b26b4b79170a9c886256b09006013a9[1]
Mon Nov 19 14:30:22 2001 d3acbc144d06407986256b09005dec70[1]
Mon Nov 19 14:30:34 2001 5358f106a973312686256b09005b15ea[1]
Mon Nov 19 14:30:44 2001 2fed6bd1d1dde04c86256b0900592f4c[1]
Mon Nov 19 14:30:50 2001 17b518014b701a4186256b090058eebc[1]
Mon Nov 19 14:30:58 2001 a99900de629d15d186256b0900579e97[1]
Mon Nov 19 14:31:20 2001 8a997f4bf444fda886256b090055f8b3[1]
Mon Nov 19 14:31:26 2001 4865bfd696e93d9186256b090052d160[1]
Mon Nov 19 14:31:36 2001 bcf28d1fb0bfb06f86256b0900518617[1]
Mon Nov 19 14:31:46 2001 4c883ffe8ae63a8786256b0900371e93[1]
Mon Nov 19 14:31:54 2001 d1415dd63a1edf5286256b0800670ea4[1]
Mon Nov 19 14:32:10 2001 (\$Sent)[3]2
Mon Nov 19 14:32:16 2001 091e2f5e05f3d25086256b09005eb3a5[1]2
Mon Nov 19 14:33:16 2001 5c4e83e5bc0c2bdb86256b09005e9c44[1]
Mon Nov 19 14:33:24 2001 84448014bad64cd586256b09005dd75d[1]
Mon Nov 19 14:33:36 2001 2f4cd0b9e1ecef386256b0900520607[1]
Mon Nov 19 14:34:02 2001 5bded7657ebc50e086256b090057f225[1]
Mon Nov 19 14:34:14 2001 584b56c59422b0a486256b0900548f65[1]
Mon Nov 19 14:35:20 2001 9e9acb9c6f1d2f8a86256b09005348f5[1]1
Mon Nov 19 14:35:54 2001 83a78463c163b43b86256b0900508423[1]
Mon Nov 19 14:36:02 2001 6c37b99aa95a8aca86256b06006126a3[1]
Mon Nov 19 14:36:06 2001 c0fab5003c11a8e886256b060055d5fa[1]
Mon Nov 19 14:36:24 2001 d97174f5b40394b586256b0900545cd2[1]
Mon Nov 19 14:37:56 2001 8956689a650ceed786256b090061fb6f[1]
Mon Nov 19 14:38:14 2001 eb8004931013f53b86256b09005f99d7[1]
Mon Nov 19 14:38:28 2001 091e2f5e05f3d25086256b09005eb3a5[1]1
Mon Nov 19 14:38:30 2001 ca659a12c64b5ff286256b09005ce23f[1]
Mon Nov 19 14:38:52 2001 f104bbd717c1439286256b09005c8873[1]
Mon Nov 19 14:39:00 2001 23cff6ed9fd456eb86256b09005c1f88[1]
Mon Nov 19 14:39:10 2001 af1dc5d213ae4b3786256b0900561d95[1]
Mon Nov 19 14:39:46 2001 b23be04933e0416e86256b0900531ff9[1]
Mon Nov 19 14:43:32 2001 2b26b4b79170a9c886256b09006013a9[1]1
Mon Nov 19 14:44:18 2001 74248b2e13d8387186256b0600787b46[1]
➔ Cheley Yahoo e-mail activity
Mon Nov 19 15:32:30 2001 ga011119l[1].htm
Mon Nov 19 15:32:32 2001 a[1]1.htm
Mon Nov 19 15:32:32 2001 yahoo1_grun[1].htm

11/19/01 4:00 PM Walsh calls Trish LaPerch office for 1 minute

➔ Cheley Yahoo e-mail activity
Mon Nov 19 16:16:42 2001 alerts[1]2.html

11/19/01 4:16 PM Walsh calls Calling Card for 2 minutes

➔ Cheley Yahoo e-mail activity

Mon Nov 19 16:24:20 2001 yahoo[1].html

Mon Nov 19 16:24:30 2001 login[1]3.html

11/19/01 4:29 PM Walsh calls Trish LaPerch office for 1 minute

11/19/01 4:43 PM Walsh calls Calling Card for 2 minutes

11/20/01 7:59 AM Walsh calls Calling Card for 2 minutes

11/20/01 – Cheley illegally accesses NN e-mail.

Tue Nov 20 09:29:36 2001 d99b64761336856e85256b0a004ca81f[1]

Tue Nov 20 09:30:08 2001 85b5856fc8f8b20686256b0a004a5a73[1]

Tue Nov 20 09:30:24 2001 bbaf1aa70d0aeff86256b0a000480b4[1]

Tue Nov 20 09:31:00 2001 df7f3bce2c1d013386256b090063ab4c[1]

Tue Nov 20 09:31:44 2001 390e6ea1b1cb0d8186256b0900537ba7[1]

Tue Nov 20 09:32:14 2001 c33a4d2df32ac21186256b09007fd70b[1]

Tue Nov 20 09:32:32 2001 a27f3be3ba82e203f86256b040075fe4f[1]

Tue Nov 20 09:32:38 2001 091e2f5e05f3d25086256b09005eb3a5[1]

➔ Cheley Yahoo e-mail activity

Tue Nov 20 09:54:38 2001 mail.yahoo[2].html

11/20/01 3:03PM Calendar entry regarding Bill Daley dinner at Gibson's is added to MS's calendar

11/20/01 4:04 PM Walsh calls 411 for 4 minutes

Automatically connects to Near North Main Number (312-280-5600)

11/20/01 4:35 PM Walsh calls FBI Main Number for 4 minutes

11/20/01 4:52 PM Walsh calls Calling Card for 2 minutes

➔ FBI surveillance of MS at Gibson's

11/20/01 9:01 PM Walsh calls Calling Card for 1 minute

11/20/01 9:03 PM Walsh calls Calling Card for 3 minutes

➔ FBI surveillance of MS driving Walsh calls work

11/21/01 7:45 AM Walsh calls Calling Card for 20 minutes

11/21/01 2:45 PM Walsh calls 312-342-7600 for 2 minutes

11/21/01 2:47 PM Walsh calls Calling Card for 2 minutes

11/23/01 2:46 PM Walsh calls Calling Card for 1 minute

11/23/01 3:20 PM Walsh calls Calling Card for 2 minutes

11/23/01 4:41 PM Walsh calls Calling Card for 3 minutes

11/24/01 8:59 AM Walsh calls Calling Card for 2 minutes

11/24/01 11:17 AM Walsh calls Calling Card for 2 minutes

11/24/01 3:57 PM Walsh calls Calling Card for 2 minutes

11/25/01 3:47 PM Walsh calls Calling Card for 1 minute

11/25/01 3:48 PM Walsh calls Calling Card for 2 minutes
11/25/01 5:14 PM Walsh calls Calling Card for 1 minute
11/25/01 5:15 PM Walsh calls Calling Card for 2 minutes

11/26/01 7:43 AM Walsh calls Calling Card for 1 minute
11/26/01 7:46 AM Walsh calls Calling Card for 2 minutes
11/26/01 7:48 AM Walsh calls Calling Card for 36 minutes
11/26/01 8:24 AM Walsh calls Calling Card for 4 minutes
11/26/01 4:51 PM Walsh calls Calling Card for 22 minutes
11/26/01 5:14 PM Walsh calls Trish LaPerch office for 2 minutes
11/26/01 6:25 PM Walsh calls Calling Card for 1 minute
11/26/01 6:48 PM Walsh calls Calling Card for 1 minute
11/26/01 6:49 PM Walsh calls Calling Card for 2 minutes

11/27/01 7:43 AM Walsh calls Calling Card for 1 minute
11/27/01 7:44 AM Walsh calls Calling Card for 35 minutes
11/27/01 8:37 AM Walsh calls Calling Card for 1 minute
11/27/01 8:38 AM Walsh calls Calling Card for 2 minutes
11/27/01 4:48 PM Walsh calls Barclay Hotel Intercontinental in New York for 6 minutes
11/27/01 4:57 PM Walsh calls Barclay Hotel Intercontinental in New York for 8 minutes
11/27/01 8:30 PM Walsh calls Calling Card for 2 minutes

11/28/01 5:59 AM Walsh calls Barclay Hotel Intercontinental in New York for 24 minutes
11/28/01 6:24 AM Walsh calls Barclay Hotel Intercontinental in New York for 11 minutes

11/28/01 – Cheley illegally accesses NN e-mail and scans MS e-mail logs. Attorney-Client Privilege communications contained in accessed materials. Cheley illegally obtains an e-mail from Sherri Stanton to Mike Segal containing NN’s August litigation report, the Bachrach matter, and AON litigation strategy.

Wed Nov 28 17:55:34 2001	ca370932f8e1db9186256b12007e54de[1]
Wed Nov 28 17:55:46 2001	be7d69117402bd9386256b12007d09bc[1]
Wed Nov 28 17:56:50 2001	cae74584b02abee386256b12006e1386[1]
Wed Nov 28 17:56:54 2001	e5d3f76cb693e2c786256b12006cbd73[1]
Wed Nov 28 17:58:22 2001	3b4c2ea15405ce4e86256b12007802f7[1]
Wed Nov 28 17:58:30 2001	c45a3b135ad24d6186256b120077e6e5[1]
Wed Nov 28 17:59:06 2001	68aeaea155462bd786256b12006de6e7[1]
Wed Nov 28 17:59:56 2001	d11059ac6a5b5ae686256b1200602edd[1]
Wed Nov 28 18:00:14 2001	852be8e856a6e8a686256b12005f9dd3[1]
Wed Nov 28 18:01:12 2001	8fa0da9216637d8786256b1200593136[1]
Wed Nov 28 18:01:22 2001	109146353f97495486256b12005762f1[1]
Wed Nov 28 18:01:46 2001	552037def69238ef85256b12005638fc[1]
Wed Nov 28 18:01:58 2001	662f5ff2c99a11ee86256b120053e826[1]
Wed Nov 28 18:02:04 2001	1a95dee80afdc35686256b1200521a68[1]
Wed Nov 28 18:02:18 2001	b24963aec5f8b95986256b1200128016[1]
Wed Nov 28 18:02:32 2001	32a7daf33e052d3786256b12006f67d1[1]
Wed Nov 28 18:02:40 2001	eec79b843208f00d86256b12005cc1bf[1]
Wed Nov 28 18:02:50 2001	0875398f380af73a86256b12005cabfb[1]

Wed Nov 28 18:03:04 2001	ad8f34aa049a0b4c86256b1200554fa0[1]
Wed Nov 28 18:03:12 2001	e1504066ea89c02d86256b12005539bd[1]
Wed Nov 28 18:03:18 2001	70466bcb2ecc75e86256b120054fdbcb[1]
Wed Nov 28 18:04:06 2001	2426851e78d4983d86256ab9005e1959[1]
Wed Nov 28 18:04:10 2001	08512d2ed72d59f388256b11007b209a[1]
Wed Nov 28 18:04:42 2001	8e08527e9c5f523686256b090075fff3[1]
Wed Nov 28 18:05:00 2001	9e9acb9c6f1d2f8a86256b09005348f5[1]
Wed Nov 28 18:05:08 2001	3d75b97bea1a862f86256b020050a1d9[1]1
Wed Nov 28 18:05:18 2001	685b105a587edcbf86256aff006ef2a7[1]
Wed Nov 28 18:05:32 2001	9eb8c5348eb1a2b586256ad80055f61c[1]
Wed Nov 28 18:06:02 2001	374168292929ed23862567e70066bcf4[1]
Wed Nov 28 18:06:12 2001	5d77340264cd33e88625676f0071aeef[1]1
Wed Nov 28 18:06:18 2001	5d77340264cd33e88625676f0071aeef[1]
Wed Nov 28 18:06:22 2001	5d77340264cd33e88625676f0071aeef[2]
Wed Nov 28 18:06:28 2001	1649202cb9e280a486256838005c031f[1]
Wed Nov 28 18:07:04 2001	beeb94a9356fb1b4862568b8005bb1ac[2]
Wed Nov 28 18:07:06 2001	beeb94a9356fb1b4862568b8005bb1ac[1]1
Wed Nov 28 18:07:08 2001	beeb94a9356fb1b4862568b8005bb1ac[2]1
Wed Nov 28 18:07:10 2001	beeb94a9356fb1b4862568b8005bb1ac[1]3
Wed Nov 28 18:07:14 2001	beeb94a9356fb1b4862568b8005bb1ac[2]3
Wed Nov 28 18:07:16 2001	beeb94a9356fb1b4862568b8005bb1ac[3]
Wed Nov 28 18:07:18 2001	beeb94a9356fb1b4862568b8005bb1ac[3]2
Wed Nov 28 18:07:22 2001	beeb94a9356fb1b4862568b8005bb1ac[1]2
Wed Nov 28 18:07:22 2001	beeb94a9356fb1b4862568b8005bb1ac[1]
Wed Nov 28 18:07:24 2001	beeb94a9356fb1b4862568b8005bb1ac[4]
Wed Nov 28 18:07:32 2001	beeb94a9356fb1b4862568b8005bb1ac[2]2
Wed Nov 28 18:07:40 2001	beeb94a9356fb1b4862568b8005bb1ac[3]1
Wed Nov 28 18:07:44 2001	11ae2c4181390d4486256af5004c5aa6[1]
Wed Nov 28 18:08:06 2001	6b835dc7eb04a04586256b090067abe6[1]
Wed Nov 28 18:08:10 2001	aa25c15ea24c576e86256b090076bd22[1]
Wed Nov 28 18:08:22 2001	All+Views[1]1
Wed Nov 28 18:08:28 2001	dba8ab772091b58b862565e70059795a[1]1
Wed Nov 28 18:08:28 2001	dba8ab772091b58b862565e70059795a[1]3
Wed Nov 28 18:08:38 2001	dba8ab772091b58b862565e70059795a[1]
Wed Nov 28 18:08:38 2001	dba8ab772091b58b862565e70059795a[1]2
Wed Nov 28 18:08:42 2001	dba8ab772091b58b862565e70059795a[3]3
Wed Nov 28 18:08:44 2001	dba8ab772091b58b862565e70059795a[2]
Wed Nov 28 18:08:50 2001	dba8ab772091b58b862565e70059795a[2]1
Wed Nov 28 18:08:56 2001	dba8ab772091b58b862565e70059795a[2]2
Wed Nov 28 18:09:06 2001	dba8ab772091b58b862565e70059795a[3]
Wed Nov 28 18:09:08 2001	dba8ab772091b58b862565e70059795a[3]1
Wed Nov 28 18:09:10 2001	dba8ab772091b58b862565e70059795a[2]3
Wed Nov 28 18:09:12 2001	dba8ab772091b58b862565e70059795a[3]2
Wed Nov 28 18:09:18 2001	dba8ab772091b58b862565e70059795a[4]2
Wed Nov 28 18:09:20 2001	dba8ab772091b58b862565e70059795a[4]1
Wed Nov 28 18:09:24 2001	dba8ab772091b58b862565e70059795a[4]
Wed Nov 28 18:09:26 2001	dba8ab772091b58b862565e70059795a[5]
Wed Nov 28 18:09:30 2001	dba8ab772091b58b862565e70059795a[5]1
Wed Nov 28 18:09:32 2001	dba8ab772091b58b862565e70059795a[5]2
Wed Nov 28 18:09:34 2001	dba8ab772091b58b862565e70059795a[6]
Wed Nov 28 18:10:34 2001	All+By+Person[1]1

Wed Nov 28 18:10:38 2001	All+By+Person[1]3
Wed Nov 28 18:10:40 2001	All+By+Person[2]1
Wed Nov 28 18:10:42 2001	All+By+Person[1]2
Wed Nov 28 18:10:46 2001	All+By+Person[2]3
Wed Nov 28 18:10:48 2001	All+By+Person[2]2
Wed Nov 28 18:10:50 2001	All+By+Person[3]1
Wed Nov 28 18:10:52 2001	All+By+Person[1]
Wed Nov 28 18:10:58 2001	All+By+Person[2]
Wed Nov 28 18:11:02 2001	All+By+Person[3]3
Wed Nov 28 18:11:04 2001	All+By+Person[3]
Wed Nov 28 18:11:06 2001	All+By+Person[4]3
Wed Nov 28 18:11:08 2001	All+By+Person[4]1
Wed Nov 28 18:11:10 2001	All+By+Person[5]3
Wed Nov 28 18:11:14 2001	All+By+Person[3]2
Wed Nov 28 18:11:16 2001	All+By+Person[5]1
Wed Nov 28 18:11:18 2001	All+By+Person[6]3
Wed Nov 28 18:11:20 2001	All+By+Person[4]
Wed Nov 28 18:11:22 2001	All+By+Person[4]2
Wed Nov 28 18:11:26 2001	All+By+Person[6]1
Wed Nov 28 18:11:26 2001	All+By+Person[5]
Wed Nov 28 18:11:28 2001	All+By+Person[5]2
Wed Nov 28 18:11:36 2001	All+By+Person[7]1
Wed Nov 28 18:11:38 2001	All+By+Person[6]
Wed Nov 28 18:11:40 2001	All+By+Person[8]1
Wed Nov 28 18:11:48 2001	All+By+Person[6]2
Wed Nov 28 18:11:50 2001	All+By+Person[7]
Wed Nov 28 18:11:50 2001	All+By+Person[7]3
Wed Nov 28 18:12:00 2001	All+By+Person[8]2
Wed Nov 28 18:12:00 2001	All+By+Person[8]
Wed Nov 28 18:12:18 2001	3d75b97bea1a862f86256b020050a1d9[1]2
Wed Nov 28 18:12:22 2001	All+By+Person[7]2
Wed Nov 28 18:12:40 2001	All+By+Person[9]
Wed Nov 28 18:12:54 2001	efa7f76a292cbe0c86256aa30073987e[1]

11/28/01 10:16 PM Walsh calls Calling Card for 3 minutes

11/29/01 – MS learns that Walsh and Gallagher had met with the Chairman of Jupiter and solicited the account in violation of their Confidentiality/Non-Solicitation Agreement with NN.

11/29/01 7:17 AM Walsh calls Calling Card for 1 minute

11/29/01 7:22 AM Walsh calls Calling Card for 1 minute

11/29/01 7:24 AM Walsh calls Calling Card for 50 minutes

11/29/01 – Cheley illegally accesses NN e-mail. Attorney-Client Privilege communications contained in accessed materials.

Thu Nov 29 12:48:32 2001	18b292032f61a24386256b1300598044[1]
Thu Nov 29 12:49:22 2001	9fb19a79871a87e586256b13005d2219[1]
Thu Nov 29 12:49:32 2001	cf3e64c57876012586256b1100700ef7[1]
Thu Nov 29 12:49:40 2001	81254e1b270abd0086256b130056e95f[1]
Thu Nov 29 12:49:58 2001	18001d03f8e4600786256b1300584daf[1]
Thu Nov 29 12:50:22 2001	760dbcc56fe7c67186256b130000d472[1]

Thu Nov 29 12:50:48 2001 a4800bdcf9e8fdee86256b130057acc8[1]
Thu Nov 29 12:50:52 2001 966b89454b28539a86256b1300577f0d[1]
Thu Nov 29 12:51:00 2001 7d2104c39ac9a9a586256b130053514d[1]
Thu Nov 29 12:51:10 2001 eec839bf0a65f1a386256b130052a854[1]
Thu Nov 29 12:51:18 2001 5827c5fe778d35d686256b130052594e[1]

11/29/01 5:27 PM Walsh calls Calling Card for 2 minutes
11/29/01 10:16 PM Walsh calls Calling Card for 3 minutes

11/30/01 8:05 AM Walsh calls Calling Card for 61 minutes
11/30/01 4:49 PM Walsh calls Calling Card for 3 minutes

12/1/01 11:30 AM Walsh calls 847-322-2340 cell phone for 2 minutes
12/1/01 11:35 AM Walsh calls 847-322-2340 cell phone for 5 minutes
12/1/01 11:40 AM Walsh calls Calling Card for 1 minute
12/1/01 11:43 AM Walsh calls Calling Card for 1 minute
12/1/01 11:54 AM Walsh calls 847-322-2340 cell phone for 2 minutes
12/1/01 11:59 AM Walsh calls Calling Card for 1 minute
12/1/01 12:04 PM Walsh calls 847-322-2340 cell phone for 1 minute

12/2/01 2:15 PM Walsh calls Calling Card for 1 minute
12/2/01 2:17 PM Walsh calls Marisa-Homme Thielen at home for 16 minutes
12/2/01 2:34 PM Walsh calls Marisa-Homme Thielen at home for 20 minutes
12/2/01 4:19 PM Walsh calls Marisa-Homme Thielen at home for 2 minutes
12/2/01 4:55 PM Walsh calls Marisa-Homme Thielen at home for 1 minute
12/2/01 5:02 PM Walsh calls Calling Card #3 (800-637-0249) CVS Pharmacy rechargeable card for 4 minutes

12/4/01 11:01 AM Walsh calls Calling Card for 31 minutes
12/4/01 5:06 PM Walsh calls Calling Card for 14 minutes
12/4/01 5:20 PM Walsh calls Calling Card for 2 minutes
12/4/01 5:22 PM Walsh calls Calling Card for 23 minutes
12/4/01 7:33 PM Walsh calls Calling Card for 8 minutes

12/5/01 6:34 AM Walsh calls Trish LaPerch office for 1 minute
12/5/01 4:41 PM Walsh calls 847-322-2340 cell phone for 1 minute
12/5/01 7:24 PM Walsh calls Calling Card for 1 minute
12/5/01 8:27 PM Walsh calls Calling Card for 1 minute
12/5/01 9:49 PM Walsh calls Calling Card for 1 minute

12/6/01 10:34 AM Walsh calls Calling Card for 15 minutes
12/6/01 4:01 PM Walsh calls Calling Card for 6 minutes
12/6/01 6:52 PM Walsh calls Calling Card for 2 minutes
12/6/01 8:48 PM Walsh calls Calling Card for 1 minute

12/7/01 8:00 AM Walsh calls Calling Card for 30 minutes
12/7/01 8:30 AM Walsh calls Calling Card for 2 minutes

12/07/01 – Cheley illegally accesses NN e-mail, scans MS e-mail logs, and then accesses his Excite e-mail account. Attorney-Client Privilege communications contained in accessed materials.

Fri Dec 7 15:37:26 2001 e2b6d4e1c720dbda86256b1b00610ad1[1]
Fri Dec 7 15:37:42 2001 9d67338d75f6673686256b1b005e24c9[1]
Fri Dec 7 15:58:18 2001 610d58cd9ddd142186256b18005359a1[1]
 Fri Dec 7 15:58:44 2001 (\$Sent)[1]6
 ➔ Cheley Excite e-mail activity
 Fri Dec 7 16:09:22 2001 act_popup[1].htm
 Fri Dec 7 16:09:24 2001 rs=7456;aff=A62EEA14;ck=137636230[1].htm
 Fri Dec 7 16:09:34 2001 folder[1]3.htm
 Fri Dec 7 16:09:46 2001
 aid=1007759371393_002E0;text=;start=0;display=true;copy=false[1].htm
 Fri Dec 7 16:13:36 2001 d381f63594305e4d86256a61004770df[4]1
 Fri Dec 7 16:14:12 2001 d381f63594305e4d86256a61004770df[1]1
Fri Dec 7 16:14:12 2001 d381f63594305e4d86256a61004770df[1]9
Fri Dec 7 16:24:22 2001 folder[1]1.htm
 Fri Dec 7 16:47:44 2001 rs=12461;aff=A62EEA14;ck=680315841[1].htm

12/7/01 4:53 PM Walsh calls Calling Card for 1 minute
 12/7/01 4:55 PM Walsh calls Calling Card for 4 minutes

Cheley Excite e-mail activity

Fri Dec 7 18:47:58 2001 rs=9567;aff=A62EEA14;ck=1048584824[1].htm
 Fri Dec 7 18:48:00 2001 folder[1]6.htm
 Fri Dec 7 18:48:04 2001 1001[1].htm
 Fri Dec 7 18:48:48 2001 folder[1].htm

12/8/01 11:29 AM Walsh calls Calling Card for 8 minutes
 12/8/01 3:37 PM Walsh calls Calling Card for 1 minute
 12/8/01 4:39 PM Walsh calls 847-322-2340 cell phone for 2 minutes
 12/8/01 8:19 PM Walsh calls John Brennan for 1 minute

12/9/01 9:18 AM Walsh calls Calling Card for 15 minutes
 12/9/01 9:33 AM Walsh calls Calling Card for 1 minute
 12/9/01 9:34 AM Walsh calls Calling Card for 1 minute
 12/9/01 9:35 AM Walsh calls Calling Card for 37 minutes
 12/9/01 3:13 PM Walsh calls Calling Card for 23 minutes
 12/9/01 4:18 PM Walsh calls 847-322-2340 cell phone for 3 minutes

12/10/01 8:20 AM Walsh calls Calling Card for 26 minutes
 12/10/01 2:45 PM Walsh calls Calling Card for 1 minute
 12/10/01 4:09 PM Walsh calls Calling Card for 1 minute
 12/10/01 4:10 PM Walsh calls Calling Card for 3 minutes
 12/10/01 4:46 PM Walsh calls Calling Card for 5 minutes
 12/10/01 5:58 PM Walsh calls 312-342-7600 for 5 minutes
 12/10/01 9:06 PM Walsh calls Calling Card for 3 minutes

12/10/01 –Cheley accesses his Excite e-mail account.

Mon Dec 10 08:45:24 2001 rs=7300;aff=A62EEA14;ck=852578647[1].htm
 Mon Dec 10 08:46:04 2001 folder[1]4.htm

12/11/01 – Cheley illegally accesses NN e-mail. Attorney-Client Privilege communications contained in accessed materials.

Tue Dec 11 09:22:18 2001 51e705340afbbccf86256b1f004c0961[1]
 Tue Dec 11 09:23:36 2001 e61acfbea993beaf86256b1e007dde5d[1]
 ➔Cheley Excite e-mail activity
 Tue Dec 11 09:24:34 2001 login[1]3.htm
 Tue Dec 11 09:24:38 2001 [1]3.htm
 Tue Dec 11 09:38:42 2001 rs=20132;aff=A62EEA14;ck=644105245[1].htm
 Tue Dec 11 11:16:34 2001 query[1]2.htm
 Tue Dec 11 11:16:36 2001 a[1]2.htm
 ➔ Cheley Hacking of Near North systems
 Tue Dec 11 11:20:08 2001 c69fc91bb70d446488256b1f005845b8[1]
 Tue Dec 11 11:21:34 2001 c55d49882dfc7ee386256b1f005581fe[1]
 Tue Dec 11 11:22:46 2001 b450e8911d3643f286256b1f0052a9a2[1]
 Tue Dec 11 11:23:20 2001 64661bf22795f6de86256b1f00524971[1]
 Tue Dec 11 11:32:40 2001 c55d49882dfc7ee386256b1f005581fe[1]1
 Tue Dec 11 11:37:38 2001 b450e8911d3643f286256b1f0052a9a2[1]1
Tue Dec 11 11:38:10 2001 286e374edcfb203586256b1a00646db7[1]
 Tue Dec 11 11:38:18 2001 (\$Sent)[1]10
 Tue Dec 11 11:39:06 2001 f8938eac954ed66886256b1e008237a8[1]
 Tue Dec 11 11:40:36 2001 (\$Sent)[1]7
 Tue Dec 11 11:41:16 2001 0e1e8f96eb6b6a7c86256b1b0058aa75[1]
Tue Dec 11 11:41:54 2001 db567306611fccde86256b1e0073b100[1]
 Tue Dec 11 12:21:00 2001 NotesMail[1]1
 Tue Dec 11 12:21:06 2001 msegal[1]2.nsf
 Tue Dec 11 12:21:12 2001 d381f63594305e4d86256a61004770df[1]5
 Tue Dec 11 12:21:22 2001 38925645d9b5dec286256b1f005fc16b[1]

12/11/01 4:56 PM Walsh calls 847-322-2340 cell phone for 2 minutes
 12/11/01 4:59 PM Walsh calls Calling Card for 2 minutes
 12/11/01 6:50 PM Walsh calls Calling Card for 2 minutes
 12/11/01 9:11 PM Walsh calls Calling Card for 6 minutes

12/12/01 7:20 AM Walsh calls White Hall Hotel in Chicago (312-944-6300) for 1 minute
 12/12/01 7:34 AM Walsh calls White Hall Hotel in Chicago for 30 minutes
 12/12/01 8:46 AM Walsh calls 312-342-7600 for 4 minutes

12/13/01 8:31 AM Walsh calls Calling Card for 2 minutes
 12/13/01 3:37 PM Walsh calls St. Paul Fire and Marine Insurance Company (312-648-5000) for 1 minute
 12/13/01 3:39 PM Walsh calls St. Paul Fire and Marine Insurance Company for 2 minutes
 12/13/01 3:52 PM Walsh calls Calling Card for 13 minutes
 12/13/01 7:07 PM Walsh calls 847-322-2340 cell phone for 1 minute
 12/13/01 7:10 PM Walsh calls Calling Card for 2 minutes

12/14/01 7:08 AM Walsh calls Calling Card for 2 minutes
 12/14/01 3:35 PM Walsh calls Calling Card for 1 minute
 12/14/01 3:39 PM Walsh calls Calling Card for 2 minutes
 12/14/01 4:14 PM Walsh calls Calling Card for 2 minutes
 12/14/01 8:55 PM Walsh calls Calling Card for 4 minutes

12/15/01 12:05 PM Walsh calls Calling Card for 2 minutes
12/15/01 1:55 PM Walsh calls Calling Card for 5 minutes
12/15/01 3:45 PM Walsh calls Calling Card for 1 minute
12/15/01 3:54 PM Walsh calls Calling Card for 7 minutes

12/16/01 7:49 AM Walsh calls Calling Card for 3 minutes
12/16/01 8:05 AM Walsh calls Calling Card for 2 minutes
12/16/01 1:40 PM Walsh calls Calling Card for 3 minutes

12/17/01 7:56 AM Walsh calls Calling Card for 48 minutes
12/17/01 3:27 PM Walsh calls Calling Card for 44 minutes
12/17/01 6:27 PM Walsh calls Calling Card for 1 minute
12/17/01 6:33 PM Walsh calls Calling Card for 7 minutes

12/18/01 7:51 AM Walsh calls Calling Card for 1 minute
12/18/01 5:11 PM Walsh calls Calling Card for 2 minutes

12/19/01 7:41 AM Walsh calls Calling Card for 34 minutes
12/19/01 6:55 PM Walsh calls Calling Card for 2 minutes

12/20/01 9:09 AM Walsh calls Calling Card for 8 minutes
12/20/01 9:20 AM Walsh calls Calling Card for 13 minutes
12/20/01 9:34 AM Walsh calls Trish LaPerch office for 2 minutes
12/20/01 10:24 AM Walsh calls Calling Card for 2 minutes
12/20/01 3:22 PM Walsh calls Calling Card for 2 minutes
12/20/01 3:39 PM Walsh calls Calling Card for 2 minutes
12/20/01 3:50 PM Walsh calls Calling Card for 2 minutes
12/20/01 8:56 PM Walsh calls Calling Card for 1 minute

*** 12/21/01 7:51 AM Walsh calls 312-545-6165 for 2 minutes
12/21/01 8:01 AM Walsh calls Calling Card for 5 minutes

12/21/01 – Cheley illegally accesses NN e-mail.

Fri Dec 21 10:03:24 2001 996328ce446aec1786256b28007c2c72[1]1

12/21/01 3:44 PM Walsh calls Calling Card for 2 minutes
12/21/01 7:27 PM Walsh calls Calling Card for 2 minutes

12/22/01 10:56 AM Walsh calls Calling Card for 2 minutes
12/22/01 12:06 PM Walsh calls Calling Card for 1 minute
12/22/01 12:53 PM Walsh calls Calling Card for 2 minutes

12/23/01 11:52 AM Walsh calls Calling Card for 3 minutes
12/23/01 3:45 PM Walsh calls Calling Card for 5 minutes
12/23/01 5:30 PM Walsh calls Calling Card for 3 minutes

Saturday, December 23, 2001

12/23/01,19:16, Cheley hacks into RAS (Dial-In Server), 3129889608,4.1 minutes
12/23/01,19:21, Cheley hacks into RAS (Dial-In Server), 3129889608,4.1 minutes

12/23/01,19:29, Cheley hacks into RAS (Dial-In Server), 3129889608,2.3 minutes
12/23/01,19:44, Cheley hacks into RAS (Dial-In Server), 3129889608,10.3 minutes
12/23/01,19:16, Cheley hacks into RAS (Dial-In Server), 3129889608,4.1 minutes

12/24/01 11:37 AM Walsh calls Calling Card for 2 minutes
12/24/01 2:49 PM Walsh calls Calling Card for 4 minutes

12/26/01 8:30 AM Walsh calls Calling Card for 21 minutes
12/26/01 3:43 PM Walsh calls Calling Card for 6 minutes
12/26/01 3:52 PM Walsh calls Calling Card for 5 minutes
12/26/01 4:18 PM Walsh calls Calling Card for 1 minute
12/26/01 4:19 PM Walsh calls Calling Card for 1 minute
12/26/01 4:24 PM Walsh calls Calling Card for 2 minutes

12/27/01 7:29 PM Walsh calls Calling Card for 1 minute

12/27/01 – Cheley illegally access NN e-mails.

12/28/01 8:03 AM Walsh calls 847-322-2340 cell phone for 2 minutes
12/28/01 8:48 AM Walsh calls Marisa-Homme Thielen at home for 2 minutes

12/28/01- Cheley illegally accesses Near North systems

Fri Dec 28 09:51:54 2001 20b2792ce9bcaa3986256b30004af538[1]
Fri Dec 28 09:52:06 2001 54fd8482a09f887086256b30004064c8[1]
Fri Dec 28 09:52:24 2001 f3b3f692a7d7f04386256b30003feacd[1]
Fri Dec 28 09:52:48 2001 6db0baf641a1fc4a86256b2f007d7d6e[1]
Fri Dec 28 09:52:54 2001 6f068ad39ccb7f6086256b30005168f6[1]1
Fri Dec 28 09:53:00 2001 6f068ad39ccb7f6086256b30005168f6[1]
Fri Dec 28 09:53:44 2001 93c498f83182921486256b30004d46b8[1]
Fri Dec 28 09:54:04 2001 c17999fccc30cd4686256b30004d1eaf[1]

➔Cheley Excite e-mail activity

Fri Dec 28 09:57:20 2001 my[2].jsp
Fri Dec 28 09:57:26 2001 login[1]2.htm
Fri Dec 28 09:57:40 2001 [3].htm
Fri Dec 28 09:57:48 2001 rs=52043;aff=A62EEA14;ck=431727741[1].htm
Fri Dec 28 09:57:58 2001 folder[1]2.htm
Fri Dec 28 09:58:16 2001 folder[1]5.htm

⬅12/28/01 1:20PM Lisa Chen email Walsh calls Walsh

⬅12/28/01 1:34PM Walsh forwards Lisa Chen email Walsh calls Berry

Fri Dec 28 14:08:18 2001 msegal[2].nsf
Fri Dec 28 14:08:24 2001 d381f63594305e4d86256a61004770df[3]
Fri Dec 28 14:08:32 2001 b26b965a84c04c0f86256b3000675bf7[1]
Fri Dec 28 14:08:44 2001 10b4272ac15e39f888256b30005ed191[1]
Fri Dec 28 14:08:50 2001 3d5d42ae2fb81c1f86256b30005d9a53[1]
Fri Dec 28 14:09:20 2001 4433b7d611ebba7286256b30005fb9cd[1]
Fri Dec 28 14:09:28 2001 dbe9d2b7f2de003f86256b30005c153c[1]
Fri Dec 28 14:09:42 2001 2d6f3310204330d986256b30005b4672[1]
Fri Dec 28 14:10:26 2001 c08ecb3634ba82a086256b300052f146[1]
Fri Dec 28 14:10:44 2001 1e7923a1e3551ea886256b3000528e42[1]
Fri Dec 28 14:10:50 2001 123ed95f0379d55886256b3000528845[1]

Fri Dec 28 14:11:02 2001 (\$Sent)[2]2
Fri Dec 28 14:11:02 2001 (\$Sent)[2]
Fri Dec 28 14:11:06 2001 4cfc99d1d9be5bc086256b30005e1e3c[1]
 Fri Dec 28 14:11:42 2001 c3ef5d90e1944d1086256b30005b5c5e[1]
 Fri Dec 28 14:12:14 2001 2649aae4e5080bed86256b30005a98cb[1]
 Fri Dec 28 14:12:34 2001 7faf68d1f2635a5a86256b300058abe5[1]
 Fri Dec 28 14:13:12 2001 1052f4989b6aee5a86256b3000588775[1]
Fri Dec 28 14:14:16 2001 555fa5de1b5acfc986256b300056600a[1]
 Fri Dec 28 14:17:04 2001 9c5282b82e83fe3d86256b2f006f8c8e[1]
 12/28/01 – 2:11 PM - Cheley illegally accesses NN e-mail and scans MS e-mail logs.
 Attorney-Client Privilege communications contained in accessed materials.
 2:14 PM - Cheley accesses a two page, attorney-client memo sent at 10:01 AM
 this morning from MS to Stanton, Rokowski and Novoselsky. The detailed
 memo discusses the need for immediate litigation against Gallagher, Walsh and
 Berry. The memo also contains references to the Jupiter account and contacts by
 Walsh and Gallagher.
 2:20 PM - Cheley sends an e-mail to Matt Walsh at AON.
 Fri Dec 28 14:17:58 2001 mail.yahoo[1]1.htm
 Fri Dec 28 14:19:16 2001 [2]1.htm
 Fri Dec 28 14:20:56 2001 [2]2.htm
 ➔ Cheley Hacking of Near North systems
 Fri Dec 28 14:21:48 2001 d381f63594305e4d86256a61004770df[2]7
 Fri Dec 28 14:22:00 2001 (\$Sent)[2]5
 Fri Dec 28 14:26:06 2001 my.yahoo[1]2.com

12/28/01 3:55 PM Walsh calls Calling Card for 7 minutes
 12/28/01 4:02 PM Walsh calls Calling Card for 1 minute
 12/28/01 4:03 PM Walsh calls Calling Card for 4 minutes
 12/28/01 4:13 PM Walsh calls FBI Main Number for 2 minutes
 12/28/01 4:34 PM Walsh calls Calling Card for 15 minutes
 12/28/01 4:57 PM Walsh calls 847-322-2340 cell phone for 1 minute
 12/28/01 6:54 PM Walsh calls 312-342-7600 for 1 minute
 12/29/01 12:07 PM Walsh calls Calling Card for 2 minutes
 12/29/01 4:01 PM Walsh calls Calling Card for 2 minutes

12/30/01 12:38 PM Walsh calls Calling Card for 1 minute
 12/30/01 12:39 PM Walsh calls Calling Card for 2 minutes

12/31/01 10:04 AM Walsh calls Jim Janic at home (708-485-8295) for 4 minutes
 12/31/01 10:11 AM Walsh calls Calling Card for 7 minutes
 12/31/01 10:33 AM Walsh calls Calling Card for 2 minutes
 12/31/01 11:44 AM Walsh calls Calling Card for 1 minute
 12/31/01 3:48 PM Walsh calls Calling Card for 2 minutes
 12/31/01 4:08 PM Walsh calls Calling Card for 2 minutes

1/2/02 – Cheley illegally accesses NN e-mail and then used his Yahoo account.

1/2/02 8:37 AM Walsh calls Calling Card for 2 minutes
 1/2/02 4:46 PM Walsh calls Calling Card for 1 minute
 1/2/02 5:06 PM Walsh calls Calling Card for 2 minutes

1/2/02 5:18 PM Walsh calls Calling Card for 2 minutes
1/2/02 5:20 PM Walsh calls 847-322-2340 cell phone for 1 minute
1/2/02 6:27 PM Walsh calls Calling Card for 1 minute
1/2/02 6:28 PM Walsh calls Calling Card for 4 minutes

1/3/02 7:33 AM Walsh calls Calling Card for 1 minute
1/3/02 7:38 AM Walsh calls Calling Card for 29 minutes
1/3/02 3:44 PM Walsh calls Calling Card for 27 minutes
1/3/02 4:12 PM Walsh calls Calling Card for 8 minutes

1/4/02 9:40 AM Walsh calls Calling Card for 1 minute
1/4/02 9:42 AM Walsh calls Calling Card for 2 minutes
1/4/02 4:02 PM Walsh calls Calling Card for 3 minutes
1/4/02 6:56 PM Walsh calls Calling Card for 1 minute
1/4/02 6:58 PM Walsh calls Calling Card for 1 minute
1/4/02 7:03 PM Walsh calls Calling Card for 2 minutes

1/5/02 10:54 AM Walsh calls Calling Card for 1 minute
1/5/02 10:55 AM Walsh calls Calling Card for 1 minute
1/5/02 1:41 PM Walsh calls Calling Card for 2 minutes
1/5/02 2:57 PM Walsh calls FBI Main Number for 2 minutes
1/5/02 6:54 PM Walsh calls Calling Card for 3 minutes

1/6/02 3:20 PM Walsh calls Marisa-Homme Thielen at home for 10 minutes
1/6/02 3:33 PM Walsh calls Marisa-Homme Thielen at home for 1 minute
1/6/02 3:38 PM Walsh calls 847-322-2340 cell phone for 1 minute
1/6/02 4:04 PM Walsh calls Marisa-Homme Thielen at home for 17 minutes
1/6/02 4:29 PM Walsh calls Marisa-Homme Thielen at home for 8 minutes

1/07/02 – Tom McNichols announces resignation. Later, one week before leaving, McNichols accesses an old financial report from 1999 and changes the date on it.

1/7/02 5:44 PM Walsh calls Calling Card for 3 minutes
1/7/02 6:44 PM Walsh calls Calling Card for 2 minutes

1/8/02 7:07 AM Walsh calls Calling Card for 2 minutes

1/08/02 – Walsh letter to Ross at Jupiter attempts to put innocent explanation on their earlier visit – the same visit referred to in the 12/28/01 e-mail.

1/8/02 4:45 PM Walsh calls Calling Card for 15 minutes
1/8/02 7:32 PM Walsh calls Calling Card for 2 minutes

Wednesday, January 9, 2002

01/09/2002,21:57:39,1,Cheley hacks into VPN at NNI\mseal","NNI\mseal",,"66.1.214.97"
01/09/2002,21:57:57,1,Cheley hacks into VPN at NNI\kgruca","NNI\kgruca",,"66.1.214.97"
01/09/2002,21:58:20,1,Cheley hacks into VPN at NNI\jmicros","NNI\jmicros",,"66.1.214.97"
01/09/2002,21:58:31,1,Cheley hacks into VPN at NNI\keads","NNI\keads",,"66.1.214.97"
01/09/2002,21:59:05,1,Cheley hacks into VPN at NNI\jsegal","NNI\jsegal",,"66.1.214.97"
01/09/2002,22:00:11,1,Cheley hacks into VPN at NNI\msoto","NNI\msoto",,"66.1.214.97"
01/09/2002,22:00:57,1,Cheley hacks into VPN at NNI\kmcgee","NNI\kmcgee",,"66.1.214.97"

01/09/2002,22:01:30,1,Cheley hacks into VPN at NNI\dsikora","NNI\dsikora",,"66.1.214.97"
 01/09/2002,22:01:55,1,Cheley hacks into VPN at NNI\admin","NNI\admin",,"66.1.214.97"
 01/09/2002,22:02:14,1,Cheley hacks into VPN at NNI\ahuda","NNI\ahuda",,"66.1.214.97"
 01/09/2002,22:02:37,1,Cheley hacks into VPN at NNI\aswiate","NNI\aswiate",,"66.1.214.97"
 01/09/2002,22:03:47,1,Cheley hacks into VPN at
 NNI\dcheleyorig","NNI\dcheleyorig",,"66.1.214.97"
 01/09/2002,22:04:05,1,Cheley hacks into VPN at NNI\djohnson","NNI\djohnson",,"66.1.214.97"
 01/09/2002,22:04:53,1,Cheley hacks into VPN at NNI\dwatkins","NNI\dwatkins",,"66.1.214.97"
 01/09/2002,22:14:40,1,Cheley hacks into VPN at NNI\bwooll","NNI\bwooll",,"66.1.214.97"
 01/09/2002,22:16:28,4,Cheley hacks into VPN at NNI\bwooll",,"66.1.214.97"
 01/09/2002,22:26:03,1,Cheley hacks into VPN at NNI\bwooll","NNI\bwooll",,"66.1.214.97"
 01/09/2002,22:27:07,1,Cheley hacks into VPN at NNI\dwatkins","NNI\dwatkins",,"66.1.214.97"
 01/09/2002,22:27:39,1,Cheley hacks into VPN at "dmi\dwatkins","DMI\dwatkins",,"66.1.214.97"
 01/09/2002,22:29:07,1,Cheley hacks into VPN at
 NNI\cjongsma","NNI\cjongsma",,"66.1.214.97"
 01/09/2002,22:35:25,1,Cheley hacks into VPN at NNI\bwooll","NNI\bwooll",,"66.1.214.97"
 01/09/2002,22:47:51,4,Cheley hacks into VPN at NNI\bwooll",,"66.1.214.97"

1/9/02 4:16 PM Walsh calls Calling Card for 1 minute
 1/9/02 4:16 PM Walsh calls Calling Card for 3 minutes
 1/9/02 6:27 PM Walsh calls 847-322-2340 cell phone for 2minutes
 1/9/02 7:36 PM Walsh calls Marisa-Homme Thielen at home for 4 minutes
 1/9/02 8:05 PM Walsh calls Marisa-Homme Thielen at home for 22 minutes
 1/9/02 8:47 PM Walsh calls Marisa-Homme Thielen at home for 9 minutes
 1/9/02 8:56 PM Walsh calls Marisa-Homme Thielen at home for 9 minutes

1/10/02 8:14 AM Walsh calls Calling Card for 34 minutes
 1/10/02 4:13 PM Walsh calls Calling Card for 1 minute
 1/10/02 4:25 PM Walsh calls Calling Card for 34 minutes

1/11/02 7:53 AM Walsh calls Calling Card for 3 minutes
 1/11/02 7:57 AM Walsh calls Calling Card for 1 minute
 1/11/02 8:28 AM Walsh calls Calling Card for 1 minute
 1/11/02 8:28 AM Walsh calls Calling Card for 2 minutes
 1/11/02 2:38 PM Walsh calls Calling Card for 16 minutes
 1/11/02 7:59 PM Walsh calls Calling Card for 2 minutes

1/12/02 10:53 AM Walsh calls Calling Card for 8 minutes
 1/12/02 3:48 PM Walsh calls Calling Card for 2 minutes

1/13/02 4:02 PM Walsh calls Calling Card for 4 minutes
 1/13/02 5:11 PM Walsh calls Calling Card for 1 minute

1/14/02 7:57 AM Walsh calls Calling Card for 2 minutes
 1/14/02 6:21 PM Walsh calls Calling Card for 1 minute
 1/14/02 6:22 PM Walsh calls Calling Card for 3 minutes
 1/14/02 6:31 PM Walsh calls Barclay Hotel Intercontinental in New York for 4
 minutes
 1/14/02 7:47 PM Walsh calls Calling Card for 1 minute
 1/14/02 7:51 PM Walsh calls Calling Card for 1 minute

1/14/02 7:52 PM Walsh calls Calling Card for 2 minutes
1/14/02 8:42 PM Walsh calls Barclay Hotel Intercontinental in New York for 31 minutes

1/15/02 7:11 AM Walsh calls Barclay Hotel Intercontinental in New York for 4 minutes
1/15/02 7:36 AM Walsh calls Barclay Hotel Intercontinental in New York for 1 minute
1/15/02 7:36 AM Walsh calls Barclay Hotel Intercontinental in New York for 10 minutes
1/15/02 8:11 AM Walsh calls Calling Card for 2 minutes
1/15/02 8:19 AM Walsh calls Calling Card for 1 minute
1/15/02 8:23 AM Walsh calls Calling Card for 1 minute
1/15/02 3:49 PM Walsh calls Calling Card for 2 minutes
1/15/02 3:58 PM Walsh calls Calling Card for 1 minute
1/15/02 4:00 PM Walsh calls Calling Card for 1 minute
1/15/02 4:01 PM Walsh calls Calling Card for 2 minutes
1/15/02 7:27 PM Walsh calls Calling Card for 1 minute
1/15/02 7:28 PM Walsh calls Calling Card for 2 minutes
1/15/02 7:35 PM Walsh calls Marisa-Homme Thielen at home for 10 minutes
1/15/02 8:12 PM Walsh calls Marisa-Homme Thielen at home for 24 minutes

1/16/02 2:11 PM Walsh calls Calling Card for 1 minute
1/16/02 2:12 PM Walsh calls Calling Card for 1 minute
1/16/02 2:13 PM Walsh calls Calling Card for 2 minutes
1/16/02 2:15 PM Walsh calls Trish LaPerch office for 1 minute
1/16/02 4:39 PM Walsh calls Calling Card for 1 minute
1/16/02 4:40 PM Walsh calls Calling Card for 2 minutes
1/16/02 5:03 PM Walsh calls Calling Card for 14 minutes
1/16/02 5:27 PM Walsh calls Calling Card for 1 minute

1/17/02 7:01 AM Walsh calls Calling Card for 1 minute
1/17/02 7:01 AM Walsh calls Calling Card for 3 minutes
1/17/02 8:10 AM Walsh calls Calling Card for 1 minute
1/17/02 8:11 AM Walsh calls Calling Card for 9 minutes
1/17/02 2:49 PM Walsh calls Calling Card for 2 minutes
1/17/02 2:52 PM Walsh calls Calling Card for 18 minutes
1/17/02 5:09 PM Walsh calls Calling Card for 1 minute
1/17/02 5:10 PM Walsh calls Calling Card for 6 minutes
1/17/02 5:15 PM Walsh calls Calling Card for 1 minute
1/17/02 5:17 PM Walsh calls Calling Card for 1 minute
1/17/02 5:18 PM Walsh calls Calling Card for 1 minute
1/17/02 5:19 PM Walsh calls Calling Card for 1 minute
1/17/02 5:33 PM Walsh calls 312-342-7600 for 4 minutes
1/17/02 5:41 PM Walsh calls Calling Card for 2 minutes
1/17/02 7:02 PM Walsh calls Calling Card for 1 minute
1/17/02 7:03 PM Walsh calls Calling Card for 1 minute
1/17/02 7:03 PM Walsh calls Calling Card for 5 minutes

1/18/02 – 1/26/02 – During the week prior to Segal's London trip, there is email correspondence between Segal and his family and administrative staff, outlining the details of Segal's trip

(departure date, itinerary, etc.). Cheley is actively inside the NN network during this time period. This itinerary was crucial to the timing of Segal's arrest.

1/18/02 2:49 PM Walsh calls Calling Card for 2 minutes
1/18/02 3:19 PM Walsh calls Calling Card for 5 minutes
1/18/02 3:23 PM Walsh calls Calling Card for 1 minute
1/18/02 3:24 PM Walsh calls Calling Card for 1 minute
1/18/02 3:25 PM Walsh calls 847-322-2340 cell phone for 3 minutes
1/18/02 3:28 PM Walsh calls Calling Card for 10 minutes
1/18/02 3:37 PM Walsh calls 847-322-2340 cell phone for 1 minute
1/18/02 3:38 PM Walsh calls Calling Card for 2 minutes
1/18/02 4:05 PM Walsh calls Calling Card for 1 minute
1/18/02 4:06 PM Walsh calls Calling Card for 10 minutes
1/18/02 4:27 PM Walsh calls Calling Card for 2 minutes

Saturday, January 19, 2002

01/19/2002,21:01:36,1,Cheley hacks into VPN at NNI\jmicros","NNI\jmicros","66.1.214.97"
01/19/2002,21:01:47,1,Cheley hacks into VPN at NNI\mseal","NNI\mseal","66.1.214.97"
01/19/2002,21:03:37,4,Cheley hacks into VPN at NNI\bwoil","66.1.214.97"
01/19/2002,21:42:40,4,Cheley hacks into VPN at NNI\bwoil","66.1.214.97"

1/19/02 7:44 AM Walsh calls Calling Card for 2 minutes
1/19/02 11:35 AM Walsh calls Calling Card for 5 minutes
1/19/02 1:47 PM Walsh calls Calling Card for 2 minutes
1/19/02 4:24 PM Walsh calls Calling Card for 3 minutes
1/19/02 4:58 PM Walsh calls Calling Card for 5 minutes
1/19/02 6:55 PM Walsh calls Calling Card for 1 minute

1/20/02 - NN files complaint against Walsh, Berry and Gallagher.

1/20/02 4:50 PM Walsh calls 847-322-2340 cell phone for 1 minute
1/20/02 5:19 PM Walsh calls 847-322-2340 cell phone for 2 minutes

1/21/02 7:59 AM Walsh calls Calling Card for 2 minutes
1/21/02 6:24 PM Walsh calls Calling Card for 2 minutes

1/22/02 – Tom McNichols' last day.

1/22/02 8:19 AM Walsh calls Calling Card for 6 minutes
1/22/02 8:58 AM Walsh calls Calling Card for 2 minutes
1/22/02 12:33 PM Walsh calls FBI Main Number for 2 minutes
1/22/02 12:57 PM Walsh calls FBI Main Number for 2 minutes
1/22/02 3:51 PM Walsh calls Calling Card for 2 minutes
1/22/02 3:52 PM Walsh calls Calling Card for 1 minute
1/22/02 3:52 PM Walsh calls Calling Card for 9 minutes
1/22/02 4:03 PM Walsh calls FBI Main Number for 2 minutes
1/22/02 4:54 PM Walsh calls 312-342-7600 for 3 minutes
1/22/02 7:23 PM Walsh calls Calling Card for 9 minutes

1/23/02 7:59 AM Walsh calls Calling Card for 1 minute

1/23/02 8:03 AM Walsh calls Calling Card for 2 minutes
 1/23/02 12:01 PM Walsh calls FBI Main Number for 1 minute
 1/23/02 3:55 PM Walsh calls FBI Main Number for 1 minute
 1/23/02 3:57 PM Walsh calls Michael Wolf of APCOA Standard Parking for 1 minute
 1/23/02 4:04 PM Walsh calls Michael Wolf of APCOA Standard Parking for 1 minute
 1/23/02 4:13 PM Walsh calls Calling Card for 2 minutes
 1/23/02 4:27 PM Walsh calls Calling Card for 2 minutes
 1/23/02 4:29 PM Walsh calls FBI Main Number for 1 minute
 1/23/02 4:51 PM Walsh calls Calling Card for 1 minute
 1/23/02 4:52 PM Walsh calls Calling Card for 5 minutes
 1/23/02 5:30 PM Walsh calls Pat Murphy FBI cell phone 312-907-8833 for 3 minutes
 1/23/02 5:52 PM Walsh calls Trish LaPerch office for 1 minute
 1/23/02 7:18 PM Walsh calls Pat Murphy FBI cell phone 312-907-8833 for 2 minutes
 1/23/02 7:48 PM Walsh calls Pat Murphy FBI cell phone 312-907-8833 for 7 minutes
 1/23/02 8:55 PM Walsh calls Calling Card for 1 minute
 1/23/02 8:56 PM Walsh calls Calling Card for 2 minutes

 1/24/02 3:58 PM Walsh calls 411 for 2 minutes
 Automatically connected Walsh calls John Hancock Center main number (312-751-3680)
 1/24/02 4:00 PM Walsh calls 411 for 2 minutes
 Automatically Connected Walsh calls USI Chicago main number (312-442-7200)
 1/24/02 4:10 PM Walsh calls 312-342-7600 for 2 minutes
 1/24/02 4:27 PM Walsh calls Jim Janic at Aon office (312-381-2846) for 3 minutes

 1/25/02 8:05 AM Walsh calls Calling Card for 3 minutes
 1/25/02 8:08 AM Walsh calls Marisa-Homme Thielen at home for 10 minutes
 1/25/02 8:19 AM Walsh calls Marisa-Homme Thielen at home for 4 minutes
 1/25/02 8:24 AM Walsh calls FBI Main Number for 2 minutes
 1/25/02 8:25 AM Walsh calls FBI cell phone 312-907-8833 for ____ minutes (Pat Murphy)
 1/25/02 1:59 PM Walsh calls Jim Janic at Aon office for 1 minute
 1/25/02 2:39 PM Walsh calls Jim Janic at Aon office for 2 minutes
 1/25/02 3:44 PM Walsh calls Calling Card for 1 minute
 1/25/02 3:44 PM Walsh calls Calling Card for 1 minute
 1/25/02 3:45 PM Walsh calls Calling Card for 1 minute
 1/25/02 3:49 PM Walsh calls Jim Janic at Aon office for 1 minute
 1/25/02 3:56 PM Walsh calls Calling Card for 3 minutes
 1/25/02 4:25 PM Walsh calls FBI cell phone 312-907-8833 for 1 minute (Pat Murphy)
 1/25/02 5:01 PM Walsh calls Pat Murphy FBI cell phone 312-907-8833 for 2 minutes
 1/25/02 5:51 PM Walsh calls Calling Card for 2 minutes
 1/25/02 5:54 PM Walsh calls 847-322-2340 cell phone for 4 minutes
 1/25/02 6:33 PM Walsh calls Calling Card for 1 minute

1/25/02 6:38 PM Walsh calls Calling Card for 2 minutes
1/25/02 7:39 PM Walsh calls Pat Murphy FBI cell phone 312-907-8833 for 2 minutes

1/26/02 – Segal arrest and NN search warrant seizes computer files and documents.

- No FBI “taint team” is called for in the affidavit in support of the search warrant.
- The investigation described in the warrant specifically addresses Near North’s handling of the PFTA and the company’s related interactions with the Illinois Department of Insurance – same activity that NN has been addressing since August 2001. NN and MS have retained Zack Stamp and others to represent them with respect to the IDOI activity and the AIG/Firemen Fund loan activity being obtained as part of the IDOI compliance.
- The search warrant does not disclose that in October 2001 the FBI has received information from Walsh in the form of illegally obtained internal confidential NN e-mails stolen by Cheley.
- Nor does the search warrant disclose that Walsh received stolen A-C privilege communications stolen by Cheley from NN.

S.A. Murphy calls Berry and Walsh from inside NN during the search of the premises. Surveillance cameras in Near North’s office show an FBI agent making a three (3) minute phone call was made to Berry’s cellular phone from the Near North courtesy phone, extension 4487, located on the 19th floor of the Near North office. Immediately afterwards, the surveillance camera shows the same FBI agent making a two (2) minute phone call is made to Walsh’s cellular phone from the same courtesy phone, extension 4487, located at the same Near North office. (References to these two FBI phone calls were deleted from the complaint.)

The FBI phone calls triggered a wave of calls by Walsh and Berry. An AON employee immediately contacted Sony London and informed them that Segal had just been arrested by federal authorities and taken into custody. A Near North employee (either Townsend or Asher) was present in the Sony London offices when AON called. Near North has just now been able to secure the additional lines. Circumstances indicate that within minutes of Segal’s arrest by federal authorities, Jeff Ludwig and USI employees began calling Near North employees and clients on behalf of AON and informing them that federal authorities had just arrested Segal.

1/26/02 4:49 AM Walsh calls Dana Berry cell phone (312-342-7510) for 1 minute
1/26/02 7:59 AM Walsh calls Calling Card for 2 minutes
1/26/02 8:15 AM Walsh calls Eric Brandfonbrener at home (847-835-5083) for 4 minutes
1/26/02 9:19 AM Walsh calls Matt Walsh at home (847-825-4881) for 1 minutes
1/26/02 9:32 AM incoming call Unknown for 1 minute
1/26/02 9:39 AM Walsh calls Calling Card for 2 minutes
1/26/02 9:41 AM incoming call Unknown for 2 minutes
1/26/02 9:48 AM Walsh calls Dana Berry cell phone for 1 minute
1/26/02 9:49 AM Walsh calls 312-342-7600 for 1 minute (Tim Gallagher)
1/26/02 9:50 AM Walsh calls Calling Card for 1 minute
1/26/02 9:51 AM Walsh calls Calling Card for 12 minutes
1/26/02 10:41 AM incoming call Unknown for 1 minute
1/26/02 10:41 AM Walsh calls Jim Janic at home (708-485-8295) for 5 minutes
1/26/02 11:26 AM incoming call from FBI at Near North offices for 2 minutes
1/26/02 11:27 AM incoming call Unknown for 2 minutes

1/26/02 11:28 AM Walsh calls 312-342-7600 for 3 minutes (Tim Gallagher)
 1/26/02 11:32 AM Walsh calls Dana Berry cell phone for 3 minutes
 1/26/02 11:58 AM incoming call Unknown for 5 minutes
 1/26/02 12:03 PM Walsh calls Pat Murphy FBI cell phone 312-907-8833 for 1 minute
 1/26/02 12:04 PM incoming call from FBI at Near North office for 4 minutes
 1/26/02 12:08 PM Walsh calls Calling Card for 2 minutes
 1/26/02 12:12 PM incoming call Unknown for 2 minutes
 1/26/02 12:39 PM Walsh calls Matt Walsh home for 5 minutes
 1/26/02 12:47 PM incoming call Unknown for 1 minute
 1/26/02 12:48 PM incoming call Unknown for 1 minute
 1/26/02 12:49 PM Walsh calls 312-342-7600 for 4 minutes
 1/26/02 12:53 PM Walsh calls Dana Berry cell phone for 1 minute
 1/26/02 12:53 PM incoming call Unknown for 1 minute
 1/26/02 12:54 PM Walsh calls Jim Janic at home for 6 minutes
 1/26/02 1:00 PM Walsh calls Pat Murphy FBI cell phone 312-907-8833 for 1 minute
 1/26/02 2:26 PM incoming call Unknown for 5 minutes
 1/26/02 2:38 PM Walsh calls Calling Card for 2 minutes
 1/26/02 2:39 PM incoming call Unknown for 1 minute
 1/26/02 2:40 PM Walsh calls Aon voicemail (312-565-6035) for 1 minute
 1/26/02 3:46 PM Walsh calls Calling Card for 1 minute
 1/26/02 4:16 PM Walsh calls Calling Card for 2 minutes
 1/26/02 4:40 PM incoming call Unknown for 14 minutes
 1/26/02 4:54 PM Walsh calls Calling Card for 1 minute
 1/26/02 4:55 PM Walsh calls Calling Card for 1 minute
 1/26/02 5:00 PM Walsh calls Calling Card for 1 minute
 1/26/02 5:01 PM Walsh calls Calling Card for 1 minute
 1/26/02 5:01 PM Walsh calls Calling Card for 14 minutes
 1/26/02 5:17 PM Walsh calls Calling Card for 2 minutes

Sunday, January 27, 2002

01/27/2002,17:33:03,1,Cheley hacks into VPN at NNI\bwooll", "NNI\bwooll", "66.1.214.97"

1/27/02 7:03 AM incoming call Unknown for 3 minutes
 1/27/02 8:16 AM Walsh calls Calling Card for 2 minutes
 1/27/02 11:51 AM incoming call Unknown for 3 minutes
 1/27/02 11:55 AM calling card for 1 minute
 1/27/02 1:24 PM incoming call Unknown for 3 minutes
 1/27/02 1:25 PM incoming call Unknown for 12 minutes
 1/27/02 1:43 PM Walsh calls Calling Card for 11 minutes
 1/27/02 1:54 PM Walsh calls Pat Murphy FBI cell phone 312-907-8833 for 1 minute
 1/27/02 1:56 PM incoming call Unknown for 8 minutes
 1/27/02 2:16 PM Walsh calls 312-342-7600 for 1 minute
 1/27/02 2:28 PM Walsh calls Dana Berry cell phone for 2 minutes
 1/27/02 2:46 PM Walsh calls Dana Berry cell phone for 3 minutes
 1/27/02 4:31 PM incoming call Unknown for 2 minutes
 1/27/02 4:33 PM incoming call Unknown for 1 minute
 1/27/02 5:34 PM Walsh calls Calling Card for 6 minutes
 1/27/02 6:36 PM incoming call Unknown for 3 minutes

1/28/02 6:16 AM incoming call Unknown for 2 minutes
 1/28/02 6:18 AM Walsh calls Dana Berry cell phone for 3 minutes
 1/28/02 6:20 AM Walsh calls Calling Card for 3 minutes
 1/28/02 6:23 AM Walsh calls 312-342-7600 for 1 minute
 1/28/02 6:30 AM Walsh calls 411 for 2 minutes
 Automatically connects Walsh calls WBEZ FM News (312-832-3350)
 1/28/02 6:32 AM Walsh calls 411 for 1 minute
 Automatically connects Walsh calls B96 WBBM (312-944-6000)
 1/28/02 6:36 AM Walsh calls 411 for 2 minutes
 Automatically connects Walsh calls WGN TV (773-528-2311)
 1/28/02 7:13 AM incoming call Unknown for 1 minute
 1/28/02 8:36 AM incoming call Unknown for 1 minute
 1/28/02 11:56 AM incoming call Unknown for 1 minute
 1/28/02 1:03 PM incoming call Unknown for 5 minutes
 1/28/02 2:34 PM incoming call Unknown for 2 minutes
 1/28/02 5:29 PM incoming call Unknown for 1 minute
 1/28/02 5:30 PM incoming call Unknown for 1 minute
 1/28/02 5:31 PM incoming call Unknown for 3 minutes
 1/28/02 5:36 PM Walsh calls Calling Card for 14 minutes.
 1/28/02 6:03 PM Walsh calls Calling Card for 6 minutes
 1/28/02 6:13 PM incoming call Unknown for 1 minute
 1/28/02 6:21 PM Walsh calls 312-342-7600 for 3 minutes
 1/28/02 6:23 PM incoming call Unknown for 10 minutes
 1/28/02 6:45 PM Walsh calls Calling Card for 1 minute
 1/28/02 6:51 PM Walsh calls Calling Card for 2 minutes
 1/28/02 6:52 PM Walsh calls Aon voicemail for 1 minute
 1/28/02 6:53 PM Walsh calls Aon voicemail for 2 minutes
 1/28/02 6:54 PM Walsh calls 312-545-6165 for 4 minutes
 1/28/02 6:58 PM Walsh calls Aon voicemail for 2 minutes
 *** 1/28/02 7:00 PM Walsh calls 312-282-3611 cell phone for 1 minute
 1/28/02 7:49 PM incoming call Unknown for 2 minutes
 1/28/02 8:17 PM Walsh calls Marisa-Homme Thielen at home for 1 minute
 1/28/02 8:28 PM Walsh calls Marisa-Homme Thielen at home for 4 minutes

1/29/02 – U.S. v. Michael Segal criminal complaint filed in the U.S. District Court in Chicago.

1/29/02 6:06 PM Walsh calls Calling Card for 30 minutes
 1/29/02 7:30 PM Walsh calls Calling Card for 1 minute
 1/29/02 7:30 PM Walsh calls Calling Card for 2 minutes
 1/29/02 8:19 PM Walsh calls Calling Card for 28 minutes

1/30/02 - 5:38pm - Dana Berry makes 3 minute phone call to Devra Gerber

1/30/02 8:27 AM Walsh calls Calling Card for 14 minutes
 1/30/02 8:42 AM Walsh calls Calling Card for 4 minutes
 1/30/02 8:46 AM Walsh calls 312-545-6165 for __ minutes
 1/30/02 8:59 AM Walsh calls 411 for 7 minutes
 Automatically connected Walsh calls Devra Gerber (312-337-5868)
 1/30/02 9:13 AM Walsh calls FBI Main Number for 11 minutes
 1/30/02 9:24 AM Walsh calls FBI Main Number for 2 minutes

1/30/02 9:27 AM Walsh calls FBI Main Number for 1 minute
1/30/02 5:32 PM Walsh calls Calling Card for 5 minutes
1/30/02 5:37 PM Walsh calls Calling Card for 1 minute
1/30/02 5:37 PM Walsh calls Calling Card for 1 minute
1/30/02 5:38 PM Walsh calls Calling Card for 1 minute
1/30/02 7:09 PM Walsh calls Marisa-Homme Thielen at home for 58 minutes
1/30/02 8:08 PM Walsh calls Marisa-Homme Thielen at home for 20 minutes

1/31/02 7:57 AM Walsh calls Calling Card for 6 minutes
1/31/02 8:03 AM Walsh calls Calling Card for 1 minute
1/31/02 8:03 AM Walsh calls Calling Card for 1 minute
1/31/02 8:04 AM Walsh calls Calling Card for 1 minute
1/31/02 8:05 AM Walsh calls Calling Card for 1 minute
1/31/02 8:05 AM Walsh calls Calling Card for 1 minute
1/31/02 4:20 PM Walsh calls FBI Main Number for 2 minutes
1/31/02 4:51 PM Walsh calls Calling Card for 1 minute
1/31/02 4:52 PM Walsh calls Calling Card for 1 minute
1/31/02 4:53 PM Walsh calls Calling Card for 7 minutes
1/31/02 4:59 PM Walsh calls FBI Main Number for 11 minutes
1/31/02 5:33 PM Walsh calls Calling Card for 1 minute
1/31/02 5:34 PM Walsh calls Calling Card for 11 minutes
1/31/02 7:30 PM Walsh calls Calling Card for 2 minutes
1/31/02 8:09 PM Walsh calls Calling Card for 2 minutes

2/1/02 8:15 AM Walsh calls Calling Card for 1 minute
2/1/02 8:15 AM Walsh calls Calling Card for 1 minute
2/1/02 8:16 AM Walsh calls Calling Card for 6 minutes
2/1/02 8:40 AM Walsh calls Calling Card for 7 minutes

2/01/02 – Cheley illegally accesses NN e-mail.

Fri Feb 1 14:27:08 2002 _8708b86af462318386256b530062a5c4[1]

Fri Feb 1 14:37:48 2002 7a055b7b0ca859c586256b52007936d6[1]

2/1/02 5:20 PM Walsh calls Calling Card for 20 minutes
2/1/02 5:40 PM Walsh calls Marisa-Homme Thielen at home for 6 minutes

2/2/02 10:53 AM Walsh calls Calling Card for 1 minute
2/2/02 10:53 AM Walsh calls Calling Card for 1 minute
2/2/02 10:54 AM Walsh calls Calling Card for 2 minutes
2/2/02 12:26 PM Walsh calls Marisa-Homme Thielen at home for 6 minutes
2/2/02 1:59 PM Walsh calls 847-322-2340 cell phone for 1 minute
2/2/02 7:05 PM Walsh calls Calling Card for 2 minutes

Marisa Homme Theilan quits Near North effective 2/2/02, therefore I will discontinue flagging specific calls Walsh calls Marisa's home and cell. However we can add these later if it is deemed appropriate.

2/??/02 - Sometime in early February, Georgeanne Meany is contacted via phone by Agent Jane Higgins. Meany gives exculpatory answers to Higgins's questions. There is no 3500 report of this conversation.

2/3/02 9:16 AM Walsh calls Calling Card for 2 minutes
 2/3/02 11:42 AM Walsh calls Calling Card for 1 minute
 2/3/02 11:43 AM Walsh calls Calling Card for 2 minutes
 2/3/02 1:40 PM Walsh calls Calling Card for 1 minute
 2/3/02 1:41 PM Walsh calls Calling Card for 2 minutes

2/04/02 – Crains Chicago news story regarding NN and Calif. & Illinois regulators.

2/01/02 -- In early February 2002, Mary Jakocko emails John Harney regarding payment arrangements on the Pritzker account with London American (Feb 1). Jakocko also informs Harney that Pritzker will no longer accept Michael Segal as an authorized signature (Feb 4). A few months later (sometime in Spring 2002) Mary Jakocko recalls a strange call from Dave Makulina, the Hyatt risk manager, asking if she deals with any other wholesalers than DMI. You can get her interpretation of the strange call. It is obviously reasonable that the horsemen planted all of this and moved on to the client.

In the middle of 2002 Bartholomay made a comment that Pritzker had a special lawyer reviewing Near North's situation, which didn't make any sense.

The FBI contacts Pritzker regarding their account with NNIB.

2/04/02 – Michael Fodor, at AON, sends Bud Scoles, at Jupiter, a fax copy of the MS criminal complaint.

2/4/02 4:55 PM Walsh calls Marisa-Homme Thielen at cell phone (703-927-1221) for 21 minutes
 2/4/02 7:38 PM Walsh calls Marisa-Homme Thielen at home for 5 minutes
 2/4/02 7:45 PM Walsh calls Marisa-Homme Thielen at home for 11 minutes
 2/4/02 7:56 PM Walsh calls Marisa-Homme Thielen at home for 3 minutes
 2/4/02 8:01 PM Walsh calls Marisa-Homme Thielen at home for 1 minute
 2/4/02 8:02 PM Walsh calls Marisa-Homme Thielen at home for 10 minutes

2/07/02 – Cheley illegally accesses NN e-mail and then accesses his Yahoo e-mail.. Attorney-Client Privilege communications contained in accessed materials.

Thu Feb 7 14:41:54 2002 56e4d79741cc795f86256b580059ee6a[1]

Thu Feb 7 14:42:38 2002 5c06c0c4127a43e186256b59005355ca[1]

Thu Feb 7 16:21:42 2002 b0a532e66668758286256b56004fc3a6[1]

Thu Feb 7 16:21:54 2002 c4a5035f89417ad986256b56004ff273[1]

➔Cheley Excite e-mail activity

Thu Feb 7 16:24:44 2002 login[1]1.htm

⬅2/7/02 8:56PM Lisa Rassmussen email to Walsh

2/08/02 – Cheley accesses his Yahoo e-mail and then illegally accesses NN e-mail. Attorney-Client Privilege communications contained in accessed materials.

⬅2/8/02 9:24AM Walsh forwards Lisa Rassmussen email Walsh calls Pat Murphy (murph353@mindspring.com)

➔Cheley Excite e-mail activity

Fri Feb 8 12:15:08 2002 login[1]4.htm

➔Cheley Hacking Near North systems

Fri Feb 8 12:20:10 2002 70ad7cd4c6ab4ae786256b5900785dc1[1]

Fri Feb 8 12:20:18 2002 017aa0e3bc15e0be86256b5900744d18[1]

Fri Feb 8 12:21:12 2002 cf1ebdaf60b076ed86256b59007af0ea[1]

Fri Feb 8 12:21:26 2002 3d715d0bbdd1562a86256b5a005a1adc[1]

Fri Feb 8 12:21:36 2002

596778009a6175b686256b5a004fc9d3[1]

Sunday, February 9, 2002

02/09/2002,20:29:48,1,Cheley hacks into VPN at NNI\bwoil", "NNI\bwoil", "66.1.214.97"
02/09/2002,20:32:58,1,Cheley hacks into VPN at NNI\dwatkins", "NNI\dwatkins", "66.1.214.97"
02/09/2002,20:55:09,1,Cheley hacks into VPN at NNI\msoto", "NNI\msoto", "66.1.214.97"
02/09/2002,21:53:31,4,Cheley hacks into VPN at NNI\msoto", "66.1.214.97"

2/9/02 8:24PM David Cheley (dave@aboutdave.com) fake email Walsh calls Walsh about obtaining new job

2/13/02 – Cheley illegally accesses NN e-mail.

2/13/02 9:28 PM Walsh calls Fairmont Hotel in Chicago (312-565-8000) for 5 minutes

2/13/02 9:33 PM Walsh calls Fairmont Hotel in Chicago (312-565-8000) for 18 minutes

2/14/01 – Cheley illegally accesses NN e-mail and then utilizes his Yahoo account twice. Attorney-Client Privilege communications contained in accessed materials.

Thu Feb 14 08:54:38 2002 f6a51b65e9d907fe86256b5f00684868[1]

Thu Feb 14 08:55:14 2002 80f3194a03681bf386256b5e00528055[1]

Thu Feb 14 08:56:14 2002 647cff0f133c6ea186256b5f00836e19[1]

Thu Feb 14 08:57:10 2002 2b6cd9620fb1ab3986256b5f005d2495[1]

Thu Feb 14 08:57:44 2002 717d7cc75a2f665b86256b5e006f0d5d[1]

➔Cheley Excite e-mail activity

Thu Feb 14 15:04:00 2002 _index[6].htm

Thu Feb 14 16:23:48 2002 login[1].htm

Thu Feb 14 16:24:00 2002 register[1]1.htm

Thu Feb 14 16:25:22 2002 register[1]2.htm

Thu Feb 14 16:25:38 2002 register[1].htm

Thu Feb 14 16:26:26 2002 register[1]3.htm

Thu Feb 14 16:26:44 2002 pWalsh callsspp[1].htm

Thu Feb 14 16:26:52 2002 _dcheley@excite[2].txt

Thu Feb 14 16:26:52 2002 _login[3].htm

2/14/02 4:51 PM Walsh calls FBI Main Number for 4 minutes

2/15/02 – Sun-Times headline “Did Segal’s Firm Cheat Nuns?”

2/15/02- Cheley illegally access NN e-mail.

2/15/02 6:41 AM Walsh calls FBI Main Number for 3 minutes

2/15/02 6:48 AM Walsh calls FBI Main Number for 2 minutes

2/15/02 6:56 AM Walsh calls Trish LaPerch office for 1 minute

2/15/02 5:39 PM Walsh calls 847-322-2340 cell phone for 4 minutes

2/15/02 6:19 PM Walsh calls 847-322-2340 cell phone for 1 minute

2/16/02 9:55 AM Walsh calls FBI Main Number for 3 minutes

2/19/02 9:52 AM Walsh calls 312-541-0050 for 1 minute

2/19/02 8:44 PM Walsh calls 847-322-2340 cell phone for 1 minute

2/22/02 7:27 AM Walsh calls FBI cell phone 312-907-8833 for 3 minutes (Pat Murphy)

2/22/02 7:52 AM Walsh calls FBI cell phone 312-907-8833 for 2 minutes (Pat Murphy)

2/22/02 3:57 PM Walsh calls FBI cell phone 312-907-8833 for 4 minutes (Pat Murphy)

2/26/02 8:24 AM Walsh calls Trish LaPerch office for 3 minutes

➔Cheley Hacking Near North systems

Tue Feb 26 16:27:24 2002 _(\$Sent)[1]

2/27/02 10:24 AM Walsh calls 847-322-2340 cell phone for 4 minutes

2/27/02 11:06 AM Walsh calls 847-322-2340 cell phone for ____ minutes

2/27/02 11:50 AM Walsh calls 847-322-2340 cell phone for 2 minutes

2/28/02 – Cheley access NN e-mail and transmits FYI e-mail to Dana Berry.

Thu Feb 28 15:05:26 2002 _quiklist[1].htm

Thu Feb 28 15:06:00 2002 _6701dbe971a1[1].htm

Thu Feb 28 15:14:00 2002 _All+By+Person[2]3

Thu Feb 28 15:14:04 2002 _All+By+Person[1]

Thu Feb 28 15:14:06 2002 _All+By+Person[2]2

Thu Feb 28 15:14:08 2002 _All+By+Person[1]1

Thu Feb 28 15:14:10 2002 _All+By+Person[3]3

Thu Feb 28 15:14:12 2002 _All+By+Person[2]

Thu Feb 28 15:14:16 2002 _All+By+Person[3]2

Thu Feb 28 15:14:18 2002 _All+By+Person[2]1

Thu Feb 28 15:14:20 2002 _All+By+Person[4]2

Thu Feb 28 15:14:22 2002 _All+By+Person[3]

Thu Feb 28 15:14:24 2002 _All+By+Person[4]1

Thu Feb 28 15:14:28 2002 _All+By+Person[3]1

Thu Feb 28 15:14:34 2002 _All+By+Person[4]

Thu Feb 28 15:14:38 2002 _All+By+Person[5]

Thu Feb 28 15:14:44 2002 _All+By+Person[5]1

➔Cheley Hotmail e-mail activity

Thu Feb 28 15:19:42 2002 _7437393f51f5[1].htm

Thu Feb 28 17:00:18 2002 sfd17.htm

3/1/02 – Cheley illegally access NN email

Fri Mar 1 15:01:22 2002 _d381f63594305e4d86256a61004770df[3]

3/1/02 1:54 PM Walsh calls Marisa-Homme Thielen at Aon office 202-862-5394 for 2 minutes

3/04/02 – Cheley illegally accesses NN e-mail and scans MS e-mail. Attorney-Client Privilege communications contained in accessed materials. During this session Cheley accesses three times a memo marked Privileged & Confidential; Civil Litigation e-mail from MS to Silets. The memo describes MS strategy regarding litigation. Between each of four NN e-mail intrusion sessions, Cheley utilizes his Hotmail account four times.

3/04/02 - Cheley transmits a second "FYI" e-mail containing this NN attorney-client communication, to Dana Berry. Cheley's message states, "Here is another FYI on some of the plans...If it's possible, can you let me know if you're received this? I have access to lots of interesting information and I want to make sure it gets to the right person."

Mon Mar 4 13:46:00 2002 becfb929325337a086256b7200531abc[1]
Mon Mar 4 13:46:24 2002 9f50d8097e685c0b86256b6f007dc54a[1]
Mon Mar 4 13:46:46 2002 d381f63594305e4d86256a61004770df[1]3
Mon Mar 4 13:46:50 2002 9d6df7776a9a09ab86256b6f007ecd5b[1]
Mon Mar 4 13:46:58 2002 347ad8629d634ed888256b6f0079789f[1]
Mon Mar 4 13:47:32 2002 4644f469810879b086256b72005e468d[1]
Mon Mar 4 13:47:40 2002 1342eb1d852c9f4086256b72005e2002[1]
Mon Mar 4 13:47:52 2002 e07b607e1be5567186256b72005343b9[1]
Mon Mar 4 13:49:18 2002 314771c73f81249e86256b7200555421[1]

→Cheley Hotmail e-mail activity

Mon Mar 4 13:49:20 2002 HoTMaiL[1]8.htm
Mon Mar 4 13:49:30 2002 compose[1]8.htm
Mon Mar 4 13:53:00 2002 7740f6202a22[1].htm

←3/4/02 Cheley (Lisa Fisher) sends email Walsh calls Dana Berry

→Cheley Hacking Near North systems

Mon Mar 4 13:53:32 2002 782deeb47085632e86256b6f0078e881[1]
Mon Mar 4 13:54:40 2002 aff6469ab6804fe586256b6f005d957b[1]
Mon Mar 4 13:54:50 2002 8849f83f73fa51f386256b6e005cee1b[1]
Mon Mar 4 13:54:56 2002 6c5a52cbc5c65e9386256b6b005f7649[1]
Mon Mar 4 13:55:30 2002 9c4977f3fc5597d886256b6b005f1122[1]
Mon Mar 4 13:55:40 2002 d6c1a0358a82d7a386256b64005424c0[1]

→Cheley Hotmail e-mail activity

Mon Mar 4 13:59:08 2002 HoTMaiL[1]3.htm
Mon Mar 4 14:00:22 2002 compose[1]3.htm
Mon Mar 4 14:03:58 2002 8385d2fa47c3[1].htm

→Cheley Hacking Near North systems

Mon Mar 4 14:04:58 2002 7fe4ad7b579f843686256b7000026298[1]

→Cheley Hotmail e-mail activity

Mon Mar 4 14:08:44 2002 _MT+memo+Mar+4+2002.doc

→Cheley Hacking Near North systems

Mon Mar 4 14:09:40 2002 372c6e7a7ed69fee86256b72006246c7[1]
Mon Mar 4 14:10:12 2002 7dc3418f0bf5240e86256b72004decee[1]
Mon Mar 4 14:10:18 2002 95fbbdc188a5e0b586256b72004d4793[1]
Mon Mar 4 14:11:34 2002 7fd68919a5fc292586256b72004d1b58[1]

→Cheley Hotmail e-mail activity

Mon Mar 4 14:14:36 2002 getmsg[1]2.htm
Mon Mar 4 14:15:10 2002 compose[1]4.htm
Mon Mar 4 14:20:52 2002 926603505061[1].htm
Mon Mar 4 14:20:58 2002 getmsg[1]1.htm
Mon Mar 4 14:34:00 2002 HoTMaiL[1]7.htm
Mon Mar 4 14:34:04 2002 getmsg[1]4.htm

←3/4/02 3:47AM Dana Berry sends response email Walsh calls Lisa Fisher

Mon Mar 4 17:20:10 2002 1f27ef626c29229586256b720078daeb[1]
Mon Mar 4 17:21:02 2002 13878bd6db071ec386256b7200738884[1]
Mon Mar 4 17:23:08 2002 _segal2.txt

Mon Mar 4 17:23:26 2002	f603c134bf61ab9088256b72006b2a8c[1]
Mon Mar 4 17:24:46 2002	dbc41140aab94e8186256b720066f123[1]
Mon Mar 4 17:25:16 2002	b6e7ecede14842b986256b720065e4f2[1]

3/4/02 – S.A. Murphy and A.U.S.A. Virginia Kendall, through Brandfonbrenner, receive attorney-client information from inside NN that Cheley sent to Berry. The e-mail clearly shows that Cheley is breaking into NN systems. Nothing is reported to NN by the F.B.I., the U.S. Attorney’s Office or by Brandfonbrenner.

3/05/02 – Berry sends Cheley an e-mail telling Cheley not to send more e-mails.

3/05/02 – Cheley illegally access NN e-mail.

←3/5/02 9:21AM Lisa Fisher sends response email Walsh calls Dana Berry

←3/5/02 9:22AM Dana Berry sends response email Walsh calls Lisa Fisher

→Cheley Hotmail e-mail activity

Tue Mar 5 10:20:00 2002	HoTMaiL[1]12.htm
Tue Mar 5 10:20:04 2002	getmsg[1]8.htm
Tue Mar 5 10:20:42 2002	HoTMaiL[2]8.htm
Tue Mar 5 10:20:44 2002	getmsg[2]4.htm
Tue Mar 5 10:20:50 2002	compose[1]5.htm
Tue Mar 5 10:22:08 2002	161794d9ebdf[1].htm
Tue Mar 5 10:22:14 2002	getmsg[1]12.htm
Tue Mar 5 10:24:22 2002	getmsg[1]11.htm
Tue Mar 5 11:03:20 2002	HoTMaiL[3]6.htm
Tue Mar 5 11:03:50 2002	protect[1].htm
Tue Mar 5 11:04:00 2002	getmsg[1]7.htm
Tue Mar 5 11:05:44 2002	HoTMaiL[2]12.htm
Tue Mar 5 11:06:06 2002	dofolders[1].htm
Tue Mar 5 11:06:20 2002	HoTMaiL[1]2.htm
Tue Mar 5 11:06:34 2002	HoTMaiL97bc62f8[1].htm

→Cheley Hacking Near North systems

Tue Mar 5 14:05:08 2002	e43fb0a612e1f31986256b730067a470[1]
Tue Mar 5 14:05:58 2002	2cefac039521b9ca86256b7300108ac0[1]
Tue Mar 5 14:11:06 2002	07bfe06401c0f9ee86256b72007d3b2b[1]
Tue Mar 5 14:11:18 2002	489fa512f25623da86256b72007b0f27[1]
Tue Mar 5 14:16:24 2002	259cf7505110056686256b72007d087e[1]
Tue Mar 5 14:18:14 2002	cc1c9581fe94de9f86256b7300643cfb[1]

3/06/02 – Cheley illegally access NN e-mail during three sessions. Attorney-Client Privilege communications contained in accessed materials. Cheley illegally accesses NN and obtains access to a Crains Chicago news story “Near North replaces CFO”

Wed Mar 6 08:37:20 2002 342cc8c97e380ebd86256b73007573cb[1]

Wed Mar 6 08:37:42 2002 4f6cf07d181ff5d086256b730073f68f[1]

→Cheley Hotmail e-mail activity

Wed Mar 6 08:47:56 2002	index[6].htm
Wed Mar 6 09:00:02 2002	query[1].htm

→Cheley Hacking Near North systems

Wed Mar 6 17:34:24 2002	4f9af468d7c4daff86256b7400778a03[1]
Wed Mar 6 17:34:52 2002	2f574af41b9bf3b786256b740077509e[1]
Wed Mar 6 17:35:12 2002	1aa1b1ecd630d2cb86256b74006d3aea[1]

→Cheley Hotmail e-mail activity

Wed Mar 6 17:35:40 2002 news[1].htm
➔Cheley Hacking Near North systems
Wed Mar 6 17:37:04 2002 529eed0dc2b1cbe586256b730075dcc7[1]
Wed Mar 6 17:37:18 2002 ae7174b6d6cd61f086256b74007727c9[1]
Wed Mar 6 17:38:16 2002 b48de76425a9c71586256b74005a022f[1]

3/6/02 6:11 PM Walsh calls FBI Main Number for 2 minutes

3/7/02 9:44 AM Walsh calls APCOA Standard Parking main number (312-274-2000) for 2 minutes

3/7/02 - Cheley sends Ingrid a list of phone calls that NN is monitoring and tells her "If there's anyone on the list that you are friends with, let them know."

3/07/02 –Cheley utilizes his Hotmail e-mail account five times and between uses of his Hotmail account he illegally access NN e-mail during five different sessions. Attorney-Client Privilege communications contained in accessed materials. During these sessions Cheley accesses three more times the same message between MS and Silets, which has now been forwarded to Novoselsky.

➔Cheley Hotmail e-mail activity

Thu Mar 7 10:21:20 2002 a[1]3.htm
Thu Mar 7 10:23:52 2002 query[2]1.htm
Thu Mar 7 10:24:10 2002 usindex[1].htm
Thu Mar 7 10:24:14 2002 mexico[1].htm
Thu Mar 7 10:49:22 2002 query[3]1.htm

*** 3/7/02 12:54 PM Walsh calls 914-707-9459 for 0 minutes (???)

3/7/02 1:43 PM Walsh calls 312-541-0050 for 2 minutes

3/7/02 1:52 PM Walsh calls Trish LaPerch office for 1 minute

➔Cheley Hotmail e-mail activity

Thu Mar 7 15:12:02 2002 HoTMaiL[1]10.htm
Thu Mar 7 15:12:10 2002 getmsg[1]6.htm

➔Cheley Hacking Near North systems

Thu Mar 7 15:12:26 2002 07d71a45d5a395f986256b750069d6cc[1]
Thu Mar 7 15:12:38 2002 99435607bbe9583586256b7500607a69[1]
Thu Mar 7 15:14:12 2002 9becf378e64e901388256b7500591cdc[1]
Thu Mar 7 15:14:30 2002 2c7d7da03644a72586256b7500529ff6[1]
Thu Mar 7 15:14:54 2002 bdea088dc2fe37ad86256b750051dfa3[1]
Thu Mar 7 15:15:06 2002 24e03785a2654a4986256b750051987d[1]
Thu Mar 7 15:15:28 2002 4ce173e08936b00488256b7500103ee8[1]
Thu Mar 7 15:15:48 2002 7d6ca8b3c3e647ea86256b750068a5a4[1]
Thu Mar 7 15:16:02 2002 e22f7d84ca46a3a686256b740051c729[1]
Thu Mar 7 15:17:58 2002 fb89ac59bd1e9bf886256b6e005c6042[1]
Thu Mar 7 15:18:06 2002 d48dc8976b6afc4086256b720050af7f[1]
Thu Mar 7 15:22:14 2002 3c7b21a83cc0c2f386256b750053f6ea[1]
Thu Mar 7 15:25:40 2002 01132aea1b1d7eb086256b75005a4dad[1]

➔Cheley Hotmail e-mail activity

Thu Mar 7 15:29:08 2002 HoTMaiL[1]5.htm
Thu Mar 7 15:29:14 2002 compose[1]2.htm
Thu Mar 7 15:30:34 2002 2922d98af3ab[1].htm

➔Cheley Hacking Near North systems

Thu Mar 7 15:33:06 2002 2fbd6daf4367863286256b75006c7cd1[1]
Thu Mar 7 15:33:30 2002 df2a4ef81504e0a086256b75005e50e9[1]
Thu Mar 7 15:35:28 2002 01132aea1b1d7eb086256b75005a4dad[1]1
Thu Mar 7 15:35:34 2002 8f2b9b0ad1a4a65f86256b7400793282[1]

➔Cheley Hotmail e-mail activity

Thu Mar 7 15:40:16 2002 HoTMaiL[2]7.htm
Thu Mar 7 15:40:28 2002 compose[1]9.htm
Thu Mar 7 15:41:32 2002 359793dd678d[1].htm
Thu Mar 7 15:41:42 2002 getmsg[2]2.htm
Thu Mar 7 15:41:50 2002 compose[2]2.htm
Thu Mar 7 15:45:34 2002 3680bef37e01[1].htm
Thu Mar 7 15:45:42 2002 getmsg[1]9.htm
Thu Mar 7 15:46:04 2002 HoTMaiL[1]4.htm
Thu Mar 7 15:46:12 2002 getmsg[1]5.htm

➔Cheley Hacking Near North systems

Thu Mar 7 15:47:14 2002 b9402db02e7448b186256b750069b3c8[1]
Thu Mar 7 15:48:54 2002 ef2e1f158f1fd44586256b750056ab9a[1]
Thu Mar 7 15:50:08 2002 (\$Sent)[3]
Thu Mar 7 15:51:18 2002 a8e6415919dae57f86256b2f006f57a7[1]

➔Cheley Hotmail e-mail activity

Thu Mar 7 15:51:32 2002 HoTMaiL[2]5.htm
Thu Mar 7 15:51:44 2002 getmsg[2]3.htm
Thu Mar 7 15:51:56 2002 HoTMaiL[1]9.htm
Thu Mar 7 15:52:08 2002 getmsg[3]2.htm
Thu Mar 7 15:53:42 2002 HoTMaiLae943034[1].htm
Thu Mar 7 15:53:52 2002 getmsg[1]10.htm
Thu Mar 7 15:54:54 2002 HoTMaiL6b250c84[1].htm
Thu Mar 7 15:55:22 2002 HoTMaiL[1]1.htm
Thu Mar 7 15:56:00 2002 HoTMaiL[1].htm
Thu Mar 7 15:56:08 2002 HoTMaiL20acb9e8[1].htm
Thu Mar 7 15:59:24 2002 dcheley@x10[2].txt
Thu Mar 7 15:59:46 2002 HoTMaiL[2].htm
Thu Mar 7 15:59:50 2002 compose[2]3.htm
Thu Mar 7 16:00:54 2002 HoTMaiL[3]5.htm
Thu Mar 7 16:04:10 2002 compose[1]1.htm
Thu Mar 7 16:04:12 2002 HoTMaiL[3]2.htm
Thu Mar 7 16:05:08 2002 50222413b45a[1].htm
Thu Mar 7 16:08:52 2002 HoTMaiL[2]10.htm
Thu Mar 7 16:08:56 2002 HoTMaiL[3]7.htm
Thu Mar 7 16:09:04 2002 HoTMaiL[3].htm
Thu Mar 7 16:19:26 2002 HoTMaiL[4].htm

➔Cheley Hacking Near North systems

Thu Mar 7 16:29:46 2002 a7d45dde1b4b57f386256b7500606098[1]

*** 3/7/02 4:37 PM Walsh calls 917-370-9245 for 0 minutes (???)

➔Cheley Hotmail e-mail activity

Thu Mar 7 16:41:00 2002 HoTMaiL[2]1.htm
Thu Mar 7 16:41:10 2002 compose[2]1.htm
Thu Mar 7 16:46:56 2002 7243190ceaa6[1].htm
Thu Mar 7 16:51:46 2002 HoTMaiL[4]1.htm

3/08/02 – Cheley illegally accesses NN e-mail, including MS mail box, during four different intrusion sessions. Between sessions Cheley utilizes his Hotmail account three times. Cheley accessing A-C Privilege e-mail from Stanton to MS regarding NN complaint against AON. Fax attached to the e-mail saved as a .gif file on Kemper hard drive by Cheley.

➔Cheley Hotmail e-mail activity

Fri Mar 8 10:23:58 2002 HoTMaiL[2]4.htm
 Fri Mar 8 10:24:04 2002 compose[1]7.htm
 Fri Mar 8 10:28:58 2002 1008f18bef79[1].htm
 Fri Mar 8 10:29:22 2002 doattach04c44e66[1].htm
 Fri Mar 8 10:29:40 2002 doattachcbfbfabf[1].htm
 Fri Mar 8 10:29:46 2002 doattach9ad1f3a5[1].htm
 Fri Mar 8 10:34:48 2002 13512cba2bc2[1].htm

➔Cheley Hacking Near North systems

Fri Mar 8 10:39:40 2002 b97acc624c1058bb86256b760000c862[1]
 Fri Mar 8 10:40:02 2002 baba7c04435797f086256b750080ec62[1]
 Fri Mar 8 10:40:12 2002 18274c5efc13f17686256b75007b6966[1]
 Fri Mar 8 10:40:22 2002 8c8bfccb689b3d2d86256b75007db2ad[1]
 Fri Mar 8 10:41:00 2002 70fa7d83daed822386256b760051d6ed[1]
 Fri Mar 8 10:41:28 2002 965dbd16d18f276286256b7600519d66[1]
 Fri Mar 8 10:41:38 2002 089d8d640496c73c86256b76005152ea[1]
 Fri Mar 8 10:41:48 2002 ff08e8ecc5e5071186256b760050ab82[1]

➔Cheley Hotmail e-mail activity

Fri Mar 8 10:50:02 2002 HoTMaiL[2]3.htm
 Fri Mar 8 10:50:38 2002 compose[3]1.htm
 Fri Mar 8 11:06:20 2002 HoTMaiL[3]4.htm
 Fri Mar 8 11:06:32 2002 HoTMaiL[5].htm
 Fri Mar 8 11:06:36 2002 compose[3].htm

➔Cheley Hacking Near North systems

Fri Mar 8 11:15:08 2002 7e4718dcc4c95dd386256b7600584b69[1]
 Fri Mar 8 11:15:48 2002 1fbfcc394b210f5186256b72005c488a[1]1
 Fri Mar 8 11:16:18 2002 1fbfcc394b210f5186256b72005c488a[1]
 Fri Mar 8 11:16:26 2002 1fbfcc394b210f5186256b72005c488a[1].1
 Fri Mar 8 11:16:30 2002 1fbfcc394b210f5186256b72005c488a[1]1.1
 Fri Mar 8 11:16:58 2002 bbe744ba339fc02886256b72005248aa[1]
 Fri Mar 8 11:17:06 2002 2f7e2f45f02605fb86256b6f004ecdef[1]
 Fri Mar 8 11:17:22 2002 e08b31e04d9bcd7786256b6e0071b850[1]
 Fri Mar 8 11:17:50 2002 7c816d476005ce3786256b730072039d[1]
 Fri Mar 8 11:18:46 2002 e5741fe4089a110b86256b7300767f6b[1]
 Fri Mar 8 11:20:28 2002 0fdcac3f764a8fe886256b73007eaafb[1]
 Fri Mar 8 11:20:32 2002 6fb8ec2ce5b7ba8386256b7300797df6[1]
 Fri Mar 8 11:20:42 2002 56e7ae46b825575886256b73006fb8fd[1]
 Fri Mar 8 11:20:52 2002 5a164360e6c4cd3986256b720081761c[1]
 Fri Mar 8 11:21:06 2002 c24473124e6b172686256b72007ab05e[1]
 Fri Mar 8 11:21:22 2002 c359321bff17bef186256b6e0075afad[1]
 Fri Mar 8 11:21:32 2002 ac9dfbe63314c33e86256b6d000cc234[1]
 Fri Mar 8 11:21:54 2002 284f6fdaf227de8b86256b6c007a0474[1]
 Fri Mar 8 11:22:00 2002 9b05ec203fb9ba9186256b6c005b4ee5[1]
 Fri Mar 8 11:25:04 2002 d381f63594305e4d86256a61004770df[2]3
 Fri Mar 8 11:25:08 2002 0996b321f3748f0a86256b7600573b0b[1]1

Fri Mar 8 11:25:20 2002 0ab44484704ad07f86256b7600560201[1]
 Fri Mar 8 11:26:20 2002 5c3541b32c8b32cb86256b5300503dab[1]
 Fri Mar 8 11:27:36 2002 127ea04ae53fa97786256b6d006c9e35[1]
 Fri Mar 8 11:29:24 2002 (\$Sent)[2]4

➔Cheley Hotmail e-mail activity

Fri Mar 8 11:37:04 2002 [1]1.htm
 3/8/02 1:51 PM Walsh calls APCOA Standard Parking main number (312-274-2000) for 3 minutes
 3/8/02 2:12 PM Walsh calls 312-266-3425 for 5 minutes
 3/8/02 2:24 PM Walsh calls 847-322-2340 cell phone for 2 minutes

➔Cheley Hacking Near North systems

Fri Mar 8 14:27:36 2002 0996b321f3748f0a86256b7600573b0b[1]
 Fri Mar 8 14:48:18 2002 d381f63594305e4d86256a61004770df[4]
 Fri Mar 8 14:49:40 2002 d1264602b9c64ce486256b760020a894[1]
 Fri Mar 8 14:50:10 2002 a29d64a383f7f0fd85256b76005ecdbe[1]
 Fri Mar 8 14:51:08 2002 (\$Sent)[2]3

3/08/02 – Swiantek first becomes aware that someone is inside the NN network system and using Internet access to the Lotus Notes e-mail to view employee e-mail without authorization. He, Jason Liang and an outside NN technical consultant begin to develop a program to monitor these NN systems intrusions.

3/11/02 – Cheley illegally accesses NN e-mail. Attorney-Client Privilege communications contained in accessed materials.

➔Cheley Hacking Near North systems

Mon Mar 11 09:56:20 2002 498dd0d5c5a4cdad86256b79004fd365[1]
 Mon Mar 11 09:56:26 2002 dede33959e7beffb86256b79003ff6cf[1]
 Mon Mar 11 09:56:58 2002 0996b321f3748f0a86256b7600573b0b[1]2
 Mon Mar 11 09:57:10 2002 53cb4df580914b5d86256b760057e2d7[1]
 Mon Mar 11 10:04:08 2002 jsegal[1]1.nsf
 Mon Mar 11 10:04:14 2002 d381f63594305e4d86256a61004770df[1]7
 Mon Mar 11 10:04:18 2002 bdecebc46103f0bb86256b79004f8aa2[1]
 Mon Mar 11 10:04:38 2002 1fdc5ee6ca883ea786256b790046d67b[1]
 Mon Mar 11 10:04:50 2002 1d93bfd2b8d7008c86256b780058bb1c[1]
 Mon Mar 11 10:05:44 2002 b4b0fc73e033f32986256b7600673bc6[1]
 Mon Mar 11 10:05:54 2002 863e394e7d8ee76b86256b760071a2e5[1]
 Mon Mar 11 10:06:12 2002 (\$Sent)[1]11
 Mon Mar 11 10:06:16 2002 cfe5713d28f822ae86256b7700817b95[1]
 Mon Mar 11 10:06:28 2002 04f3696884ec3fa686256b7700814473[1]
 Mon Mar 11 10:06:38 2002 e0b59a4fe554e6c486256b770080fc41[1]
 Mon Mar 11 10:06:48 2002 470581dcd8bdd63486256b7700807e8e[1]
 Mon Mar 11 10:07:14 2002 c66cb11417e74afb86256b760079696d[1]
 Mon Mar 11 10:07:28 2002 eafad91182455c9486256b76005c8eda[1]
 Mon Mar 11 10:07:34 2002 5cfb6838a8b98dcd86256b76005a4134[1]
 Mon Mar 11 10:07:50 2002 2480959ab7131ad886256b7800057c94[1]

3/11/02 – Ingrid N terminated by NN.

3/12/02- Cheley illegally accesses NN system

Hotmail e-mail activity

Tue Mar 12 09:54:48 2002 HoTMaiL[5]1.htm

Tue Mar 12 09:55:02 2002 getmsg[4]1.htm
 ➔Cheley Hacking Near North systems
 Tue Mar 12 09:57:00 2002 f94fbc7e8a784a9286256b79005b0bea[1]
 Tue Mar 12 09:57:44 2002 7e976afb0dddca5686256b7a0050f244[1]
 Tue Mar 12 09:58:00 2002 6f55259e237d5cf986256b7a004febc8[1]
 Tue Mar 12 09:58:22 2002 91f864946b92ee2e86256b7a004fbb4d[1]
 Tue Mar 12 09:58:30 2002 0bfbe60d75af67dd86256b7a004fa16d[1]
 Tue Mar 12 09:58:40 2002 ea6bca9dab1b097886256b7a004f7427[1]
 Tue Mar 12 09:58:48 2002 867064ac7968923f86256b7a004f4fda[1]
 Tue Mar 12 09:59:00 2002 216d90b0aff61b7886256b790050c9c1[1]
 Tue Mar 12 09:59:44 2002 83fa0bd0ad7de59b86256b790053b0c7[1]
 ➔Cheley Yahoo e-mail activity
 Tue Mar 12 10:02:30 2002 my.yahoo[1]5.com
 Tue Mar 12 13:51:00 2002 _8896c758ee3f[1].htm
 3/12/02 – Cheley uses his Hotmail account and then illegally accesses NN e-mail.
 Attorney-Client Privilege communications contained in accessed materials.

3/13/02 8:58 AM Walsh calls 312-541-0050 for 1 minute
 3/13/02 9:03 AM Walsh calls Tom Ealy at USI office (312-342-7510) for 1
 minute
 3/13/02 9:04 AM Walsh calls 312-541-0050 for 1 minute
 3/13/02 9:05 AM Walsh calls 312-541-0050 for 1 minute

3/13/02 – Cheley uses his Hotmail account, then illegally accesses NN e-mail and MS's
 mail box twice. He then uses his Hotmail account twice and his Excite account once.
 Attorney-Client Privilege communications contained in accessed materials.

➔Cheley Hotmail e-mail activity
 Wed Mar 13 15:08:20 2002 getmsg[2]7.htm
 Wed Mar 13 15:16:30 2002 compose[4].htm
 Wed Mar 13 15:17:32 2002 0548000f2787[1].htm
 Wed Mar 13 15:17:38 2002 domsgaddresses[1]1.htm
 Wed Mar 13 15:17:56 2002 getmsg[1].htm
 Wed Mar 13 15:23:16 2002 HoTMaiL[3]1.htm
 Wed Mar 13 15:23:24 2002 compose[2]4.htm
 Wed Mar 13 15:23:42 2002 0970b92e2608[1].htm
 Wed Mar 13 15:27:28 2002 HoTMaiL[2]2.htm
 Wed Mar 13 15:27:32 2002 compose[1]6.htm
 Wed Mar 13 15:28:34 2002 1219ddf17fc6[1].htm
 Wed Mar 13 15:28:52 2002 doattachf0331670[1].htm
 Wed Mar 13 15:29:26 2002 doattach048695d8[1].htm
 Wed Mar 13 15:29:56 2002 13331afe0ea6[1].htm
 Wed Mar 13 15:30:28 2002 getmsg[2]6.htm
 Wed Mar 13 15:30:56 2002 HoTMaiL[3]3.htm
 Wed Mar 13 15:31:02 2002 getmsg[1]3.htm
 Wed Mar 13 15:31:38 2002 compose[4]1.htm
 Wed Mar 13 15:37:42 2002 HoTMaiL[1]11.htm
 Wed Mar 13 15:38:12 2002 getmsg[2]5.htm
 Wed Mar 13 15:38:22 2002 compose[3]3.htm
 Wed Mar 13 15:45:50 2002 1869d3cce480[1].htm
 Wed Mar 13 15:46:02 2002 getmsg[2].htm
 Wed Mar 13 15:46:32 2002 HoTMaiL[1]6.htm

➔Cheley Hacking Near North systems

Wed Mar 13 16:31:20 2002 756b0b2922e53d2f86256b7b0070e18e[1]

Wed Mar 13 16:31:44 2002 (\$Sent)[3]1

➔Cheley Hotmail e-mail activity

Wed Mar 13 16:48:18 2002 HoTMaiL[6].htm

Wed Mar 13 16:48:22 2002 compose[1].htm

Wed Mar 13 16:48:56 2002 606996e413f6[1].htm

Wed Mar 13 16:49:20 2002 doattach41d382c3[1].htm

Wed Mar 13 16:49:30 2002 doattachef62bcb9[1].htm

Wed Mar 13 16:49:52 2002 61360b16c2ad[1].htm

Wed Mar 13 16:50:10 2002 HoTMaiL[2]6.htm

➔Cheley Excite e-mail activity

Wed Mar 13 16:57:38 2002 logout[1].htm

Wed Mar 13 16:58:14 2002 excite[1].com

Wed Mar 13 16:58:14 2002 dcheley@excite[1].txt

Wed Mar 13 16:58:20 2002 login[2].htm

➔Cheley Hacking Near North systems

Wed Mar 13 17:18:42 2002 msegal[2]1.nsf

Wed Mar 13 17:18:48 2002 d381f63594305e4d86256a61004770df[1]8

Wed Mar 13 17:18:48 2002 d381f63594305e4d86256a61004770df[1]13

Wed Mar 13 17:19:04 2002 d381f63594305e4d86256a61004770df[1]12

Wed Mar 13 17:19:16 2002 d381f63594305e4d86256a61004770df[1]15

Wed Mar 13 17:19:54 2002 da8ea020b09503aa85256b6b005420c6[1]

Wed Mar 13 17:20:02 2002 0381d1fa6ab464da86256b6b0078fab3[1]

Wed Mar 13 17:20:22 2002 d381f63594305e4d86256a61004770df[1]6

Wed Mar 13 17:20:22 2002 d381f63594305e4d86256a61004770df[1]4

Wed Mar 13 17:20:26 2002 58b440c39152e41486256b6600678aa6[1]

Wed Mar 13 17:21:08 2002 476b0a7bd2d1499d86256b650074c369[1]

Wed Mar 13 17:21:32 2002 d381f63594305e4d86256a61004770df[3]1

Wed Mar 13 17:21:58 2002 d381f63594305e4d86256a61004770df[1]10

Wed Mar 13 17:22:12 2002 f9a659e4e09d527586256b5b005ce200[1]

Wed Mar 13 17:22:40 2002 d381f63594305e4d86256a61004770df[1]14

Wed Mar 13 17:23:08 2002 d381f63594305e4d86256a61004770df[3]2

Wed Mar 13 17:23:38 2002 d381f63594305e4d86256a61004770df[2]5

Wed Mar 13 17:23:38 2002 d381f63594305e4d86256a61004770df[2]2

Wed Mar 13 17:24:02 2002 10eddbcc204c189686256b5b00054e5b[1]

Wed Mar 13 17:24:22 2002 d381f63594305e4d86256a61004770df[2]6

Wed Mar 13 17:24:40 2002 f81185c998dd5a7986256b61006f5a90[1]

Wed Mar 13 17:25:00 2002 97c6843beabd11bc86256b600078dc14[1]

Wed Mar 13 17:26:18 2002 2b659801bd335ac486256b600058a46d[1]

Wed Mar 13 17:51:18 2002 a0141655a0d384a186256b6600784edb[1]

3/13/02 4:53 PM Walsh calls 847-322-2340 cell phone for ____ minutes

3/13/02 4:55 PM Walsh calls 847-322-2340 cell phone for ____ minutes

3/14/02 –Cheley uses his Hotmail account.

➔Cheley Hotmail e-mail activity

Thu Mar 14 10:48:58 2002 HoTMaiL[2]11.htm

Thu Mar 14 10:49:34 2002 getmsg[3]3.htm

Thu Mar 14 10:49:54 2002 domsgaddresses[1].htm

Thu Mar 14 10:50:12 2002 getmsg[2]1.htm

3/15/02 11:28 AM Walsh calls 847-322-2340 cell phone for 1 minute
 3/15/02 11:30 AM Walsh calls 847-322-2340 cell phone for 2 minutes
 3/15/02 11:32 AM Walsh calls APCOA Standard Parking (312-274-2198) for 7 minutes
 3/15/02 11:55 AM Walsh calls APCOA Standard Parking (312-274-2198) for 2 minutes
 3/15/02 1:18 PM Walsh calls 847-322-2340 cell phone for 1 minute
 3/15/02 1:28 PM Walsh calls APCOA Standard Parking (312-274-2198) for 2 minutes
 3/15/02 4:12 PM Walsh calls 847-322-2340 cell phone for 1 minute

 3/16/02 2:42 PM Walsh calls 847-322-2340 cell phone for 2 minutes
 3/16/02 5:24 PM Walsh calls 847-322-2340 cell phone for 1 minute

3/18/02 – Michael Blaum resigns from NN.

3/18/02 – Cheley uses his Hotmail account, illegally accesses NN e-mail, and then again used his Hotmail account.

→Cheley Yahoo e-mail activity

Mon Mar 18 09:28:06 2002 [dcheley@yahoo\[2\].txt](#)

→Cheley Hotmail e-mail activity

Mon Mar 18 12:39:50 2002 HoTMaiL[2]9.htm

Mon Mar 18 12:39:58 2002 getmsg[3].htm

Mon Mar 18 12:40:16 2002 compose[3]2.htm

Mon Mar 18 12:41:00 2002 31808017f453[1].htm

Mon Mar 18 12:41:10 2002 getmsg[3]1.htm

→Cheley Hacking Near North systems

Mon Mar 18 12:54:26 2002 d5fe2bef769972f586256b800057e3dd[1]

Mon Mar 18 12:56:30 2002 (\$Sent)[1]5

Mon Mar 18 12:56:36 2002 c019c7296a63f35986256b7f006b644e[1]

Mon Mar 18 12:56:46 2002 3c45a321b0d0ed9486256b7f0068b29c[1]

→Cheley Hotmail e-mail activity

Mon Mar 18 17:51:30 2002 HoTMaiL[7].htm

Mon Mar 18 17:51:56 2002 getmsg[4]2.htm

Mon Mar 18 17:52:34 2002 compose[2].htm

Mon Mar 18 17:54:50 2002 19174e863daf[1].htm

Mon Mar 18 17:54:54 2002 getmsg[4].htm

Mon Mar 18 17:54:58 2002 hotmail__1[1].js

3/18/02 8:22 PM Walsh calls 847-322-2340 cell phone for 1 minute

3/19/02 5:45 PM Walsh calls 847-322-2340 cell phone for 2 minutes

3/20/02 - Cheley emails Jongsma saying that he has he has a large file of NNNG stuff that "would surely cause major problems for the company" and that he has financial record proving NN was out of trust. Cheley tells Jongsma that he will "scan this stuff in.... and send it to you."

3/20/02 5:22 PM Walsh calls 847-322-2340 cell phone for 2 minutes

3/20/02 7:19 PM Walsh calls 847-322-2340 cell phone for 2 minutes

3/20/02 – After illegally accessing NN e-mail, Cheley utilizes his Hotmail e-mail account.

Wednesday, March 20, 2002

03/20/2002,22:51,Cheley hacks into RAS (Dial-In Server), 3129889608,1.9 minutes
03/20/2002,22:54,Cheley hacks into RAS (Dial-In Server), 3129889608,1.8 minutes
03/20/2002,23:02:47,1,Cheley hacks into VPN at NNI\msoto", "NNI\msoto", "66.1.214.97"
03/20/2002,23:03:17,4,Cheley hacks into VPN at NNI\dwatkins", "NNI\dwatkins", "66.1.214.97"
03/20/2002,23:20:33,1,Cheley hacks into VPN at NNI\aswiate", "NNI\aswiate", "66.1.214.97"
03/20/2002,23:21:53,1,Cheley hacks into VPN at NNI\bwooll", "NNI\bwooll", "66.1.214.97"

3/21/02 – After illegally accessing NN e-mail, Cheley utilizes his Hotmail e-mail account.

3/22/02 – Cheley illegally accesses NN e-mail.

Saturday, March 23, 2002

03/23/2002,20:36,Cheley hacks into RAS (Dial-In Server), 3129889608,2.3 minutes
03/23/2002,20:38,Cheley hacks into RAS (Dial-In Server), 3129889608,2.9 minutes
03/23/2002,20:49:50,1,Cheley hacks into VPN at NNI\dwatkins", "NNI\dwatkins", "66.1.214.97"
03/23/2002,22:13:58,4,Cheley hacks into VPN at NNI\dwatkins", "NNI\dwatkins", "66.1.214.97"
03/23/2002,22:32:09,4,Cheley hacks into VPN at NNI\dwatkins", "NNI\dwatkins", "66.1.214.97"

3/25/02 – Cheley illegally accesses NN e-mail from a Kemper machine and his laptop, scanning MS's e-mail account. Attorney-Client Privilege communications contained in accessed materials.

➔Cheley Hacking Near North systems

Mon Mar 25 18:52:20 2002	706cb24ef854ddd088256b87007ead53[1]
Mon Mar 25 18:52:36 2002	e70258ec3574f3c286256b870081ffc7[1]
Mon Mar 25 18:55:36 2002	NotesMail[2]
Mon Mar 25 18:55:40 2002	msegal[1]3.nsf
Mon Mar 25 18:55:50 2002	4e36c7367cb6219a86256b870080f48f[1]
Mon Mar 25 18:57:06 2002	9bf0ca08760a3fda86256b87007bf488[1]
Mon Mar 25 18:57:28 2002	9fb1d57a27920b8c88256b87007b1670[1]
Mon Mar 25 18:57:38 2002	288e923388f59e7286256b870076b068[1]
Mon Mar 25 18:57:48 2002	b0bc5efd8b28870086256b87005f4ccf[1]
Mon Mar 25 18:58:00 2002	b0bc5efd8b28870086256b87005f4ccf[1]1
Mon Mar 25 18:59:04 2002	753c5ea6852d8afb86256b87005b77c8[1]
Mon Mar 25 18:59:22 2002	15a29f83155f891886256b8700507864[1]
Mon Mar 25 18:59:40 2002	(\$Sent)[3]3
Mon Mar 25 18:59:42 2002	ef216907f100808286256b87007db2e4[1]
Mon Mar 25 19:00:40 2002	24f639a157f3943486256b87007794a1[1]
Mon Mar 25 19:01:12 2002	e3004203c1b6150e86256b8700607f7e[1]
Mon Mar 25 19:01:18 2002	865ec06e21bc816a86256b87005e70bc[1]
Mon Mar 25 19:01:54 2002	5201d4b0a4c4d44286256b87005d413b[1]
Mon Mar 25 19:02:04 2002	b9f61a01ec6daf6286256b87005ec59d[1]
Mon Mar 25 19:02:12 2002	ccc5dc58a9d9c19986256b87005f2a2b[1]
Mon Mar 25 19:02:24 2002	1957286235b6c30686256b87005ccd6b[1]
Mon Mar 25 19:02:38 2002	d4b832cd08c1d45386256b87005c7c6f[1]
Mon Mar 25 19:02:56 2002	e20966edfe2a9bc686256b87005b4d02[1]

Mon Mar 25 19:05:46 2002	cabf5d0df4a2e77386256b87005ac1a7[1]
Mon Mar 25 19:05:54 2002	4ab9f60c9b421f9386256b87005a6eec[1]
Mon Mar 25 19:06:16 2002	1bf45d98b1c1a77586256b870053cf18[1]
Mon Mar 25 19:06:28 2002	4fa675e1bef9de1186256b8700522532[1]
Mon Mar 25 19:06:52 2002	68c307e48d1c19dc86256b8700519917[1]
Mon Mar 25 19:07:02 2002	eedaea5c7fc0968786256b84005260b2[1]
Mon Mar 25 19:07:08 2002	d381f63594305e4d86256a61004770df[3]3
Mon Mar 25 19:07:10 2002	a3690d479c7f415486256b87007e7f5c[1]
Mon Mar 25 19:07:14 2002	b2db8bcde479b8b386256b87007e4b51[1]
Mon Mar 25 19:07:44 2002	fbcb65f2c6326b95a86256b8400787030[1]

3/26/02 – Cheley illegally accesses NN e-mail.

➔Cheley reads Chicago Tribune article on Segal/Near North

Tue Mar 26 14:18:20 2002	chi_all[1].html
Tue Mar 26 14:18:26 2002	chi-0203260003mar26[1].html
Tue Mar 26 14:21:50 2002	index[1].html
Tue Mar 26 14:21:56 2002	cst-nws-segal26[1].html

3/27/02 – Cheley illegally accesses NN e-mail.

3/27/02 10:35 AM Walsh calls John Brennan for 23 minutes

3/28/02 – Cheley illegally accesses NN e-mail and then uses his Excite e-mail account.

3/29/02 – Cheley illegally accesses NN e-mail and then uses his Excite and Hotmail e-mail accounts.

Sunday, March 31, 2002

03/31/2002,21:22:38,1,Cheley hacks into VPN at NNI\msoto", "NNI\msoto",,, "66.1.214.97"

03/31/2002,21:30:20,4,Cheley hacks into VPN at NNI\msoto",,, "66.1.214.97"

4/01/02 – Cheley illegally accesses NN e-mail and then uses his Hotmail account and Sendfakemail account.

4/1/02 3:25 PM Walsh calls Children's Memorial Hospital (773-880-4000) for 4 minutes (possible Ludwig conversation because of his sick child.)

4/1/02 3:28 PM Walsh calls Tom Ealy at USI office (312-342-7510) for 1 minute

4/02/02 – Cheley illegally accesses NN e-mail.

4/03/02 – Cheley uses his Hotmail account before illegally accessing NN e-mail.

4/3/02 4:42 PM Walsh calls FBI Main Number for 2 minutes

4/4/02 4:57 PM Walsh calls 847-322-2340 cell phone for 1 minute

4/4/02 11:21 PM Walsh calls 847-322-2340 cell phone for 1 minute

4/4/02 – Karen Gruca learns from other NN employees that someone had advised Mary Jo Erickson outside NN that she (Erickson) was going to be terminated from NN. Erickson knew when she was going to be terminated, knew the terms of the termination, and indicated to the HR section that she was not satisfied with them. Gruca immediately recognized that someone from

outside the company was reading her e-mail - a fact she confirmed (with the help of Swiantek) by reviewing her e-mail use logs.

4/5/02 8:28 AM Walsh calls 312-541-0050 for 6 minutes

4/5/02 1:29 PM Walsh calls FBI Main Number for 2 minutes

4/05/02 – Cheley uses his Hotmail account before illegally accessing NN e-mail.

4/8/02 5:07 PM Walsh calls 847-322-2340 cell phone for 1 minute

4/8/02 5:08 PM Walsh calls 847-322-2340 cell phone for 1 minute

4/08/02 – Cheley illegally accessing NN e-mail before using his Hotmail e-mail account.

4/9/02 5:25 PM Walsh calls FBI Main Number for 1 minute

4/09/02 – Cheley illegally accessing NN e-mail before using his Hotmail e-mail account.

4/10/02 4:46 PM Walsh calls 312-541-0050 for 4 minutes

4/10/02 6:05 PM Walsh calls 847-322-2340 cell phone for 5 minutes

4/10/02 – Cheley illegally accesses NN e-mail.

4/11/02 2:51 PM Walsh calls 312-541-0050 for 5 minutes

4/11/02 2:56 PM Walsh calls 312-541-0050 for 2 minutes

Thursday, April 11, 2002

04/11/2002,22:01,Cheley hacks into RAS (Dial-In Server), 3129889608,2.9 minutes

4/12/02 – Cheley illegally accesses NN e-mail.

4/13/02 1:03 PM Walsh calls 847-322-2340 cell phone for 1 minute

4/13/02 7:43 PM Walsh calls 847-322-2340 cell phone for 1 minute

4/13/02 7:44 PM Walsh calls John Brennan for 2 minutes

4/15/02 – Cheley illegally accesses NN e-mail.

4/16/02 11:03 AM Walsh calls 312-986-0404 for 1 minute

4/16/02 11:06 AM Walsh calls Jeff Ludwig USI office (312-442-7250) for 1 minute

4/16/02 5:10 PM Walsh calls 847-322-2340 cell phone for 1 minute

4/17/02 – Cheley illegally accesses NN e-mail.

4/17/02, after 5 PM – The NN monitoring system developed by Swiantek and Liang went into place. Within an hour of its installation it discloses that NN was being hacked by several IP addresses at Kemper Insurance in Long Grove (847-320-xxxx). Swiantek and others immediately suspected a prior employee, David Cheley, who working at Kemper as an outsource employee due to the telephone exchange used by Cheley to call NN employee, Craig Jongsma. It was assumed that the Kemper identification was related to Cheley's activities. However, this could not be proven without access to Kemper's internal records. Also, there was suspected use of a Sprint Broadband account from a home location.

4/18/02 – Cheley illegally accesses NN e-mail.

4/18/02 11:37 AM Walsh calls Eric Brandfonbrener office at Grippo & Eldon (312-704-7773) for 7 minutes

4/18/02 – Swiantek and others at NN meet with Dave Grossman of Pinkerton for the first time to obtain advise on conducting the investigation into the Cheley intrusions. Grossman told the NN employees that law enforcement should be advised and that if the F.B.I. became involved they would create a Chinese Wall between the Segal investigation and the investigation into the computer intrusion.

4/19/02 – Cheley illegally accesses NN e-mail and then uses his Hotmail account twice. Attorney-Client Privilege communications contained in accessed materials.

➔Cheley Hacking Near North systems

Fri Apr 19 09:37:22 2002	f42f1f72cc5feeb486256b9e007e9961[1]
Fri Apr 19 10:36:54 2002	query[1].html
Fri Apr 19 11:43:44 2002	08e433429d916be386256ba000572559[1]
Fri Apr 19 11:45:04 2002	3a75fb2f734344e786256ba00006fda1[1]
Fri Apr 19 11:46:48 2002	ca0aa78b19dd224a86256b9f00660af0[1]
Fri Apr 19 11:52:00 2002	92b04d8a6ee1bf3786256ba000481f4c[1]2
Fri Apr 19 11:52:00 2002	92b04d8a6ee1bf3786256ba000481f4c[1]
Fri Apr 19 11:53:42 2002	6aa7292e9287542886256ba00055cae8[1]1
Fri Apr 19 11:53:48 2002	6aa7292e9287542886256ba00055cae8[1]
Fri Apr 19 11:54:12 2002	05a0804451e6903f86256ba000546055[1]
Fri Apr 19 11:54:32 2002	89e212caee87e5f886256ba000598ba7[1]
Fri Apr 19 11:54:52 2002	48c86d06c578121486256ba0004bdef2[1]
Fri Apr 19 11:54:54 2002	8dbf1a214283dfd086256ba0004bcf61[1]
Fri Apr 19 11:55:02 2002	35e6364337295bf186256ba0004a287e[1]
Fri Apr 19 11:55:14 2002	c289f28019335f3d86256b9f004a9564[1]
Fri Apr 19 12:02:40 2002	b5ee9b0edcb1936b85256b9f00759565[1]
Fri Apr 19 12:06:28 2002	jsegal[1].nsf
Fri Apr 19 12:06:36 2002	d381f63594305e4d86256a61004770df[1]2
Fri Apr 19 12:06:44 2002	e732f35594663b0d86256ba000571c65[1]
Fri Apr 19 12:07:08 2002	6a3eac2d202c3a8b86256b9f004b6b32[1]
Fri Apr 19 12:07:32 2002	(\$Sent)[1]2
Fri Apr 19 12:07:40 2002	80fc12e4756f722b86256b9f00660ae6[1]
Fri Apr 19 12:07:52 2002	4d2940e0ef6e93f586256b9f005edd67[1]
Fri Apr 19 12:08:00 2002	8c835d5acf0314ae86256b9f00500a5e[1]
Fri Apr 19 12:08:20 2002	7a29de071816149086256b9c00723df9[1]
Fri Apr 19 12:08:54 2002	1d1112888ef1460186256b9c0071ced1[1]
Fri Apr 19 12:09:02 2002	b82f8d5cd71dfe7686256b9c0050eb95[1]
Fri Apr 19 12:09:06 2002	180c0b6748ec7a7a86256b9c004f3498[1]
Fri Apr 19 12:09:16 2002	36411263666db69f86256b9900608c17[1]
Fri Apr 19 12:10:38 2002	92b04d8a6ee1bf3786256ba000481f4c[1]1
Fri Apr 19 12:13:28 2002	All+Views[1]
Fri Apr 19 12:14:00 2002	f05ca6839066bac6862568030045b8ff[1]
Fri Apr 19 12:15:42 2002	f05ca6839066bac6862568030045b8ff[1]3
Fri Apr 19 12:15:46 2002	f05ca6839066bac6862568030045b8ff[1]8
Fri Apr 19 12:16:00 2002	f05ca6839066bac6862568030045b8ff[1]5
Fri Apr 19 12:16:08 2002	f05ca6839066bac6862568030045b8ff[1]4

Fri Apr 19 12:16:10 2002	f05ca6839066bac6862568030045b8ff[1]9
Fri Apr 19 12:16:10 2002	f05ca6839066bac6862568030045b8ff[1]1
Fri Apr 19 12:16:22 2002	f05ca6839066bac6862568030045b8ff[1]10
Fri Apr 19 12:16:22 2002	f05ca6839066bac6862568030045b8ff[1]2
Fri Apr 19 12:16:32 2002	f05ca6839066bac6862568030045b8ff[1]7
Fri Apr 19 12:16:38 2002	11f1e25dd138d6018625687a006f1c8b[1]
Fri Apr 19 12:16:54 2002	f05ca6839066bac6862568030045b8ff[2]4
Fri Apr 19 12:17:06 2002	f05ca6839066bac6862568030045b8ff[1]6
Fri Apr 19 12:17:10 2002	f05ca6839066bac6862568030045b8ff[2]7
Fri Apr 19 12:17:12 2002	f05ca6839066bac6862568030045b8ff[2]1
Fri Apr 19 12:17:16 2002	f05ca6839066bac6862568030045b8ff[2]5
Fri Apr 19 12:17:20 2002	f05ca6839066bac6862568030045b8ff[2]
Fri Apr 19 12:17:22 2002	CAIJMRQL
Fri Apr 19 12:17:28 2002	f05ca6839066bac6862568030045b8ff[2]8
Fri Apr 19 12:17:32 2002	CAVUR25L
Fri Apr 19 12:17:38 2002	f05ca6839066bac6862568030045b8ff[2]9
Fri Apr 19 12:17:40 2002	CAGDHN8D
Fri Apr 19 12:17:48 2002	f05ca6839066bac6862568030045b8ff[2]3
Fri Apr 19 12:17:50 2002	CAAJC3IN
Fri Apr 19 12:18:00 2002	f05ca6839066bac6862568030045b8ff[3]5
Fri Apr 19 12:18:18 2002	CAZWWDOA
Fri Apr 19 12:18:52 2002	f05ca6839066bac6862568030045b8ff[3]3
Fri Apr 19 12:18:56 2002	CA6JWHUV
Fri Apr 19 12:19:02 2002	f05ca6839066bac6862568030045b8ff[3]2
Fri Apr 19 12:19:06 2002	CA6LYN6V
Fri Apr 19 12:19:54 2002	f05ca6839066bac6862568030045b8ff[2]2
Fri Apr 19 12:19:56 2002	CA1L1F7T
Fri Apr 19 12:20:08 2002	f05ca6839066bac6862568030045b8ff[2]6
Fri Apr 19 12:20:10 2002	CA0LQRGT
Fri Apr 19 12:20:20 2002	f05ca6839066bac6862568030045b8ff[3]1
Fri Apr 19 12:20:34 2002	CATTQ7TX
Fri Apr 19 12:20:48 2002	f05ca6839066bac6862568030045b8ff[4]5
Fri Apr 19 12:21:00 2002	CAOPUF4D
Fri Apr 19 12:21:16 2002	f05ca6839066bac6862568030045b8ff[4]3
Fri Apr 19 12:21:22 2002	CAP5IDD9
Fri Apr 19 12:21:30 2002	f05ca6839066bac6862568030045b8ff[4]2
Fri Apr 19 12:21:34 2002	CASRKD2F
Fri Apr 19 12:22:44 2002	f05ca6839066bac6862568030045b8ff[3]
Fri Apr 19 12:22:46 2002	CAQNW16R
Fri Apr 19 12:22:52 2002	f05ca6839066bac6862568030045b8ff[3]4
Fri Apr 19 12:22:58 2002	CAWTE7GL
Fri Apr 19 12:23:50 2002	f05ca6839066bac6862568030045b8ff[4]1
Fri Apr 19 12:24:06 2002	CA91IXZ5
Fri Apr 19 12:24:12 2002	f05ca6839066bac6862568030045b8ff[5]3
Fri Apr 19 12:24:16 2002	CACO1WAA
Fri Apr 19 12:24:22 2002	f05ca6839066bac6862568030045b8ff[5]2
Fri Apr 19 12:24:26 2002	CAW107Q3
Fri Apr 19 12:24:34 2002	f05ca6839066bac6862568030045b8ff[5]1
Fri Apr 19 12:24:42 2002	CAG2VQ56
Fri Apr 19 12:25:04 2002	f05ca6839066bac6862568030045b8ff[4]
Fri Apr 19 12:25:12 2002	CAUTMG8A

Fri Apr 19 12:25:22 2002	f05ca6839066bac6862568030045b8ff[4]4
Fri Apr 19 12:25:26 2002	CASDAVO1
Fri Apr 19 12:25:34 2002	f05ca6839066bac6862568030045b8ff[5]
Fri Apr 19 12:25:36 2002	CAKH03WJ
Fri Apr 19 12:25:46 2002	f05ca6839066bac6862568030045b8ff[6]1
Fri Apr 19 12:25:50 2002	CA14WEH7
Fri Apr 19 12:25:54 2002	f05ca6839066bac6862568030045b8ff[6]
Fri Apr 19 14:33:44 2002	weather[1]
Fri Apr 19 16:07:20 2002	326da0e55544409086256ba0006f9162[1]
Fri Apr 19 16:07:28 2002	891c67edc93bc23386256ba00066fe0d[1]
Fri Apr 19 16:10:48 2002	4de793b72d329d0888256ba0006686a6[1]
Fri Apr 19 16:11:14 2002	326da0e55544409086256ba0006f9162[1]1
Fri Apr 19 16:11:18 2002	5b0962b58483dec86256ba0006f432a[1]
Fri Apr 19 16:30:34 2002	313643d62f08ee8e86256ba00069806b[1]
Fri Apr 19 16:32:08 2002	93eecf38b7d7890486256b9f0061f51d[1]
Fri Apr 19 16:34:14 2002	dbff38e431d68301862568030045b8fe[1]
Fri Apr 19 16:39:40 2002	dbff38e431d68301862568030045b8fe[1]1
Fri Apr 19 16:40:54 2002	dbff38e431d68301862568030045b8fe[1]2
Fri Apr 19 16:45:22 2002	All+Views[2]
Fri Apr 19 16:53:44 2002	d495103269206463862568190052f4d1[2]

Friday, April 19, 2002

04/19/2002,07:29,Cheley hacks into RAS (Dial-In Server), 3129889608,6.4 minutes

4/22/02 – Cheley illegally accesses NN e-mail and MS's e-mail account. Attorney-Client Privilege communications contained in accessed materials.

➔Cheley Hacking Near North systems

Mon Apr 22 07:32:42 2002	63ff3b54b4b2bc0388256ba10055506b[1]
Mon Apr 22 07:33:06 2002	93723e35cd379c2b88256ba100101e46[1]
Mon Apr 22 07:58:44 2002	jasegal[1].nsf
Mon Apr 22 07:59:34 2002	cede212a87633ecc86256b9c0059e451[1]
Mon Apr 22 08:00:10 2002	8d8b803220e8e95486256b9c00522d3e[1]
Mon Apr 22 08:00:24 2002	4c05aed3691295f986256b9900549e33[1]
Mon Apr 22 08:00:30 2002	6f1b7b5c83e9c9f586256b98004f51a3[1]
Mon Apr 22 08:00:54 2002	(\$Sent)[1]
Mon Apr 22 08:00:58 2002	e17b4c22ed0e15d386256ba200799871[1]
Mon Apr 22 08:01:04 2002	58e14e22241f5f2e86256ba2007987a9[1]
Mon Apr 22 08:01:26 2002	6f38bc33b72ff81f86256b9e005165b9[1]
Mon Apr 22 13:28:06 2002	0fe289f86845844686256ba300634282[1]
Mon Apr 22 13:33:36 2002	61f69bc29a40e34388256ba3005e1d1c[1]
Mon Apr 22 13:33:46 2002	ff5a25ad57e200b986256ba3005db8ce[1]
Mon Apr 22 13:33:56 2002	b7f5509524ec363e86256ba3005088ef[1]
Mon Apr 22 13:34:08 2002	4910a7facb0128a788256ba3005a1262[1]
Mon Apr 22 13:34:32 2002	cdcbbee70740fdb986256ba3004b2761[1]
Mon Apr 22 13:34:50 2002	2d62b0eef6d563f486256ba300515dc6[1]
Mon Apr 22 13:35:20 2002	e51e9a38f916963686256ba30053ebe8[1]
Mon Apr 22 13:35:42 2002	8296b9433113f94f86256ba3004e34a1[1]
Mon Apr 22 13:36:18 2002	c9f0ce39bc5c5c8c86256ba300649507[1]
Mon Apr 22 13:36:26 2002	bb32e65e3ccd279586256ba30051caa1[1]
Mon Apr 22 13:36:38 2002	cef724804d5b2f9386256ba3005066e7[1]
Mon Apr 22 13:36:48 2002	40ad71e138a3bb7986256ba300500c90[1]

Mon Apr 22 13:37:10 2002	15d394372adff3ac86256ba3004f9fde[1]
Mon Apr 22 13:37:34 2002	bbf7b5d66e61a3a986256ba3004f6446[1]
Mon Apr 22 13:37:40 2002	a926b70e8d408f5386256ba3004df06e[1]
Mon Apr 22 13:38:04 2002	9f2914a35c7a3bbd86256ba3004ddc8f[1]

4/22/03 – Stanton (and MS) contact Kemper and ask for a meeting. Kemper is told only that the meeting has to do with computer security.

4/23/02 – Cheley illegally accesses NN e-mail. Attorney-Client Privilege communications contained in accessed materials.

→Cheley Hacking Near North systems

Tue Apr 23 10:27:12 2002	36c4b719bafb558e86256ba4000adc57[1]
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Tue Apr 23 10:28:18 2002	c5957a5227dedd5986256ba30075e620[1]
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4/23/02

–11:00AM -- Sherri Stanton, Tony Swiantek, Jason Liang, and Don Sgouridis (independent computer consultant from AZBS, Inc.) attend a meeting at Kemper. Present for Kemper were John Conway (Legal Counsel), Vince Inserra (Director of Corporate Security), Alan Pakaski (Manager of IT Security), Jack Scott (CIO), and later on Harold Rudolph (Senior Security Analyst).

Swiantek explains NN's facts as it relates to the hacking. Kemper is willing to jointly monitor and track the hacking with NN personnel, until Vince Inserra states that Kemper could have legal issues by doing this. Inserra indicates that an independent investigation is needed.

The meeting then breaks so that Kemper can do an immediate assessment to prove where the hacking was originating. After at least an hour deliberation, Alan Pakaski, John Conway, and Harold Rudolph enter the room with a stack of computer logs. Harold leads this part of the meeting and explains some of their initial findings from the Elron web inspector activity reports. It is determined that the hacker of NN's network is David Cheley. During the previous 45 days, Cheley has used three desktops and one laptop (IROAMER) to illegally access NN systems. 95% of the illegal activity originated from the laptop.

Swiantek explains that the laptop must be seized or imaged because it's crucial to the investigation. Also, it agreed that NN would leave their systems vulnerable so that Cheley's activities could be tracked.

Swiantek also explains to Kemper that Cheley could very well try to leave with proprietary Kemper information if he is allowed to leave the building with the laptop. Contrary to Swiantek's request, neither Kemper nor Kroll seize or image Cheley's laptop before making his leave Kemper.

As a result of Inserra's previous comments before the break, Kemper does not turn over the computer logs at the end of the day.

-- approximately 3:30PM --- Stanton, Swiantek, and Liang all leave Kemper and head back to the Hancock. Kemper does not allow them to take any materials related to their findings of Cheley's hacking (primarily this then consisted of the Elron web inspector activity reports).

– Once back at the Hancock, Swiantek compiles a list of phone numbers that Kemper accepted to run through their system to see if Cheley had been calling any of these numbers. Alan Pakaski

stated that he had formerly run the telecommunications department a couple years ago and this was then possible. He even further stated that he didn't foresee any problems running this type of phone search because unless Kemper had completely changed their telephone infrastructure (which he didn't believe had happened) that this request should be possible.

--6:02PM -- Sherri Stanton faxes Swiantek's list of phone numbers directly to John Conway at Kemper. This list did not contain any names, but it did outline all known numbers of the Horesmen, along with the main Chicago FBI number and the block of cell phones that the FBI uses.

4/24/02 – Cheley illegally accesses NN e-mail and scans MS e-mail. Attorney-Client Privilege communications contained in accessed materials.

Wed Apr 24 10:14:22 2002	d381f63594305e4d86256a61004770df[2]
Wed Apr 24 10:16:50 2002	NotesMail[1]
Wed Apr 24 10:16:56 2002	msegal[1].nsf
Wed Apr 24 10:17:04 2002	d381f63594305e4d86256a61004770df[2]1
Wed Apr 24 10:17:16 2002	a2ddeded1081c52086256ba5000db52e[1]
Wed Apr 24 10:17:40 2002	8703baa16848b9b188256ba500057924[1]
Wed Apr 24 10:17:58 2002	0f7383881c6744a388256ba400815bfa[1]
Wed Apr 24 10:18:08 2002	c274c164de7ed37388256ba40080cd55[1]
Wed Apr 24 10:18:20 2002	74b951f1b787cb5b86256ba4007a8772[1]
Wed Apr 24 10:18:48 2002	0713a348df7fe0f786256ba400781a9f[1]
Wed Apr 24 10:19:04 2002	ce added37c1027c33286256ba4005e8eb4[1]
Wed Apr 24 10:19:28 2002	d381f63594305e4d86256a61004770df[1]
Wed Apr 24 10:19:32 2002	(\$Sent)[1]1
Wed Apr 24 10:19:38 2002	c9b6d18e5640a8d086256ba3004fbd00[1]
Wed Apr 24 10:19:54 2002	d9f9b2736e26335486256ba5004bc5ce[1]
Wed Apr 24 10:20:00 2002	8ff798a509edb35e86256ba5004d12b5[1]
Wed Apr 24 10:20:18 2002	78527d477271420d86256ba5004d3cf6[1]

4/24/02 10:14AM – Swiantek calls Harold Rudolph at Kemper to notify him that Cheley was illegally accessing the network at that very moment. Rudolph acknowledged that he was aware of the intrusion, but did not say anything further. Rudolph never mentioned the fact that Kroll was onsite doing their investigation of Cheley.

4/24/02 – Fred Foreman attempts to arrange for Cheley's arrest by making calls to the Lake County and Cook County States Attorney's Offices.

4/24/02- Unknown to NN, Kemper has Kroll come in, review the computer printouts from the day before and interview Cheley. Cheley admits his NN intrusion. Cheley tells Kroll investigators that he started accessing Near North's secure website immediately after he started working for Kemper as a contractor. Cheley says he accessed Near North's network at least twice a day since beginning at Kemper. In his written statement he says that he was accessing the system to keep current with the status of Near North because Near North had recently gone through some legal problems and he was interested in the welfare of existing employees (friends) of the company. He says he passed no information on to any Near North or Kemper employees.

Cheley is directed to leave the Kemper premises on the evening of April 24, 2002 before NN has a chance to question him or the review his laptop. Kroll does glances at the laptop for Kemper proprietary information. Cheley refuses to let them make a copy of the hard drive on the laptop.

(Later, in a conversation with Grossman, Inserra states that Kemper's MIS department made the call to Kroll.)

4/25/02 -- Kroll makes mirror images of the three Kemper hard drives that Cheley used and sends those to the Kroll office in NY for preservation. They establish chain of custody for these drives and all future copies requested are made from these images. According to the Kroll report, one can reasonably assume that the original hard drives were left at Kemper (they weren't needed by Kroll once the images had been created). (Since Kroll did not take the original desktops, but instead made mirror images, it is important to determine who made the mirror of the drives for Kroll and whether any other copies were made besides the one given to Kroll.) It is later learned in May 2003 that Kemper does not know where the original computers are located.

4/25/02 8:26AM -- Stanton calls John Conway at Kemper and leaves a voicemail message.

4/25/02 8:27AM -- After not being able to get in contact with Conway, Stanton immediately calls Vince Inserra.

4/25/02 10:18AM -- Stanton receives on her cell phone, a call from Patricia Fix. The call lasts three minutes.

4/25/02 10:21AM -- Immediately after ending the preceding call, Stanton calls back Patricia Fix (Lake County's Head of Cyber Crimes Division). She has a 21 minute conversation with her.

4/25/02 11:23AM -- Stanton calls Conway for the second time that morning and then learns that at the end of the previous business day (4/24/02) Cheley was escorted from Kemper for violating Kemper Corporate Policy. Kroll imaged three hard drives, but did not image or seize his laptop. Call lasted 5 minutes.

Friday, 4/26/02 8:27AM -- Stanton emails John Conway about the subject of phone records. Consistent with our understanding that Kemper was fully able to run the phone number search, Sherri asks "Do you have an idea when you may be able to confirm whether your phone records show any hits on the list I provided to you?"

Friday, 4/26/02 11:11AM -- Stanton calls Abigail Abraham (Cook County's Head of Cyber Crimes Division) and leaves a voicemail.

Friday, 4/26/02 3:07PM -- Stanton calls Abigail Abraham and has a 16 minute phone conversation with her.

Friday, 4/26/02 5:08PM -- John Conway responds to Sherri's email about phone records. He states: "I have learned that we stopped storing information on outgoing telephone calls several years ago."

Monday, 4/29/02 9:01AM -- Stanton forwards John Conway's email response to John Harney, Fred Foreman, David Novoselsky, Tom Rakowski, and Mike Segal.

4/29/02 9:34AM -- Fred Foreman responds to Stanton's email by stating: "I will call you about my discussion with the Lake County States's attorney about venue."

April/May 2002 - Reidy asks AUSA Hogan the background of NN email issues. Hogan flat out denies any and claims that allegations are a lot of bunk.

May 2002 - Cook running along the lake shore runs with Glockner and brings up a conversation as to emails. Glockner's retort is that there must be a lot of emails from aldermen.

During the week of 5/1/02 -- David Schaeffer and Fred Foreman attend a reception and Dick DeVine (Cook County States Attorney) commits to pursue investigation on behalf of Near North Insurance and differentiates between NN and Segal. DeVine also knew of William Bartholomay's involvement at NN. DeVine states that NN is especially entitled to have an investigation of a potential computer crime as to the magnitude alleged.

5/1/02 – MS meets with David Grossman of Pinkerton to further discuss the Cheley matter. Grossman was first contacted on 4/18/02 when the Cheley activity was first discovered. Back on 4/18/02 Grossman told Swiantek and MS that law enforcement should be advised and that if the F.B.I. became involved they would create a Chinese Wall between the Segal investigation and the investigation into the computer intrusion.

5/1/02 1:59PM -- Stanton emails Foreman requesting an update on “who may be asserting jurisdiction in our cyber hacking case.”

5/1/02 3:33PM -- Stanton calls Abigail Abraham and has 15.5 minute phone conversation with her.

5/2/02 2:37PM -- FBI calls Stanton and call is answered by Stanton's assistant. FBI agent leaves a voicemail for Stanton.

Monday, 5/06/02 - Grossman meets with Shields and provides background allegations regarding the Cheley intrusion matter. Shields was aware of the case and indicated that there was an “open” file.

5/6/02 1:21PM -- Stanton emails her assistant telling her that she's expecting Bryant Jones of the FBI for a meeting at 3:00pm today. The FBI agent doesn't show up for the meeting.

5/06 or 5/07/02 - Grossman meets with S.A. Robert Shields, of the FBI computer squad division, and provides background allegations regarding Cheley intrusion matter. Shields was aware of the case.

◆ Grossman is willing to provide an affidavit.

Tuesday, 5/7/02 6:15PM – Stanton emails her assistant telling her that two FBI agents (Bryant Jones and Justin Kolenbrander) will be at NN on Wednesday, 5/8/02 at 9:30am.

5/8/02 – FBI agents don't call or show up for the 9:30am meeting. These agents don't call Sherri until the following day and then make a new meeting time of 5/9/02 3:00pm.

5/8/02 – S.A. Robert Shields, of the computer squad division, contacts Sherri Stanton by phone. He indicates that the F.B.I. wants to talk to NN about computer break-in. Indicates he may not be involved in the investigation personally. Says he is not aware of the “other investigation.” He says they do not need copies of the e-mail to proceed at this time. Shields says they want to find out how the system and the password files were accessed. He indicates that he wants system logs and an interview with NN's IT person. He says he will confine the meeting to establishing the link between NN and Kemper. He will talk to his “Kemper contact.” He indicates that NN can

proceed civilly and that the civil and criminal cases can proceed concurrently. U.S. Attorney will make the final decision on prosecution.

5/9/02 3:00PM – Meeting is held in Stanton's office with Swiantek, John Harney, and two FBI agents (Bryant Jones and Riley). NN explains the details of the Cheley hacking and turns over various computer firewall logs, web activity logs, and remote access server phone logs. During this meeting the agents asked Stanton for documents reflecting that NN had lost over \$5,000 in business as a result of the intrusion. The F.B.I. indicated that for them to have jurisdiction losses of \$5,000 and/or an interstate activity had to be established. He further stated that qualified expenses in calculating this loss included consultants, additional equipment purchased, clients, etc. Stanton told them she would obtain the information.

5/9/02 – After the meeting, Swiantek prepares a detailed justification of why the FBI should take jurisdiction in this case. In addition to showing that the loss figure was way above \$5000, this memo describes how interstate e-commerce has been affected and the initial estimates of system downtime that NN incurred because of the hacking incident.

5/09/02 - Fred Foreman and Josh Buchman, an attorney for the corporation, were meeting with US Attorney Polales when questions about Cheley hacking investigation developed.

Buchman and Foreman indicated that the company was considering filing a civil case against Cheley. Polales indicated "Don't rush and do any lawyer work, that would only confuse the matter. Give us a chance to investigate it first." A week or so went by and no one from the Government contacted Near North.

- ◆ Note: Polales, as a member of the Segal criminal investigation team should have been on the other side of a Chinese Wall from the Cheley matter. Buchman thinks he knew that Conway was on the case at the time.
- ◆ How did Polales know about Cheley?
- ◆ Why did Polales later tell Buchman he didn't know there were any attorney client privileged emails?

5/9/02 – Stanton provides S.A. Jack Riley with two CD-ROMs containing NN firewall logs (one dated 4/18/02 and the other dated 4/23/02); hard copies of Sprint call record reports and NN's internal Web tracking. During this meeting the agents asked Stanton for documents reflecting that NN had lost over \$5,000 in business as a result of the intrusion. The **F.B.I. indicated that for them to have jurisdiction losses of \$5,000 and/or an interstate activity had to be established.** Stanton told them she would obtain the information.

- ◆ It is believed that these jurisdictional issues are not actually in line with the law.

5/10/02 8:55AM -- Stanton sends an email to the NN Board of Directors stating "Fred Foreman would like to set up an informal meeting of the board to provide an update on his meeting with the U.S. Attorney yesterday).

5/10/02 10:08AM -- Stanton forwards Swiantek's damage estimates to Bryant Jones email account (bcjones@fbi.gov).

5/10/02 - Within days after a SunTimes article mentions her name, Kitty Kurth is subpoenaed by the civil defendants for her records regarding Mike Segal.

5/13/02 – S.A. Bryant Jones talks with Stanton and indicates the F.B.I. has opened a case on the matter and now needs to talk to the U.S. Attorney. Jones says he will call as soon as he has more information.

5/16/02 1:00PM – NN Board meeting where Fred relates comments about his meeting with Polales from the week before.

5/16/02 – Grossman meets with O'Malley at retirement party. Grossman asked O'Malley why there was no "Chinese Wall" between the Segal criminal investigation and the Cheley investigation. O'Malley said no "Chinese Wall" was necessary because NN would never make the connection between to two matters.

- ◆ How did O'Malley know that Grossman was involved in the case?
- ◆ How did O'Malley know that the horsemen were not involved?
- ◆ What happened when they later attempted to use a Chinese Wall?

5/17/02 – S.A. Bryant Jones goes to Kemper and obtains copies of Elron Web Inspector Reports, 3 Kemper hard drives with Kroll labels, a 4/25/02 "Work Product" statement concerning NN access from Kemper, a 4/25/02 letter concerning a meeting between Kemper and NN and KTS Security, a letter dated 5/9/02 relating to imaging hard drives, the written statement of David Cheley dated 4/24/02. (Important to determine whether the appropriate procedures, chain of control, and documentation were followed.)

5/21/02 - Grossman meets with Shields and learns that Shields had presented the case to Jim Conway and Conway had expressed concern as to whether the \$5,000 statutory minimum would be met.

End of 5/02 – After his dealings with the F.B.I. on this matter, Grossman tells MS that he should consider filing a civil suit.

@last week of 5/02 - The week before the decision was made by LAX about wrap around insurance, Penny Campbell of NN-LA office received several phone calls from S.A. Patrick Murphy of the FBI Chicago. During the conversation with Murphy, Campbell cooperated fully and offered to provide all the documents requested by Murphy. Segal had never had anything to do with account and had never met the risk manager. He said he was trying to determine how Near North was using DMI.

5/30/02 - Oral interviews of prospective insurance brokers for the LAX project takes place in Los Angeles.

6/02 – Muldowney gets call from S.A. Jones of the F.B.I. who asks for e-mail and jurisdictional materials.

6/3/02 - The day the LAX insurance decision was to be made, S. A. Murphy called the LAX Risk Manager, Madeline Ramirez, about Near North and DMI. He had her name and direct telephone number. FBI questioned the Risk Manager about her contacts with Near North and DMI. She tells her supervisors and calls Campbell about the FBI contact. Campbell called Bill Bruce, Ramirez's supervisor, and reassures him that Near North is not being investigated.

Later on June 3, Campbell asked Murphy why he called the client. He said he was just checking the information Campbell had given him the week before. He then advised Campbell that he had just been given a second lead that morning (the morning of the week of the decision) to contact the LAX Risk Manager. The lead had given him the Risk Manager's name and telephone number. During his conversation with Campbell, Murphy seemed surprised and disturbed by the timing. He said he didn't know this (LAX bid and the timing) was going on. Campbell sensed that Murphy felt that he was being used by AON. Campbell told Murphy that the call personally cost Campbell \$80,000 and would cost Near North at a minimum of \$300,000. AON-LA got the LAX bid.

6/4/02 1:00PM – First NN meeting with Bill Cook. Stanton, Swiantek, and MS were in attendance.

6/7/02 – Cook meet with Jim Conway, U.S. Attorney's Office. S.A. Justin Kolenbrander FBI was present.

Cook advised Conway that he would be investigating and handling potential civil litigation involving unauthorized access into NNNG computer systems and e-mail. Cook made it clear that he was working for the Board. Conway described Cheley as an e-mail surfer.

Conway indicated he would make no recommendation about whether or not civil litigation should be commenced, but he did later indicate that he would appreciate it if we waited a week before filing anything. Cook promised nothing.

Conway refused to disclose what information the government might have from Kemper or whether they have interviewed Cheley.

Conway asked NN to wait a week before filing any complaint against Cheley.

Conway indicated that he would share no investigation information with NN except as may be required since NN was the victim.

Conway indicated that they had log files from NNNG but none of the e-mail contents of NN e-mails. Cook advised Conway that several of the e-mail had attorney-client communications. Conway said he wanted to see complete e-mails and it would be up to NN to decide to limit disclosure. Conway indicated that he didn't think any A-C e-mail communications in the NN e-mail would be too sensitive.

Conway said he didn't answer to anyone else on the Cheley case and no one who be reviewing his investigation.

Cook asked Conway who would be reviewing his work in the office and Conway would not say.

Conway said he was interested in the fact that Cook was trying to correlate the reviewed e-mail to business losses, indicating that this would of course improve the damage picture dramatically. Cook indicated that by merely using a traditional damage calculation it was clear that NNNG had incurred significant damages.

6/24/02 – Cheley federal hacking complaint is filed.

6/24/02 -- Cook meeting with the F.B.I. at NN with Harney, Swiantek and Buchman. F.B.I. provided a copy of the damage report used to support the allegations in the complaint. Cook advises F.B.I. that under Computer Fraud and Abuse statute NN system investigation and recovery costs are adequate to meet \$5,000 required under the statute. F.B.I. again asks for copies of NN e-mails. Cook indicates that that analysis is continuing but that attorney-client problem still exists re: e-mail content. Cook promises cooperation. Cook asks agents if Cheley has been interviewed or if Cheley's laptop has been searched. The agents refuse to provide the information.

6/28/02 -- Expedited discovery granted in Cheley civil case.

7/2/02 -- Cook, Swiantek and Liang meet with Kemper to obtain hard drive copies and interview witnesses. Kroll report received is finalized and received.

Kroll's report is dated 7/2/2002 -- over 2 months after they investigated Cheley at Kemper.

@7/14/02 -- Cheley served with civil complaint after avoiding service for over a month.

7/17/02 -- Cook meets with Tuite and is advised that Cheley has been interviewed by the F.B.I. and that his laptop was searched and that the F.B.I. found nothing. He says he has a copy of the search warrant, but it's in his office. (Tuite has never provided this information.)

At about the same time as the Tuite meeting, Tuite and Jongsma were interviewed by the F.B.I. squad investigating the Segal criminal matter and questioned about contacts they had had with the attorneys handling the Cheley civil matter.

7/18/02 -- Cook attends F.B.I. InfraGard meeting attended also by S.A. Jones. Conway speaks at the meeting and tells group that the F.B.I. will cooperate with private victims and keep them generally informed about the investigation progress.

Jones asks Cook about NN investigation. Cook indicates that investigation is still underway. Cook asks Jones if Cheley has been interviewed and if the Cheley laptop has been searched. Jones gives no indication about search, but does suggest the Cheley was interviewed, but gives no information about results of interview.

Cook asks Conway about F.B.I. progress on the NN matter. Conway says NN should provide the e-mails. Cook asks Conway about search of Cheley computer and Conway indicates that that was "news to him."

@8/02 - Tobin and Cook meet with Tuite. Tuite calls AON, AON calls Brandfonbrenner, Brandfonbrenner calls Hogan, and Hogan calls Tuite and is questioned about contacts by Tobin and Cook. The next day two FBI agents from the Segal criminal investigation interview Tuite about his contacts with Tobin and Cook.

**Tuite and DeRose (Jongsma's lawyer) are contacted by the F.B.I. Look at 3500 material to prove date.

8/12/02 -- Within days of meeting with the government, Dave Cheley deletes his aboutdave.com website from the ISP's computer server; he agrees to continue to pay the ISP via his Visa credit card. Following their normal procedures, the ISP, purges all information relating to

aboutdave.com on 9/13/02. It is known that Cheley sent Walsh info via the web site, and it is believed that he also sent Ludwig info from the site.

8/22/02 - FBI interviews attorney Patrick Tuite

8/30/02 - FBI interviews attorney John DeRose

9/??/02 - Buchman in a casual conversation with Polales says that Polales brings up the subject "I didn't realize that any of these emails talked about attorney client privilege."

9/17/02 – Buchman meeting with U.S. Attorney's Office. **Hogan and Kendall tell Buchman "that their investigation had established that there was no connection whatsoever between Cheley and the witnesses (Walsh, Berry and Gallagher) cooperating in the Segal prosecution."** S.A. Murphy countered that "he recalled an occasion last fall (2001) when one of the cooperating witnesses (perhaps Walsh) received an unsolicited e-mail communication from an unidentified sender that may have contained confidential NN information. Murphy did not elaborate on this, but indicated that the unidentified sender sent the e-mail to a large number of recipients, not just Walsh."

After leaving the U.S. Attorney's Office, **Buchman received a phone call from Kendall who stated "that the cooperating witness who received the e-mail contacted the Bureau the day of the receipt and provided the Bureau with a copy of it.** It was discussed what they do about it, and they discussed that they would send a responsive e-mail that essentially stated cease and desist ... that was back in the fall of last year."

9/23/02 -- Buchman meeting with USAO. Gives Buchman emails from Lisa Fisher to Dana Berry. See detailed notes for significance.

"At the outset of the meeting, Murphy said that in approximately October 2001, Matt Walsh received an unsolicited email from an unknown third party that contained confidential Near North information. Walsh called Murphy about, and Murphy advised Walsh to call Walsh's civil attorney (Brandfonbrenner) about it. Murphy could not recall if Walsh described the content of the email, or if Walsh sent a copy of the email to Murphy at Murphy's personal email address. Murphy has since checked his computer, and could find no indication that he ever received any email correspondence from Walsh on this issue. Murphy has also checked with Brandfonbrenner, who likewise could find no record of receiving any email correspondence on this issue from Walsh. Brandfonbrenner did, however, recall the incident, and he told Murphy that he advised Walsh to send a "cease and desist" email back to the party who sent him the unsolicited Near North email. Walsh insists that he did send the cease and desist message, but did not maintain a copy of it. In short, neither Walsh, Murphy, nor Brandfonbrenner have any record of the events described in this paragraph.

(Buchman) asked Murphy if he knew how many confidential Near North emails Walsh received in the fall of 2001, and Murphy said he did not know, but did not think it was a large number (perhaps "one or two").

Murphy then handed (Buchman) a four page email string between a hotmail account in the name of Lisa Fisher and Dana Berry's email account at AON. The emails were dated March 4, 2002 and March 5, 2002. Murphy said he obtained these emails from Berry late last week after

our September 17, 2002 meeting. Murphy said he believed, based on a source other than Berry, that “Lisa Fisher” is a pseudonym for David Cheley.

Murphy said the first email in the string, from “Lisa Fisher” to Berry, contained a privileged and confidential Near North email between Michael Segal and Harvey Silets. That attached email had been deleted or redacted from the version produced to me at this meeting, because Murphy did not want to be exposed to privileged communications between Segal and his attorney. ((Buchman) later asked Kendall to provide (him) or Dan Reidy with an unredacted version of the email).

The remaining three emails in the string consist of Berry asking Lisa Fisher to stop sending him “those notes,” and Fisher agreeing to stop “right away.”

Both Murphy and Kendall said it did not occur to them at the time they learned of these incidents in the Fall of 2001 and the Spring of 2002 that the emails that were sent to Walsh and Berry were obtained through illegal activity, such as computer hacking.

(Note, Kendall has been one of the major computer crime prosecutors in the U.S. Attorney’s Office in Chicago for several years.)

10/2/02 – NN v. AON civil case filed in state court.

10/3/02 – The federal Grand Jury investigating Mike Segal issues a subpoena to NN to produce all documents supporting the civil complaint filed the day before. NN is given until 10/10/02 to comply with the subpoena and directed not to ask for an extension of time to answer the subpoena.

11/??/02 - Steve Kawa is an insurance consultant that works on gaming accounts. Kawa is located in Las Vegas and has had a long term relationship with Kaercher Insurance and Allen Kaercher. Kawa called Allen and suggested that he might want to meet with Dana and Matt, who are in LV. Kaercher goes to a restaurant to have a drink with Kawa, Dana and Matt. Kawa then leaves the restaurant. Kawa indicates that Allen might want to talk to two friends who are concerned about you. After their conversation with Dana and Matt a day later Agent Murphy calls Kaercher at home.

11/14 & 15/02 – Chicago Tribune runs John Kass article disclosing “VIP List” contents that Gallagher stole from NN at the time of his departure.

12/02 - Near North obtains a protective order that forces the civil defendants to preserve relevant electronic data.

@12/02 – 2/03 – Cook hires a computer forensics team to further analyze Cheley’s intrusions into NN’s network. This company used the same forensic software application as the F.B.I. use to conduct forensic computer investigations (Encase). In forensically searching the Kemper hard drives, a vast amount of NN email content (mostly MS attorney-client privileged material) is recovered. All of this content would be viewable from a similar search performed by the F.B.I.

1/13/03 & 1/24/03 - Cook and Conway exchange letters re obtaining emails. Conway sends a letter to Cook that is answered within a week, emphasizing the contradictory and non-factual position that Conway has taken in not having any investigation of Cheley.

It must be kept in mind that Conway stated to Bill Cook, "I would like a copy of all the e-mails." Cook states that many are attorney client privileged. Conway then states that in this day and age there is no attorney client privilege on the Internet.

Conway continues to request, himself and through FBI agents, e-mail and takes the position that there is not an issue with attorney client privileged e-mails claiming he needs the e-mail to claim jurisdiction. It is reasonably believed that there was initial concern from the very beginning of Conway's quest to determine which attorney client e-mail and other e-mail Near North has obtained in their investigation. Conway states that he will request all of NNIB's information, but will not be reciprocal with his part of the investigation and what it determines.

2/20/03 - Government files Bill of Particulars. Included in these documents are a draft correspondence written by Tom McNichols. The government attaches to this memo a list of alleged write offs supposed approved by Segal. This combination of documents is false and misleading, as the fake attachment was not really what the memo referred to. These documents were apparently sent to the DOI by the government, and the DOI subsequently investigated the items on the list.

3/19/03 -- NN issued a press release regarding a motion in the civil suit. The Government called NN's attorney and said that the press release was an attempt to damage their witnesses. They further threatened to indict the corporation as a result of the release. They say that NN is creating huge legal fees for their witnesses (even though it is known that Aon is paying their legal fees.) At that time, the Government also threatened to revoke Segal's bail due to a rumored altercation with Blaum at Gibson's.

4/2/03 - AON responds to discovery requests and attempts to distance themselves from the other defendants, stating that alleged employees of AON received these e-mails with the attached documentation and did not read them.

Discovery by AON turns over in excess of 100 documents, some repeated and some that are substantial attorney client privileged documents. Some of the documents refer to key economic motivation, economic information, and substantial activity subsequent to the e-mail that could not take place without knowledge of the stolen e-mail. It is possibly believed that the e-mails turned over through AON could be certain hand picked documents to develop spins and scenarios, until one knows how they were forensically were discovered. Whatever the spin and scenario would be, the important thing is that someone lied and someone has conflicting statements between Brandfonbrener, the horsemen, Agent Murphy, and the US Attorney's Hogan and Polales.

The civil defendants do not respond to the discovery requests, deny receiving documents, or have no recall of receiving any documents. Additional motions of discovery will eventually be received allowing a full forensic review of all related technology of civil defendants.

4/03 - In late April / early May, Jongsma who is defending himself communicates with Matt Miller (one of NNIB's civil lawyers) and attempts to be friendly. He turns over approximately 20 e-mails between Cheley and Jongsma. It is believed the e-mails are limited to show that Jongsma was really not involved with Cheley while he was working at Near North. The e-mails reveal proof that Cheley scans the documents, uses the post office to send documents, and provides information that leads to the evidence of Cheley's penetration into all of Near North's systems, not just e-mail, in excess of 50 times. It also shows how Cheley gets into the system, which has relevance to both Brandfonbrener and the cyber-crime FBI simultaneously stating that Near North

was negligent in how they handled Cheley's access. This proves 100% to the contrary and shows other questionable responses from the FBI, US Attorney, and Brandfonbrener.

Within these emails Cheley indicates to Jongsma that within one week of Cheley being walked out of Kemper he writes a program on his personal website where if anyone from NNNG goes to his website they are automatically forwarded on to the FBI website. Does this appear to be someone who is worried about being walked out for wire hacking and signing a confession?

4/8/03 – Walsh & Berry attempt to intimidate various NN employees (Hess, Wright and Reidinger) at RIMS Conference in Chicago.

4/14/03 – Kemper meeting with Jiganti, Cook and Prendergast. Effort to obtain further assistance from Kemper.

Meetings with Kemper

April meeting at Kemper with Prendergast, Jiganti, and Bill Cook, Kemper does not refer to Vince Inserra's role or involvement. There are conflicting statements as to when and how Kroll became involved and an admission of the methodology of Kemper and Kroll with the process of reviewing Cheley's laptop.

- Non-specific reason of not taking laptop for fear of taking personal articles. This does not explain why they do not take a mirror image.
- Kemper states that Kroll stood over the shoulder of Cheley with a Kemper IT person and reviewed what Cheley had in his hard drive related to Kemper. They had him delete that information and put it in the recycle bin.
- None of the above makes any sense from a sophisticated MIS or from one of the world's largest forensic investigation companies.

Subsequent to Prendergast and Jiganti talking to Kemper in April, additional communication takes place in which Kemper goes out of its way to indicate they will cooperate and talk further if they can be of help.

Jiganti talks to Vince Inserra. He is careful in his conversation and answers a question that he had no involvement. When specifically asked whether he made any calls internally or externally after the meeting, Inserra states a vague non-involvement but corrects himself and says that when the FBI came to visit Kemper he was in the meeting. Inserra also does not disclose to Jiganti that when the SPA people, Joe Gargan, and John Harney go to Kemper, Vince Inserra attends meeting and no one knows why he was there. It is questionable why Vince Inserra straddles his answers and forgets the extent of his involvement when he meets with Jiganti.

4/15/03 – Reidy letter to Polales regarding U.S. v. Segal and various discovery issues including 3500 material, Attorney-Client Privilege Issues, Open File discovery and Brady material.

4/17/03 – S.A. Jones advises Cook that Conway has asked him to follow-up on Cheley investigation materials.

4/18/03 – Court proceeding before Judge Hall on NN motion to for expedited discovery.

4/18/03 - Reidy meets with Polales. Polales alludes to legal fees in civil case.

@4/23/03 – Prendergast letter to Polales regarding the strength of the Near North's case against Cheley, Walsh, Berry and AON. AON discovery materials shared with Polales, Kendal and Hogan.

4/24/03 – Cheley debriefing at Prendergast office.

Meetings with Cheley

Cheley, who is now representing himself with the permission of his ex-lawyer, has two meetings with Prendergast's law firm. It is learned that on _____(date) the cyber division of the FBI reviews Cheley's laptop. It is implied that he leaves it with them and no further information is disclosed.

Cheley also states that in March 2003 he sells his laptop on E-Bay and there is some question as to the consistency of his communication as to the hard drive and how many hard drives he had.

Cheley attempts to turn over CD ROMs of his hard drive, which reflect Kemper information on projects that he was working with at Kemper. Cheley has conflicting information as to how and when he erased his hard drive. It is interesting to note that Polales pays careful attention to the communications with Prendergast as to when Cheley alleges he erased his hard drive, which may lead to inconsistency.

During one meeting with Prendergast, Cheley tells Prendergast that he did not instigate this and changes his story on meeting with Jeff Ludwig.

4/28/03 – Cook meeting with S.A. Jones and S.A. Alder; AON materials, court transcript and courtroom graphics shared with Jones for ultimate distribution to Conway. Cook discusses the strength of the case against Cheley, AON, Walsh and Berry.

4/29/03 -- Jongsma (who is apparently eager to remove himself from the conspiracy) submits to Prendergast copies of emails between himself and Cheley. In those emails Cheley states that he has hard copies of documents to scan in (presumably Sagitta records) and that he sometimes goes to the post office to send things.

5/??/03 - Motion to disqualify Perkins Coie in civil case

5/2/03 - Conway and Reidy letters sent to the management of the US Attorneys office.

5/2/03 - Jiganti, Streicker, (and maybe others) meet with Patrick Fitzgerald. MS understands that perhaps Hogan indicated that he thought the civil suit was a red herring. Also there was some conversation as to non-expectations of the civil suit part of any settlement, but were there any innuendoes in reference to any sale as to issues of where the civil suit would end up with respect to the sale?

Other Meetings with government - dates unknown

In a meeting between Streicker, Prendergast, Polales, and Kendall, Kendall states that she never thought the civil case was frivolous. She also goes on to state that she doesn't really keep track of it, but gets information sent to her (implying Brandfonbrener) and rarely looks at it then puts it in the file. Hogan, Polales, and Murphy along with Brandfonbrener go on to make multiple, perhaps questionable statements as to explanations for the e-mail and explanations of who redacted the e-mails that were attorney client privileged. Statements were made that the e-mails were sent back and told

to cease and desist and they don't recall if they got a copy, or they were told to cease and desist and the e-mail could have been deleted in a home computer. There is an attempt by Murphy to describe an early e-mail by camouflaging it and relating to an e-mail that came off of our Intranet and was more of a message to NNIB associates.

Murphy recently states to Jim Streicker that he does not remember the February 2 e-mail sent from Walsh to Murphy at his home account, even though the e-mail states "from time to time I will be sending you." (It is believed that this e-mail is allowed to stay in, for there would be a spin on it relating to possible intimidation of the witnesses, which is absurd. Let alone asking since this was after the arrest and he admits to having knowledge of a few e-mails in the Fall, why wouldn't there be appropriate forms and records prepared and the actual pursuit of a hacker with notification of Near North.)

Hogan and Brandfonbrener at the same time state that these guys never use the e-mails for any commercial purposes. That statement is totally untrue and has substantial evidence to the contrary. Hogan denies the issues of any e-mail to Dan Reidy in a meeting that Hogan has with Reidy on _____(date).

In a meeting with Streicker in May, Hogan asks what the attachments were to US Attorney Conway's letter that was sent to the management of the office. When Streicker said that he viewed it was appropriate because he viewed that there was a Chinese Wall, Hogan commented that it is not a very tight Chinese Wall. This is another interesting comment that can be questioned.

Management of the US Attorney's office and the trial team have suggested that motions and the civil suit should be dropped. Polales and Hogan have stated through notes of lawyers meetings that the civil suit would be dropped as part of a settlement and perhaps the fines would be predicated on the attorney fees that their witnesses had to pay under the theory that they have been harassed. In a meeting of the Board of Directors in May, management of the US Attorney's office was very specific to communicate the fact that the civil case would not be part of any plea bargaining.

5/5/03 – Cook letter sent to Conway with new evidence and new communications rebutting prior erroneous positions taken by U.S. Attorney's Office.

5/8/03 – Cook message to Dave Glockner requesting his personal review of the Cheley case and the new information turned over by AON in civil discovery. Glockner reply message assures that a complete review of the Cheley case will take place.

5/9/03 - Through a carefully guarded conversation, Hogan admits that Virginia Kendall had conversations with Lake County and Cook County. But implies that the calls were made after these two offices declined to investigate. Hogan offers to look at the phone records and logs. This is the first time there is an admission of these conversations and the question is still outstanding as to the notes, records, and write ups as to the nature of the conversations.

5/9/03 - Warmbir calls Josh Buchman and asked when the company was going to be indicted.

6/10/03 - Segal files a motion in the criminal case for an evidentiary hearing related to the hacking

6/??/03 - After Segal's filing of a response to the Government's motion and posing an evidentiary hearing, Penni Campbell gets a call from Agent Murphy suggesting she come to Chicago to get interviewed and a possible grand jury. The issue is that Penni Campbell is the remaining person in Near North LA and is committed to keep her team and others in a growing concern, as others have left and taken people and the business. It is too coincidental for that specific timing and follows a pattern of harassing employees by having an FBI call. The issues of Penni Campbell have also been discussed multiple times relating to the LAX Airport, and is also a concern of Murphy's for the set up of Murphy calling LAX Airport two days before Campbell and Near North was to receive the assignment.

7/3/03 - The government response to the motion for an evidentiary hearing. The government indicates that a hearing is not justified, and supports their argument (in part) with the following statements:

- Near North took action to stop the hacker and approached State's Attorneys in Lake and Cook counties "over a month before the United States Attorney's Office learned of the allegations."
- That the FBI agents had no knowledge of the hacking while it was occurring. "Indeed, nothing even remotely suggests that the government agents were aware of Cheley or that he was an unauthorized person on Near North's computer system, until well after Near North discovered Cheley's intrusions after the arrest of Mr. Segal."

7/11/03 - McNulty meets with AUSAs Polales and Hogan and FBI squad for superceding indictment discovery meeting and specifically discusses facts of what has not been available and demands communications via inspection of files and other written discovery.

7/16/03 - On that day that NN was to file a reply to the government's response, Agents contact Segal's attorneys to say they have found a forgotten set of notes from early January 2002. These notes indicate that prior to Segal's arrest at least one agent on the case knew Cheley's name, his address, and that he was a hacker.

8/15/03 - In the mid-afternoon John Carmody gets a call from Agent Murphy and discusses the subject of CHA. MS does not have details as they were related from Carmody to John Harney. John Carmody talks for a while, not suggesting that he has a lawyer. He also states that there are multiple questions with respect to Mike Mackey. Once again there is a major coincidence as CHA is coming up to bid this Monday and Carmody has a lot to do with it. Carmody is also considering whether to go to Hub through the Near North deal or go elsewhere.

8/15/03 - Civil defendants file a motion for leave to file a civil RICO claim.

8/18/03 (sometime this week) - A deposition subpoena was served on an attorney for Mesirow before we closed the deal. It is believed to have been engineered by Brandfonbrener, but requested by Blaum's outside lawyer who has an AON relationship and is paid for by AON.

DATES UNKNOWN

_____ - Paul Halloran can relate the fact that when he took over the Turner account he noticed the Dana Berry was charging a fee and commission. He had some concern and a lack of understanding as to what the agreement was. When Halloran sent Dana an email, Berry came

back and said don't ever put anything like that to me in writing. Ultimately Paul changed the arrangement with the client on his own

_____ - When Berry and Dan Vecchio wrote the D&O on Trump Casino they had a fee, yet MS understands that Berry and Vecchio worked out a commission in addition to that.

_____ - Annheiseur Busch incident. Aon (who insures Annheiseur Busch) sends a communication to Mr. Busch, their risk manager, and their internal counsel. NN helped place product recall for Corona in Mexico, and placed Corona's logo on our website as an example of a client. Annheiseur Busch (who as a 50/50 joint venture with US Corona) requested that we take the logo off the website, and commented on MS's and the firm's indictment. NN later lost the Corona account and out corresponding broker in Mexico no longer wants to do business with us.

_____ - Liz Simer remembers sitting in Ludwig's office when Ludwig receives a call. Ludwig says something to the effect that in no way could he turn us down.

_____ - MS receives two anonymous letters at different times. Walsh and Berry tell Tricia LaPerch that Segal is going to go to prison and use similar words to those in the letters. Walsh and Berry tell LaPerch that they just took a course in Internet privacy.

_____ - After arrest there are several hearings and then there is a day where Silets sends out subpoena documents for horsemen. Hearings are before magistrate with files.

_____ -

_____ - Streicker's conversation relative to Hogan regarding e-mail notes in existence. It talks about defense of horsemen with e-mail and underscores that Agent Murphy denies remembering a February 2 e-mail containing Near North stolen e-mail.

_____ - Reidy conversation to Polales indicating 'give up the civil suit and pay for horsemen's attorneys.'

_____ - Hogan's conversation with Reidy that the Government has not given any competitive advantage to the horsemen or whoever.

_____ - Hogan's conversation with Reidy where he questions and denies that anyone said to give up the civil case.

_____ - Hogan or Polales tells an attorney that if Segal doesn't plead appropriately the company will go down and he will have to pay the notes and will have license issues.

_____ - Copy of Conway/Cook letters sent to USA Fitzgerald, Shapiro, and Glockner

_____ - Cheley's bank accounts are subpoenaed to follow through on payments to host for aboutdave.com website (has this subpoena happened yet??)

_____ - Polales indicates to Buchman that pursuing Cheley would most likely end up in a 5th amendment situation.

____??____ - Cheley first interviewed by FBI. Agent Jones says Cheley was interviewed in July 2002, which differs from the August conversation. Conway relates that this was news to him.

____??____ - Cheley first learns of Kemper and Kroll's knowledge of his activities

____??____ - Did Cheley turn over his laptop to FBI? If so when? Tuite's story differs from Cheley's possible statement that he turned over his laptop and Conway held it.

Additional relevant concepts (No particular time/date)

Specific Detail's of Cheley's Hacking Activities

Cheley's hacking activities began immediately after he was fired from NN on 8/18/01, and continued until he is confronted and fired by Kemper on 4/24/02 - a period of over 8 months

Cheley enters Near North networks through a web browser by using stolen usernames & passwords. For 8 months, Cheley routinely accessed NN email accounts without authorization

Hardware - In his hacking activities, Cheley uses:

- 3 Kemper desktop computers
- A personal laptop, unauthorized by Kemper
- A CD-ROM burner, unauthorized by Kemper
- Additional hardware kept at his home

Time - Cheley spends an extensive amount of time in NN's system

- At his peak, Cheley spends 2-3 hours per day in NN's networks.
- He has a regular pattern of accessing NN's system in the morning, at lunch, and before he leaves work.
- There is evidence that on some days Cheley used SprintBroadband connections from his home to continue hacking.

Volume - Evidence shows that in a 45 day period:

- more than 3,000 hits on NN servers from Cheley's 3 Kemper desktops.
- more than 11,000 hits on NN servers from Cheley's laptop.

Based on Cheley's process of selecting specific subject matters that he would not ordinarily be familiar with and/or interested in, it can be shown in many instances Cheley must have been collaborating/discussing the hacked information with other parties. Those parties would have been reviewing the hacked information and giving Cheley direction on how to proceed. For example:

- PJ Clarke's - The issue of PJ Clarke's would not be known to anyone but the Government. The horsemen are aware of the PJ Clarke's issue and Cheley subsequently chases after any information with PJ Clarke's after an initial viewing.
- Bachrach litigation - The complete hacking of USI and Bachrach's litigation is no coincidence. This, tied in to Segal's October 9 deposition by Bachrach and USI attorney's, goes to proving this issue. The selection of letters by Segal to Harvey Gattleson shows only a selection that Cheley would now know and the horsemen through Jeff Ludwig would only know.

Cheley has approximately \$4000 rent and car expenses per month, but has no known source of employment or income.

Distribution of Stolen Emails

Forensics also show limited distribution to civil defendants that corresponds to disclosure by Murphy, Hogan, and Kendall as to the alleged early Fall receipt by Walsh and March 3 receipt by Berry. It is believed that disclosure is not complete, for further forensics on the hard drive show e-mail transmitted to Berry on February 28, 2002, Ingrid Naudzius stolen e-mail on March 1,

2002, and Matt Walsh attorney client privileged Near North communication on December 28, 2001. Coincidentally the e-mail not disclosed are not readily determined off the hard drive from the average forensic review.

It must be kept in mind that there is a hint of various excuses by Brandfonbrener and the Government as to the use and impact of Near North's stolen e-mail. It is true that there are a limited number of e-mails that are proven as being electronically delivered to Walsh, Berry, and Gallagher. But there is substantial evidence of specific e-mails with the time dates of when they were stolen that do not necessarily show up in the discovery in the first round of AON along with no response from the other civil defendants.

It is important to note the lack of specificity from the Government and Agent Murphy as to which e-mails Walsh received in early Fall. There are multiple known e-mails in the early Fall that have already been proven to have been hacked. These particular e-mails, even though they are not marked attorney client privileged, are between Segal as his wife and relate the whole background of the horsemen. A particular e-mail regards anticipating the horsemen's actions and is 4 single-spaced pages. That document in itself is so prejudicial against Segal in the case that it basically goes beyond any attorney client privileged legal rationale for privacy.

Government Involvement

Questions are raised as to the process of exculpatory information, attorney client privileged information, and not protecting this or pursuing the cyber crime intrusion of NNIB, especially after admission of several Near North e-mail in the Fall 2001.

In a note on November 17, 2001 Tom McNichols sends attorney client privileged documents of AIG and Fireman's Fund loan agreements to his house and indicates "for home use." It should be noted that these documents in detail are referred to in Segal's complaint and initial arrest warrant.

It is interesting to note the various positions and changes of positions by both Brandfonbrener, Hogan, and Polales with respect to the NNIB hacked e-mails. These positions and statements are separate from Conway and the cyber squad team.

The Conway team concentrates on still determining if there is any jurisdiction, which could be contrary to Virginia Kendall's statement. They then proceed to ponder for 6 months what constitutes jurisdiction then create the issue of showing economic damages which in any event there are, but which is not part of the statute. In a most recent communication from Conway's squad he asks for the prior two submissions of data in an electronic format. No one has found the regulation that suggests as such.

Besides concern as to the egregious violations of the professional conduct, rules, and regulations does this go the basic fact of the joint venture to destroy Segal and NNIB?

It is important to note that there were perhaps conversations by Cheley's lawyer that relate early on to whether it is planted communication that Cheley does turn over several attorney client privileged documents. Cheley's attorney also states that Brandfonbrener is involved in delivering Near North e-mail to the Government.

Several months ago there was a conversation with Jim Streicker and Hogan. Hogan either said to Stricker or McNulty "We have very little contact now with our witnesses, they mostly talk to the FBI."

Recently when Fireman's Fund hired a lawyer by the name of King, who recently worked at the AUSA's office he evidently had a conversation with Polales and reported back a conversation which Reidy is aware of, but this time it can be characterized as pejorative and aggressive with respect to Near North and Segal. "In order to let a sale go through the corporation would have to waive attorney client privileges and Segal refused a good deal." The comments had a negative connotation which sent a difficult and hurtful message back to Fireman's Fund and ultimately created discomfort on Joe Stinnette's part. It is my belief that Harold Marsh, not familiar with these matter concluded by King's conversation through Polales that I was the impediment to a sale deal from a very novice perspective.