

UNITED STATES DISTRICT COURT

United States Courts
Southern District of Texas
FILED

SOUTHERN DISTRICT OF TEXAS

FEB 27 2020

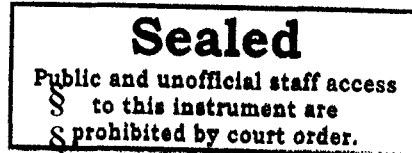
David J. Bradley, Clerk of Court

HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

SUMMER HEATHER WORDEN



Unsealed 4/6/20

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§
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CRIMINAL NO.

20 CR 125

INDICTMENT

THE GRAND JURY CHARGES:

Introduction

At all times material to this Indictment:

1. The Federal Trade Commission (FTC) was a bi-partisan agency within the executive branch of the government of the United States with the dual mission to protect consumers and promote competition.

2. The National Aeronautics and Space Administration (NASA) was an agency within the executive branch of the government of the United States with the mission to drive advances in science, technology, aeronautics, and space exploration in order to enhance knowledge, education, innovation, economic vitality and stewardship of earth.

3. The NASA Office of the Inspector General was an office within NASA that conducted audits, review, and investigations of NASA programs and operations

to prevent and detect fraud, waste, abuse, and mismanagement and to assist NASA management in promoting economy, efficiency, and effectiveness. Among its missions was the duty to investigate allegations of crime, cybercrime, fraud, abuse or misconduct having an impact on NASA programs, personnel and resources.

4. SUMMER HEATHER WORDEN (“Defendant”) was a resident of Travis County, Texas. WORDEN maintained multiple accounts at USAA Federal Savings Bank (USAA), and these accounts were accessible through her online banking profile at USAA.com by entering login credentials, including a username, password, and PIN.

5. Person A was a commissioned officer serving in the United States Army on detail to NASA’s Johnson Space Center, which was located in the Southern District of Texas.

6. From at least 2015 until January 31, 2019, WORDEN granted access to her online banking profile, including her login credentials, to Person A. In April 2018, WORDEN opened a personal checking account at USAA, with an account number ending in -4223, which was named in WORDEN’s online profile as the “KC House” account and referred to by WORDEN and Person A as the “KC” account.

COUNT ONE

7. On or about March 19, 2019, in the Southern District of Texas and elsewhere, defendant **SUMMER HEATHER WORDEN** did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the government of the United States, to wit, the defendant falsely stated and represented to the Federal Trade Commission that:

a. Defendant WORDEN, in September of 2018, had opened a new “personal checking account” and “reset my login credentials,” and “had changed passwords and opened a new private account specifically to ensure that [Person A] had no visibility or access to my financial status/transactions,” when in fact and as she well knew, Defendant WORDEN had opened the account in April 2018 and did not change her login credentials until January 31, 2019.

In violation of Title 18, United States Code, Section 1001(a)(2).

COUNT TWO

8. On or about July 22, 2019, in the Southern District of Texas and elsewhere, defendant **SUMMER HEATHER WORDEN** did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the government of the United States, to wit, the defendant falsely stated and represented to Special Agents of the NASA Office of the Inspector General, in Houston, Texas:

a. Defendant WORDEN had in September of 2018 opened a new checking account with USAA Federal Savings Bank and changed her login credentials, when in fact and as Defendant WORDEN well knew, the USAA Federal Savings Bank checking account had been opened in April 2018 and Defendant WORDEN had not changed her login credentials at that time;


b. Person A had improperly accessed Defendant WORDEN's new USAA Federal Savings Bank checking account from the NASA International Space Station without WORDEN's consent on January 5, 2019 and January 31, 2019, when in fact and as Defendant WORDEN well knew, WORDEN had previously provided her login credentials to Person A and permitted access to her USAA.com online profile, and at no point prior to January 5 and January 31 had

WORDEN revoked her permission to Person A to access the profile.

All in violation of Title 18, United States Code, Section 1001(a)(2).

RYAN K. PATRICK
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF TEXAS

By:



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RALPH E. IMPERATO
Assistant United States Attorneys
Southern District of Texas

Original signature on File

Foreperson of the Grand Jury