

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : Crim. No.
 :
 v. :
 : (VIO: 29 U.S.C. § 439)
 CHARYLE EMEL : **ELECTRONICALLY FILED**

I N F O R M A T I O N

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE
Falsification of Financial Records Required
To Be Kept By Labor Union
(29 U.S.C. § 439(c))

1. At all times material to this information, American Postal Workers Union (APWU), AFL-CIO, State College Area Local #2013, was a labor organization in an industry affecting commerce within the meaning of Sections 402(i) and 402(j) of Title 29; United States Code, as well as Section 1209(b) of Title 39, United States Code.

2. At all times material to this Information defendant, beginning in June 2004 and continuing through January 2006, served as President of Local #2013 and in this position maintained possession and control over the financial assets and records of said union including, but not limited to, a Visa credit card account and a checking account maintained at Omega Bank, With this credit card defendant, beginning on or about November 2004, and continuing through on or about March 2006, charged approximately \$7,000 worth of expenses on the Visa

account as well as paid those debts and wrote additional checks to herself on the account of Local #2013.

3. That on or about the 31st day of January 2006, at State College, Centre County, Commonwealth of Pennsylvania, and in the Middle District of Pennsylvania, and within the jurisdiction of this Court, the defendant,

CHARYLE EMEL

willfully made and caused to be made a false entry or document in a record required to be maintained by Section 436 of Title 29, United States Code, that is the financial records of Local #2013, a record on matters required to be reported in the annual financial report of Local #2013 required to be filed with the Secretary of Labor, and specifically an agreement between Local #2013 and defendant, dated January 1, 2005, purportedly allowing defendant to "borrow up to 18% of her USPS salary" from Local #2013 and requiring her to "pay said sum by the end of her term in office," which defendant knew was false since the union never entered into any such loan agreement with defendant.

All in violation of Title 29, United States Code, Section 439(c).

THOMAS A. MARINO
United States Attorney

Dated: _____, 2006