

UNITED STATES DISTRICT COURT

FILED

DISTRICT OF CONNECTICUT

Oct 7 1 47 PM '03

H-03-3

U.S. DISTRICT COURT
NEW HAVEN, CONN.

UNITED STATES OF AMERICA

:

CRIMINAL NO. 3:03CR 288(JCH)

V.

:

VIOLATIONS: 29 U.S.C. § 501(c)

ALLEN CAHILL

:

(Embezzlement of Assets)

29 U.S.C. §§ 436 and 439(a)

(Failure to Maintain Union

Records)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

At all times material to this indictment,

1. Local 745, Paper, Allied-Industrial, Chemical and Energy Workers International Union ("PACE"), P.O. Box 765, Wallingford, Connecticut, hereinafter referred to as PACE Local 745, was a labor organization engaged in an industry affecting commerce within the meaning of sections 402(i) and 402(j) of Title 29, United States Code.

2. ALLEN CAHILL, the defendant herein, was an officer as that term is defined in Section 402(n) of Title 29, United States Code, that is, he was the elected and serving President of PACE Local 745.

3. From at least as early as February 1997, and continuing through March 18, 2000, the exact dates unknown to the Grand Jury, in the District of Connecticut, ALLEN CAHILL, the

herein, did embezzle, steal, and unlawfully and willfully abstract and convert to his own use and the use of others, moneys, funds, securities, property, and other assets of PACE Local 745, in the approximate amount of \$42,047.00, in that the defendant, among other things, used a PACE Local 745 checking account debit card to make unauthorized cash withdrawals from the PACE Local 745 checking account; used a PACE Local 745 checking account debit card to purchase meals and other items of personal use without authorization; obtained and kept travel advance funds for travel on union business when he in fact did not travel; obtained reimbursement for travel expenses for his family which were not reimbursable expenses; obtained duplicate reimbursements for expenses; and increased his salary as President without authorization by the other union officers and management board.

All in violation of Title 29, United States Code, Section 501(c).

COUNT TWO

1. Paragraphs 1 and 2 of Count One are hereby incorporated by reference and re-alleged as if set out in full.

3. From at least as early as February 1997, and continuing through March 18, 2000, the exact dates unknown to the Grand Jury, in the District of Connecticut, ALLEN CAHILL, the defendant herein, did knowingly and willfully fail to maintain records required to be kept by PACE Local 745 pursuant to Section 436 of Title 29, United States Code, in that the defendant, ALLEN CAHILL, failed to provide records, receipts, vouchers and other supporting documentation for disbursements of union funds involving his use of a PACE Local 745 debit card to obtain cash withdrawals and make purchases of meals and other items of personal use.

All in violation of Title 29, United States Code, Sections 436 and 439 (a).

A TRUE BILL

Linda Kay Gorman
FOREPERSON

K/OZ
KEVIN J. O'CONNOR
UNITED STATES ATTORNEY

Peter S. Jongbloed
PETER S. JONGBLOED
SUPERVISORY ASSISTANT U. S. ATTORNEY

Michael E. Runowicz
MICHAEL E. RUNOWICZ
ASSISTANT UNITED STATES ATTORNEY

I Hereby certify that the foregoing
is a true copy of the original document
on file. Date: 10/7/03

KEVIN F. ROWE
Clerk
By [Signature]
Deputy Clerk