

IN THE UNITED STATES DISTRICT COURT FOR THE **FILED**
WESTERN DISTRICT OF OKLAHOMA

APR - 6 2004

ROBERT D. DENNIS
U.S. DIST. COURT, WESTERN DIST. OF OKLA.
BY *[Signature]*

UNITED STATES OF AMERICA,
Plaintiff,

-vs-

DEBBIE SAMPLES,
Defendant.

No. **CR 04-059 A**

Violation: 29 USC § 501(c)
18 USC § 981(a)(1)(C)
28 USC § 2461(c)

INDICTMENT

The Federal Grand Jury charges:

COUNT 1

On or about November 30, 1999, in the Western District of Oklahoma,

----- **DEBBIE SAMPLES,** -----

the defendant herein, while a person employed, directly and indirectly, by the Plasterers' & Cement Masons' AFL-CIO Local Union 809, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to her own use the moneys and funds of said labor organization in the amount of \$600.00.

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

COUNT 2

On or about March 10, 2000, in the Western District of Oklahoma,

----- DEBBIE SAMPLES, -----

the defendant herein, while a person employed, directly and indirectly, by the Plasterers' & Cement Masons' AFL-CIO Local Union 809, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to her own use the moneys and funds of said labor organization in the amount of \$1,000.00.

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

COUNT 3

On or about May 24, 2000, in the Western District of Oklahoma,

----- DEBBIE SAMPLES, -----

the defendant herein, while a person employed, directly and indirectly, by the Plasterers' & Cement Masons' AFL-CIO Local Union 809, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to her own use the moneys and funds of said labor organization in the amount of \$400.00.

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

COUNT 4

On or about May 31, 2000, in the Western District of Oklahoma,

----- DEBBIE SAMPLES, -----

the defendant herein, while a person employed, directly and indirectly, by the Plasterers' & Cement Masons' AFL-CIO Local Union 809, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to her own use the moneys and funds of said labor organization in the amount of \$400.00.

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

FORFEITURE ALLEGATIONS

1. Upon conviction of one or more of the offenses alleged in Counts 1-4 of this Indictment, defendant Debbie Samples shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property constituting or derived from proceeds obtained directly or indirectly as a result of said violations, including but not limited to the following:

A sum of money equal to \$2,400.00 in United States currency, representing the amount of proceeds obtained as a result of the offenses, labor union embezzlement.

2. If any of the above-described forfeitable property, as a result of any act or omission of the defendant, Debbie Samples,

A. cannot be located upon the exercise of due diligence;

B. has been transferred or sold to, or deposited with, a third person;

C. has been placed beyond the jurisdiction of the Court;

- D. has been substantially diminished in value; or
- E. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

All in accordance with Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

S. G. Smith Jr.
 FOREPERSON OF THE GRAND JURY

ROBERT G. McCAMPBELL
 United States Attorney

Susan Dickerson Cox
 SUSAN DICKERSON COX
 Assistant U.S. Attorney