

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED
U.S. DISTRICT COURT
INDIANAPOLIS DISTRICT
2004 FEB 18 PM 12:57
SOUTHERN DISTRICT
OF INDIANA
LAURA A. BRIGGS
CLERK

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 JEROME M. SMITH,)
)
 Defendant.)

Cause No. IP 04-25 CR-01 H/F

INFORMATION

The United States Attorney charges that:

1. From on or about 1995 through September 9, 2002, JEROME M. SMITH was the Financial Secretary of United Auto Workers Union Local 933 in Indianapolis, Indiana.
2. Pursuant to the UAW Constitution and the by-laws of Local 933, JEROME M. SMITH as Financial Secretary was responsible for handling the finances of Local 933, including receiving dues and all other income, overseeing the preparation of checks, deposits and inventory, managing the union charge accounts, and scheduling rental of the union hall.
3. Pursuant to the collective bargaining agreement and by-laws, JEROME M. SMITH as Financial Secretary was a full-time union officer drawing his salary from the union; however, he was obligated to report for work at Rolls Royce for four hours a month, and any pay from Rolls Royce was to be reported by SMITH to the union, to be deducted from his union salary.

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4. Beginning in or about 1995 and continuing until on or about September 2002, JEROME M. SMITH embezzled, stole, or unlawfully and willfully abstracted or converted to his own use, or the use of another, money, funds, property, or other assets of a labor organization, to wit: UAW Local 933, of which he was an officer, or by which he was employed, in the approximate amount of \$30,000, and in the following manner:

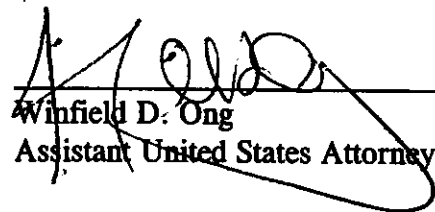
- A. JEROME M. SMITH periodically reported and was paid for work at Allison, but he did not report that pay to the union so that it could be deducted from his union salary.
- B. JEROME M. SMITH used the union charge account to charge personal expenses.
- C. JEROME M. SMITH took money directed to a union charity fundraiser for his personal purposes.
- D. JEROME M. SMITH took money directed to rental of the union hall for his personal purposes.

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


SUSAN W. BROOKS
United States Attorney

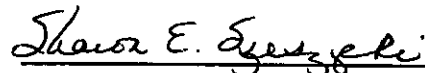
STATE OF INDIANA)
)
COUNTY OF MARION) SS:

Winfield D. Ong, being first duly sworn, upon his oath deposes and says that he is an Assistant United States Attorney in and for the Southern District of Indiana, that he makes this affidavit for and on behalf of the United States of America and that the allegations in the foregoing Information are true as he is informed and verily believes.



Winfield D. Ong
Assistant United States Attorney

Subscribed and sworn to before me, a notary public, on this 11th day of February, 2004.



Notary Public

My Commission Expires:
November 19, 2006

My County of Residence:
Hancock