

1 KEVIN V. RYAN (CASBN 118321)
2 United States Attorney

ORIGINAL
FILED

03 MAY 13 PM 3:57

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

DLJ

USAtty

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 ADELA TONGSON,

16 Defendant.

CR-03-40097

VIOLATION: 29 U.S.C. § 501(c) - Theft of
Labor Organization Money by Employee

OAKLAND VENUE

17
18 INDICTMENT

19 The Grand Jury charges:

20 COUNT ONE: (29 U.S.C. § 501(c))

21 1. At all times relevant to this indictment, Local 250 of the Service Employees
22 International Union, also known as Local 250 of the Health Care Workers Union, was a labor
23 organization engaged in an industry affecting commerce and Adela Tongson was an employee of
24 Local 250.

25 2. On or about November 29, 1999, in the Northern District of California, and
26 elsewhere, the defendant

27 ADELA TONGSON,

28 did unlawfully and willfully embezzle, steal, abstract, and convert to her own use and the use of
others moneys, funds, securities, property and other assets of Local 250, to wit, approximately

INDICTMENT

1 \$41,528.88, in violation of Title 29, United States Code, Section 501(c).

2

3 COUNT TWO: (29 U.S.C. § 501(c))

4 3. Paragraph 1 is incorporated by reference as if set forth in full.

5 4. On or about November 30, 1999, in the Northern District of California, and
6 elsewhere, the defendant

7 ADELA TONGSON,

8 did unlawfully and willfully embezzle, steal, abstract, convert to her own use and the use of
9 others moneys, funds, securities, property and other assets of Local 250, to wit, approximately
10 \$58,471.12, in violation of Title 29, United States Code, Section 501(c).

11

12 DATED: A TRUE BILL.


13

14 FOREPERSON

15 KEVIN V. RYAN
16 United States Attorney

17 

18 CHARLES B. BURCH
19 Chief, Criminal Division

20 (Approved as to form: )
21 AUSA Parrent

22

23

24

25

26

27

28

INDICTMENT

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

OFFENSE CHARGED

Title 29, United States Code, Section 501(c) --
Theft of Labor Organization Money by Employee
(2 counts)

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY:

Each count: 5 years imprisonment, \$250,000 fine, 3 years supervised release, \$100 special assessment, restitution

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Labor Dept.

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

this is a reprobation of charges previously dismissed which were dismissed on motion of:

U.S. Att'y Defense

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE CASE NO.

Name and Office of Person Furnishing Information on THIS FORM

KEVIN V. RYAN

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

Mark Parrent

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S. ORIGINAL FILED

ADELA TONGSON

DISTRICT COURT NUMBER 13 PH 3:57

CR-03-0097

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
 - 5) On another conviction
 - 6) Awaiting trial on other charges
- } Fed'l State
- If answer to (6) is "Yes", show name of Institution

Has detainer been filed? Yes No

} If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

Month/Day/Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT Bail Amount: No bail.

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

**Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment*

Date/Time: _____

Before Judge: _____

Comments: