

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

U.S. DISTRICT COURT  
DISTRICT OF COLORADO

2005 JUN 20 PM 3:13

GREGORY W. LAWRENCE  
CLERK

Criminal Case No. **05 - CR - 287 RB**

UNITED STATES OF AMERICA

BY \_\_\_\_\_ DEP. CLERK

Plaintiff,

v.

1. STEPHEN L. BUSH,

Defendant.

---

**INDICTMENT**  
29 U.S.C. 501(c)

---

The United States Attorney charges that:

**COUNTS 1-51**

On or about the dates listed below, in the State and District of Colorado, and elsewhere, the defendant, STEPHEN L. BUSH, while a person employed as a full-time employee and officer, directly by United Food and Commercial Workers AFL-CIO Local Union 990 Greeley, Colorado, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to his own use and the use of another the moneys, funds, securities, property, and other assets of said labor union on the dates set forth below and in the amounts set forth below:

Count	Date	Amount	Vendor
1	11/29/00	2,015.00	Withdrawal
2	5/24/01	526.99	Mandalay Bay Resort, Las Vegas, NV
3	9/3/01	526.99	Withdrawal
4	11/5/01	2,500.00	Withdrawal

5	3/20/01	750.00	Withdrawal
6	8/21/00	528.49	United Airlines
7	8/26/00	427.47	Fishermen's Restaurant, Seattle, WA
8	8/28/00	307.51	Avis, Seattle, WA
9	9/13/00	189.00	United Airlines
10	9/13/00	189.00	United Airlines
11	9/13/00	40.00	ASA Travel Consultants
12	10/12/00	425.04	MGM Reservations, Las Vegas, NV
13	10/17/00	212.20	MGM/Brown Derby, Las Vegas, NV
14	10/19/00	939.77	MGM Grande Hotel, Las Vegas, NV
15	3/6/02	171.00	United Airlines
16	3/6/02	19.50	Flight insurance
17	3/7/02	224.23	Monte Carlo Hotel
18	4/30/02	906.00	Alaska Airlines
19	7/15/00	286.19	Rex TV
20	9/27/00	322.50	Michel's Clothing, Kansas City, MO
21	10/2/00	210.00	Ducks Unlimited
22	10/20/00	53.35	Casual Male Big & Tall
23	11/10/00	825.00	Big Ralph's Rickets, Denver, CO
24	11/22/00	131.44	Dillard's, Greeley, CO
25	11/24/00	520.41	Kaufman's Big & Tall, Englewood, CO
26	12/17/00	106.45	Cabella's Sporting, Sidney, NE
27	4/11/01	367.48	Home Depot, Greeley, CO
28	4/30/01	1,587.44	Rex TV
29	6/9/01	108.00	Rockies Baseball Team Tickets
30	7/8/01	60.00	DeJavu, Cincinnati, OH
31	7/8/01	109.53	Cincinnati Reds Baseball Tickets

32	7/10/01	1,123.50	Circuit City, Cincinnati, OH
33	7/31/01	488.91	Kaufman's Big & Tall, Englewood, CO
34	9/7/01	359.00	Dillards, Greeley, CO
35	10/8/01	205.00	Ducks Unlimited, Memphis, TN
36	11/1/01	361.60	Kaufman's Big & Tall, Englewood, CO
37	11/23/01	106.57	Sportsman Warehouse, Loveland, CO
38	11/23/01	167.29	Home Depot, Greeley, CO
39	12/19/01	381.22	Sears Roebuck
40	12/24/01	132.74	Maurice's #732, Glenwood Springs, CO
41	12/26/01	57.25	Juicy Lucy Steak House, Glenwood Springs, CO
42	12/27/01	167.16	Blue Creek Grill, Glenwood Springs, CO
43	1/16/02	306.07	Gallaghers
44	2/1/02	93.57	Dillars
45	3/21/02	269.03	One Time Dish Network
46	4/22/02	696.47	Linen 'N Things, Fort Collins, CO
47	4/27/02	1,206.97	Concepts, Greeley, CO
48	7/25/02	70.00	Entanglements, Greeley, CO
49	7/31/02	93.60	Rusty's Hickory House, Aspen, CO
50	9/28/02	242.47	Bike Peddler Cycling, Greeley, CO
51	10/8/02	400.00	Ducks Unlimited, Memphis, TN
	<b>TOTAL</b>	22514.40	

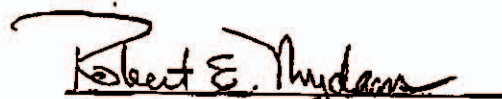
All in violation of Title 29, United States Code, Section 501(c).

A TRUE BILL:

  
\_\_\_\_\_  
Foreperson

Respectfully submitted,

WILLIAM J. LEONE  
Acting United States Attorney

  
\_\_\_\_\_  
By: Robert E. Mydans  
Assistant United States Attorney