FILED

# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

MAY 1 9 2005

U. S. DISTRICT COURT EASTERN DISTRICT OF MO

UNITED STATES OF AMERICA,	) ST. LOUIS
Plaintiff,	4:050000
v.	4:05CRO 0283 HE A
CASSANDRA WILLIAMS,	)
Defendant.	) )

## **INDICTMENT**

### **COUNT ONE**

The Grand Jury charges that:

On or about October 28, 2004, in the Eastern District of Missouri,

#### CASSANDRA WILLIAMS,

the defendant herein, in a matter within the jurisdiction of the Department of Labor, Office of Labor Management Standards, a department of the United States, knowingly and willfully made materially false, fictitious and fraudulent statements and representations, to wit: defendant CASSANDRA WILLIAMS advised an Investigator for the Department of Labor, Office of Labor Management Standards that documents she submitted that day, including e-mail messages and a letter from the Salvation Army were true and correct, when in truth and fact, as the defendant CASSANDRA WILLIAMS then knew, she had altered these documents in an attempt to make it appear that she had made a contribution to the Salvation Army.

In violation of Title 18, United States Code, Section 1001(a)(2)

#### **COUNT TWO**

The Grand Jury further charges that:

On or about October 28, 2004, in the Eastern District of Missouri,

#### CASSANDRA WILLIAMS,

the defendant herein, did corruptly influence, obstruct and impede, and endeavor to influence, obstruct and impede the due and proper administration of the law under which a pending proceeding, to wit: an investigation by the United States Department of Labor, Office of Labor Management Standards into whether payments made by the American Federation of Government Employees, Local 905, were lawfully made was being had before the United States Department of Labor, Office of Labor Management Standards, by presenting to investigators of the United States Department of Labor, Office of Labor Management Standards documents which the defendant had altered in an attempt to justify the payments being investigated.

In violation of Title 18, United States Code, Section 1505.

A TRUE BILL.

•	FOREPERSON	
JAMES G. MARTIN United States Attorney		

DAVID M. ROSEN #23537 Assistant United States Attorney