

FILED

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CLERK OF COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,

v.

DARRYL C. MAYNARD,  
Defendant.

INDICTMENT

1:03CR 235

CR. NO.

Title 29, Sections 1101, 1102, and  
501 of the United States Code and  
**JUDGE NUGENT**  
Title 18, Section 2, United  
States Code

COUNT 1

The Grand Jury charges:

1. That all times hereinafter mentioned and within the meaning of Sections 3(i) and 3(j) of the Labor-Management Reporting and Disclosure Act of 1959, 29 U.S.C. §§ 402(i) and 402(j), hereinafter referred to as the Act:

(a) Paper, Allied-Industrial, Chemical & Energy Workers International Union, Local Union 05-816, hereinafter referred to as the Union, was and is a labor organization representing employees in an industry affecting commerce and has conducted and

conducts its operations in Cleveland, Ohio, and maintains an office in Cleveland, Ohio.

(b) At all times relevant herein, the defendant, DARRYL C. MAYNARD, was the Secretary-Treasurer of the Union and as such was an officer and an employee of a labor organization within the meaning of Sections 3(f) and 3(n) of the Act [29 U.S.C. §§ 402(f) and (n)].

2. That from approximately June 2001, through April 2002, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendant, DARRYL C. MAYNARD, did unlawfully and willfully embezzle, steal, and abstract and convert to his own use, and the use of others, approximately seven thousand five hundred and nine dollars (\$7,509.00), which monies and funds belong to said Union;

All in violation of said Act, Title 29, Section 501(c), United States Code, and Title 18, Section 2, United States Code.

### COUNT 2

The Grand Jury further charges:

1. Paragraphs 1 and 2 of Count 1 are incorporated as if fully realleged herein.
2. From on or about June 2001, through on or about April 2002, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendant, DARRYL C. MAYNARD, did willfully make false entries in records of the Union required to be kept by Sections 436 and 431 of Title 29, United States Code, that is, the Union's checks, check book, check register, and financial records, in that the defendant, DARRYL C. MAYNARD, forged the name of an authorized signer on various Union checks made payable to the defendant and entered false information on these checks and the Union's financial records as to the purpose of the checks.

All in violation of Title 29, United States Code, Section 439(c) and Title 18, United States Code, Section 2.

A TRUE BILL.

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FOREPERSON

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GREGORY A. WHITE  
UNITED STATES ATTORNEY