

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUDGE GOTTSCHALL
MAGISTRATE JUDGE BROWN

UNITED STATES OF AMERICA)
)
 v.)
)
 DERRICK THOMAS)

No. **04CR0752**
Violation: Title 29, United States Code,
Section 501(c)

COUNT ONE

The SPECIAL MARCH 2004 GRAND JURY charges:

1. At times material to this indictment:

A. The International Union of Glass Molders Pastics Union, Local 138 (the "Union"), was a labor organization engaged in an industry affecting commerce.

B. Defendant DERRICK THOMAS was the Union's financial secretary. In his capacity as Union financial secretary, defendant THOMAS had access to and control over Union funds which were maintained in an account at TCF Bank, Chicago, Illinois.

2. From on or about May 28, 1998, and continuing until on or about October 19, 2000, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DERRICK THOMAS,

defendant herein, embezzled, stole, and unlawfully and willfully abstracted and converted to his own use moneys and funds of a labor organization of which he was an officer, namely, approximately \$10,297.72 from the Union's treasury, by writing checks payable to himself and others, and then converting the Union's funds to his own us, all without the knowledge or consent of the Union;

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

SENTENCING ALLEGATIONS

The SPECIAL MARCH 2004 GRAND JURY further alleges:

1. In and during the course of the commission of the conduct alleged in Count One:
 - a. the offense involved more than minimal planning. USSG § 2F1.1(b)(2)(A)
 - b. the defendant abused a position of public and private trust in a manner that significantly facilitated the commission and concealment of the offense. USSG § 3B1.3

FOREPERSON

UNITED STATES ATTORNEY