

FILED
U.S. DISTRICT COURT
DISTRICT OF KANSAS

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS
(TOPEKA DOCKET)

2007 APR 18 P 2:07

WILLIAM BELLOACH
CLERK
BY MI DEPUTY
AT TOPEKA, KS.

UNITED STATES OF AMERICA,)
PLAINTIFF,)

vs.)

No. 07-40032-01-SAC

KELLI R. TYRELL-MOORE,)
DEFENDANT.)

29 U.S.C. 501(c)

INDICTMENT

The Grand Jury charges:

At all material times:

COUNT 1

From on or about November 15, 2004, continuing until December 20, 2005 in the District of Kansas, the defendant KELLI R. TYRELL-MOORE, while a person employed, directly and indirectly, by Kansas Nursing Association, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to her own use and the use of another the moneys, funds, securities, property, and other assets of said labor organization in the approximate amount of \$63,397.16.

The foregoing is in violation of Title 29, United States Code, Section 501(c).

A TRUE BILL.

4-18-07
DATE

FOREMAN OF THE GRAND JURY



UNITED STATES ATTORNEY
DISTRICT OF KANSAS

[It is requested that trial be held in Topeka, Kansas]

The Court acknowledges the receipt of this indictment in open court.



UNITED STATES DISTRICT JUDGE