

1546

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	Criminal No. 12-236
v.)	
)	(29 U.S.C. § 501(c))
CHARLES E. ROCHA)	

INDICTMENT

The grand jury charges:

INTRODUCTION

At all times material to this Indictment:

1. The United Steelworkers International Union (USW) was a labor organization engaged in an industry affecting interstate commerce, within the meaning of §§ 402(i) and (j) of Title 29, United States Code.

2. The defendant, CHARLES E. ROCHA, was employed by the USW as Director of the Political Department.

3. The defendant, CHARLES E. ROCHA, carried a USW American Express (AMEX) card, which was to be used for work-related hotel charges, but was not permitted to be used for personal expenses. The defendant was also permitted to make work-related airfare reservations through Gateway Travel Management, which then directly billed the USW.

4. The defendant, CHARLES E. ROCHA, submitted to the USW semimonthly expense vouchers on which he recorded work-related expenses, for reimbursement by the USW. Neither personal expenses

nor expenditures not incurred were to be included, for USW reimbursement, on the vouchers.

COUNTS 1-18

On or about the following dates, in the Western District of Pennsylvania and elsewhere, the defendant, CHARLES E. ROCHA, while employed by the USW, a labor organization engaged in an activity affecting interstate commerce, did embezzle, steal and unlawfully and willfully abstract and convert to his own use the following amounts of monies, funds, property and assets of said labor organization, that is the defendant, CHARLES E. ROCHA, did charge said amounts in personal expenses to a union credit card and travel account, and did make falsified voucher entries pertaining to personal and non-incurred expenses, each such action constituting a separate count of this Indictment:

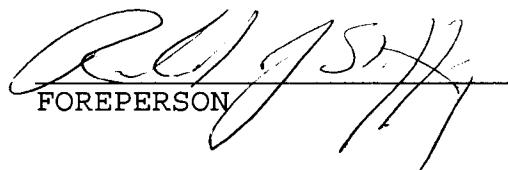
<u>COUNT</u>	<u>APPROXIMATE DATES</u>	<u>AMOUNT</u>	<u>EXPENSE</u>
1	1/1-2/08	\$485.00	AMEX charge for personal golfing trip to Fernandina Beach, Florida
2	3/12-17/08	\$873.07	Gateway Travel and AMEX airfare and hotel charges for personal golfing trip to Jacksonville, Florida
3	4/10/08	\$467.48	Vouchered hotel, car rental and gas charges for personal trip to Tyler, Texas
4	4/23-27/08	\$818.50	Vouchered hotel, airfare, car-rental, gas, restaurant and other charges for personal golfing trip to Myrtle Beach, South Carolina

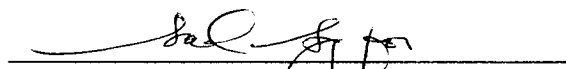
<u>COUNT</u>	<u>APPROXIMATE DATES</u>	<u>AMOUNT</u>	<u>EXPENSE</u>
5	12/23/08	\$539.00	Gateway Travel airfare charge for personal trip to Dallas, Texas
6	2/2-3/09	\$124.80	Vouchered mileage to and from Washington, D.C., where expense incurred by another
7	3/11-12/09	\$298.67	Gateway Travel and AMEX airfare and hotel charges for personal golfing trip to Florida
8	3/27-28/09	\$100.00	AMEX charge for personal golfing trip to Myrtle Beach, South Carolina
9	4/9-14/09	\$733.74	Gateway Travel and vouchered airfare and airport parking charges for personal trip to London
10	4/21-23/09	\$915.06	Vouchered airfare, hotel, car rental, gas, airport parking, baggage fee and per diem charges for personal golfing trip to North Carolina
11	4/30/09-5/1/09	\$180.58	Vouchered hotel and per diem charges for personal trip to Wheeling, West Virginia
12	5/3-4/09	\$127.20	Vouchered mileage to and from Washington, D.C., where expense incurred by another
13	5/9-10/09	\$604.95	Vouchered airfare, hotel, car rental, gas, airport parking, per diem and other charges for personal trip to Orlando, Florida
14	5/18/09	\$ 63.60	Vouchered mileage for Pittsburgh to Washington, D.C. trip, where expense incurred by another

<u>COUNT</u>	<u>APPROXIMATE DATES</u>	<u>AMOUNT</u>	<u>EXPENSE</u>
15	5/27/09	\$ 67.20	Vouchered mileage for personal trip to and from Parkersburg, West Virginia
16	5/30-31/09	\$418.68	Vouchered hotel, per diem and mileage to and from Detroit for personal trip to Stanley Cup hockey game
17	6/3/09	\$ 63.60	Vouchered mileage for Pittsburgh to Washington, D.C. trip, where expense incurred by another
18	6/17/09	\$ 90.06	Vouchered personal luncheon expense

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

A True Bill,


FOREPERSON


DAVID J. HICKTON
United States Attorney
PA ID No. 34524