IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA)	
)	
V.)	Criminal No.
)	
DENNIS TALBOTT)	INFORMATION

THE UNITED STATES CHARGES:

At all times relevant to this Information:

INTRODUCTORY ALLEGATIONS

- 1. **Dennis Talbott** was a trustee of employee pension benefit plans and employee welfare benefit plans subject to Title 1 of the Employee Retirement Income Security Act of 1974, to wit: the Tri-County Building Trades Health Fund and the Sheet Metal Workers Local Pension Plan. (collectively referred to hereafter as "Plans").
- 2. Capital Consultants ("Capital") was a provider of investment services to the Plans. Capital solicited and accepted funds from the Plans for investment. The Plans entrusted funds to Capital for investment and paid fees to Capital. Capital exercised control over Plan funds entrusted to Capital for investment pursuant to investment management agreements with the Plans. The agreements were administered by Plan trustees.
- 3. As a trustee acting on behalf of Plan participants and beneficiaries, **Dennis Talbott** participated in and influenced actions and decisions of the Plans, including, but not limited to, the investment of Plan funds with Capital.

COUNT 1

4. Paragraphs 1 through 3 of the introductory allegations are re-alleged and incorporated

herein.

5. In or about September 1998, in the State and District of Oregon, **Dennis Talbott**, because

of any of the actions, decisions, and other duties of **Dennis Talbott** related to any question or matter

concerning the Plans including, but not limited to the allocation and investment of Plan funds with

Capital, received and agreed to receive gifts and things of value from Capital Consultants, to wit a

hunting trip and related expenses, in violation of 18 U.S.C. § 1954.

Michael W. Mosman United States Attorney District of Oregon

Neil Evans

Assistant United States Attorney

William B. Jacobson Trial Attorney, Criminal Division United States Department of Justice