

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
GLENN W. SPITZER,)
)
 Defendant.)

INFORMATION
(18 U.S.C. § 1343)
(18 U.S.C. § 2)

THE UNITED STATES ATTORNEY CHARGES THAT:

INTRODUCTION

1. Glenn W. Spitzer, a resident of Amery, Wisconsin, and formerly a resident of Eden Prairie, Minnesota, was employed at Katun Corporation from approximately 1984 to August 1, 2002. Between January 1, 1996 and April 2001, Spitzer served as Katun's Chief Staff Officer and held the position of Group Vice President. During portions of this time period, Spitzer supervised Katun's travel department employees, among various other responsibilities.

2. Beginning prior to March 1997 and continuing until about mid-2001, Katun Corporation's travel department employees made domestic airline reservations and purchased round trip business airline tickets for Katun employees by using a dedicated phone line computer reservation system, all via interstate commerce.

COUNT 1
(Wire Fraud)

3. Between March 1997 and March 1999, in the State and District of Minnesota and elsewhere, the defendant,

GLENN W. SPITZER,

aided and abetted by others, did knowingly and intentionally engage in a scheme to defraud various airlines and obtain money and property by means of false and fraudulent pretenses, by using airline tickets purchased by his employer, Katun Corporation, for business travel, which allowed defendant to travel on a reduced fare, extended stay ticket, when, in fact, defendant never intended to engage in return travel on the dates ticketed, and did not travel on those dates, but instead returned on earlier dates than ticketed with the intent to defraud the airlines out of the increase fare that would have been incurred for the actual travel dates.

4. On or about March 12, 1999, for the purpose of executing the above-described scheme and artifice to defraud and obtain money and property by means of false and fraudulent pretenses, the defendant, aided and abetted by others, did knowingly cause to be transmitted by means of wire communications in interstate commerce certain writings, signals, pictures, and sounds, that is, the reservation and purchase of a United Airlines ticket for defendant to engage in round-trip business travel between Minneapolis, Minnesota and White Plains, New York, involving travel to White Plains on March 29, 1999 and a supposed return trip to Minneapolis on April 5, 1999, when in truth, defendant always intended to return to Minneapolis on or about March 31, 1999 and did return on that date, costing United Airlines approximately \$680 in lost

revenue.

All in violation of Title 18, United States Code, Sections
1343 and 2.

Respectfully submitted,

Dated: January 22, 2004

THOMAS B. HEFFELFINGER
United States Attorney

BY: HENRY J. SHEA
Assistant U.S. Attorney
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