

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	)	
	)	<b>INFORMATION</b>
Plaintiff,	)	
	)	(18 U.S.C. § 1341)
v.	)	(18 U.S.C. § 2)
	)	
LARRY J. STROUP,	)	
	)	
Defendant.	)	

THE UNITED STATES ATTORNEY CHARGES THAT:

**COUNT 1**  
**(MAIL FRAUD)**

1. Larry J. Stroup, a resident of Eden Prairie, Minnesota, was employed at Katun Corporation (Katun) from approximately 1981 until June 2003. He served as Katun's Chief Operating Officer and Executive Vice President from approximately May 1986 until June 2000. He served as Katun's President and Chief Executive Officer from June 2000 until June 2003.

2. Beginning in or about 1988 and continuing until about June 2000, in the State and District of Minnesota and elsewhere, the defendant,

**LARRY J. STROUP,**

did knowingly and intentionally aid and abet others at Katun in a scheme to defraud Xerox Corporation and obtain property by means of false and fraudulent pretenses, whereby Katun secretly provided, through the U.S. mail, more than 40 so-called "consulting payments" or bribes, totaling more than \$20,000, to Steve Adams, a Xerox employee, in exchange for certain Xerox pricing information, all

without the knowledge of Adams' superiors at Xerox and in violation of Xerox standards of conduct policies. During this same time period, defendant knew that others at Katun used or provided the Xerox pricing information in connection with dealings with other business entities, all of which was unknown to Xerox.

3. On or about September 23, 1999, in connection with defendant's September 20, 1999 written approval, and for the purpose of executing the above-described scheme to defraud and obtain property by means of false and fraudulent pretenses, the defendant did knowingly aid and abet others to cause to be sent and delivered by mail according to the direction thereon by the United States Postal Service, Katun Corporation Check No. 72567, in the amount of \$500.00 to Steve Adams, 4404 Candelwood, Sylvania, Ohio, 43560.

All in violation of Title 18, United States Code, Sections 1341 and 2.

Dated: January 22, 2004

Respectfully submitted,

THOMAS B. HEFFELFINGER  
United States Attorney

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