

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUDGE RAKOFF

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UNITED STATES OF AMERICA :

- v. - : INDICTMENT

TODD HANSEN, and
JAMES BUCKLEY, :

12 CRIM 188

Defendants. :

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COUNT ONE

(Conspiracy to Commit Wire Fraud)

USDC SDNY
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DOC #:
DATE FILED: **FEB 28 2012**

The Grand Jury charges:

1. From at least in or about 2004, up to and including in or about 2009, in the Southern District of New York and elsewhere, TODD HANSEN and JAMES BUCKLEY, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit wire fraud in violation of Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that TODD HANSEN and JAMES BUCKLEY, the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communications in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of

executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

Overt Acts

3. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York, and elsewhere:

a. On or about November 7, 2009, TODD HANSEN, the defendant, sent an email from California to JAMES BUCKLEY, the defendant, in New York, New York, and another person ("Former Controller-1"), instructing Former Controller-1 to make a particular accounting entry in the books and records of their employer, the United States division of one of the world's largest outdoor advertising companies ("Company-1").

b. On or about January 18, 2008, Former Controller-1 sent an email from California to BUCKLEY, in New York, New York, about recording false revenues in Company-1's books and records.

c. On or about October 8, 2009, Former Controller-1 sent an email to BUCKLEY and HANSEN about recording false revenues in Company-1's books and records.

(Title 18, United States Code, Section 1349.)

COUNT TWO
(Wire Fraud)

The Grand Jury further charges:

4. From in or about 2004, up to and including in or about 2009, in the Southern District of New York and elsewhere, TODD HANSEN and JAMES BUCKLEY, the defendants, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire, radio, and television communications in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, HANSEN, as President of Company-1, and BUCKLEY, as Finance Director of Company-1, engaged in a scheme to cause false accounting entries to be made in the books and records of Company-1 in order to artificially improve the appearance of Company-1's financial performance and, thereby, to obtain higher compensation and bonuses for themselves.

(Title 18, United States Code, Sections 1343 and 2.)

FORFEITURE ALLEGATION
(As to Counts One and Two)

5. As a result of committing the offenses alleged in Counts One and Two of this Indictment, TODD HANSEN and JAMES BUCKLEY, the defendants, shall forfeit to the United States,

pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the wire fraud offenses alleged in Counts One and Two of this Indictment.

Substitute Asset Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

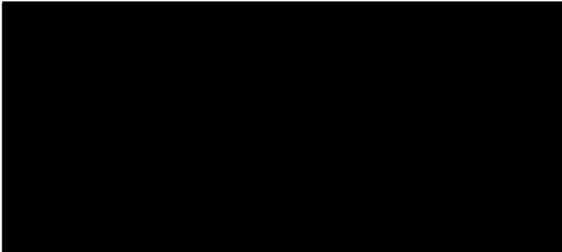
c. has been placed beyond the jurisdiction of the Court;

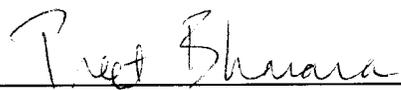
d. has been substantially diminished in value;
or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of TODD HANSEN and JAMES BUCKLEY, the defendants, up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982(a)(2)(A);
and Title 21, United States Code, Section 853.)





PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

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TODD HANSEN, and
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Defendants.

INDICTMENT

12 Cr.

(18 U.S.C. §§ 1349, 1343 and 2.)

PREET BHARARA
United States Attorney.

A TRUE BILL


Foreperson.

2/28/12 - filed Indictment. Case assigned to Judge Rakoff.

*J. KATZ
U.S.M.J.*