

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_  
v. : **DATE FILED:** \_\_\_\_\_  
**CHRISTOPHER M. COOK** : **VIOLATIONS:**  
: **18 U.S.C. § 641 (theft of government**  
: **property 1 count)**  
: **18 U.S.C. § 1361 (destruction of**  
: **government property - 1 count)**

**INDICTMENT**

**COUNT ONE**

**(Theft of Government Property)**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

**Introduction**

1. The Naval Air Station Joint Reserve Base (“NAS JRB”), located in Willow Grove, Pennsylvania, supported a number of military detachments, including the U.S. Marine Corps Wing Support Squadron 472, and several others. Its mission was to provide, train, and maintain a ready force capable of meeting any national contingency.

2. Marine Wing Support Squadron 472 (MWSS-472) was a reserve aviation ground support unit of the United States Marine Corps. The Headquarters Element of MWSS 472 was located at NAS JRB. In addition to serving as the squadron headquarters, it was also the primary site for all of the Airfield Operations specific Military Occupational Specialties (MOSs). Military Police and communications MOSs were also located at MWSS 472. Its mission was to

provide all essential Aviation Ground Support requirements to a designated fixed-wing component of an Aviation Combat Element (ACE) and all supporting or attached elements of the Marine Air Control Group.

3. Defendant CHRISTOPHER M. COOK was a sergeant in the United States Marine Corps who was assigned to MWSS-472 at NAS JRB.

4. The Expeditionary Airfield (“EAF”) was a shore-based, aviation weapons support system which permitted deployment of landing force aircraft within range of ground forces. Although an EAF could be as basic as a grass landing zone to support helicopter operations, the installation of one or more EAF subsystems added versatility and durability to the site selected for aircraft operations. The goal of the EAF was to provide the Marine Air Ground Task Forces with a flexible capability to rapidly deploy and establish survivable, self-sustaining airfields in support of the Aviation Combat Element (“ACE”) for employment in an expeditionary operation.

5. The Short Airfield for Tactical Support (SATS) was a rapidly constructed expeditionary airfield that could be erected near a battle area to provide air support for amphibious Marine forces. In any land-and-sea military operation, the rapid assembly of a temporary airfield provided ground units with the distinct advantage of continuous air support on foreign soil. A SATS field incorporated numerous parts, including what was known as an AM-2 mat.

6. The AM-2 mat was a fabricated aluminum panel, 1.5 inches thick that contained a hollow, extruded, one-piece main section with extruded end connectors welded to each end. The AM-2 mat was made in full sheets and half sheets and was painted Marine Corps

green. The top surface was coated with a nonskid material of the same color. For runways and taxiways, the mats were installed in a brickwork type of pattern. The staggered joint arrangement provided the required stability across the runway and the necessary flexibility in the direction of aircraft travel.

7. At NAS JRB, the Marine Corps maintained a stock of AM-2 mats which were stored in the fenced lot behind the Motor Transport Command and east of Building 638, and which can be summarized as follows:

<u>Quantity</u>	<u>Description</u>	<u>Value</u>
21	12 ft. Expeditionary Airfield (F-71) AM-2 Mat Assembly Packages	\$630,000
4	6 ft. Expeditionary Airfield (F-72) AM-2 Mat Assembly Packages	\$80,000
1	Stake and Edge Clamp Package Assembly (F-74)	\$50,000

**Theft and Destruction of Government Property by the Defendant**

8. During the period from on or about August 18, 2010 to on or about February 19, 2011, defendant CHRISTOPHER M. COOK rented trucks from a local U-Haul dealer, drove them onto the base at NAS JRB, stole approximately 60,000 pounds of metal, including all of aluminum helicopter airfield mats described in paragraph 7 above, and then took the metal and airfield mats to a local scrap metal dealer which melted down nearly all of the airfield mats and paid Cook approximately \$50,917 for the metal, as follows:

<u>Date</u>	<u>Amount Paid by Scrap Dealer</u>
August 18, 2010	\$75.00
August 30, 2010	\$269.06

September 9, 2010	\$555.90
September 13, 2010	\$1,318.36
September 15, 2010	\$668.38
October 22, 2010	\$768.32
October 25, 2010	\$693.84
October 29, 2010	\$973.10
November 3, 2010	\$1,129.84
November 11, 2010	\$2,241.37
November 19, 2010	\$1,970.72
November 23, 2010	\$4,061.12
November 30, 2010	\$4,052.98
December 10, 2010	\$4,175.13
December 23, 2010	\$4,115.25
December 30, 2010	\$4,342.40
January 6, 2011	\$4,585.06
January 11, 2011	\$180.08
January 12, 2011	\$4,441.43
January 26, 2011	\$3,755.64
February 10, 2011	\$4,349.28
February 19, 2011	\$2,194.40
<b><u>Total:</u></b>	<b><u>\$50,916.66</u></b>

8. After stealing and causing the destruction of this government property, defendant CHRISTOPHER M. COOK then used the proceeds he received from the scrap dealer to pay for a variety of personal items including, among others, travel expenses, restaurants and other entertainment, clothing and jewelry, and repairs to his truck.

9. From on or about August 18, 2010 to on or about February 19, 2011, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER M. COOK**

embezzled, stole, purloined, and knowingly converted to his own use a thing of value of the United States in an amount over \$1,000, that is, twenty-one 12 ft. Expeditionary Airfield (F-71) AM-2 Mat Assembly Packages, four 6 ft. Expeditionary Airfield (F-72) AM-2 Mat Assembly Packages and one Stake and Edge Clamp Package Assembly (F-74), worth a total of approximately \$760,000.

In violation of Title 18, United States Code, Section 641.

**COUNT TWO**

**(Destruction of Government Property)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are incorporated here.
2. From on or about August 18, 2010 to on or about February 19, 2011, in the

Eastern District of Pennsylvania, defendant

**CHRISTOPHER M. COOK**

willfully and by means of theft and transport to a scrap metal yard, did injure and commit a depredation against property of the United States and of any department or agency thereof, specifically, twenty-one 12 ft. Expeditionary Airfield (F-71) AM-2 Mat Assembly Packages, four 6 ft. Expeditionary Airfield (F-72) AM-2 Mat Assembly Packages and one Stake and Edge Clamp Package Assembly (F-74), and the resulting damage was approximately \$760,000.

In violation of Title 18, United States Code, Section 1361.

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

\_\_\_\_\_  
**ZANE DAVID MEMEGER**  
United States Attorney