

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

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED** _____
SHANNON GILLIAM : **VIOLATIONS:**
: **18 U.S.C. § 201(b)(2)(C)**
: **(bribery- 1 count)**

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this Information:

1. Defendant SHANNON GILLIAM was employed as a Security Training Instructor with the Transportation Security Administration (TSA) and was assigned to the Philadelphia International Airport. As a Security Training Instructor, defendant GILLIAM's full-time responsibility was to conduct training for Transportation Security Officers (TSOs) and to administer mandatory screening proficiency tests to TSOs who handle passenger and baggage screening at the Philadelphia International Airport.
2. TSOs had to receive passing grades on annual, mandatory screening proficiency tests in order to continue employment as passenger and baggage screeners with TSA.
3. Defendant SHANNON GILLIAM was a public official as defined in 18 U.S.C. § 201(a)(1).

4. From on or about August 1, 2011 through on or about October 24, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SHANNON GILLIAM,

a public official, that is, a Security Training Instructor with the TSA, directly and indirectly corruptly demanded, sought, received, accepted, and agreed to receive and accept, something of value personally, in return for being induced to do an act in violation of his official duty; that is, taking a \$200 payment in exchange for taking a mandatory, annual certification examination for TSO #1, known to the United States Attorney, and ensuring a passing grade for TSO #1.

In violation of Title 18, United States Code, Section 201(b)(2)(C).


ZANE DAVID MEMEGER
United States Attorney