

FILED
U.S. DISTRICT COURT
DISTRICT OF KANSAS

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS 2009 JUL -1 PM 12:46

TRACI L. WILSON
CLERK

BY MEMMOT DEPUTY
AT KANSAS CITY, KS

UNITED STATES OF AMERICA,)
)
 Plaintiff)
)
 v.)
)
 MARY JO LADURON, a/k/a MARY JO GAULT,)
)
 Defendant.)

Case No. 2:08-cr-20055-KHV

Hon. Kathryn H. Vratil

SUPERSEDING INFORMATION
False Statement (18 U.S.C. § 1001)

The United States of America charges that:

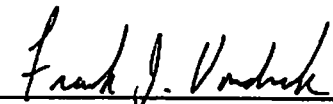
1. Beginning in 1999 and continuing through at least November 2003, MARY JO LADURON a/k/a MARY JO GAULT worked for Elephantine Corporation.
2. Elephantine Corporation was formed and owned by Leonard Douglas "Doug" LaDuron and held itself out to be an independent consultant to schools seeking subsidies for the purchase and installation of Internet access and telecommunications services as well as internal computer and communication networks through the Federal Government's E-Rate Program. Leonard Douglas "Doug" LaDuron, who is the son of MARY JO LADURON a/k/a MARY JO GAULT, introduced her to the E-Rate Program prior to her beginning work for Elephantine Corporation.
3. On March 23, 2006, in the District of Kansas, MARY JO LADURON a/k/a MARY JO GAULT knowingly and willfully made a false statement which was material to a matter within the jurisdiction of the executive branch of the Government of the United States. Specifically, in connection with an investigation by the Federal Bureau of

Investigation ("FBI"), MARY JO LADURON a/k/a MARY JO GAULT was interviewed by agents of the FBI. During that interview, MARY JO LADURON a/k/a MARY JO GAULT falsely stated that she was unaware of who the owner of Elephantine was and did not recall how she had become familiar with the E-Rate Program.

4. MARY JO LADURON a/k/a MARY JO GAULT made this false statement in the District of Kansas within five years preceding the filing of this Information.

All in violation of Title 18 United States Code Section 1001.

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