

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

JUDGE LEINENWEBER

MAGISTRATE JUDGE DENLOW

UNITED STATES OF AMERICA)
)
 v.)
)
 CHARLES PATTON,)
)
 Defendant.)

INFORMATION

Case No. **09CR 528**

Violations: 18 U.S.C. § 2315
18 U.S.C. § 981(a)(1)(C)
28 U.S.C. § 2461(c)

THE UNITED STATES OF AMERICA, THROUGH ITS ATTORNEYS, CHARGES:

1. For purposes of this Information, the "relevant period" is that period from in or about March 2004 until in or about September 2008. During the relevant period, the defendant, CHARLES PATTON ("defendant"), was a member of the Illinois Army National Guard in Chicago, Illinois. From in or about March 2004 until in or about March 2005, defendant's friend and fellow Illinois Army National Guard member, Major Christopher West ("West"), was deployed to Bagram Airfield, Afghanistan as the "S4" in charge of Base Operations.

COUNT ONE

[18 U.S.C. § 2315 – Receipt of Stolen Property]

2. During the relevant period, the defendant herein,

CHARLES PATTON,

knowingly received, possessed, concealed, and stored money of the value of \$5,000 or more, which crossed a boundary of the United States after being stolen, unlawfully converted, and taken, knowing the money to have been stolen, unlawfully converted, and taken; to wit, defendant received through the United States mail at his residence in the Northern District of Illinois from West in Afghanistan at least \$100,000 in United States currency, which defendant

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possessed, concealed, and stored, and which defendant knew had been stolen and otherwise unlawfully converted and taken by West in Afghanistan in an illegal scheme connected to the supply of concrete bunkers and barriers at Bagram Airfield.

3. During his deployment to Afghanistan, West sent money he had stolen, unlawfully converted and taken to defendant at his residence in the Northern District of Illinois. Upon receiving the money, which was hidden in a series of boxes sent via the United States mail by West, defendant possessed, concealed and stored the money in his residence.

4. In or about the end of November 2004, upon West's return from Afghanistan during mid-tour leave, West came to defendant's residence and retrieved the money West had previously mailed to defendant at his residence.

5. Upon West's return to Afghanistan in December 2004, West continued to send boxes containing stolen and otherwise unlawfully converted money to defendant at his residence, which defendant received, possessed, concealed, and stored, knowing the money had been stolen and otherwise unlawfully converted and taken by West in Afghanistan.

6. In or about early April 2005, West requested defendant open a safe deposit box in defendant's name, which he did on or about April 11, 2005. Into this safe deposit box, defendant placed a large manila envelope containing approximately ten smaller sachets of money, each of which held approximately ten thousand dollars. Defendant received this envelope of money from West, knowing this money to have been stolen, unlawfully converted, and taken by West.

7. During the remainder of the relevant period, defendant possessed, concealed, and stored this money in his safe deposit box, periodically retrieving money for West, as requested, some of which he deposited into his own bank account prior to remitting it to West.

All in violation of Title 18, United States Code, Section 2315.

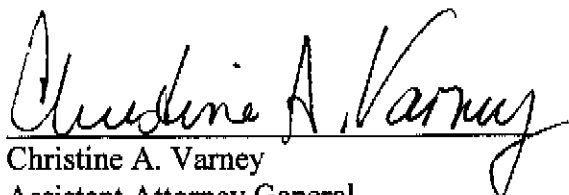
CRIMINAL FORFEITURE

[18 U.S.C. § 981(a)(1)(C);
28 U.S.C. § 2461 – Criminal Forfeiture]

8. The allegations contained in paragraphs 1-7 of this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c). Upon conviction of the offense in violation of 18 U.S.C. § 2315 set forth in Count One of this Information, defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense, including, but not limited to: \$16,700 in United States currency seized from defendant's safe deposit box #1172 at Seaway National Bank on September 4, 2008.

9. If any of the property described above, as a result of any act or omission of defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (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 divided without difficulty, the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).



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