

JAN -5 1983

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA )

Criminal No. 83-00005

v. )

INFORMATION

GARY D. BATEMAN )

31 U.S.C. §§1101, 1058

(Currency Reporting)

INFORMATION

The United States Attorney charges:

**GESELL, J.**

COUNT I

1. At all times relevant to this Count, defendant GARY D. BATEMAN was employed as international sales manager for Crawford Enterprises, Inc., and from on or about November 1, 1978, was vice-president of marketing for Crawford International, Inc.

2. At all times relevant to this Count, Crawford Enterprises, Inc. was a corporation organized under the laws of the State of Texas with principal offices in Houston, Texas and engaged in, among other things, the sale of compression equipment.

3. From on or about August 26, 1977, Crawford International, Inc. was a corporation organized under the laws of the State of Texas and was a wholly owned subsidiary of Crawford Enterprises, Inc.

4. At various times between March 1977 and February 1979, defendant GARY D. BATEMAN travelled between Houston, Texas and Mexico City, Mexico for the purpose of conducting business on behalf of, and in the course of his employment with, Crawford Enterprises, Inc. In advance of these business trips, defendant GARY D. BATEMAN would receive cash advances from Crawford Enterprises, Inc. for the purpose of covering company business expenses while he was in Mexico.

5. On or about November 2, 1977, defendant GARY D. BATEMAN, in the Southern District of Texas, and elsewhere, did knowingly and willfully transport, on one occasion,

Case Related To 83-00004

certain monetary instruments in excess of \$5,000; that is, defendant GARY D. BATEMAN obtained \$6,000 in United States currency as an advance from Crawford Enterprises, Inc. and did transport that \$6,000 in United States currency from Houston, Texas via Houston International Airport, a place within the United States, to Mexico City, Mexico, a place without the United States, without filing or without causing to be filed a report as required by Title 31, United States Code, Section 1101, and 31 C.F.R. Sections 103.23(a) and 103.25(b).

All in violation of Title 31, United States Code, Section 1058 and 31 C.F.R. Section 103.49.

## COUNT II

1. Paragraphs 1 through 3 of Count I of this Information are incorporated by reference and hereby realleged as though set forth in full herein.

2. At all times relevant to this Count, C. E. Miller Corporation, a wholly owned subsidiary of C. E. Miller Holding Corporation, was a corporation organized under the laws of the State of California with principal offices in Irvine, California, and engaged in, among other things, the engineering and fabrication of compression systems for use in the petroleum industry.

3. On or about January 25, 1979, C. E. Miller Corporation obtained a Bank of America foreign draft payable to a fictitious payee in the amount of \$335,225.38.

4. On or about January 28, 1979, defendant GARY D. BATEMAN, in the Southern District of Texas, and elsewhere, did knowingly and willfully transport, on one occasion, certain monetary instruments in excess of \$5,000; that is, defendant GARY D. BATEMAN did transport \$335,225.38 in the form of a bearer instrument, namely, the check referred to in paragraph 3 of this Count, from Houston, Texas via Houston International Airport, a place within the United States, to Mexico City, Mexico, a place without the United States, without filing or without causing to be filed a report as required by Title 31, United States Code, Section 1101, and 31 C.F.R., Sections 103.23(a) and 103.25(b).

All in violation of Title 31, United States Code, Section 1058 and 31 C.F.R. Section 103.49.

### Count III

1. At all times relevant to this Count, Applied Process Products Overseas, Inc. was a corporation organized under the laws of the State of Texas, engaged in, among other things, representing various United States companies in sales efforts in Mexico.

2. At all times relevant to this Count, defendant GARY D. BATEMAN was Chairman of the Board, President and sole shareholder of Applied Process Products Overseas, Inc.

3. On or about November 5, 1980, Applied Process Products Overseas, Inc. issued a check payable to a fictitious payee in the amount of \$66,188.74.

4. On or about November 5, 1980, defendant GARY D. BATEMAN in the Southern District of Texas, and elsewhere, did knowingly and willfully transport, on one occasion, certain monetary instruments in excess of \$5,000; that is, defendant GARY D. BATEMAN did transport \$66,188.74 in the form of a bearer instrument namely the check referred to in paragraph 3 of this Count, from Houston, Texas via Houston International Airport, a place within the United States, to Mexico City, Mexico, a place without the United States, without filing or without causing to be filed a report as required by Title 31 United States Code, Section 1101, and 31 C.F.R. Sections 103.23(a) and 103.25(b).

All in violation of Title 31, United States Code, Section 1058 and 31 C.F.R. Section 103.49.

#### Count IV

1. Paragraphs 1 and 2 of Count III of this Information are incorporated by reference and hereby realleged as though set forth in full herein.

2. On or about January 8, 1981, Applied Process Products Overseas, Inc. issued a check payable to a fictitious payee in the amount of \$51,838.53.

3. On or about January 8, 1981, defendant GARY D. BATEMAN in the Southern District of Texas, and elsewhere, did knowingly and willfully transport, on one occasion, certain monetary instruments in excess of \$5,000; that is, defendant GARY D. BATEMAN did transport \$51,838.53 in the form of a bearer instrument, namely the check referred to in paragraph 2 of this Count, from Houston, Texas, via Houston International Airport, a place within the United States, to Mexico City, Mexico, a place without the United States, without filing or without causing to be filed a report as required by Title 31, United States Code, Section 1101, and 31 C.F.R., Sections 103.23(a) and 103.25(b).

All in violation of Title 31, United States Code, Section 1058 and 31 C.F.R. Section 103.49.

Count V

1. Paragraphs 1 and 2 of Count III of this Information are incorporated by reference and hereby realleged as though set forth in full herein.

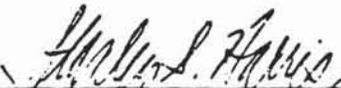
2. On or about March 11, 1981, Applied Process Products Overseas, Inc. issued a check payable to a fictitious payee in the amount of \$61,464.80.

3. On or about March 11, 1981, defendant GARY D. BATEMAN in the Southern District of Texas, and elsewhere, did knowingly and willfully transport, on one occasion, certain monetary instruments in excess of \$5,000; that is, defendant GARY D. BATEMAN did transport \$61,464.80 in the form of a bearer instrument, namely the check referred to in paragraph 2 of this count from Houston, Texas, via Houston International Airport, a place within the United States, to Mexico City, Mexico, a place without the United States, without filing or without causing to be filed a report as required by Title 31, United States Code, Section 1101, and 31 C.F.R. Sections 103.23(a) and 103.25(b).

All in violation of Title 31, United States Code, Section 1058 and 31 C.F.R., Section 103.49.

Dated

1/4/83

  
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Stanley S. Harris  
United States Attorney

  
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William F. Pendergast  
Attorney, Fraud Section  
Department of Justice