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OCT 18 2010 NF

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

JUDGE NORGLE

MAGISTRATE JUDGE MASON

UNITED STATES OF AMERICA)
)
 v.)
)
 ANGELA WEST,)
)
 Defendant.)
 _____)

INFORMATION
Case No. **10 CR 883**

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, defendant, ANGELA WEST (“defendant”), was an employee of Northern Trust Bank in Chicago, Illinois. From in or about March 2004 until in or about March 2005, defendant’s husband, Christopher West (“West”), was a Major in the Illinois Army National Guard 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, defendant herein,
ANGELA WEST,
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, possessed, concealed, and stored in her home; in a safe deposit box at Northern Trust Bank; and elsewhere U.S. currency, which had been sent to the United States

from West in Afghanistan, and which money defendant knew had been stolen and otherwise unlawfully converted and taken by West in Afghanistan.

3. During his deployment to Afghanistan, West sent money he had stolen, unlawfully converted and taken to his friend and fellow Illinois Army National Guard member, Charles Patton, who was not deployed to Afghanistan. Patton received the money, which was hidden in a series of boxes, and possessed, concealed and stored the money in his residence located in the Northern District of Illinois.

4. In or about the end of November 2004, upon West's return from Afghanistan during mid-tour leave, defendant accompanied West to Patton's home, where West opened the boxes to reveal the money hidden inside. Upon departing Patton's home, West and defendant took the boxes, money, and contents to their residence located in the Northern District of Illinois.

5. Upon West's return to Afghanistan in December 2004, he left the money with defendant, which she possessed, concealed, and stored in their residence within the Northern District of Illinois, knowing the money to have been stolen, unlawfully converted, and taken.

6. On or about December 2, 2004, defendant deposited this money into her safe deposit box at Northern Trust Bank, where she possessed, concealed and stored it, knowing the money been stolen and otherwise unlawfully converted, until on or about February 2, 2005, when defendant removed all the money from her safe deposit box and gave it to Patton.

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]

7. The allegations contained in paragraphs 1-6 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.

8. 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).

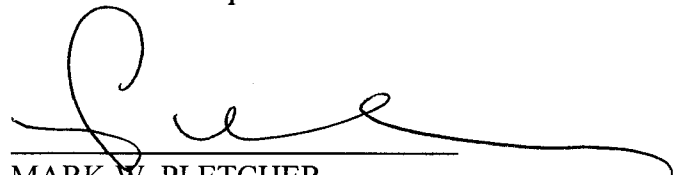
All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

DATED: October 15, 2010, at Washington, D.C.

FOR THE UNITED STATES

DENIS MCINERNEY
Chief, Fraud Section
United States Department of Justice

By:



MARK W. PLETCHER
EMILY W. ALLEN
Trial Attorneys, U.S. Department of Justice
Criminal and Antitrust Divisions