

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
) No. _____
) Violation: Title 29, United
) States Code, Sections 186(b)(1) and (d)(2)
WILLIAM E. DUGAN)
)

COUNT ONE

The UNITED STATES ATTORNEY charges:

1. At times material,
 - a. The International Union of Operating Engineers Local 150, the headquarters of which are located at 6140 Joliet Road, Countryside, Illinois, was a labor organization engaged in an industry affecting interstate commerce within the meaning of Title 29, United States Code, Section 402 (i) and (j).
 - b. Defendant WILLIAM E. DUGAN was the President – Business Manager of Local 150 and as such was the chief executive officer of that labor organization.
2. On or about approximately April 2005, in South Elgin in the Northern District of Illinois and elsewhere,

WILLIAM E. DUGAN,

an officer and employee of a labor organization, to wit: International Union of Operating Engineers Local 150, did unlawfully and willfully, demand, receive and accept, and agree to receive and accept the payment, and delivery of a thing of value, namely concrete buffalo feeders, having a value of more than \$900 from Company A, an employer whose employees were employed in an industry

affecting commerce and which employed individuals represented by the International Union of Operating Engineers Local 150;

In violation of Title 29, United States Code, Sections 186(b)(1) and (d) (2).

UNITED STATES ATTORNEY