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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: CO
Deputy

AU:25-CR-00256-ADA

UNITED STATES OF AMERICA Plaintiff

V

TERRY LENDO

SEALE

Defendant

INDICTMENT

[Ct. 1: 18 U.S.C. § 1001 – False Statements; Ct. 2: 18 U.S.C. § 661 – Theft Within Special Maritime and Territorial Jurisdiction]

THE GRAND JURY CHARGES:

COUNT ONE False Statements [18 U.S.C. § 1001]

On or about November 20, 2019, in the Western District of Texas, Defendant,

TERRY LENDO,

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by falsely stating on Form LM-3 Labor Organization Annual Report that, for the time period July 1, 2018 to June 30, 2019,

- a. no employee received salary, allowances, and other expenses totaled more than \$10,000,
 and
- b. American Federation of Government Employees Local 1745 ("AFGE Local 1745")
 disbursed \$0 to LENDO

when in fact **LENDO** knew that AFGE Local 1745 disbursed over \$21,000, including unauthorized disbursements that were for his own personal benefit.

In violation of 18 U.S.C. § 1001.

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COUNT TWO Theft Within Special Maritime and Territorial Jurisdiction [18 U.S.C. § 661]

Beginning on or about July 18, 2014, and continuing through and including on or about July 30, 2021, in the Western District of Texas, and within the special maritime and territorial jurisdiction of the United States, Defendant

TERRY LENDO,

did take and carry away, with intent to steal and purloin, money from one or more bank accounts, of a value exceeding \$1,000.

In violation of 18 U.S.C. § 661.

A TRUE BILL

FOREPERSON

MARGARET F. LEACHMAN ACTING UNITED STATES ATTORNEY

FOR: G. KARTHIK SRINIVASAN

ASSISTANT UNITED STATES ATTORNEY

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