

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

UNITED STATES OF AMERICA

Criminal No: 6:17cr1187

v.

CHARLEY DEAN HILL

INFORMATION

COUNT ONE
False Statements

The United States Attorney charges:

At all times relevant to this Information, unless otherwise specified:

1. From in or around February 2006 until in or around February 2010, defendant CHARLEY DEAN HILL (“HILL”), a resident of South Carolina, was employed in various capacities by a United States company that contracted with and provided integrated security and critical infrastructure services to, among other customers, the United States military (“Company A”). Company A operated in the Republic of Iraq, among other places.

2. As an employee of Company A, HILL was responsible for working with others, including Iraqi lawyers, translators, and others, to obtain licenses, permits, registrations, and visas in Iraq on Company A’s behalf.

3. On or about February 11, 2010, HILL was interviewed by Special Agents of the Federal Bureau of Investigation (“FBI”), a federal agency, at the United States Victory Base Complex, Baghdad, Iraq, concerning payments made by Hill on behalf of Company A to Iraqi entities in connection with licensing and permitting processes. During that interview, HILL knowingly and willfully made materially false representations to the FBI concerning whether he ever mailed shipments of money from Iraq into the District of South Carolina. In particular, HILL falsely stated that he never sent mail shipments containing money from Iraq to South Carolina, when in fact he did so on numerous prior occasions, amounting to at least \$71,900.

4. On or about February 11, 2010, CHARLEY DEAN HILL, in a matter within the jurisdiction of the executive branch of the Government of the United States, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation, to wit, HILL falsely told the FBI that HILL never sent mail shipments containing money from Iraq to South Carolina, when in truth and in fact, as HILL then well knew, HILL did so on numerous prior occasions, amounting to at least \$71,900.

All in violation of Title 18, United States Code, Sections 1001 and 2.

FORFEITURE ALLEGATION

5. Paragraphs 1 through 4 of this Information are realleged and incorporated by reference as if fully set forth herein for the purpose of noticing forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(c) and Title 28, United States Code, Section 2461(c).

6. HILL will execute, no later than December 22, 2017, the Consent to Administrative Forfeiture for funds he personally received for his participation in the fraudulent scheme. This Judgment will be in the amount of \$71,900.00.

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