UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

		Criminal Number:
UNITED STATES OF AMERICA	:	
	:	**Violation:**
	:	**18 U.S.C. § 641 (Theft of Government Property)**
v.	:	
	:	
	:	**Criminal Forfeiture:**
JOHN C. BEALE	:	**18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461(c); 21 U.S.C. § 853(p)**
Defendant.	:	

INFORMATION

The United States Attorney charges:

COUNT ONE
(Theft of Government Property)

From in or about 2000 through on or about April 30, 2013, in the District of Columbia and elsewhere, in a continuing course of conduct, the defendant, JOHN C. BEALE, while an employee of the United States Environmental Protection Agency ("EPA"), knowingly stole and converted for his own use money and property of the United States, to wit, $886,186, which said money and property had come into the defendant's possession in the form of salary, benefits, and certain Retention Incentive Bonuses for which BEALE had not earned by providing employment services to the EPA.

(Theft of Government Property, in Violation of Title 18, United States Code, Section 641)

CRIMINAL FORFEITURE ALLEGATION

1. The allegations set forth in Count One of this Information are re-alleged as though set forth fully herein and incorporated by reference for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(c), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense alleged in Count 1, the defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to this offense, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c). The property subject to forfeiture includes:

   a. a money judgment in the amount of $ 507,207.

3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the 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 that cannot be divided without difficulty;

the defendant shall forfeit to the United States any other property of the defendant, up to the value of the property described above, pursuant to 21 U.S.C. § 853(p).

(Criminal Forfeiture, pursuant to Title 18, United States Code, Section 981(a)(1)(c), Title 28 United Sates Code, Section 2461(c), and Title 21, United States Code, Section 853(p))

Respectfully submitted,

RONALD C. MACHEN JR.
UNITED STATES ATTORNEY

BY: _____

JAMES E. SMITH
ASSISTANT U.S. ATTORNEY
D.C. Bar No. 482985
Fraud & Public Corruption Section
555 Fourth Street, N.W.
Washington, D.C. 20530
james.smith9@usdoj.gov