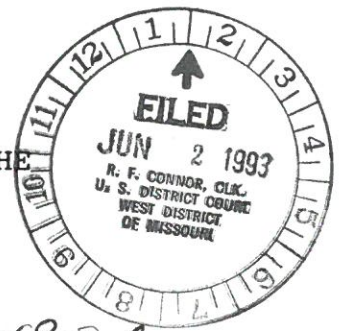


IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION



UNITED STATES OF AMERICA,
Plaintiff,

vs.

WILLIAM L. WEBSTER,
[DOB: 9-17-53]

Defendant.

No. 93-03243-01-CR-S-4

Count One:

18 U.S.C. § 371
NMT 5 Years and/or
\$250,000 Fine

Count Two

18 U.S.C. § 666(a)(1)(A)
NMT 10 Years and/or
\$250,000 Fine

\$50 Mandatory Penalty
Assessment on Each Count

I N F O R M A T I O N

The United States Attorney Charges That:

COUNT ONE

INTRODUCTION

At all times material:

A. The State of Missouri was a State that received federal assistance and benefits in excess of \$10,000 during each of the calendar years 1985 through 1993, inclusive.

B. WILLIAM L. WEBSTER was an agent, as defined by 18 U.S.C. § 666(d)(1), of the State of Missouri, that is, WILLIAM L. WEBSTER was the Attorney General of the State of Missouri from January, 1985 through January 11, 1993.

1
ORIGINAL

Document # 2

THE CONSPIRACY

From in or about 1985 up through and including in or about January of 1993, in Greene County, in the Western District of Missouri and elsewhere, **WILLIAM L. WEBSTER** did willfully and knowingly combine, conspire, confederate and agree together with others known and unknown to commit certain offenses against the laws of the United States, to wit, violations of Title 18, United States Code, Sections 666.

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance of the conspiracy and to effect the objects thereof, **WILLIAM L. WEBSTER** and his co-conspirators did commit the following overt acts, among others, in the Western District of Missouri and elsewhere:

1. From in or about 1985, up to and including in or about 1992, in the Western District of Missouri, and elsewhere, **WILLIAM L. WEBSTER** and his coconspirators demanded, solicited and accepted campaign contributions to **WILLIAM L. WEBSTER'S** political campaign committees, including Citizens for Webster, with the intent to be influenced and rewarded in connection with the business and transactions of the State of Missouri, including the administration of the Missouri Second Injury Fund by the Missouri Attorney General's Office.

2. In or about January of 1993, in the Western District of Missouri, **WILLIAM L. WEBSTER** caused, directed or allowed the destruction and deletion of files and records stored on the

computers of the Missouri Attorney General's Office.

3. From in or about 1985 up to and including in or about 1992, in the Western District of Missouri, **WILLIAM L. WEBSTER** and his coconspirators caused, directed or allowed employees of the Missouri Attorney General's Office to utilize the property, equipment and resources of that Office to prepare and print materials for **WILLIAM L. WEBSTER'S** fundraising activities and his political campaign committees, including Citizens for Webster, and to utilize the property, equipment and resources of that Office to deliver printed campaign materials, fundraising materials, campaign mail and campaign contributions between **WILLIAM L. WEBSTER'S** campaign offices and the Office of the Missouri Attorney General.

4. From in or about 1985, up to and including in or about 1992, in the Western District of Missouri, **WILLIAM L. WEBSTER** and his coconspirators caused, directed or allowed employees of the Missouri Attorney General's Office to utilize the property, equipment and resources of that Office to operate and manage **WILLIAM L. WEBSTER'S** fundraising activities and political campaign committees, including Citizens for Webster, and to transfer data from the computers of that Office to private computers for the purpose of operating and managing **WILLIAM L. WEBSTER'S** fundraising activities and political campaign committees.

5. From in or about 1990 up to and including in or about 1992, in the Western District of Missouri, and elsewhere, **WILLIAM**

L. WEBSTER and his coconspirators caused, directed or allowed employees of the Missouri Attorney General's Office to accompany him on political campaign trips and fundraisers.

6. In or about 1985, in the Western District of Missouri, WILLIAM L. WEBSTER and his coconspirators caused, directed or allowed the hiring of an individual as an employee of the State of Missouri and thereafter, up to and including in or about 1992, WILLIAM L. WEBSTER and his coconspirators caused, directed or allowed said employee to be absent from her duties at the Office of the Missouri Attorney General on more than one hundred occasions in order to provide babysitting services to WILLIAM L. WEBSTER. In addition, WILLIAM L. WEBSTER and his coconspirators caused, directed or allowed said employee to receive raises and promotions despite her frequent absences from work and caused, directed or allowed said employee to utilize "sick leave" and receive her state salary at times when the employee was actually providing babysitting services to WILLIAM L. WEBSTER.

All in violation of 18 U.S.C. § 371.

COUNT TWO

1. At all times material:

A. The State of Missouri was a State that received federal assistance and benefits in excess of \$10,000 during the each of the calendar years 1985 through 1993, inclusive.

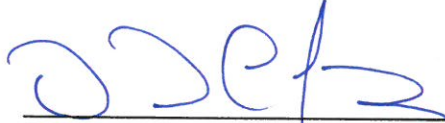
B. WILLIAM L. WEBSTER was an agent, as defined by 18 U.S.C. § 666(d)(1), of the State of Missouri, that is, WILLIAM L. WEBSTER was the Attorney General of the State of Missouri from January, 1985 through January 11, 1993.

2. From on or about 1985, up to and including on or about 1993, in Cole County, in the Western District of Missouri, WILLIAM L. WEBSTER, the Defendant, did intentionally misapply and otherwise without authority knowingly convert to his own use and to the use of others the property of the State of Missouri of a value of \$5,000 or more, that is, the services of employees of the State of Missouri and the property, equipment and resources of the State of Missouri.

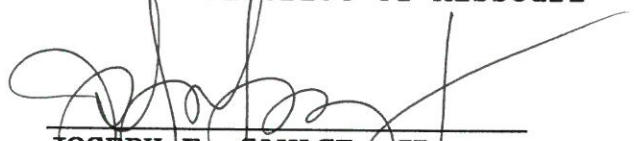
All in violation of 18 U.S.C. §§ 666 (a)(1)(A) and 2.



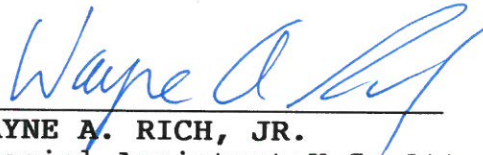
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