

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

FILED
JAN 23 2012
G. PATRICK MURPHY
DISTRICT JUDGE
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS, ILLINOIS

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.)
)
 CHARLES R. PRIESTLEY,)
)
 Defendant.)

No. 10-cr-30180-GPM

STIPULATION OF FACTS

The United States of America, by and through its attorneys, Stephen R. Wigginton, United States Attorney, and Ranley R. Killian and William E. Coonan, Assistant United States Attorneys, and the defendant, Charles R. Priestley, and his attorney, John D. Stobbs, II, submit the following agreed stipulation of facts:

1. At all relevant times, Hummingbird Aviation is a company in Louisiana operated by Defendant Charles R. Priestley. Priestley entered into a contract with USTRANSCOM, part of the U.S. Department of Defense, and responsible for national and international military transportation for the United States
2. USTRANSCOM's headquarters and contracting office is located at Scott Air Force Base in St. Clair County and within the Southern District of Illinois
3. The contract allowed Priestley to provide helicopter service in Afghanistan, effective October 1, 2007. The contract provided that the United States would pay Hummingbird for the services of each helicopter at \$298,790 per month.

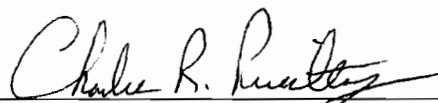
4. On December 12, 2007, Hummingbird sent a payroll summary to USTRANSCOM, which requested reimbursement for the aircraft lease for October 1 through November 30, 2007, amounting to \$300,000.

5. That payroll summary was a claim or request for reimbursement and was false and fictitious in that (a) Priestley had back-dated a contract with a third-party provider of helicopters which was provided to USTRANSCOM for documentation for reimbursement, and (b) Priestley requested reimbursement for services which were not rendered and could not have been rendered.

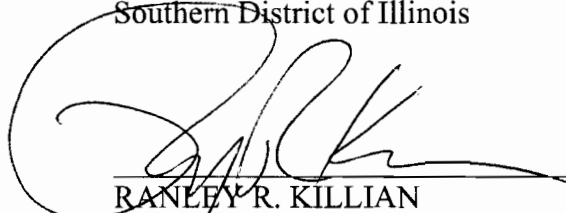
6. Priestley admits that the claim was false and fictitious and that the services had never and could not have been rendered for the aircraft lease for October 1 through November 30, 2007.

7. The loss to the United States was \$300,000.


IT IS SO STIPULATED.



CHARLES R. PRIESTLEY
Defendant

STEPHEN R. WIGGINTON
United States Attorney
Southern District of Illinois


RANLEY R. KILLIAN
WILLIAM E. COONAN
Assistant United States Attorneys



JOHN D. STOBBS, II
Attorney at Law
Attorney for Defendant

Date: January 23, 2012

Date: January 23, 2012