

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

UNITED STATES OF AMERICA

v.

CHARLEY DEAN HILL

Criminal No: 8:17 CR 1187

18 U.S.C. § 1001

18 U.S.C. § 2

RECEIVED  
USDC, CLERK GREENVILLE, SC  
2018 FEB 14 AM 10:18

**INDICTMENT**

The Grand Jury charges that:

**General Allegations**

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 by a United States company (“Company A”) that contracted with and provided integrated security and critical infrastructure services to the United States Armed Forces, in order to help secure and reconstruct the Republic of Iraq (“Iraq”).

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

3. In or around 2010, the Federal Bureau of Investigation (“FBI”), a federal agency within the executive branch of the Government of the United States, began an official investigation into possible violations of U.S. criminal laws, including whether HILL and others associated with Company A defrauded the United States by overstating the funds required to obtain certain licenses and permits in Iraq and shaved off part of those funds for personal gain (the “Investigation”).

4. On or about February 11, 2010, at the United States Victory Base Complex, Baghdad, Iraq, HILL was interviewed by Special Agents of the FBI in connection with the Investigation. During the interview, the FBI questioned HILL about, among other things, his role relating to Company A’s efforts to obtain licenses, permits, and registrations from Iraqi authorities, as well as costs required to obtain the aforementioned items.

5. During the interview, on or about February 11, 2010, HILL knowingly and willfully made materially false statements and representations to the FBI concerning whether he and others sent money from Iraq to the United States. Specifically, HILL falsely stated that he never sent money from Iraq to the United States except for approximately \$13,000 that an Iraqi translator sent to pay off student loans for HILL’s daughter, when in fact on numerous occasions beginning in or around May 2009, HILL sent and caused to be sent from Iraq to the United States, including to the District of South Carolina, via FedEx and U.S. Mail,

envelopes containing United States Currency to his then-girlfriend, his son, and his daughter, among others.

**The Offense**

6. On or about February 11, 2010, at the United States Victory Base Complex, Baghdad, Iraq, HILL, in a matter within the jurisdiction of the executive branch of the Government of the United States, did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations, to wit, HILL falsely told Special Agents of the FBI that no money, other than approximately \$13,000 mailed by an Iraqi translator purportedly to pay off student loans for HILL's daughter, was sent by or for the benefit of HILL and HILL's family from Iraq to the United States, when in truth and in fact, as HILL then well knew, HILL mailed and caused mailings, via FedEx and U.S. Mail, containing United States currency to be sent to his then-girlfriend and children on numerous prior occasions, amounting to at least approximately \$185,150.

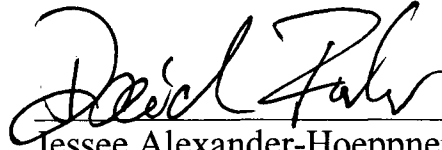
All in violation of Title 18, United States Code, Sections 1001 and 2.

A True Bill

REDACTED  
~~\_\_\_\_\_~~  
FOREPERSON

  
\_\_\_\_\_  
BETH DRAKE (MBC/jw)  
UNITED STATES ATTORNEY

JOHN P. CRONAN  
Acting Assistant Attorney General  
Criminal Division  
U.S. Department of Justice

A handwritten signature in black ink, appearing to read "Jesse Alexander-Hoepfner", written over a horizontal line.

Jessee Alexander-Hoepfner  
David M. Fuhr  
Trial Attorneys  
Fraud Section  
U.S. Department of Justice  
1400 New York Avenue, N.W.  
Washington, D.C. 20005  
jessee.alexander-hoepfner@usdoj.gov  
david.fuhr@usdoj.gov