

## **ORIGINAL**

## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:15-CR-409-M

LYDIA BANKHEAD (3)

## **SUPERSEDING INFORMATION**

The United States Attorney charges:

## Count One

Aiding and Abetting Participating in a Matter Affecting an Employee's Financial Interest Violation of 18 U.S.C. §§ 208 and 2 (18 U.S.C. § 216(a)(1))

Beginning in or about February 2015 and continuing until in or about August 2015, in the Dallas Division of the Northern District of Texas, Defendant, Lydia Bankhead, aided and abetted Lydia Taylor, then an employee of the Department of Labor (DOL), an independent agency of the United States, to knowingly participate personally and substantially as a Government officer and employee, by investigating claims, accessing DOL systems and claims data, and taking other actions, in matters in which Bankhead knew Taylor has a financial interest, namely, Union Medical Supplies and Equipment, of which both Bankhead and Taylor were employees.

In violation of 18 U.S.C. §§ 208 and 2 (18 U.S.C. § 216(a)(1)).

Respectfully submitted,

ERIN NEALY COX UNITED STATES ATTORNEY

NICOLE DANA

Assistant United States Attorney Texas State Bar No. 24062268 1100 Commerce Street, Third Floor Dallas, Texas 75242-1699

Telephone: 214-659-8600 Facsimile: 214-659-8800

Email: nicole.dana@usdoj.gov