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## FOR THE WESTERN DISTRICT OF TEXASCLERK LED PASO DIVISION

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UNITED STATES OF AMERICA,

INFORMATION

Plaintiff,

v.

CRIMINAL NO. EP-14-CR-213-DB

RICHARD CRAIG ROONEY (1) and CHARLIE TAKHYUN SONG (4),

Defendants.

## THE UNITED STATES ATTORNEY CHARGES:

## COUNT ONE

(18 U.S.C. §§ 208 and 2)

(Acts Affecting a Personal Financial Interest and Aiding and Abetting)

Beginning on or about March 2, 2002 and continuing through and including August 2010, in the Western District of Texas, the Western District of North Carolina and elsewhere, the defendant, RICHARD CRAIG ROONEY, who at all times during the period alleged herein, was an employee of the Executive Branch of the United States Government, that is, an active duty soldier of officer level rank and pay in the United States Army, United States Department of Defense, aided and abetted by defendant, CHARLIE TAKHYUN SONG, participated personally and substantially as a Government employee, through decision making, recommendation and otherwise, in a Government contract and claim and other particular matter in which defendants knew defendant Rooney had a financial interest, that is: the defendant, Richard Craig Rooney, as an Army surgeon, caused the Department of Defense to order and pay

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for medical equipment, knowing that he received remuneration for consultation on, and the design and testing of, said equipment in violation of Title 18, United States Code, Sections 208 and 2.

RICHARD L. DURBIN, JR.

ACTING UNITED STATES ATTORNEY

By:

Debra P. Kanof

Assistant U.S. Attorney