

**FILED**

OCT 07 2005

HIGH COURT  
CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

KEVIN RYAN (CASBN 118321)  
United States Attorney

Attorney for Plaintiff

1c  
RMW

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

E-filing

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN STEPHEN SACROSANTE,

Defendant.

**CR** No. **05 00639** RMW

VIOLATION: 18 U.S.C. § 506(a)(2) -  
Seals of Departments or Agencies

SAN JOSE VENUE

**RS**

INFORMATION

The United States Attorney charges:

COUNT ONE: 18 U.S.C. § 506(a)(2) - Seals of Departments or Agencies

On or about February 10, 2003, in the Northern District of California, the defendant,

JOHN STEPHEN SACROSANTE,

for the purpose of purchasing a helicopter, did knowingly affix and impress a fraudulently made, forged and counterfeited seal of a Department and Agency of the United States to and upon a document dated February 10, 2003, to wit:

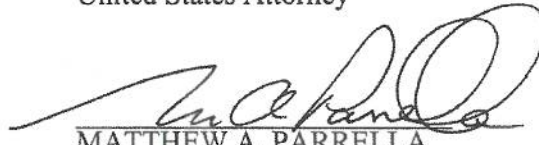
A one page document containing, among other things, the writings, "Federal Document", "Department of Homeland Security", "Memo of Intent to Purchase on or before: 21 .February.2003",

INFORMATION


“LINE ITEM: HELICOPTER, BELL 412, SN: 33037/ N177LG”, and “PURCHASE AMOUNT: \$2,550,000.00 USD”; and depicting, among other things, the seal and name of the United States Department of Homeland Security, the seal of the United States President, and the seal of the United States Department of the Army. All in violation of Title 18, United States Code, Section 506(a)(2).

DATED: 9/16/05

KEVIN RYAN  
United States Attorney



MATTHEW A. PARRELLA  
Chief, San Jose Branch Office

(Approved as to form:   
SAUSA: Scott C. Tsui