

B. OBJECT OF THE CONSPIRACY:

It was the object of the conspiracy that GEORGE S. ACKERSON and others known and unknown to the Grand Jury would utilize a Canon model laser copier to falsely make, forge and counterfeit approximately ONE HUNDRED THOUSAND (\$100,000.00) DOLLARS of Federal Reserve Notes in ONE HUNDRED (\$100.00) DOLLARS denominations for the purpose of passing the counterfeit notes and in return receive goods, services, legitimate Federal Reserve Notes and/or cashier checks.

C. OVERT ACTS

In furtherance of the conspiracy and to effect the object thereof, the following overt acts, among others, were committed in the Western District of Louisiana and elsewhere:

- (1) On or about December 9, 1989, at Lake Charles, Louisiana, Gregory J. Caton, not named herein as a defendant, spoke via telephone with a business associate of Caton's regarding use of the business associates copying machine by Caton and defendant GEORGE S. ACKERSON for the purpose of making currency.
- (2) On or about December 12, 1989, defendant GEORGE S. ACKERSON, accompanied by Gregory J. Caton, travelled to the Copy Magic Store in Lake Charles, Louisiana, and while at that location made copies of a FIFTY (\$50.00) DOLLAR bill and other documents, utilizing a Laser copier machine.
- (3) On or about December 12, 1989, while at the Copy Magic Store, defendant GEORGE S. ACKERSON, in the company of Gregory J. Caton, discussed with Caton's business associate the utilization of the associates Laser copier to print \$100,000.00 in \$100.00 bills and ACKERSON's plans for distribution of the counterfeit bills.
- (4) Between December 9, 1989 and December 15, 1989, defendant GEORGE S. ACKERSON travelled from the State of Louisiana to the State of Texas and returned to Louisiana with a quantity of "rag" paper to be used in printing the money.

- (5) On or about December 14, 1989, at Lake Charles, Louisiana, defendant GEORGE S. ACKERSON provided Gregory J. Caton with twelve (12) one hundred (\$100.00) dollar Federal Reserve Notes which Caton then pasted on three sheets of paper.
- (6) On or about December 15, 1989, defendant GEORGE S. ACKERSON accompanied by Gregory J. Caton travelled to the Copy Magic Store and commenced printing sheets of currency.
- (7) On or about December 16, 1989, defendant GEORGE S. ACKERSON accompanied by Gregory J. Caton travelled to the Copy Magic Store for the purpose of printing 250 pages (four \$100.00 bills to each page) of counterfeit money.

All in violation of Title 18, United States Code, Section 371.

[18 U.S.C. §371].

COUNT II.

That on or about December 16, 1989, in the Western District of Louisiana, GEORGE S. ACKERSON, defendant herein, along with others known and unknown to the Grand Jury, each knowingly and willfully aided and abetted by the other, did knowingly, willfully and with intent to defraud falsely make, forge, and counterfeit, and caused to be falsely made, forged and counterfeited, certain obligations of the United States, that is, Federal Reserve Notes in the denomination of ONE HUNDRED (\$100.00) DOLLARS, in violation of Title 18, United States Code, Sections 471 and 2. [18 U.S.C. §§471, 2].

COUNT III

That on or about December 16, 1989, in the Western District of Louisiana, GEORGE S. ACKERSON, defendant herein, and Gregory J. Caton, not named as a defendant herein, knowingly, willfully and with intent to defraud, did keep in their possession and conceal

falsely made, forged and counterfeited obligations of the United States, that is, Federal Reserve Notes, in the denomination of ONE HUNDRED (\$100.00) DOLLARS, which they full well knew to be forged and counterfeited, in violation of Title 18, United States Code, Section 472. [18 U.S.C. §472].

A TRUE BILL:

Alfred J. Boudie
FOREMAN: FEDERAL GRAND JURY

JOSEPH S. CAGE, JR.
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