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U.S. COURTS

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ELIZABETH A. SMITH  
CLERK, DISTRICT OF IDAHO

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOHN T. BUJAK,

Defendant.

Case No. **CR 14-0002-SEJL**

**INDICTMENT**

18 U.S.C. § 157  
18 U.S.C. § 152(1)  
18 U.S.C. § 152(2)  
18 U.S.C. § 1956(a)(1)  
18 U.S.C. § 1503

The Grand Jury charges:

**COUNT ONE**

**Bankruptcy Fraud  
18 U.S.C. § 157**

1. From on or about November 1, 2010, until on or about September 21, 2011, in the District of Idaho, the defendant,

JOHN T. BUJAK

did devise a scheme and artifice to defraud his creditors, as to material matters, by concealing from the bankruptcy trustee and his creditors, in Bankruptcy Case No. 10-03569-JDP, his and his then wife's ownership of a women's Rolex watch.

2. For the purpose of executing and concealing said scheme and artifice, the defendant (i) did file a petition, statement of financial affairs, and schedules under Title 11, United States Code, wherein he knowingly omitted the women's Rolex watch, and (ii) did make a false and fraudulent representation, claim, and promise concerning and in relation to a proceeding under Title 11, United States Code, to wit: he falsely testified, under oath in the Section 341(a) meeting of creditors, that he had listed all of his assets in the bankruptcy petition, statement of financial affairs, and schedules when, in truth and in fact, he knew that he had omitted therefrom the women's Rolex watch.

3. It was part of the scheme that, after filing the bankruptcy petition, statement of financial affairs, and schedules, and testifying at the Section 341(a) meeting of creditors, the defendant sold the women's Rolex watch and a diamond ring to a jewelry store in Florida and received a \$26,000 check as payment. Of this amount, the payment for the watch was \$25,000.

4. It was further a part of the scheme that the defendant concealed the sale and his receipt of the \$26,000 in proceeds from the United States trustee, the bankruptcy trustee, and his creditors. He did this by intentionally cashing the check at a MoneyTree store, rather than depositing the check into his personal bank accounts or cashing the check at his bank.

5. It was further a part of the scheme that, when the sale of the women's Rolex watch came to the attention of the bankruptcy trustee, the defendant made false statements to the bankruptcy trustee. Namely, the defendant falsely stated that he and his then wife originally purchased the watch as a gift for his mother-in-law, that they did not possess it when they filed for bankruptcy, and that his mother-in-law returned the watch after they filed for bankruptcy.

6. It was further a part of the scheme that the defendant attempted to persuade his then wife to make false statements to the bankruptcy trustee. Namely, he encouraged his then wife to falsely state that they originally purchased the watch as a gift for her mother, that they did not possess the watch when they filed for bankruptcy, and that her mother returned the watch after they filed for bankruptcy.

All in violation of Title 18, United States Code, Sections 157 and 2.

**COUNT TWO**

**Concealment of Assets  
18 U.S.C. § 152(1)**

On or about November 15, 2010, in the District of Idaho, the defendant,

JOHN T. BUJAK

did knowingly and fraudulently conceal property belonging to him and his then wife, in Bankruptcy Case No. 10-03569-JDP, specifically a women's Rolex watch, from the trustee charged with control of the debtor's property, the creditors, and the United States Trustee.

All in violation of Title 18, United States Code, Sections 152(1) and 2.

**COUNT THREE**

**False Statement Under Oath  
18 U.S.C. § 152(2)**

On or about December 8, 2010, in the District of Idaho, the defendant,

JOHN T. BUJAK

did knowingly and fraudulently make a false material statement under oath in and in relation to a case under Title 11, Bankruptcy Case No. 10-03569-JDP, by falsely testifying under oath in a proceeding before the case trustee, to wit: a Section 341(a) meeting of creditors, that he had

listed all of his assets in the bankruptcy petition, statement of financial affairs, and schedules when, in truth and in fact, he knew that he had omitted therefrom a women's Rolex watch.

All in violation of Title 18, United States Code, Sections 152(2) and 2.

**COUNT FOUR**

**Money Laundering  
18 U.S.C. § 1956(a)(1)**

On or about May 17, 2011, in the District of Idaho, the defendant,

JOHN T. BUJAK

knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, to wit: Concealment of Assets in violation of Title 18, United States Code, Section 152(1), and False Statement Under Oath in violation of Title 18, United States Code, Section 152(2), did conduct and attempt to conduct such financial transaction, to wit: cashing and attempting to cash a \$26,000 check at a MoneyTree store in Caldwell, Idaho, which, in fact, involved the proceeds of specified unlawful activity, to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1) and 2.

**COUNT FIVE**

**Obstruction of Justice  
18 U.S.C. § 1503**

From on or about September 1, 2011, until on or about September 2, 2011, in the District of Idaho, the defendant,

JOHN T. BUJAK

did corruptly endeavor to influence, obstruct and impede the due administration of justice in Case No. 10-03569-JDP, in the United States Bankruptcy Court for the District of Idaho, by attempting to persuade his then wife to falsely state to the bankruptcy trustee that he and his then wife originally purchased a women's Rolex watch as a gift for her mother, that they did not possess the watch when they filed for bankruptcy, and that her mother returned the watch to them after they filed for bankruptcy.

All in violation of Title 18, United States Code, Section 1503.

**COUNT SIX**

**Obstruction of Justice  
18 U.S.C. § 1503**

On or about September 2, 2011, in the District of Idaho, the defendant,

JOHN T. BUJAK

did corruptly influence, obstruct and impede the due administration of justice in Case No. 10-03569-JDP, in the United States Bankruptcy Court for the District of Idaho, by falsely stating to the bankruptcy trustee that he and his then wife originally purchased a women's Rolex watch as a gift for his mother-in-law, that he and his wife did not possess the watch when they filed for bankruptcy, and that his mother-in-law returned the watch after he and his wife filed for bankruptcy.

All in violation of Title 18, United States Code, Section 1503.

**CRIMINAL FORFEITURE ALLEGATIONS**

**Forfeiture of Proceeds of Specified Unlawful Activity  
18 U.S.C. §§ 981(a)(1)(C) and 28 U.S.C. § 2461(c)**

As a result of committing one or more of the above offenses in violation of 18 U.S.C. §§ 152 and 1503, as alleged in Counts Two, Three, Five, and Six of this Indictment, the defendant,

JOHN T. BUJAK

shall forfeit to the United States, pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real and personal, which constitutes or is derived from any proceeds traceable to the commission of said offenses, including but not limited to the following:

A. Money Judgment:

The sum of money in the amount of \$25,000.00 in United States currency, representing the amount of proceeds derived from the scheme to defraud by the defendant.

B. Substitute Assets:

If any of the properties and interests described above as being subject to forfeiture, as a result of any act or omission of the defendant:

1. Cannot be located upon the exercise of due diligence;
2. Has been transferred or sold to, or deposited with, a third person;
3. Has been placed beyond the jurisdiction of the court;
4. Has been substantially diminished in value; or
5. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the said defendant up to the value of the forfeitable property described above.

**Forfeiture of Property Involved in Money Laundering  
18 U.S.C. § 982(a)(1)**

As a result of committing the money-laundering offense alleged in Count Four of this Indictment, in violation of 18 U.S.C. § 1956(a)(1), the defendant,

JOHN T. BUJAK

shall forfeit to the United States pursuant to 18 U.S.C. §§ 982(a)(1), any property, real and personal, which was involved in such offense, and any property traceable to such property, including but not limited to the property set out in the Forfeiture Allegation above, namely a money judgment of \$25,000.00 and substitute assets.

DATED this 14th day of January, 2014.

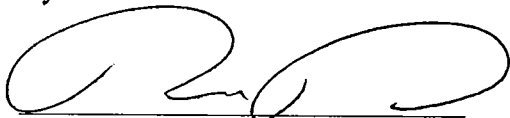
A TRUE BILL

/s/ [Signature on Reverse]

Foreperson

WENDY J. OLSON  
United States Attorney

By:



Raymond E. Patricco  
Assistant United States Attorney