

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b>
	:	
<b>v.</b>	:	<b>VIOLATIONS: 18 U.S.C. § 641</b>
	:	<b>(Conversion of Public Money); and</b>
	:	<b>§ 2 (Aiding and Abetting;</b>
	:	<b>Causing an Act to be Done)</b>
<b>JAMES M. WOOSLEY,</b>	:	
	:	<b>28 U.S.C. § 2461(c) &amp;</b>
<b>Defendant.</b>	:	<b>18 U.S.C. § 981(a)(1)</b>
	:	<b>(Criminal Forfeiture)</b>

**INFORMATION**

The United States Attorney hereby informs the Court that:

1. At all times relevant, United States Immigration and Customs Enforcement (hereinafter “ICE”) was a component of the United States Department of Homeland Security (“DHS”), which was a Department in the Executive Branch of the United States Government. The Headquarters for ICE was in Washington, D.C.

2. At all times relevant, defendant **JAMES M. WOOSLEY** (“**WOOSLEY**”) was an ICE Intelligence supervisor, first as Deputy Director for the ICE Office of Intelligence, then, on or about August 1, 2009, Acting Director of that Office, and then, on or about June 9, 2010, Acting Assistant Director of Intelligence within the then newly formed Homeland Security Investigations – Headquarters. The official duty station at ICE for defendant **WOOSLEY** was in Washington, D.C., and he lived in Virginia. Defendant **WOOSLEY** had two adult sons, one of whom (“son #1”) was employed at all relevant times by a company (“the Company”) that did contract work for ICE, and a second son (“son #2”).

3. In or about 2007, defendant **WOOSLEY** first met Lateisha M. Rollerson (“Rollerson”), with whom he thereafter developed a close, personal relationship. Rollerson asked defendant

Woosley to get her a job at ICE, and defendant **WOOSLEY** told her one way to get into ICE was first to get a job at the Company that did contract work for ICE. In or about May of 2008, after defendant **WOOSLEY** had one of his subordinates edit Rollerson's resume, Rollerson was hired as an Intelligence Reports Writer for the Company. In or about December of 2008, defendant **WOOSLEY** obtained a position for Rollerson at ICE Headquarters as an Intelligence Research Specialist. In that position, Rollerson then worked for all relevant times after that date, first in the chain of command of defendant **WOOSLEY**, and then, from in or about February of 2009, reporting directly to defendant **WOOSLEY** as **WOOSLEY**'s personal assistant. The official duty station at ICE for Rollerson was in Washington, D.C., and she lived in Virginia, often with defendant **WOOSLEY**, where she paid many of the bills for both her and defendant **WOOSLEY**.

4. At all times relevant, Stephen E. Henderson ("Henderson") was employed by the Company that did contract work for ICE as a Senior Lead Intelligence Analyst. Henderson did work in that position as a contractor for ICE, DHS, Office of Intelligence, with his permanent residence in Tucson, Arizona. Henderson's official duty location with the Company was in Tucson, Arizona, until on or about August 26, 2009, when his Company changed it to Fairfax, Virginia.

5. At all times relevant, Ahmed Adil Abdallat ("Abdallat") was employed by ICE, DHS, as a Supervisory Intelligence Research Specialist with ICE, DHS, in El Paso, Texas. Abdallat had a long time association with defendant **WOOSLEY** while both were employed in the government. At all relevant times, defendant **WOOSLEY** was Abdallat's Senior Manager within the ICE Intelligence Division.

6. At all times relevant, an individual ("Contract Employee #1") worked for the Company doing contract work with ICE. His permanent residence was in Oklahoma.

7. At all times relevant, William J. Korn ("Korn") was employed by ICE, DHS, as either an Intelligence Research Specialist or a Supervisory Intelligence Research Specialist, Office of Intelligence, with his official duty station and his residence, to his knowledge, in Tucson, Arizona.

8. Between in or about May of 2008 and in or about February of 2011, defendant **WOOSLEY**, and others known and unknown to the United States Attorney, did willfully and knowingly embezzle, steal, purloin, and convert to the use of defendant **WOOSLEY** and others, money exceeding the sum of \$1,000, property of the United States or a department or agency thereof, which property had come into the possession and under the control of defendant **WOOSLEY** and others, including, among others, Rollerson, Henderson, Abdallat, Korn, and Contract Employee #1, by means of the submission of fraudulent travel claims and time and attendance claims for expenses that were not legitimately incurred and thereafter receiving the resulting payments from the United States to which the respective individual was not entitled.

**(Conversion of Public Money, in Violation of Title 18, United States Code, Sections 641 and 2(aiding and abetting, causing an act to be done))**

### **FORFEITURE ALLEGATION**

1. The allegations set forth in Count One of this Information, **Conversion of Public Money**, in violation of Title 18, United States Code, Sections 641 and 2 (aiding and abetting, causing an act to be done), are re-alleged as though set forth fully herein and incorporated by reference for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 28, United States Code, Section 2461(c) (incorporating Title 18, United States Code, Section 981(a)(1)).

2. As a result of the offense alleged in Count One of this Information, the defendant, **JAMES M. WOOSLEY**, shall forfeit to the United States any and all property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly, as the result of **Conversion of Public Money**, in violation of Title 18, United States Code, Sections 641 and 2 (aiding and abetting, causing an act to be done), including, but not limited to:

**Money Judgment**

A judgment against defendant in favor of the United States for one-hundred eighty-three thousand, one hundred twenty-five dollars and one cent (\$183,125.01), which represents a sum of money constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the offense of **Conversion of Public Money**, in violation of Title 18, United States Code, Sections 641 and 2 (aiding and abetting, causing an act to be done).

3. By virtue of the commission of the felony offense charged in Count One of this Information, any and all interest that the defendant, **JAMES M. WOOSLEY**, has in the property constituting, or derived from, proceeds obtained directly or indirectly as the result of the offense of **Conversion of Public Money**, in violation of Title 18, United States Code, Sections 641 and 2 (aiding and abetting, causing an act to be done), is vested in the United States and hereby forfeited to the United States pursuant to the provisions of Title 28, United States Code, Section 2461(c) (incorporating Title 18, United States Code, Section 981(a)(1)). If, as a result of any act or omission of **JAMES M. WOOSLEY**, the property identified above:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or


- e. has been commingled with other property that cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to the provisions of Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c) (incorporating Title 18, United States Code, Section 981(a)(1)), to seek forfeiture of any other property of said defendant up to the value of said property listed above as being subject to forfeiture.

**(Criminal Forfeiture, pursuant to Title 28, United States Code, Section 2461(c)  
(incorporating Title 18, United States Code, Section 981(a)(1)).**

Respectfully submitted,

RONALD C. MACHEN JR.  
UNITED STATES ATTORNEY  
D.C. BAR # 447889

BY:   
DANIEL P. BUTLER  
D.C. BAR # 417718  
ALLISON BARLOTTA  
D.C. BAR # 475285  
ASSISTANT U.S. ATTORNEYS  
Fraud & Public Corruption Section  
555 Fourth Street, N.W., Fifth Floor  
Washington, D.C. 20530  
(202) 252-7881 (Butler)  
(202) 252-7295 (Barlotta)  
[Daniel.Butler@USDOJ.Gov](mailto:Daniel.Butler@USDOJ.Gov)  
[Allison.Barlotta@USDOJ.Gov](mailto:Allison.Barlotta@USDOJ.Gov)