UNITED STATES DISTRICT COURT DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v. Cr. No. 07- -01-

WILLIAM R. SLACK

INDICTMENT

(18 U.S.C. § 1341; mail fraud)

At all times relevant to this Indictment:

- 1) The Beer Judges Certification Program (BJCP), a New York State not-for-profit corporation that recognizes and promotes beer tasting and evaluation skills.
- 2) The BJCP was founded in 1985 and currently has approximately 2,500 active members throughout North America.
- 3) The BJCP certifies and ranks individual beer judges through an exam and monitoring process.
- 4) The BJCP maintains no physical offices, and the BJCP traditionally has conducted most of its business through its members, with oversight through its Program Administrator.
- 5) The BJCP has a Board of Directors comprising 7 elected representatives from seven regions across the United States and Canada.
- 6) The Board elects its own officers annually, which consist of a President, Vice President and a Treasurer.
 - 7) The defendant, William R. Slack, was the Treasurer of the BJCP.
- 8) As Treasurer, the defendant exercised physical control of the BJCP bank account which was maintained at the Bank of New Hampshire.

9) The by-laws of the BJCP specifically provided that "[n]o Officer or Director may

receive remuneration of any kind for his or her services to the BJCP" and that "Officers,

Directors, employees, and other individuals directed by the Board of Directors to serve the BJCP

in any capacity that requires out-of-pocket expenses may be reimbursed these expenses."

10) The defendant devised a scheme and artifice to defraud the BJCP whereby he wrote

checks from the BJCP bank account to pay personal expenses and to pay himself money which

was not related to his duties as an Officer of the BJCP and which was in contravention of the by-

laws of the BJCP.

11) Beginning at a date uncertain, but at least as early as in or about January 2001 and

continuing to on or about April 10, 2004, in the District of New Hampshire and elsewhere, the

Defendant, William R. Slack, having devised the above-described scheme and artifice to defraud,

for the purpose of executing and in order to effect the scheme and artifice to defraud, did

knowingly cause to be sent, delivered, and moved by the United States Postal Service, monthly

bank account statements, from the Bank of New Hampshire to the defendant, William R. Slack,

on or about the last day of each month from at least as early as January, 2001 to March, 2004.

All in violation of Tile 18, United States Code, Section 1341.

April 25, 2007

TRUE BILL

/s/ Foreperson

Grand Jury Foreperson

THOMAS P. COLANTUONO United States Attorney

By: /s/Arnold H. Huftalen

Arnold H. Huftalen

Assistant U.S. Attorney