

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA

vs.

Case: 2:20-cr-20382
Assigned To : Michelson, Laurie J.
Referral Judge: Stafford, Elizabeth A.
Assign. Date : 8/27/2020
Description: INFO USA V. WILLIAMS (NA)

**VIOLATIONS: 18 U.S.C. § 371
 29 U.S.C. § 501(c)**

D-1 DENNIS WILLIAMS,

Defendant.

_____ /

INFORMATION

The United States Attorney charges:

INTRODUCTION

Unless otherwise stated, at all times material to this Information, the following was true:

1. The International Union, United Automobile, Aerospace, and Agricultural Implement Workers of America (referred to herein as “UAW” or as “United Auto Workers”) was a labor organization engaged in an industry affecting commerce

within the meaning of Sections 402(i) and 402(j) of Title 29, United States Code. The UAW represented hundreds of thousands of non-managerial employees employed by automobile manufacturers and other employers at numerous locations in Michigan and across the United States. The UAW was headquartered in Detroit, Michigan.

2. The UAW Region 5 Midwest States Community Action Program (CAP) Council (“UAW Midwest CAP”), the UAW Midwest CAP’s predecessor entities, and the UAW Region 5 Southwestern States CAP Council (“UAW Southwest CAP”) were labor organizations engaged in an industry affecting commerce within the meaning of Sections 402(i) and 402(j) of Title 29, United States Code.

3. The UAW Midwest CAP, its predecessor entities, and the UAW Southwest CAP are some of the UAW’s many Community Action Program Councils funded through “per-capita” tax payments derived from member dues. CAP councils existed as labor organizations subordinate to the UAW and were governed by the UAW Constitution and its bylaws. The UAW Southwest CAP was based in Dallas, Texas; while the UAW Midwest CAP was located at the UAW Region 5’s headquarters in Hazelwood, Missouri. UAW Region 5 was an internal subdivision of the United Auto Workers union.

4. From at least 2010 through June 2014, **DENNIS WILLIAMS** was the

Secretary-Treasurer of the UAW. From June 2014 through June 2018, **DENNIS WILLIAMS** was the President of the UAW. As such, **DENNIS WILLIAMS** was an officer, within the meaning of Sections 402(n) of Title 29, United States Code, and was responsible for overseeing the operations of the UAW.

5. From at least in or about 2010 through September 2012, Gary Jones served as the Assistant Director of UAW Region 5. From in or about October 2012 through June 2018, Gary Jones served as the Director of UAW Region 5. From June 2018 through October 2019, Gary Jones served as the President of the United Auto Workers union.

6. From in or about 2010 through September 2019, Vance Pearson served as either an officer or direct employee of the United Auto Workers.

7. From at least in or about 2010 through at least September 2019, Edward N. Robinson was the President of the UAW Midwest CAP or a predecessor entity. As such, Edward N. Robinson was an officer, within the meaning of Sections 402(n) of Title 29, United States Code, and was responsible for overseeing the operations of this UAW entity.

8. From in or about 2010 through in or about 2016, UAW Official C was directly employed by the United Auto Workers.

9. From in or about 2010 through in or about 2016, UAW Official D served

as either an officer or direct employee of the United Auto Workers.

10. From in or about 2010 through in or about 2012, UAW Official E served as an officer of the United Auto Workers.

COUNT 1

**18 U.S.C. § 371 & 29 U.S.C. § 501(c)
Conspiracy to Embezzle Union Funds**

D-1 DENNIS WILLIAMS

11. The allegations contained in all preceding paragraphs are hereby re-alleged and incorporated by reference in Count 1 as if fully set forth herein.

12. From at least in or about 2010 and continuing through in or about September 2019, both dates being approximate, in the Eastern District of Michigan, Southern Division, and elsewhere, the defendant, **DENNIS WILLIAMS**, Gary Jones, Edward N. Robinson, Vance Pearson, UAW Official C, Union Official D, and UAW Official E did unlawfully, knowingly, and willfully combine, conspire, confederate, and agree with each other and with other individuals, both known and unknown, to embezzle union funds, in violation of Title 29, United States Code, Section 501(c).

13. During the course of the conspiracy, while **DENNIS WILLIAMS**, Gary Jones, Edward N. Robinson, Vance Pearson, UAW Official C, Union Official D,

and UAW Official E, were officers of the United Auto Workers or were employed directly by the United Auto Workers, they did embezzle, steal, and unlawfully and willfully abstract and convert to their own use moneys, funds, property, and other assets of the United Auto Workers.

14. While he was an officer of the UAW between 2013 and 2018, **DENNIS WILLIAMS** accepted housing for himself in Palm Springs, California, housing for his friends in Palm Springs, California, golf clothing and other related merchandise, rounds of golf outside of the dates of UAW conferences, and certain meals, liquor, and cigars provided to him by co-conspirators Gary Jones, UAW Official C, UAW Official E, Vance Pearson, and Edward N. Robinson. Most of these items were provided to **DENNIS WILLIAMS** before, during, or after conferences put on by UAW Region 5, and they were all paid for with UAW funds from the UAW headquarters in Detroit, Michigan, the UAW Southwest CAP, or the UAW Midwest CAP.

15. As part of the conduct, Gary Jones and Vance Pearson signed and verified vouchers relating to UAW Region 5 conferences submitted for payment to UAW headquarters in Detroit, Michigan, which they knew contained false or incomplete information in order to conceal the embezzlement of UAW funds relating to the provision of items to **DENNIS WILLIAMS** that were not legitimate union business

expenses, but were for the personal benefit of **DENNIS WILLIAMS**, his friends, and others.

Overt Acts

In furtherance of the conspiracy, and to effect the objects thereof, the defendant and his co-conspirators committed and caused to be committed the following overt acts, among others, in the Eastern District of Michigan, and elsewhere:

16. In or about December 2015, Gary Jones ordered cigars from the Gary's Sales company located in Parker, Arizona. Gary Jones ordered these cigars for his own use and for the use of **DENNIS WILLIAMS** and others. In 2016, **DENNIS WILLIAMS** accepted a portion of these cigars.

17. From December 17, 2015 through March 31, 2016, **DENNIS WILLIAMS** accepted a villa in Palm Springs, California, paid for with \$17,195 in UAW funds. Ostensibly, the villa was for the use of **DENNIS WILLIAMS** during a week-long, January 2016 UAW Region 5 conference and other UAW-related meetings.

18. In January 2016, Gary Jones gave \$6,000 in gift certificates for rounds of golf at the Indian Canyons Golf Resort, in Palm Springs, California, paid for with UAW funds, to an associate of **DENNIS WILLIAMS** for their use outside of the

dates of any UAW-related conferences. **DENNIS WILLIAMS** and the associate used a portion of those certificates.

19. From December 1, 2016 through April 1, 2017, **DENNIS WILLIAMS** accepted a villa in Palm Springs, California, paid for with \$22,195 in UAW funds. Ostensibly, the villa was for the use of **DENNIS WILLIAMS** during a week-long, January 2017 UAW Region 5 conference and other UAW-related meetings.

20. From December 28, 2016 through March 1, 2017, **DENNIS WILLIAMS** accepted a villa in Palm Springs, California, for his friends, paid for with \$12,195 in UAW funds. The villa was for the use of the friends of **DENNIS WILLIAMS** who had no role in any UAW Region 5 conference or other UAW-related meetings.

21. From December 20, 2017 through March 1, 2018, **DENNIS WILLIAMS** accepted a villa in Palm Springs, California, paid for with \$13,945 in UAW funds. Ostensibly, the villa was for the use of **DENNIS WILLIAMS** during a week-long, January 2018 UAW Region 5 conference and other UAW-related meetings.

All in violation of Title 18, United States Code, Section 371 and Title 29, United States Code, Section 501(c).

FORFEITURE ALLEGATIONS

**Forfeiture – 18 U.S.C. § 981(a)(1)(C) &
28 U.S.C. § 2461(c)**

1. Upon conviction of the offense alleged in Count 1 of this Information, defendant, **DENNIS WILLIAMS**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to said violations or a conspiracy to commit said violations of Title 18, United States Code, Section 371 and Title 29, United States Code, Section 501(c).

2. If any of the property described in paragraph 1 hereof as being subject to forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant –

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

e. has been commingled with other property which cannot be divided without difficulty;

the United States of America, shall be entitled to forfeiture of substitute property under Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

MATTHEW SCHNEIDER
United States Attorney

s/David A. Gardey
David A. Gardey
Assistant United States Attorney
Chief, Public Corruption Unit

s/Steven P. Cares
Steven P. Cares
Assistant United States Attorney

Date: August 27, 2020

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number: 20-cr-20382
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number: 17-cr-20406, 19-cr-20146, and 19-cr-20726
This may be a companion case based on LCrR 57.10(b)(4) ¹ :	Judge Assigned: Paul D. Borman
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	AUSA's Initials: s/DAG

Case Title: USA v. Dennis Williams

County where offense occurred: Wayne

Offense Type: Felony

Information -- **no** prior complaint

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

Reason:

Defendant Name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

August 27, 2020

Date

s/David A. Gardey

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.