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2 District of Arizona
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7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE DISTRICT OF ARIZONA

10 United States of America,
11 Plaintiff,

12 vs.

13 Sharon M. Helman,
14 Defendant.
15

NO.

INFORMATION

VIO: 18 U.S.C. § 1001
(Making a False Statement to a
Government Agency)
Count 1

16
17 THE UNITED STATES ATTORNEY CHARGES:

18 On or about March 21, 2014, in the District of Arizona:

19 1. Sharon M. Helman, the Director of the Department of Veterans Affairs Medical
20 Center in Phoenix, Arizona, made a false statement in a matter within the jurisdiction of
21 the United States Department of Veterans Affairs; and

22 2. Specifically, Sharon M. Helman electronically signed and submitted a 2013
23 Financial Disclosure Report, OGE form 278. Sharon M. Helman's signature certified
24 "that the statements I have made on this form...are true, complete and correct to the best
25 of my knowledge." On that report, Sharon M. Helman checked "None" under the section
26 requiring the disclosure of gifts, when, in fact, during 2013 she had received seven (7)
27 gifts with a total approximate value of \$19,331.88 from a single source; and

28 3. Sharon M. Helman acted willfully; that is, deliberately and with knowledge that

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the statement was untrue and that her conduct was unlawful; and

4. The statement was material to the activities or decisions of the United States Department of Veterans Affairs; that is, it had a natural tendency to influence, or was capable of influencing, the agency's decisions or activities.

All in violation of 18 U.S.C. § 1001.

Dated this ____ day of January, 2016.

JOHN S. LEONARDO
United States Attorney
District of Arizona

FRANK T. GALATI
Assistant U.S. Attorney