

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
NEWARK DIVISION

UNITED STATES OF AMERICA	)	
	)	Case No. <i>09-783</i>
v.	)	
	)	Count One: 18 U.S.C. § 201(b)(2)
ANA C. CHAVEZ,	)	(Bribery)
	)	
Defendant.	)	Count Two: 18 U.S.C. § 1956(h)
	)	(Money Laundering Conspiracy)
_____	)	

**INFORMATION**

The United States charges:

1. For purposes of this Information, the relevant period is that period from in or about February 2005 until in or about September 2006. During the relevant period, the U.S. Department of Defense (“DOD”) operated a military base at Bagram Airfield (“BAF”), Afghanistan. From in or about 2004 until in or about April 2005, ANA C. CHAVEZ (“defendant”) was a Sergeant in the U.S. Army stationed at BAF.

2. During the relevant period, as part of her deployment to BAF, defendant was assigned to the Transportation Operations Support Office. Defendant was responsible for administering transportation services provided by DOD contractors, including linehaul trucks used to transport goods from BAF to destinations throughout Afghanistan. Defendant could issue work orders for linehaul services and could, through her recommendation, influence which contractor received linehaul services contracts.

3. During the relevant period, Person A operated a DOD contractor, Company A, that provided, among other things, linehaul trucking services at BAF. During the relevant period,

Co-Conspirator One worked for another DOD contractor that provided, among other things, linehaul trucking services at BAF.

**COUNT ONE**  
**18 U.S.C. § 201(b)(2)**  
**(Bribery)**

Paragraphs 1 through 3 of this Information are incorporated by reference as if fully stated herein, and the following is further alleged:

4. Beginning at least in or about February 2005 and continuing until at least in or about April 2005, in Afghanistan and elsewhere, defendant,

**ANA C. CHAVEZ,**

a public official, directly and indirectly did corruptly demand, seek, receive, accept, and agree to receive and accept something of value in return for being influenced in the performance of official acts, in return for being influenced to commit, aid in committing, collude in, and allow fraud on the United States, and in return for being induced to do and omit to do acts in violation of her official duty; that is, defendant corruptly demanded, sought, received, accepted, and agreed to receive and accept approximately \$90,000 in cash and wire transfers from Person A, in return for exercising her influence at the Transportation Operations Support Office in the award of DOD contracts and work orders to Company A.

**(All in violation of Title 18, United States Code, Section 201(b)(2), and pursuant to the extraterritorial venue provision, Title 18, United States Code, Section 3238.)**

**COUNT TWO**  
**18 U.S.C. § 1956(h)**  
**(Money Laundering Conspiracy)**

Paragraphs 1 through 3 of this Information are incorporated by reference as if fully stated herein, and the following is further alleged:

5. From at least in or about March 2005 and continuing until at least in or about September 2006, in Afghanistan, New Jersey, and elsewhere, defendant

**ANA C. CHAVEZ**

and others did knowingly and unlawfully combine, conspire, confederate, and agree with Co-Conspirator One and others known and unknown to the United States:

(a) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, that is, wiring money from a bank in Afghanistan to banks within the United States, which transactions involved the proceeds of specified unlawful activity, that is, bribery in violation of 18 U.S.C. § 201, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(b) to transport, transmit, and transfer, and attempt to transport, transmit, and transfer funds involving the proceeds of specified unlawful activity, that is, bribery in violation of 18 U.S.C. § 201, to a place in the United States from and through a place outside the United States, that is, wiring money to banks in the United States from

Afghanistan and delivering cash to the United States from the United Arab Emirates, knowing that the funds involved represented the proceeds of some form of unlawful activity and knowing that the transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

MANNER AND MEANS OF THE CONSPIRACY

6. It was part of the conspiracy that defendant and her co-conspirators would, among other things, do the following:

(a) Give to Co-Conspirator One cash proceeds of bribes paid to defendant, in order for Co-Conspirator One to repatriate the funds from Afghanistan to the United States;

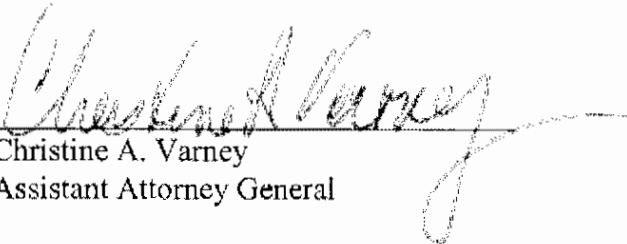
(b) Provide Co-Conspirator One the names and bank account information of associates in the United States designated by defendant to receive money on behalf of defendant;

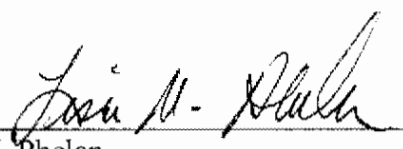
(c) Transfer money from Afghanistan to defendant's designees in a series of wire transfers in amounts under \$10,000 each;

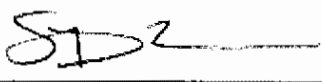
(d) Transfer money from defendant's designees to defendant, through the use of cash withdrawals and wire transfers; and


(e) Arrange for hand-delivery of money to defendant by an associate of Co-Conspirator One.

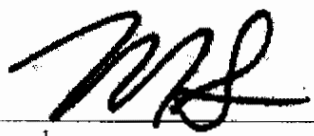
(All in violation of Title 18, United States Code, Section 1956(h).)

  
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