FILED  U.S. DISTRICT COURT E.D.N.Y  SEP 03 2009
BROOKLYNOFF

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

- - - - - - - - - - x

UNITED STATES OF AMERICA

- against -

DARRYL JAY JOHNSON,

Defendant.

T. 18, U.S.C. § 201(b)(2)(A)

- - - - - - v

## CRIMINAL INFORMATION

THE UNITED STATES OF AMERICA, THROUGH ITS ATTORNEYS, CHARGES THAT:

- 1. During the period covered by this Information, the defendant, Darryl Jay Johnson, was an inspector employed by Company A, a contractor for the Department of Defense ("DoD") that operated the Transportation Office for the United States Army installation at Fort Hamilton, Brooklyn, New York. In this capacity, the defendant was a public official within the meaning of 18 U.S.C. § 201(a).
- 2. As an inspector, on behalf of the DoD, the defendant participated in the award of contracts to carriers and their local moving agents for the transportation and storage of military household goods, i.e., the furniture, personal effects, and unaccompanied baggage of members of the military, DoD

civilian employees and their families, in the New York and New Jersey area. The defendant was also responsible for authorizing the use of equipment and special packing materials by the local moving agents at additional cost to the Government. In addition, the defendant was responsible for inspecting the suitability and safety of the local agents' warehouses in which the military household goods were stored pending shipment elsewhere. Finally, the defendant was responsible for ensuring the satisfactory completion of the contracts.

3. Beginning at least as early as September 2003 and continuing until at least September 2008, the exact dates being unknown to the United States, the defendant, Darryl Jay Johnson, being a public official, directly and indirectly, knowingly, intentionally and corruptly demanded, sought, received, accepted and agreed to receive and accept United States currency and other things of value in return for being influenced in the performance of his official acts.

## JURISDICTION AND VENUE

4. The crime charged in this |Information was carried out, in part, within the Eastern District of New York, within the five years preceding the filing of this Information.

ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 201(b)(2)(A).

DATED:

CHRISTINE A. VARNEY

Assistant Attorney General

SCOTT D. HAMMOND

Deputy Assistant Attorney General

MARC SIEGEL

Director of Criminal Enforcement

Antitrust Division

U.S. Department of Justice

LISA M. PHELAN

Chief.

National Criminal Enforcement

Section

KATHERINE A. SCHLECH

KENNETH W. GAUL

MICHAEL L. WHITLOCK

Attorneys, Antitrust Division

U.S. Department of Justice

Nat'l Crim. Enforcement Sec.

Suite 11300

450 5th St., NW

Washington, D.C. 20530

Tell.: (202) 307-5778