

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA

2007 AUG 23 AM 9:10
LORETTA G. WHYTE
CLERK

UNITED STATES OF AMERICA

v.

RAUL JORGE MIRANDA,

Defendant.

)
) Criminal No.:
)
) Violation: 18 U.S.C. § 201(b)(2)(B)
)
) Filed:
)

07-313

SECT. L MAG. 1

INFORMATION

The United States charges that:

1. Raul Jorge Miranda is hereby made a defendant on the charge contained in this Information.
2. The United States Army Corps of Engineers (hereinafter "USACE") is an agency of the United States government.
3. Hurricane Katrina struck New Orleans in August 2005 causing extensive damage to the levee systems. In August 2006, the USACE solicited bids for the reconstruction and enlargement of the Lake Cataouatche Levee, south of New Orleans, Louisiana, a Hurricane Protection Project, solicitation No. W912P8-06-R0194. The value of this contract was in excess of \$15 million.
4. At all times relevant to this Information, the defendant was a public official, as defined in Title 18, United States Code, Section 201(a)(1), that is, he was a contractor consultant for the USACE, and as such an employee or person acting for or on behalf of the United States, or any department or agency or branch of Government thereof, in any official function, under or by the authority of any such department or agency or branch of Government.
5. At all times relevant to this Information, Subcontractor A was a sand and gravel subcontractor.

✓ Fee USA
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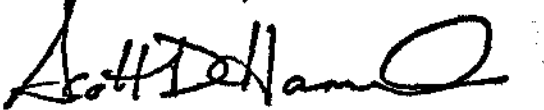
6. Beginning on or about August 1, 2006, and continuing thereafter through October 25, 2006, the exact dates being unknown to the United States, in the Eastern District of Louisiana, and elsewhere, in connection with the foregoing procurement, the defendant, directly and indirectly, did corruptly demand, seek, and agree to accept something of value, that is, money in the amount of approximately \$299,000, from Subcontractor A, in return for, and with the intent of being influenced to commit or aid in committing, or to collude in, or allow, any fraud, or make opportunity for the commission of any fraud, on the United States, that is, he disclosed confidential bid, proposal and source selection information, to Subcontractor A, before the award of the contract.

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

Dated:



THOMAS O. BARNETT
Assistant Attorney General



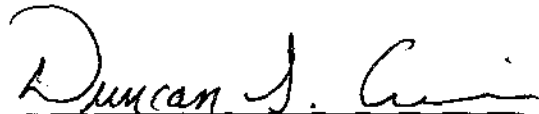
SCOTT D. HAMMOND
Deputy Assistant Attorney General



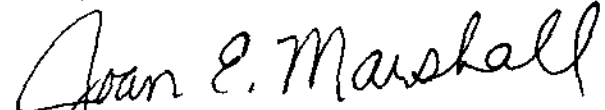
MARC SIEGEL
Director of Criminal Enforcement
Antitrust Division
U.S. Department of Justice



JIM LETTEN
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Eastern District of Louisiana



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