

JUDGE PHILIP MARTINEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

EP 11 CR 2207

FILED
AUG 30 2011
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY *[Signature]*
DEPUTY CLERK

UNITED STATES OF AMERICA,
Plaintiff,

v.

JUVENTINO ROSAS,
Defendant.

INFORMATION

Cause No. EP-11-CR-

[Violation:
Count 1: Title 41 U.S.C. § 53
Count 2: Title 41 U.S.C. § 53
Count 3: Title 41 U.S.C. § 53
Solicitation and acceptance of
kickbacks]

FILED
2011 SEP -9 PM 1:06
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY *[Signature]*
DEPUTY

THE UNITED STATES OF AMERICA CHARGES:

COUNT ONE
(41 U.S.C. § 53)

1. From in or about November 2008 until in or about May 2009 (“the relevant period”), JUVENTINO ROSAS (“the defendant”) was employed as a project manager for Prime Contractor A. During the relevant period, Prime Contractor A was a prime contractor, as defined in 41 U.S.C. § 52, on the Job Order Contract, contract number W9124J-07-R-011, being performed for the U.S. Army at Fort Bliss, Texas. Among other duties, the defendant managed the Job Order Contract. In his capacity as project manager for the Job Order Contract, the defendant had the ability to influence the selection of subcontractors for the Job Order Contract.

2. In or about December 2008, the defendant solicited and accepted a kickback, as defined in 41 U.S.C. § 52, from Subcontractor A in the form of an air-conditioning system, valued at \$14,000, installed at his home. In exchange for the air-conditioning system, the defendant promised favorable treatment to Subcontractor A in connection with subcontracts under the Job Order Contract.

3. The conduct alleged in this Count is a violation of 41 U.S.C. § 53, and was carried out within the Western District of Texas within the five years preceding the date of this Information.

COUNT TWO
(41 U.S.C. § 53)

4. The United States realleges and incorporates Paragraph 1 of the Information as if fully set forth herein.

5. In or about February 2009, the defendant solicited and accepted a kickback, as defined in 41 U.S.C. § 52, from Subcontractor B in the form of floor tile, valued at \$3,000, installed at a bar partially owned by the defendant. In exchange for the floor tile, the defendant promised favorable treatment to Subcontractor B in connection with subcontracts under the Job Order Contract.

6. The conduct alleged in this Count is a violation of 41 U.S.C. § 53, and was carried out within the Western District of Texas within the five years preceding the date of this Information.

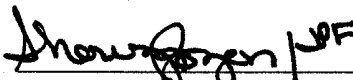
COUNT THREE
(41 U.S.C. § 53)

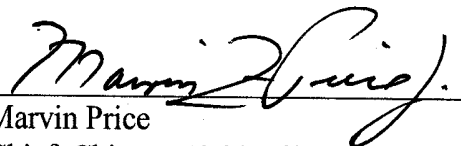
7. The United States realleges and incorporates Paragraph 1 of the Information as if fully set forth herein.

8. In or about March 2009, the defendant solicited and accepted a kickback, as defined in 41 U.S.C. § 52, from Subcontractor C in the form of painting work, valued at \$2,300, at a bar partially owned by the defendant. In exchange for the painting work, the defendant promised favorable treatment to Subcontractor C in connection with subcontracts under the Job Order Contract.


9. The conduct alleged in this Count is a violation of 41 U.S.C. § 53, and was carried out within the Western District of Texas within the five years preceding the date of this Information.

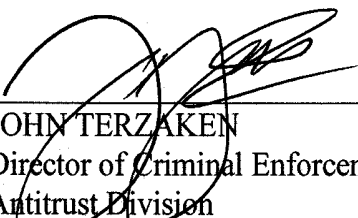
Respectfully Submitted,


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JOHN TERZAKEN
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