

OMEED A. ASSEFI  
Acting Assistant Attorney General  
United States Department of Justice  
Antitrust Division

KENNETH M. SORENSON  
United States Attorney  
District of Hawaii

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII  
Mar 20, 2026, 11:45 am (ea)  
Lucy H. Carrillo, Clerk of Court

REBECCA A. BERS, Trial Attorney  
DON DANIEL, Trial Attorney  
MATTHEW CHOU, Trial Attorney  
United States Department of Justice  
Antitrust Division  
450 Golden Gate Avenue  
Box 36046, Room 10-0101  
San Francisco, California 94102-3478  
Telephone: (415) 934-5300  
Email: Rebecca.Bers@usdoj.gov

DARREN W.K. CHING #6903  
Assistant U.S. Attorney  
Room 6-100, PJKK Federal Bldg.  
300 Ala Moana Boulevard  
Honolulu, Hawaii 96850  
Telephone: (808) 541-2850  
Email: Darren.Ching@usdoj.gov

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CR. NO. 26-00031 SASP
	)	
Plaintiff,	)	INFORMATION
	)	
vs.	)	[18 U.S.C. § 1349
	)	18 U.S.C. §§ 201(b)(1)(B), 2
ALAN HAYWARD JAMES,	)	15 U.S.C. § 1]
	)	
Defendant.	)	
	)	

INFORMATION

The United States of America, by its attorneys, charges:

Count 1  
Conspiracy to Commit Wire Fraud  
(18 U.S.C. § 1349)

Beginning in at least April 2016 and continuing to in or about April 2025, in the District of Hawaii, and elsewhere, the defendant, ALAN HAYWARD JAMES, and others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree together and with each other, to commit wire fraud in violation of Title 18, United States Code, Section 1343. It was a part and object of the conspiracy that the defendant, JAMES, and others known and unknown, knowingly having participated in, devised, and intending to devise, a scheme, plan, and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises—to wit, a scheme to defraud United States federal agencies in relation to Information Technology contracts—would and did transmit and cause to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme, plan, and artifice, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Section 1349.

Count 2  
Bribery  
(18 U.S.C. §§ 201(b)(1)(B), 2)

Beginning in at least April 2016 and continuing to in or about April 2025, in the District of Hawaii, and elsewhere, coconspirator companies and coconspirator individuals committed the crime of bribery. Specifically, coconspirator companies and coconspirator individuals did, directly and indirectly, give, offer, and promise a thing of value to Coconspirator Individual 1, who was a federal public official, and others; coconspirator companies and coconspirator individuals acted corruptly, that is, with the intent to influence Coconspirator Individual 1 and others to commit and allow fraud on the United States.

The defendant, ALAN HAYWARD JAMES, intentionally helped coconspirator companies and coconspirator individuals commit bribery. Specifically, JAMES aided, counseled, commanded, induced, and procured coconspirator companies and coconspirator individuals with respect to giving, offering, and promising something of value to Coconspirator Individual 1 and others; JAMES acted with the intent to facilitate the bribery; and JAMES acted before the bribery was complete.

All in violation of Title 18, United States Code, Sections 201 and 2.

Count 3  
Conspiracy to Rig Bids  
(15 U.S.C. § 1)

Beginning in at least May 2019 and continuing to at least October 2022, in the District of Hawaii, and elsewhere, the defendant, ALAN HAYWARD JAMES, and others known and unknown, knowingly entered into and engaged in a combination and conspiracy to suppress and eliminate competition by rigging bids for Information Technology contracts awarded by the United States Department of Defense. The combination and conspiracy engaged in by the defendant and coconspirators was a per se unlawful, and thus unreasonable, restraint of interstate trade and commerce, and the conspiracy substantially affected interstate commerce in goods and services, and occurred within the flow of interstate commerce in goods and services.

All in violation of Title 15, United States Code, Section 1.

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DATED: March 20, 2026, at Honolulu, Hawaii.

OMEED A. ASSEFI  
ACTING ASSISTANT ATTORNEY  
GENERAL  
United States Department of Justice  
Antitrust Division



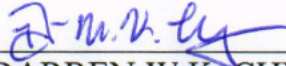
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United States v. Alan Hayward James  
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