

STANLEY E. WOODWARD, JR.
Associate Attorney General
U.S. Department of Justice

KENNETH M. SORENSON
United States Attorney
District of Hawaii

DANIEL W. GLAD
Acting Deputy Assistant Attorney
General, Antitrust Division

REBECCA A. PERLMUTTER
Assistant United States Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Boulevard
Honolulu, Hawaii 96850
Telephone: (808) 541-2850
Email:
rebecca.perlmutter@usdoj.gov

NOLAN MAYTHER
ANDREW SCHUPANITZ
KYLIE MCLAUGHLIN
Trial Attorneys
450 Golden Gate Avenue
San Francisco, CA 94102
Telephone: (415) 934-5300
Email:
nolan.mayther@usdoj.gov
andrew.schupanitz@usdoj.gov
kylie.mclaughlin@usdoj.gov

Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CASE NO. CR26- 00101 DKW
	)	
Plaintiff,	)	INFORMATION
	)	
vs.	)	[18 U.S.C. §§ 201(b)(2), 371, and 1031]
	)	
CARLOS DUQUE,	)	
	)	
Defendant.	)	
	)	

INFORMATION

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

COUNT 1
Conspiracy
(18 U.S.C. § 371)

1. From as early as January 2021, and continuing thereafter until at least on or about October 2022, in the District of Hawaii and elsewhere, CARLOS DUQUE, the defendant, BRIAN KENT and LEONARD PICK, his coconspirators, and others known and unknown, knowingly and intentionally conspired with each other, to commit the following offenses against the United States:

- a. bribery of a public official, in violation of 18 U.S.C. § 201; and
- b. major fraud, in violation of 18 U.S.C. § 1031.

2. It was the purpose of the conspiracy for DUQUE to receive bribe payments from KENT and PICK, and for the conspirators to fund and conceal the bribe payments by making materially false and fraudulent statements about the costs related to a subcontract awarded to Company 1.

All in violation of Title 18, United States Code, Section 371.

COUNT 2
Receipt of Bribe by a Public Official
(18 U.S.C. § 201(b)(2))

3. Beginning at least as early as January 2021, and continuing until at least October 2022, in the District of Hawaii and elsewhere, CARLOS DUQUE, the defendant, being a public official, directly and indirectly, and corruptly, did

demand, seek, receive, accept, and agree to receive and accept anything of value personally, in return for being influenced in the performance of an official act and for being influenced to commit and aid in committing and to collude in, and allow, and to make opportunity for the commission of a fraud on the United States.

All in violation of Title 18, United States Code, Section 201(b)(2).

COUNT 3
Major Fraud
(18 U.S.C. § 1031)

4. Beginning as early as January 2021 and continuing until on or about October 2022, in the District of Hawaii and elsewhere, CARLOS DUQUE, the defendant, knowingly executed and attempted to execute a scheme and artifice with the intent to defraud the United States and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that such pretenses, representations, and promises were false and fraudulent when made, in a procurement of property and services as a subcontractor on a contract, the value of which was at least \$1,000,000, and in which there was a prime contract with the United States.

All in violation of Title 18, United States Code, Section 1031.

FORFEITURE NOTICE

5. The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title

18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

6. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 371 and 201 set forth in Counts 1 and 2 of this Information, CARLOS DUQUE, the defendant, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, the following: a sum of money, representing all property which constitutes or is derived from proceeds traceable to the commission of the offenses.

7. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property

pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

DATED: August 31, 2026, at Honolulu, Hawaii.



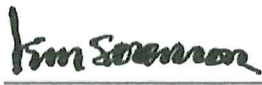
STANLEY L. WOODWARD, JR.
Associate Attorney General
U.S. Department of Justice



DANIEL W. GLAD
Acting Deputy Assistant Attorney General
Antitrust Division



NOLAN J. MAYTHER
ANDREW SCHUPANITZ
KYLIE MCLAUGHLIN
Trial Attorneys
Antitrust Division



KENNETH M. SORENSON
United States Attorney
District of Hawaii



REBECCA A. PERLMUTTER
Assistant United States Attorney

United States v. Carlos Duque
Information
Case No. CR26-00101 DKW