

Sealed
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

STEVEN HUGH HUNTER

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§

CRIMINAL NO.

18CR415

UNDER SEAL

INFORMATION

United States Courts
Southern District of Texas
FILED

JUL 23 2018

David J. Bradley, Clerk of Court

THE UNITED STATES CHARGES:

Introduction

At all relevant times, unless otherwise specified:

1. The Foreign Corrupt Practices Act of 1977 ("FCPA"), as amended, Title 15, United States Code, Section 78dd-1, *et seq.*, was enacted by Congress for the purpose of, among other things, making it unlawful to act corruptly in furtherance of an offer, promise, authorization, or payment of money or anything of value, directly or indirectly, to a foreign official for the purpose of obtaining or retaining business for, or directing business to, any person.

2. Defendant **STEVEN HUGH HUNTER** ("Defendant **HUNTER**"), was a U.K. citizen, and a resident of Qatar, France, or the United Arab Emirates. Defendant **HUNTER** was an agent of an "issuer," an agent of a "domestic concern," a "person," and an agent of a "person" as those terms are used in the

FCPA, Title 15, United States Code, Sections 78dd-1(a); 78dd-2(a), (h)(1); and 78dd-3(a), (f)(1).

3. “Intermediary Company” was a Monaco-based group of affiliated companies that purported to provide, among other things, intermediary services for oil and gas companies throughout the world. Intermediary Company was a “person” as that term is used in the FCPA, Title 15, United States Code, Section 78dd-3(a), (f)(1). In providing intermediary services, Intermediary Company and its principals and employees acted as “agents” of Intermediary Company’s oil and gas clients, including companies headquartered or doing business in the Southern District of Texas, that were “issuers,” “domestic concerns,” and/or “persons” as those terms are used in the FCPA, Title 15, United States Code, Sections 78dd-1(a); 78dd-2(a), (h)(1); and 78dd-3(a), (f)(1).

4. “Co-Conspirator 1” was one of the owners and senior executives of Intermediary Company.

5. “Co-Conspirator 2” was a partner of Intermediary Company.

6. “Company A” was a multinational engineering company headquartered in New Jersey that maintained an office in Houston, Texas, and whose shares were traded on the New York Stock Exchange. Company A was an “issuer” of publicly traded securities as that term is used in the FCPA, Title 15, United States Code, Section 78dd-1(a). During the relevant time period, Company