

FILED**10/4/2010**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION
JUDGE PALLMEYER
MAGISTRATE JUDGE VALDEZ

UNITED STATES OF AMERICA)

v.)

WESLEY NAVARRO,)

Defendant.)

INFORMATION

Case No.

10 CR**830**

Violation: 18 U.S.C. § 201(c)

INFORMATION**FILED**

OCT - 4 2010

The United States of America charges that:

INTRODUCTIONMICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

1. For the purposes of this Information, the "relevant period" is that period from in or about December 2003 until in or about July 2004. From in or about December 2003 until in or about April 2004, defendant was a Staff Sergeant in the United States Air Force, deployed as a Contracting Officer to Bagram Airfield ("BAF"), Afghanistan. As a Staff Sergeant in the United States Air Force, defendant was a public official within the meaning of 18 U.S.C. § 201(a)(1).

2. As a Contracting Officer at BAF, defendant was responsible for soliciting, reviewing bids for, and awarding Department of Defense ("DOD") contracts for goods and services in support of Operation Enduring Freedom. During the relevant period, defendant reviewed and awarded numerous contracts for, among other things, concrete bunkers and barriers, electric generators, and line haul (*i.e.* trucking) services.

3. During the relevant period, Person A, an Afghan-U.S. dual citizen, was President of Contractor A, a military contractor that provided, among other things, concrete bunkers and

barriers, electric generators, and line haul services at BAF.

4. During the relevant period, defendant performed numerous official acts on behalf of Contractor A, including the award, modification, and extension of contracts at BAF for, among other things electric generators and line haul services.

5. In or about July 2004, Person A wired \$20,000 from a bank account in the United Arab Emirates to the bank account of defendant's designee in California.

COUNT ONE

[18 U.S.C. § 201(c)(1)(B) - Gratuity]

6. In or about July 2004, in Afghanistan, the United Arab Emirates, the United States, and elsewhere, the defendant

WESLEY NAVARRO

being a public official, otherwise than as provided by law for the proper discharge of official duty, did, knowingly and unlawfully, directly and indirectly, seek, receive, accept, and agree to receive and accept something of value for and because of official acts performed by him; that is, defendant sought, received, and accepted things of value worth approximately \$20,000 from Person A for and because of official acts performed by him related to Contractor A's contracts at BAF.

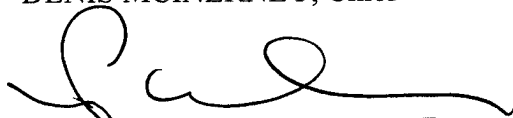
(All in violation of Title 18, United States Code, Section 201(c), and pursuant to the extraterritorial venue provision, Title 18, United States Code, Section 3238).

DATED: Oct. 1, 2010, at Washington, D.C.

FOR THE UNITED STATES

DENIS MCINERNEY, Chief

By:

A handwritten signature in black ink, appearing to read 'Mark W. Pletcher', written over a horizontal line.

MARK W. PLETCHER

EMILY W. ALLEN

Criminal and Antitrust Divisions

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