

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA

UNITED STATES OF AMERICA,)	Criminal No. 4:09CR01-001
)	
)	<u>Count I:</u> 18 U.S.C. § 201
v.)	<u>Count II:</u> 18 U.S.C. § 201
)	<u>Count III:</u> 18 U.S.C. § 201
)	<u>Count IV:</u> 18 U.S.C. § 201
CHRISTOPHER H. MURRAY)	<u>Count V:</u> 18 U.S.C. § 1001
)	and Criminal Forfeiture
Defendant.)	
_____)	

The United States of America charges that:

INFORMATION

1. Co-conspirator Contractors One, Two, Three, and Four [collectively, Co-conspirator Contractors] were businesses operating in Kuwait that contracted with DOD.
2. For purposes of Counts I-III, the “relevant period” is that period of time from at least in or about September 2005 until at least in or about March 2006. From on or about September 21, 2005 until on or about March 2006, the defendant was a Major with the United States Army deployed as a contracting specialist to the Small Purchases branch of the Contracting Office at Camp Arifjan, Kuwait. As a contracting specialist, defendant was responsible for soliciting bids for military contracts, evaluating the sufficiency of those bids, and recommending the award of contracts to particular contractors. During the relevant period, as a Major in the United States Army, defendant was a public official within the meaning of 18 U.S.C. § 201(a)(1).
3. For the purposes of Count IV, the “relevant period” is that period of time from at least in or about September 2006 until at least in or about November 2006. During the relevant

period, defendant was a contracting officer deployed to Camp Arifjan, Kuwait. As a contracting officer, defendant was responsible for awarding and administering contracts for goods and services in support of Operation Iraqi Freedom. During the relevant period, as a Major in the United States Army, defendant was a public official within the meaning of 18 U.S.C. § 201(a)(1).

4. Other co-conspirators not made defendants in this Information participated in the offenses charged and performed acts and made statements in furtherance thereof.

5. Whenever in this Information reference is made to any act, deed or transaction of any corporation, the allegation means that the corporation engaged in the act, deed, or transaction by or through its officers, directors, agents, employees, or other representatives while they were actively engaged in the management, direction, control or transaction of its business or affairs.

COUNT ONE

[18 U.S.C. § 201(b)(2) – Bribery]

Paragraphs 1, 2, 4, and 5 of this Information are incorporated by reference as if fully stated herein, and the following is further alleged:

6. Beginning at least in or about September 2005, and continuing until at least in or about March 2006, the exact dates being unknown, in Kuwait and elsewhere, defendant

CHRISTOPHER H. MURRAY,

being a public official, did directly and indirectly, corruptly seek, receive, accept, and agree to receive and accept things of value in return for being influenced in the performance of official acts and in return for being induced to do and omit to do acts in violation of his official duty; to wit, in return for recommending and facilitating the award of furniture contracts to Co-conspirator Contractor One, defendant sought, received, accepted, and agreed to receive and

accept approximately \$120,000 from Co-conspirator Contractor One.

(All in violation of Title 18, United States Code, Section 201(b)(2), and pursuant to the extraterritorial venue provision, Title 18, United States Code, Section 3238.)

COUNT TWO

[18 U.S.C. § 201(b)(2) – Bribery]

Paragraphs 1, 2, 4, and 5 of this Information are incorporated by reference as if fully stated herein, and the following is further alleged:

7. Beginning at least in or about September 2005, and continuing until at least in or about March 2006, the exact dates being unknown, in Kuwait and elsewhere, defendant

CHRISTOPHER H. MURRAY,

being a public official, did directly and indirectly, corruptly seek, receive, accept, and agree to receive and accept things of value in return for being influenced in the performance of official acts and in return for being induced to do and omit to do acts in violation of his official duty; to wit, in return for recommending and facilitating the award of fencing contracts to Co-conspirator Contractor Two, defendant sought, received, accepted, and agreed to receive and accept approximately \$95,000 from Co-conspirator Contractor Two.

(All in violation of Title 18, United States Code, Section 201(b)(2), and pursuant to the extraterritorial venue provision, Title 18, United States Code, Section 3238.)

COUNT THREE

[18 U.S.C. § 201(b)(2) – Bribery]

Paragraphs 1, 2, 4, and 5 of this Information are incorporated by reference as if fully stated herein, and the following is further alleged:

8. Beginning at least in or about September 2005, and continuing until at least in or about March 2006, the exact dates being unknown, in Kuwait and elsewhere, defendant

CHRISTOPHER H. MURRAY,

being a public official, did directly and indirectly, seek, receive, accept, and agree to receive and accept things of value in return for being influenced in the performance of official acts and in return for being induced to do and omit to do acts in violation of his official duty; to wit, in return for recommending and facilitating the award of contracts for sundry items to Co-conspirator Contractor Three, defendant sought, received, accepted, and agreed to receive and accept approximately \$10,000 from Co-conspirator Contractor Three.

(All in violation of Title 18, United States Code, Section 201(b)(2), and pursuant to the extraterritorial venue provision, Title 18, United States Code, Section 3238.)

COUNT FOUR

[18 U.S.C. § 201(b)(2) – Bribery]

Paragraphs 1, 3, 4, and 5 of this Information are incorporated by reference as if fully stated herein, and the following is further alleged:

9. Beginning at least in or about September 2006, and continuing until at least in or about November 2006, the exact dates being unknown, in Kuwait and elsewhere, defendant

CHRISTOPHER H. MURRAY,

being a public official, did directly and indirectly, corruptly seek, receive, accept, and agree to receive and accept things of value in return for being influenced in the performance of official acts and in return for being induced to do and omit to do acts in violation of his official duty; to wit, in return for awarding a construction contract to Co-conspirator Contractor Four, defendant sought, received, accepted, and agreed to receive and accept approximately \$20,000 from Co-conspirator Contractor Four.

(All in violation of Title 18, United States Code, Section 201(b)(2), and pursuant to the

extraterritorial venue provision, Title 18, United States Code, Section 3238.)

COUNT FIVE

[18 U.S.C. § 1001(a) – False Statement]

Paragraphs 1 through 5 of this Information are incorporated by reference as if fully stated herein, and the following is further alleged:

10. On November 15, 2007, in the Middle District of Georgia, defendant

CHRISTOPHER H. MURRAY,

did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation to agents of the Defense Criminal Investigative Service (“DCIS”) and the Special Inspector General for Iraq Reconstruction (“SIGIR”) in a matter within the jurisdiction of both DCIS and SIGIR, agencies within the executive branch of the United States, in that the defendant stated that he only had received \$30,000 in bribes proceeds from two different military contractors in Kuwait, when, as the defendant well knew and believed at the time he made this statement, the defendant in fact had received \$245,000 from at least four different military contractors in Kuwait.

(All in violation of Title 18, United States Code, Section 1001(a))

CRIMINAL FORFEITURE

[18 U.S.C. § 981(a)(1)(C);
28 U.S.C. § 2461 – Criminal Forfeiture]

11. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), the defendant, once convicted of Counts One through Four (bribery, in violation of 18 U.S.C. § 201(b)(2)) shall forfeit to the United States the following property: A sum of money equal to the total amount of proceeds traceable to the bribery, in

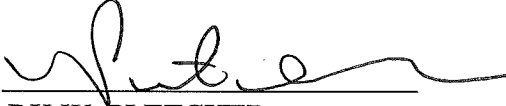
violation of 18 U.S.C. § 201(b)(2), as charged in Counts One through Four, for which the defendant is convicted, less \$10,000 which defendant has already tendered to the United States; and a Rolex Oyster Perpetual Submariner watch.

12. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 26, United States Code, Section 2461, the defendant shall forfeit substitute property, up to the value of the amount described in the foregoing paragraphs, if, by any act or omission of the defendant, the property described in such paragraphs, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.


DATED: January 08, 2009, at Washington, D.C.

ON BEHALF OF THE UNITED STATES,

LISA M. PHELAN, Chief
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