FILED

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

2009 AUG 31 P 4: 41

Alexandria Division

CLERK US DISTRICT COURT ALEXANDRIA, VIRGINIA

UNITED STATES OF AMERICA) Case No.: 1:09-CR-392
v.)
) Count 1: 18 U.S.C. § 371
BRYAN LEE BURROWS,) (Conspiracy to Solicit Kickbacks)
)
Defendant)

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1

(Conspiracy to Solicit Kickbacks)

From in or about February 2009 to in or about May 2009, in the Eastern District of Virginia and elsewhere, BRYAN LEE BURROWS and others known and unknown to the United States Attorney unlawfully, willfully, and knowingly combined, conspired, confederated, and agreed together and with each other to commit offenses against the United States of America, to wit, to violate Title 41, United States Code, Section 53, by knowingly and willfully soliciting one or more kickbacks, specifically, money, payments, and commissions, in connection with the award of a private security services subcontract relating to a prime contract entered into by the United States, known as the Afghanistan Infrastructure Rehabilitation Project ("AIRP") in violation of Title 18, United States Code, Section 371. In furtherance of the conspiracy and to effect the objects and purposes thereof, BURROWS and co-conspirators performed overt acts, including, but not limited to, soliciting kickbacks from vendors located in the Eastern District of Virginia and elsewhere to be paid, in part, to a prime contractor agent in exchange for favorable

treatment in connection with the award of a private security services subcontract to protect U.S.

(In violation of Title 18, Unites States Code, Section 371)

government personnel and contractors operating under the AIRP.

Respectfully submitted,

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