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ASJZ/SD/DG USAO# 2024R00564

SEALED

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

LAWRENCE EADY,

Defendant

* **CRIMINAL NO. JR22 24-0301**
*
* **(Bribery, 18 U.S.C. § 201(b)(2);**
* **Forfeiture, 18 U.S.C. § 981(a)(1)(C);**
* **28 U.S.C. § 2461(c); 21 U.S.C.**
* **§ 853(p))**
*
* **UNDER SEAL**

INFORMATION

COUNT ONE
(Bribery)

The United States, acting through its attorneys, charges that:

At all times relevant to this information.

1. Defendant **LAWRENCE EADY** was a resident of Maryland and a public official within the meaning of 18 U.S.C. § 201 at Agency 1, a government agency located in Virginia. As part of his official duties, **EADY** identified and recommended information technology solutions for Agency 1 based on the best interests of Agency 1 and free from conflicts of interest. **EADY** had regular access to procurement information and had influence in Agency 1's procurement process, including by influencing whether Agency 1 purchased various products, as well as when and how much of a product Agency 1 purchased.

2. Company 1 was a cloud data management and data security company headquartered in Palo Alto, California. Company 1 sold hardware and software solutions to government agencies, including Agency 1.

3. Director 1 was a resident of Maryland and the Director of Intelligence and Special Access Programs for Company 1

4. Contractor 1 was a government contractor who worked onsite at Agency 1.

5. On or about August 19, 2019, and until at least October 8, 2020, in the District of Maryland and elsewhere, the defendant,

LAWRENCE EADY,

a public official, directly and indirectly, did corruptly demand, seek, receive, accept, and agree to receive and accept something of value personally, in return for being influenced in the performance of any official act, being influenced to commit or aid in committing, or to collude in, or allow, any fraud, or make opportunity for the commission of any fraud, on the United States, and being induced to do an act in violation of his official duty, that is: **EADY** did directly and indirectly accept \$630,000 in United States currency from Director 1 and Contractor 1: (A) in return for undertaking official acts related to procurements of Company 1 products and services; (B) to commit, aid in committing, collude in, allow, and make opportunities for the commission of fraud on Agency 1; and (C) to do or omit to do an act in violation of his lawful duty of assisting in the procurement of goods and services in a manner free from conflicts of interest.

18 U.S.C. § 201(b)(2)

FORFEITURE ALLEGATION

The United States, acting through its attorneys, further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as a part of any sentence in accordance with 18 U.S.C. §§ 981(a)(1)(C), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of Defendant's conviction under Count One of this Information.

Bribery Forfeiture

2. Upon conviction of the offense alleged in Count One of this Information, the defendant,

LAWRENCE EADY,

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such offense.

Substitute Assets

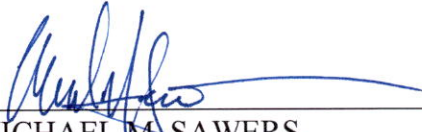
3. If, as a result of any act or omission of the defendant, any of the property described above as being subject to forfeiture:

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

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property described above pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 981(a)(1)(C)
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)

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