

worldwide.

3. The defendant **ALOYSIUS JOHANNES JOZEF (“LOUIS”) ZUURHOUT** (“defendant **ZUURHOUT**”) was an employee of Dutch subsidiaries of Rolls-Royce plc (“Rolls-Royce”), where defendant **ZUURHOUT** assisted in the sale of equipment, including equipment that was manufactured or assembled by RRESI.

4. “Co-Conspirator 1,” an individual whose identity is known to defendant **ZUURHOUT** and the United States, was a U.K. national and senior executive of Rolls-Royce plc with responsibility over the Rolls-Royce sales division, including the sales of equipment manufactured and assembled by RRESI.

5. “Co-Conspirator 2,” an individual whose identity is known to defendant **ZUURHOUT** and the United States, was a Greek national and resident of Istanbul, Turkey. Co-Conspirator 2 was the head of Intermediary 1.

6. “Intermediary 1,” a company whose identity is known to defendant **ZUURHOUT** and the United States, was a U.K.-based company that contracted to serve as a commercial advisor for RRESI to help RRESI win a contract supplying gas turbines to Asia Gas Pipeline, LLC.

7. Asia Gas Pipeline, LLC (“AGP”) was a state-owned joint venture between Kazakh and Chinese state-owned entities that was created to build and connect a gas pipeline between Kazakhstan and China. AGP was controlled by the Kazakh and Chinese governments and performed government functions for Kazakhstan and China, and thus was an “instrumentality” within the meaning of the FCPA.

8. “Co-Conspirator 3,” an individual whose identity is known to defendant **ZUURHOUT** and the United States, was a U.S. national and employee of RRESI with responsibility as a sales director for the sales of equipment manufactured and assembled by RRESI.

9. “Technical Advisor,” a company whose identity is known to defendant

ZUURHOUT and the United States, was an international engineering and consulting firm with offices worldwide. Technical Advisor purported to provide independent engineering advice and project management in a number of business sectors, such as national infrastructure, oil and gas, and energy. Technical Advisor served as an independent engineering consultant to AGP.

10. "Co-Conspirator 5," an individual whose identity is known to defendant ZUURHOUT and the United States, was a Russian national and employee of the Almaty, Kazakhstan office of Technical Advisor.

11. "Co-Conspirator 6," an individual whose identity is known to defendant ZUURHOUT and the United States, was an Armenian national and employee of the Beijing, China office of Technical Advisor.

12. "Co-Conspirator 7," an individual whose identity is known to defendant ZUURHOUT and the United States, was an Austrian national and employee of the Munich, Germany office of Technical Advisor.

13. "Intermediary 2," a company whose identity is known to defendant ZUURHOUT and the United States, was a Monaco-incorporated and based oil and gas services intermediary that served as a commercial advisor for RRESI to help RRESI win a contract supplying gas turbines to AGP.

14. "Foreign Official," an individual whose identity is known to defendant ZUURHOUT and the United States, was a high-ranking Kazakh official of a Kazakh state-owned entity that had authority over AGP and was a "foreign official" within the meaning of the FCPA. Foreign Official had the authority to exert official influence over purchasing decisions at AGP.

The Conspiracy

15. From in or around February 2000 through in or around August 2013, within the Southern District of Ohio and elsewhere, the defendant,

ALOYSIUS JOHANNES JOZEF ZUURHOUT

did knowingly and willfully, that is, with the intent to further the objects of the conspiracy, combine, conspire, confederate, and agree with others known and unknown, including, among others, Co-Conspirator 1, Co-Conspirator 2, Co-Conspirator 3, Co-Conspirator 5, Co-Conspirator 6, and Co-Conspirator 7 to commit offenses against the United States, namely, to willfully make use of the mails and means and instrumentalities of interstate commerce corruptly in furtherance of an offer, payment, promise to pay, and authorization of the payment of any money, offer, gift, promise to give, and authorization of the giving of anything of value, to a foreign official and to any person, while knowing that all, or a portion of such money and things of value would be and had been offered, given, and promised to a foreign official, for purposes of (i) influencing acts and decisions of such foreign official in his or her official capacity; (ii) inducing such foreign official to do and omit to do acts in violation of the lawful duty of such official; (iii) securing any improper advantage; and (iv) inducing such foreign official to use his or her influence with a foreign government and agencies and instrumentalities thereof, to affect and influence acts and decisions of such government and agencies and instrumentalities, in order to assist RRESI and others known and unknown, in obtaining and retaining business for and with, and directing business to, Rolls-Royce, RRESI, and others, in multiple countries worldwide, including, Algeria, China, Hungary, Italy, Kazakhstan, Russia, Slovakia, Turkmenistan, and Uzbekistan, in violation of Title 15, United States Code, Section 78dd-2.

Manner and Means of the Conspiracy

16. That manner and means by which defendant **ZUURHOUT** and his coconspirators sought to accomplish the objects of the conspiracy included, among other things, the following:

17. It was part of the conspiracy that defendant **ZUURHOUT** and others, including Co-Conspirator 1 and Co-Conspirator 3, knew that intermediaries, agents, third-party commercial

advisors, and others, including Co-Conspirator 2, Intermediary 1, and Intermediary 2, used payments from RRESI to bribe foreign officials.

18. Throughout and in furtherance of the conspiracy, defendant ZUURHOUT corruptly received confidential, non-public information related to competitors or projects in numerous countries.

19. It was further part of the conspiracy that defendant ZUURHOUT and others, including Co-Conspirator 1 and Co-Conspirator 3, discussed in person, and through, among other means, electronic mail ("email"), advancing the scheme to cause RRESI to make bribe payments to Foreign Official, through Intermediary 1, in order to secure an improper advantage and obtain and retain business for RRESI and Rolls-Royce.

20. It was further part of the conspiracy that defendant ZUURHOUT communicated with others, including Co-Conspirator 1 and Co-Conspirator 3, to arrange meetings between Co-Conspirator 1 and Foreign Official to discuss the bribery scheme and solidify Foreign Official's influence in support of RRESI's attempts to obtain and retain business from AGP.

21. It was further part of the conspiracy that defendant ZUURHOUT, at the direction of Co-Conspirator 1 and Co-Conspirator 3, sought to (a) perform due diligence to ensure that Foreign Official had decision-making authority to influence AGP decisions in RRESI's favor, and (b) work with Co-Conspirator 2, Co-Conspirator 5, and Co-Conspirator 7 to obtain confidential, non-public information from AGP and Technical Advisor.

22. It was further part of the conspiracy that defendant ZUURHOUT and others, including Co-Conspirator 1, Co-Conspirator 2, Co-Conspirator 3, Co-Conspirator 5, and Co-Conspirator 7, took steps to conceal the bribery scheme, including by (a) using code names to refer to Foreign Official, (b) deleting incriminating documents and emails, and (c) concealing the bribe payments to Foreign Official within RRESI's commission payments to Intermediary 1.

Overt Acts

23. In furtherance of the conspiracy and to achieve the objects thereof, at least one of the coconspirators committed, or caused to be committed, in the Southern District of Ohio and elsewhere, at least one of the following overt acts, among others:

24. In or around 2008 and 2009, Co-Conspirator 2, Co-Conspirator 5, and Co-Conspirator 7 provided defendant **ZUURHOUT** with confidential, non-public information from AGP and Technical Advisor, which defendant **ZUURHOUT** shared with Co-Conspirator 1, Co-Conspirator 3 and others, even though defendant **ZUURHOUT** and others, including Co-Conspirator 1 and Co-Conspirator 3, knew that the information was obtained through corrupt means.

25. In or around January 2009, defendant **ZUURHOUT** met with Co-Conspirator 2 in Istanbul, where they discussed the corrupt scheme and that the Kazakhs, including Foreign Official, wanted RRESI to increase its commission payment to Intermediary 1. Defendant **ZUURHOUT** understood that this increase was because Co-Conspirator 2 intended to divert at least a portion of the commission as a bribe payment to Foreign Official.

26. On or about January 15, 2009, defendant **ZUURHOUT**, Co-Conspirator 2 and Co-Conspirator 3 met in Zurich, Switzerland with others purporting to represent Foreign Official. During the meeting, Foreign Official's representatives demanded that RRESI increase its commission payment, and defendant **ZUURHOUT**, Co-Conspirator 2 and Co-Conspirator 3 knew that this demand was made because at least a portion of the commission payment was intended to be paid as a bribe to Foreign Official.

27. In or about January 2009, following the Zurich meeting, defendant **ZUURHOUT** traveled to Mount Vernon, Ohio, from which he emailed Co-Conspirator 1 and Co-Conspirator 3 about the Zurich meeting and the need for RRESI to reallocate the commission payments in order

to meet Foreign Official's expectations. Defendant ZUURHOUT also explained that Co-Conspirator 5 would be meeting with Foreign Official, and defendant ZUURHOUT suggested that Co-Conspirator 1 also meet with Foreign Official in order to confirm the percentage that RRESI was willing to pay as a commission on the AGP project.

28. In or around November 2009, RRESI won a contract to supply 11 gas turbine units to AGP for approximately \$145 million.

29. Defendant ZUURHOUT and others, caused RRESI to make corrupt commission payments to Intermediary 1 with the knowledge that Co-Conspirator 2 and Intermediary 1 would use the commission payments to bribe Foreign Official in furtherance of the corrupt bribery scheme. As a result, on or about the following dates, corrupt commission payments were made by RRESI from RRESI's bank accounts in Mount Vernon, Ohio, located in the Southern District of Ohio, to Intermediary 1's bank accounts in the United Kingdom as part of the corrupt bribery scheme:

Overt Act	Date	Amount
29.a.	April 21, 2010	\$732,877.21
29.b.	October 1, 2010	\$177,683.30
29.c.	December 13, 2010	\$355,366.59
29.d.	February 23, 2011	\$133,218.23
29.e.	April 18, 2011	\$177,683.30
29.f.	September 20, 2011	\$133,218.23
29.g.	March 7, 2012	\$236,975.71

All in violation of Title 18, United States Code, Section 371.

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