

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

FILED
KENNETH J. MURPHY
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COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION
CINCINNATI

UNITED STATES OF AMERICA,
Plaintiff,

Criminal No.

INFORMATION

vs.

18 U.S.C. § 1952

J. Rubin

HERBERT B. STEINDLER,
Defendant.

CR 1 94 - 68

The United States of America charges that:

COUNT 1

(Use of the Mail in Aid of Racketeering)

At times relevant to this Information:

1. As set forth herein, from approximately 1984 through 1990, defendant HERBERT B. STEINDLER ("STEINDLER") participated in a scheme to divert and launder approximately \$11 million from contracts between General Electric Company ("General Electric") and the Government of Israel ("Israel"). These contracts were for sales of engines for Israeli Air Force ("IAF") F-16 jet fighters and maintenance equipment and services for the engines, all financed by the U.S. Government with foreign military aid funds. STEINDLER and Rami Dotan ("Dotan"), an official of the IAF who oversaw for the IAF the purchase and maintenance of the IAF's aircraft engines, effected the diversions for their personal benefit and agreed to share the proceeds. Another individual, Harold Katz, an attorney in private practice in Israel, laundered


the diverted funds through European bank accounts.

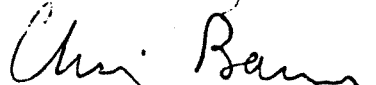
2. STEINDLER was employed by General Electric at the General Electric Aircraft Engines facility in Evendale, Ohio, in the Southern District of Ohio. General Electric developed, manufactured and sold aircraft engines and related products and services. STEINDLER was an international sales manager, and his responsibilities included negotiating and supervising sales to Israel. STEINDLER is a citizen of the United States, and during the relevant period, he resided within the Southern District of Ohio.

3. On or about October 10, 1989, in the Southern District of Ohio and elsewhere, STEINDLER did knowingly and willfully use or cause the use of the interstate mails -- that is, the mailing of an invoice in the amount of \$2,000,000 for services in connection with a purported flight test of General Electric's F110-GE-100A engine sold to Israel from New Jersey by an entity known as GSK Management Consultants, Inc. ("GSK"), a New Jersey corporation located in New Jersey, which was owned by a friend and business associate of STEINDLER's and which functioned as a conduit for paperwork and funds in the above-referenced scheme, to General Electric in the Southern District of Ohio -- with the intent to promote, manage, establish, and carry on and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit, conferring an unlawful benefit on Dotan, in violation of N.J. Stat. Ann. § 2C:21-10(c), and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to

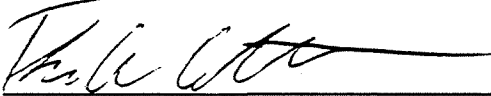
facilitate the promotion, management, establishment, and carrying on of said unlawful activity,

All in violation of Title 18, United States Code, Sections 1952 and 2.

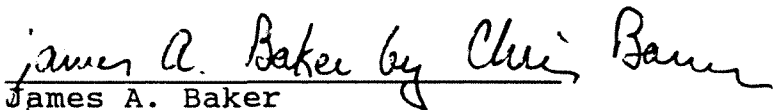

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