

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

FILED

UNITED STATES OF AMERICA,

v.

C.E. MILLER CORPORATION, and
CHARLES E. MILLER,

Defendants

SEP 17 9 18 AM '82
No. CR 82- 918 AM '82
CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
I N BY O R M S A O H C A L I F O R N I A
D E

[15 U.S.C. 78dd 2(a)(3):
Bribery of Foreign Officials;
18 U.S.C. 2: Aiding and
Abetting]

The United States Attorney charges:

[15 USC 78dd-2(a)(3); 18 U.S.C. 2]

1. At all times material hereto defendant C.E. MILLER CORPORATION was a California corporation with principal offices in Irvine, California, and was engaged in, among other things, the engineering and fabrication of turbine compression systems for use in the petroleum industry.

2. At all times material hereto defendant CHARLES E. MILLER was president, chairman of the board, and the majority shareholder of defendant C.E. MILLER CORPORATION.

3. At all times material hereto, Petroleos Mexicanos (hereinafter "Pemex") was a national oil company wholly owned by the government of the Republic of Mexico, and was an instrumentality of the Mexican government as that term is used in 15 U.S.C. 78dd-(d)(2).

4. At various times material hereto, Ignacio DeLeon was the sub-director of Pemex in charge of purchasing, and was a foreign official as that term is defined in 15 U.S.C. 78dd-2(d)(2).

5. At various times material hereto, Jesus Chavarria was the sub-director of Pemex in charge of exploration, and was a foreign official as that term is defined in 15 U.S.C. 78dd-2(d) (2).

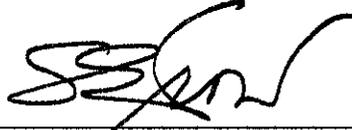
6. At all times material hereto, Crawford Enterprises, Inc. was a Texas corporation with its principal offices located in Houston, Texas, and was engaged in, among other things, the business of selling turbine compression systems to Pemex. Crawford Enterprises, Inc. was a domestic concern as that term is defined in 15 U.S.C. 78dd-2(d) (1) (B).

7. At various times material hereto Grupo Industrial Delta S.A. (hereinafter "Grupo Delta") was a corporation organized and existing under the laws of the State of Mexico in the Republic of Mexico after September 26, 1977, with principal offices located in Mexico City, Mexico and held itself out to be engaged in, among other things, the business of representing Crawford Enterprises, Inc. and other companies, in sales efforts to Pemex.

8. On or about January 27, 1978, in furtherance of an offer, payment and promise by a domestic concern, that is, Crawford Enterprises, Inc., to pay money, that is, the equivalent of five percent of the price of each contract, to a person, to wit, Grupo Delta, while knowing that all or a portion of such money would be offered, given or promised to Ignacio DeLeon and Jesus Chavarria, both foreign officials, for the purpose of influencing the acts and decisions of said foreign officials in their official capacity in order to obtain and retain business for Crawford Enterprises, Inc., that is, contracts for the sale to Pemex of turbine compression systems, defendants C.E. MILLER

CORPORATION and CHARLES E. MILLER, would and did aid and abet Crawford Enterprises, Inc., in the Central District of California and elsewhere, by corruptly using an instrumentality of interstate commerce, to wit, a commercial aircraft to travel from Los Angeles, California to Houston, Texas.

All in violation of 15 U.S.C. 78dd-2(a)(3) and 18 U.S.C. §2.



STEPHEN S. TROTT
United States Attorney



WILLIAM F. PENDERGAST
Trial Attorney
Department of Justice

Dated: September , 1982