

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA)	
)	Criminal No. 83-0034 (PLS)
v.)	
)	Violations: 31 U.S.C. §1059(1)
SAM P. WALLACE COMPANY, INC.)	15 U.S.C. §78m(b)(2)(A)
)	15 U.S.C. §78ff(a)

INFORMATION

*Received & filed
February 23, 1983
2:20 PM
ME*

The United States Attorney charges:

COUNT 1

(1) At all times relevant herein the defendant, SAM P. WALLACE COMPANY, INC., a corporation organized and existing under the laws of the State of Texas, was engaged, directly and through its subsidiary corporations, in the business of mechanical, electrical and civil construction in the United States and overseas.

(2) On or about November 3, 1980, the defendant, SAM P. WALLACE COMPANY, INC., through certain of its officers and employees, did knowingly and willfully cause to be transported on one occasion a certain monetary instrument in excess of \$5,000,; that is, a bearer check drawn upon the Royal Bank of Canada, located in Hato Rey, in the District of Puerto Rico, and payable in United States dollars in the amount of \$275,000., from San Juan, Puerto Rico, a place within the United States, to Georgetown, Grand Cayman, a place outside the United States, without filing and without causing to be filed a report as required by Title 31, United States Code, Section 1101, and

RECD	TO JUDGE
2/24	# 1
BY [Signature]	

C.F.R. Sections 103.23(a) and 103.25(b), and that this said violation was willfully committed in furtherance of the commission of a violation of another federal law, that is, Title 15, United States Code, Section 78dd-1(a)(1) and (3), the corrupt payment of a bribe in the aggregate amount of \$1,391,000. to John H. O'Halloran, then chairman of the Trinidad and Tobago Racing Authority, in order to obtain and retain a contract to construct the grandstand and receiving building portion of the Caroni Racetrack Project in Trinidad, all in violation of Title 31, United States Code, Section 1059 and 31 C.F.R. Section 103.49.

COUNTS 2-4

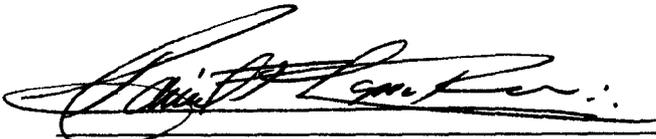
(1) The allegations in paragraph (1) of Count 1 of this Information are realleged.

(2) On or about March 31, 1981, in the District of Puerto Rico, defendant SAM P. WALLACE COMPANY, INC., an issuer with a class of securities registered pursuant to Section 12 of the Securities Exchange Act of 1934, 15 U.S.C. 781, aided and abetted by certain of its officers and employees, caused the Sam P. Wallace & Co. of P.R., Inc., a wholly owned subsidiary of the defendant SAM P. WALLACE COMPANY, INC., and whose earnings are consolidated in the financial reports of the defendant SAM P. WALLACE COMPANY, INC., to fail to keep books, records and accounts, which, in reasonable detail, fairly reflected the following transactions and dispositions of \$1,391,000. of the

assets of the defendant SAM P. WALLACE COMPANY, INC., by creating, among other false books, records and accounts, the following fictitious purchase orders to purported suppliers for the purpose of concealing the withdrawal of corporate funds in order to pay a bribe in the aforesaid amount to John O'Halloran, Chairman of the Trinidad and Tobago Racing Authority.

<u>COUNT</u>	<u>FALSE RECORD</u>	<u>AMOUNT</u>	<u>PURPORTED SUPPLIER</u>
2	Purchase Order	\$342,000	Carribean Contracting Company
3	Purchase Order	\$450,000	Atlantic Supply Company
4	Purchase Order	\$599,000	B.J. Pyron & Co., Inc.

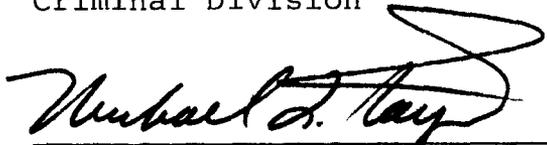
All in violation of Title 15, United States Code, Section 78m(b) (2) (A) and Title 15 United States Code, Section 78ff(a).



UNITED STATES ATTORNEY



PETER B. CLARK, Trial Attorney
United States Department of Justice
Fraud Section
Criminal Division



MICHAEL L. FAYAD, Trial Attorney
United States Department of Justice
Fraud Section
Criminal Division