

11/18/85  
4:30 P.M.

2

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 W.S. KIRKPATRICK, INC. )  
 )  
 Defendant. )

CRIMINAL NO. 85-415 JHR

Title 15, United States Code,  
Section 78dd-**FILED**

INFORMATION

NOV 18 1985

The United States Attorney Charges:  
Count One

At 8:30.....M  
ALLYN Z. LITE

On or about December 21, 1982, in the District of Newark, defendant, W.S. Kirkpatrick, Inc., a domestic concern, used a means and instrumentality of interstate commerce, that is, a Western Union international telex from Fairfield, New Jersey, to New York, New York, to order Standard Chartered Bank of New York to pay \$580,973.00 to the Bank of New York for the account of Bank of Commerce and Credit International in Luxembourg, corruptly in furtherance of an Offer, payment, promise to pay and authorization of the payment of money to:

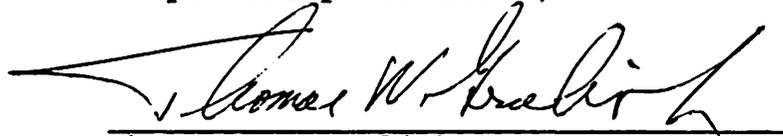
- (a) a person, that is Benson "Tunde" Akindele through two companies, Deriks and Los, Panamanian bearer share corporations, while having reason to believe that a portion of such money would be offered, given, or promised, directly or indirectly to foreign officials, Nigerian Air Force

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NEWARK

officers, the Party of Nigeria, the Minister of Nigeria and other government defense personnel for the purpose of influencing the acts and decisions of such foreign officials and others in their official capacity and inducing them to use their influence within the Government of Nigeria in order to obtain a contract for flight training equipment for W.S. Kirkpatrick, Inc.

All in violation of Title 15, United States Code,  
Section 78dd-2.

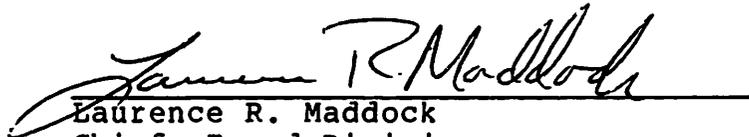
Respectfully submitted,



Thomas W. Greelish  
United States Attorney



Steven M. Levy  
Fraud Section  
U.S. Department of Justice



Laurence R. Maddock  
Chief, Fraud Division  
United States Attorney's Office

Attorneys for the Plaintiff  
United States of America