

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Crim. No. 14-
MODESTO TORRES : 18 U.S.C. §§ 1001(a)(3) and 2

I N F O R M A T I O N

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

1. In or about June 2012, Defendant MODESTO TORRES (hereinafter "TORRES") was an electronics engineer for the U.S. Army, U.S. Department of Defense (hereinafter "U.S. Army"), who worked at the Picatinny Arsenal located in Picatinny Arsenal, New Jersey.

2. In or about June 2012, TORRES and Individual 1, through Company A, sought to bid on a contract with the U.S. Army to manufacture the Artillery Portable Universal Battery Supply (hereinafter "APUBS"), which was the battery that powered the guidance system on the 105 mm Howitzer, a type of artillery weapon utilized by the U.S. Army. TORRES prepared the majority of the content of a proposal dated June 14, 2012 for the APUBS contract that was submitted to the U.S. Army bidding officer for review and consideration.

3. TORRES included in the proposal fabricated biographies of personnel who were not employed by Company A, as well as false representations regarding Company A's supplier relationships with

manufacturers based in Puerto Rico and China, when no such relationships existed.

4. On or about June 14, 2012, in the District of New Jersey and elsewhere, defendant

MODESTO TORRES

did knowingly and willfully make and use false writings and documents knowing the same to contain materially false, fictitious, and fraudulent statements and entries, as described in Paragraph 3 above, in a matter within the jurisdiction of the executive branch of the Government of the United States – namely the U.S. Department of Defense.

In violation of Title 18, United States Code, Section 1001(a)(3) and Section 2.



PAUL J. FISHMAN
UNITED STATES ATTORNEY

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INFORMATION FOR

18 U.S.C. §§ 1001(a)(3) & 2

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