

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	HON. Anne E. Thompson
	:	
v.	:	Criminal No. 11-719
	:	
DERISH WOLFF	:	18 U.S.C. § 286

SUPERSEDING
INFORMATION

The defendant having waived in open court prosecution by Superseding Information, and the defendant having waived any defenses in open court based upon any statutes of limitations, the United States Attorney for the District of New Jersey charges:

1. From at least as early as in or about 2003 through in or about 2006, in the District of New Jersey and elsewhere, defendant

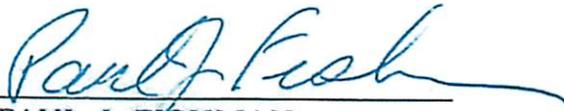
DERISH WOLFF

did knowingly and intentionally conspire and agree with others to defraud the United States and an agency thereof, namely, the United States Agency for International Development (“USAID”), by obtaining and aiding to obtain the payment and allowance of false, fictitious, and fraudulent material claims, namely, contract payments billed at knowingly inflated overhead-recovery rates.

2. It was a part of the conspiracy that, on a periodic basis by an accounting method known as a “journal entry,” LBG’s Assistant Controller and

Controller, under the oversight and supervision of defendant DERISH WOLFF, would improperly reclassify the work hours of LBG employees at East Orange headquarters, unbeknownst to those LBG employees or despite their objections, by transferring their charged work hours from a corporate overhead account to a USAID-devoted overhead account, notwithstanding that those employees had not devoted those work hours to USAID, thereby raising the overhead-recovery rate.

All in violation of Title 18, United States Code, Section 286.


PAUL J. FISHMAN
United States Attorney