



foreign wire transfers, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, BELL, while working as Chief Systems Engineer in the New York office of Science Applications International Corporation ("SAIC"), the lead contractor on the CityTime project, together with others known and unknown, defrauded the City into significantly overpaying for the CityTime project in order to, among other reasons, increase the amount of concealed kickbacks paid to him and at least one other by an SAIC subcontractor.

Overt Act

3. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about February 10, 2009, CARL BELL, the defendant, received approximately \$36,000 in a bank account he controlled in Connecticut from a bank account in India via a wire transfer through New York, New York.

(Title 18, United States Code, Section 1349.)

COUNT TWO

The United States Attorney further charges:

4. From at least in or about 2003, up to and including at least in or about 2011, in the Southern District of New York and elsewhere, CARL BELL, the defendant, and others

known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit honest services wire fraud in violation of Title 18, United States Code, Sections 1343 and 1346.

5. It was a part and an object of the conspiracy that CARL BELL, the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and to deprive BELL's employer, SAIC, of its intangible right to BELL's honest services, would and did transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, including interstate and foreign wire transfers, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Sections 1343 and 1346, to wit, BELL, while working as Chief Systems Engineer in the New York office of SAIC, received millions of dollars in concealed kickbacks from a subcontractor working for SAIC on the CityTime project.

Overt Act

6. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about February 10, 2009, CARL BELL, the defendant, received approximately \$36,000 in a bank account he controlled in Connecticut from a bank account in India via a wire transfer through New York, New York.

(Title 18, United States Code, Section 1349.)

**COUNT THREE**

The United States Attorney further charges:

7. From at least in or about 2003, up to and including at least in or about 2011, in the Southern District of New York and elsewhere, CARL BELL, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and to deprive BELL's employer, SAIC, of its intangible right to BELL's honest services, did transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, including interstate and foreign wire transfers, for the purpose of executing such scheme and artifice, to wit, BELL, while working as Chief Systems Engineer in the New York office of SAIC, received millions of dollars in concealed kickbacks from a subcontractor working for SAIC on the CityTime project through foreign and interstate wire transfers including a wire transfer of approximately \$36,000 on or about February 10, 2009, sent from a bank account in India to a bank account BELL

controlled in Connecticut via a wire transfer through New York, New York.

(Title 18, United States Code, Sections 1343 and 1346.)

**COUNT FOUR**

The United States Attorney further charges:

8. From at least in or about 2003, up to and including in or about 2011, in the Southern District of New York and elsewhere, CARL BELL, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, a violation of Title 18, United States Code, Section 1952.

9. It was a part and object of the conspiracy that CARL BELL, the defendant, and others known and unknown, willfully and knowingly would and did travel in interstate commerce, and use and cause to be used the mail and facilities in interstate and foreign commerce, with the intent to distribute the proceeds of an unlawful activity, and to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, to wit, the offering and acceptance of commercial bribes in violation of New York Penal Law Sections 180.00 and 180.05, and thereafter would and did perform and attempt to perform an act to distribute the proceeds of said unlawful activity, and to promote, manage, establish,

carry on, and facilitate the promotion, management, establishment, and carrying on of said unlawful activity, in violation of Title 18, United States Code, Sections 1952(a)(1) and (3).

Overt Act

10. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about February 10, 2009, CARL BELL, the defendant, received approximately \$36,000 in a bank account he controlled in Connecticut from a bank account in India via a wire transfer through New York, New York.

(Title 18, United States Code, Section 371.)

COUNT FIVE

The United States Attorney further charges:

11. From at least in or about 2003 up to and including in or about 2011, in the Southern District of New York and elsewhere, CARL BELL, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other, to violate Title 18, United States Code, Section 1956(a)(1)(B)(i).

12. It was a part and object of the conspiracy that CARL BELL, the defendant, and others known and unknown, in an

offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, wire transfers, represented the proceeds of some form of unlawful activity, willfully and knowingly would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, the proceeds of the wire fraud and honest services fraud schemes charged in Counts One, Two and Three, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), to wit, BELL established 3C Enterprises LLC, a shell entity which he used to conceal millions of dollars in kickbacks he received in connection with the offenses charged in Counts One, Two and Three.

Overt Act

13. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about February 10, 2009, CARL BELL, the defendant, received approximately \$36,000 in a bank account he

controlled in Connecticut from a bank account in India via a wire transfer through New York, New York.

(Title 18, United States Code, Section 1956(h).)

**FORFEITURE ALLEGATION: COUNTS ONE THROUGH FOUR**

14. As a result of committing one or more of the offenses alleged in Counts One through Four of this Information, CARL BELL, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the said offenses.

**Substitute Asset Provision**

15. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 982, and Title 28, United States Code, Section 2461.)

**FORFEITURE ALLEGATION: COUNT FIVE**

16. As a result of committing the money laundering offense alleged in Count Five of this Information, CARL BELL, the defendant, shall forfeit to the United States pursuant to Title 18, United States Code, Section 982, all property, real and personal, involved in the money laundering offense and all property traceable to such property.

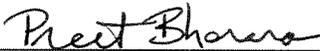
Substitute Asset Provision

17. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant, up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982 and 1956.)

  
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PREET BHARARA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

CARL BELL,

Defendant.

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INFORMATION

S1 11 Cr. 121 (GBD)

(18 U.S.C. §§ 371, 1343, 1346, 1349, &  
1956.)

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PREET BHARARA  
United States Attorney.

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