

ATTACHMENT A
**(Use of the Mail and Facilities in Interstate Commerce to Promote, Carry
On and Facilitate Commercial Bribery)**

In or about 2012 through in or about 2013, in the District of New Jersey, and elsewhere, defendant

DANIEL LAWRYNOWICZ

did knowingly and intentionally use and cause the use of the mail and facilities in interstate commerce with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, that is, commercial bribery, contrary to N.J.S.A. §2C:21-10 and Title 18, United States Code, Section 1952(a)(3) and, thereafter, did perform and attempt to perform acts to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of such unlawful activity.

In violation of Title 18, United States Code, Section 1952(a)(3) and Title 18, United States Code, Section 2.

ATTACHMENT B

I, James B. Smith, am a Special Agent with the Federal Bureau of Investigation. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. The investigation has revealed that in or about 2012 through in or about 2013, representatives of a metallurgical technology company (hereinafter "Technology Company") made payments to Daniel Lawrynowicz ("LAWRYNOWICZ"), an employee of a medical device company in New Jersey (hereinafter "Medical Device Company"), as a bribe for his assistance in securing a contract with the Medical Device Company worth millions of dollars.
2. An individual associate with the Technology Company (hereinafter "Representative One") has acknowledged to law enforcement that he and others made illicit bribe payments to LAWRYNOWICZ to secure a contract the Technology Company sought with LAWRYNOWICZ's employer, including a cash payment of approximately \$75,000 to LAWRYNOWICZ after the contract sought was signed. A review of bank records of Representative One and others associated has revealed cash withdrawals consistent with such a cash bribe.
3. Such a payment was impermissible under LAWRYNOWICZ's employer's policies.
4. On or about December 22, 2015, Representative One made a consensually recorded call to LAWRYNOWICZ, during which Representative One stated that he was nervous about a purported upcoming government audit of the Technology Company. An excerpt of the conversation is as follows:

Representative One: “I am more worried about that 75k in cash that eh you know that we gave you, I don’t know if that ever comes up, or we deny it right, obviously.”

LAWRYNOWICZ: “Yeah, Yeah . . . when is that happening?”

Representative One: “Its ongoing, they called us to say they are auditing us and they just showed up. . .”

LAWRYNOWICZ: “Let’s get a story together so that ah you know it all has legs and a tail.”

5. On or about December 23, 2015, Representative One made another consensually recorded call to LAWRYNOWICZ. An excerpt of the conversation is as follows:

Representative One: “I want to get back to this audit thing we talked about yesterday. . .”

Later into the conversation, **LAWRYNOWICZ**, referring to the \$75,000 cash payments by representatives from the Technology Company, stated “how about that larger sum, ahh what documentation if any is there?”

Representative One: “Oh you are talking about the eh \$75K cash that we gave for, after [medical device company] contract?”

LAWRYNOWICZ: “Yeah” . . . “what link do you have documented to [a consulting company operated by LAWRYNOWICZ, hereinafter “Consulting Company”]? “What does [Consulting Company] represent within any of the files of [the Technology Company]? . . . “What is the story, that eh, what services did [Consulting Company] render to make sure that we are all singing the same tune, if there is a dialogue? . . .”

Representative One: “I know I took out my \$25K in a safe way . . . I don’t know if that is as important, just to make sure that yours was not appropriated in any kind of visible way, I mean tell me that you left it in cash or at least if you put it somewhere that you put it an untraceable account . . .”

LAWRYNOWICZ: “Yeah, yeah, it never made it into any account . .
. there is no record of any kind of deposit . . .”

Representative One: “That should be okay, I guess. . .”

LAWRYNOWICZ: “From my end, I’ve been very cognizant from not
creating any raised eyebrows kind of scenarios, so it’s all been
appropriately handled.”