

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

	:	Crim. No. 18-
UNITED STATES OF AMERICA	:	
	:	18 U.S.C. § 1952(a)(3)
v.	:	
	:	
DANIEL LAWRYNOWICZ	:	<u>INFORMATION</u>

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

1. At all times relevant to this Information:

a. Defendant DANIEL LAWRYNOWICZ was an employee of a medical device company in New Jersey (the "Medical Device Company"), and was involved with the research and development of new technologies.

b. Eugene Ostrovsky ("Ostrovsky"), Co-Conspirator-1, and Co-Conspirator-2 were principals in a metallurgical technology company (hereinafter "Technology Company").

2. Beginning in or about 2012, Ostrovsky, Co-Conspirator-1, and Co-Conspirator-2 sought a contract with the Medical Device Company to supply goods to the Medical Device Company in exchange for millions of dollars. Defendant DANIEL LAWRYNOWICZ, as an employee of the Medical Device Company, made recommendations to others at the Medical Device Company relating to such goods.

3. From at least in or about 2012 through in or about 2013, Ostrovsky, Co-Conspirator-1, and Co-Conspirator-2 made illicit bribe payments to

defendant DANIEL LAWRYNOWICZ in exchange for defendant DANIEL LAWRYNOWICZ'S assistance in helping the Technology Company secure the contract with the Medical Device Company. These payments included a cash payment of approximately \$75,000 to defendant DANIEL LAWRYNOWICZ after the contract sought was signed. At various times, Ostrovsky, Co-Conspirator-1, and Co-Conspirator-2 communicated with defendant DANIEL LAWRYNOWICZ via telephone regarding the contract while Ostrovsky, Co-Conspirator-1, and Co-Conspirator-2 were located in New York or Florida and defendant DANIEL LAWRYNOWICZ was located in New Jersey. Ostrovsky, Co-Conspirator-1, and Co-Conspirator-2 traveled to New York from other states to make the illicit bribe payments to defendant DANIEL LAWRYNOWICZ.

4. From at least in or about 2012 through in or about 2013, in the District of New Jersey, and elsewhere, defendant

DANIEL LAWRYNOWICZ

knowingly and intentionally used and caused to be used the mail and any facility 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.

FORFEITURE ALLEGATION

1. The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 982(a)(7).

2. Upon conviction of the offense in violation of Title 18, United States Code, Sections 1952(a)(3) and 2, the defendant, DANIEL LAWRYNOWICZ, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(7), all right, title, and interest in the sum of \$75,000, which constitutes or is derived, directly or indirectly, from gross proceeds traceable to the offense of conviction.

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

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty, the United States shall be entitled, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(a)(7), to forfeiture of any other property of defendant DANIEL LAWRYNOWICZ up to the value of the property described in the preceding paragraph.


CRAIG CARPENITO
United States Attorney

CASE NUMBER: 2015R00674

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

Daniel Lawrynowicz

INFORMATION FOR

18 U.S.C. § 1952(a)(3)

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