
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Mark Falk
v. : Magistrate. No. 19-3527 (MF)
ROBERT DOMBROSKI and : **CRIMINAL COMPLAINT**
INDRA NAYEE

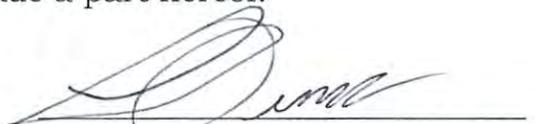
I, Luciano Dimino, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigations, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



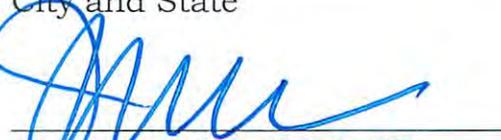
Luciano Dimino, Special Agent
Federal Bureau of Investigation

Sworn to before me, and
subscribed in my presence

February 13, 2019 at
Date

Newark, New Jersey
City and State

Honorable Mark Falk
United States Magistrate Judge
Name & Title of Judicial Officer



Signature of Judicial Officer

ATTACHMENT A

COUNT 1

(Conspiracy to Commit Wire Fraud)

From in or about 2010 through in or about 2018, in Morris County, in the District of New Jersey, and elsewhere, defendants

ROBERT DOMBROSKI and
INDRA NAYEE

knowingly and intentionally conspired and agreed with each other and others to devise a scheme and artifice to defraud the United States Government and Company A, and to obtain money and property, by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice to defraud, to transmit and cause to be transmitted, by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, affecting financial institutions, contrary to Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Section 1349.

COUNT 2
(False Statements)

On or about February 22, 2017, in Morris County, in the District of New Jersey, and elsewhere, defendant

ROBERT DOMBROSKI

in a matter within the jurisdiction of the executive branch of the United States Government, namely, the Department of Defense, knowingly and willfully made materially false, fictitious and fraudulent statements and representations, and falsified, concealed and covered up by trick, scheme, and device, certain material facts, by filing an OGE Form 450 to United States Office of Government Ethics, as set forth in Attachment B, Paragraph 26.

In violation of Title 18, United States Code, Section 1001.

COUNT 3
(False Statements)

On or about February 22, 2016, in Morris County, in the District of New Jersey, and elsewhere, defendant

ROBERT DOMBROSKI

in a matter within the jurisdiction of the executive branch of the United States Government, namely, the Department of Defense, knowingly and willfully made materially false, fictitious and fraudulent statements and representations, and falsified, concealed and covered up by trick, scheme, and device, certain material facts, by filing an OGE Form 450 to United States Office of Government Ethics, as set forth in Attachment B, Paragraph 25.

In violation of Title 18, United States Code, Section 1001.

COUNT 4
(False Statements)

On or about February 10, 2015, in Morris County, in the District of New Jersey, and elsewhere, defendant

ROBERT DOMBROSKI

in a matter within the jurisdiction of the executive branch of the United States Government, namely, the Department of Defense, knowingly and willfully made materially false, fictitious and fraudulent statements and representations, and falsified, concealed and covered up by trick, scheme, and device, certain material facts, by filing a OGE Form 450 to United States Office of Government Ethics, as set forth in Attachment B, Paragraph 24.

In violation of Title 18, United States Code, Section 1001.

COUNT 5
(False Statements)

On or about February 4, 2014, in Morris County, in the District of New Jersey, and elsewhere, defendant

ROBERT DOMBROSKI

in a matter within the jurisdiction of the executive branch of the United States Government, namely, the Department of Defense, knowingly and willfully made materially false, fictitious and fraudulent statements and representations, and falsified, concealed and covered up by trick, scheme, and device, certain material facts, by filing a OGE Form 450 to United States Office of Government Ethics, as set forth in Attachment B, Paragraph 23.

In violation of Title 18, United States Code, Section 1001.

ATTACHMENT B

I, Luciano Dimino, am a Special Agent of the Federal Bureau of Investigation. My experience as a Special Agent has included the investigation of cases involving various financial frauds and other federal criminal violations of law. I have received training and have gained experience in interview and interrogation techniques, arrest procedures, obtaining electronically stored information through criminal process, search warrant applications, and the execution of searches and seizures. I have also received training and information and have gained experience concerning fraud investigations. I have knowledge of the facts set forth herein through my personal participation in this investigation and through oral and written reports from other federal agents or other law enforcement officers. 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. Where I assert a value or amount, I am asserting an approximate value or amount. Where statements of others are related herein these statements are related in substance and part. Because this Criminal Complaint is being submitted for the limited purpose of establishing probable cause for the issuance of arrest warrants against the named defendants, I have not set forth every fact know to me or other law enforcement officers concerning this investigation. Rather, I have only set forth those facts that I believe are sufficient to that show probable cause exists to believe that the defendants have committed the offenses set forth in Attachment A.

The Defendants and Other Parties:

1. At all times relevant to this Criminal Complaint:

a. Picatinny Arsenal ("PICA") was a United States Army installation located in Morris County, New Jersey. PICA's Research, Development, Engineering Command conducted research, development, acquisition and lifecycle management of advanced conventional weapons systems and advanced ammunitions. PICA provided products and services to all branches of the United States military.

b. Company A was headquartered in Arlington, Virginia and had a branch office in Lake Hopatcong, New Jersey. Company A was a privately held company that had contracts with the United States Department of Defense ("DoD") and specialized in advanced engineering, advanced analytics, management consulting and IT services, including cyber security. Company A's New Jersey branch office had numerous, multi-million dollar government contracts originating out of PICA and, in that capacity, it provided support for the PICA contracts and had employees working as contractors on PICA.

c. Defendant Robert Dombroski (“DOMBROSKI”) was a resident of New Jersey and during the time of the conspiracy was, among other positions, a civilian rehired annuitant at PICA serving as a Senior Products Manager for advanced weapons. Prior to his retirement as Federal employee in December 2015 and becoming a rehired annuitant, DOMBROSKI was employed at PICA for over 30 years. Immediately prior to retiring, DOMBROSKI held the position of Senior Associate for Advanced Weapons and worked on and supervised contract projects with Company A. In that capacity, DOMBROSKI had influence over the awarding of government contracts to Company A and influenced how the money allocated to Company A’s contracts was spent. In addition, DOMBROSKI influenced the funding for Company A’s projects and had influence over whether or not Company A would be awarded future government contracts. DOMBROSKI was terminated as a rehired annuitant on March 7, 2017.

d. Defendant Indra Nayee (“NAYEE”) was a resident of Middlesex County, New Jersey and was the PICA Division Director at Company A. As the PICA Division Director, NAYEE had direct oversight and control over how Company A executed the government contracts it had with PICA, and he supervised and directly managed all branch employees, to include Irene Pombo. NAYEE was the primary point of contact at Company A for PICA employees, to include but not limited to, DOMBROSKI, Joseph Gooch, and Nicole Pier. NAYEE reported directly to Company’s A senior management.

c. Irene Pombo (“POMBO”), a co-conspirator not named as a defendant herein, was a resident of New Jersey.¹ POMBO was a Senior Program manager for Company A and worked directly for NAYEE. She had direct contact with Government employees at PICA and needed approval from NAYEE in order to place orders on Company A’s government contracts for PICA employees. POMBO was an additional point of contact at Company A for PICA employees, to include DOMBROSKI.

d. Nicole Pier (“PIER”), a co-conspirator not named as a defendant herein, was a resident of New Jersey.² PIER was employed by the United States Army as a civilian employee and was an Acquisition Analyst and a Contracting Officer Representative (“C.O.R.”) at PICA’s Weapons and

¹ On or about March 20, 2018, POMBO plead guilty to an Information, Crim. No. 18-137 (JMV), charging her with conspiracy to defraud the United States, in violation of 18 U.S.C. Section 371.

² On or about March 20, 2018, PIER plead guilty to an Information, Crim. No. 18-136 (JMV), charging her with conspiracy to defraud the United States, in violation of 18 U.S.C. Section 371.

Software Engineering Center, Tactical Effects, Protection and Interactive Technologies Directorate. As a C.O.R., PIER was authorized by the United States Army to act as its representative on contracts made with federal contracting companies, such as Company A. As a C.O.R., PIER had the responsibility and authority to monitor all aspects of the day-to-day administration of government contracts, to include but not limited to, the ordering of materials consistent with and needed to accomplish the goals of the contract.

e. Joseph Gooch (“GOOCH”), a co-conspirator not named as a defendant herein, was a resident of New Jersey, was employed by the United States Army as a civilian employee and was assigned as a General Engineer at PICA in the Weapons and Software Engineering Center, Tactical Effects, Protection and Interactive Technologies Directorate.³ In addition to his duties as a General Engineer, GOOCH was a C.O.R. authorized by the United States Army to act as its representative on contracts made with federal contracting companies, such as Company A, and had the responsibility and authority to monitor all aspects of the day-to-day administration of those contracts, to include but not limited to, the ordering of “materials” needed to accomplish the goals of the contracts. As the C.O.R. for Company A, GOOCH was also responsible for the evaluation of Company A’s work and had influence over the granting of additional future contracts to Company A. GOOCH worked directly with DOMBROSKI and NAYEE during the time of the conspiracy.

f. The Government’s Confidential Financial Disclosure system was established to assist employees and their agencies in avoiding conflicts between official duties and private financial interests or affiliations. Title 5, Code of Federal Regulations (“C.F.R.”), Part 2634, requires identified employees to fully report their financial interests so that agency ethics officials can thoroughly review these reports for possible conflicts of interest. Title 5, C.F.R., Part 2635.605, sets forth the requirements for each confidential report. The regulations require designated employees to file a Confidential Financial Disclosure Report, OGE Form 450, as part of their disclosure requirement, every twelve (12) months. The annual report must include information from the preceding calendar year.

h. Any employee who participates personally and substantially, through decision or exercise of significant judgment, in taking an official action for contracting or procurement, administering or monitoring grants, or regulating a non-Federal entity is required to fill out an OGE Form 450. By

³ On or about March 20, 2018, GOOCH plead guilty to an Information, Crim. No. 18-313 (JMV), charging him with conspiracy to defraud the United States, in violation of 18 U.S.C. Section 371.

completing the OGE Form 450, employees identify their financial interests and recognize whether these interests conflict with their official duties. Ethic officers review the filings to ensure that the agency has complied with the filing requirements and to identify any financial interests that may conflict with a filer's official duties. Part V of the OGE Form 450 requires annual filers to report all gifts or travel reimbursements worth more than \$150 received by the filer, filer's spouse, and dependent children from a single source aggregating more than \$375 during the reporting period.

Overview of the Scheme to Defraud: Manner and Means of the Conspiracy

2. It was part of the conspiracy that:

a. DOMBROSKI, NAYEE and their co-conspirators devised and executed an interstate scheme to defraud the United States Government and Company A. In furtherance of this scheme to defraud, DOMBROSKI sent numerous emails from his Government email account to NAYEE and POMBO's Company A work email accounts for the purpose of fraudulently obtaining items of value, such as Apple products and other luxury items, from Company A's military contract. The items of value were neither part of nor authorized by the government contracts issued to Company A. The defendants and their co-conspirators fraudulently obtained these items for their personal use and enjoyment and the personal use and enjoyment of their family and friends.

b. The defendants and their co-conspirators then submitted or caused to be submitted false claims to the United States Government, causing the fraudulent payment for certain of the items not covered by the contracts.

c. DOMBROSKI made materially false, fictitious and fraudulent statements and representations on his OGE Form 450s to the United States Office of Government Ethics by falsifying and concealing the receipt of any of the items of value he fraudulently obtained through the scheme.

Acts in Furtherance of the Scheme to Defraud

3. On or about April 14, 2014, DOMBROSKI sent an email from his government email account to NAYEE and POMBO's Company A email accounts requesting NAYEE and POMBO purchase items of value for DOMBROSKI's personal use and enjoyment and to charge the purchase against a Company A military contract for the Towed Artillery Digitization Program meant to provide support for modernizing and increasing the lethality and accuracy of weapons systems. In the email DOMBROSKI stated, "Hi Irene, I understand from Joe that my \$150K is on the latest contract. I need to pick up a laptop and a couple of things. OK to send you the list? P.S. Haven't seen you at the diner lately... Bob." POMBO responded, "Bob, Please send your list to me and I'll take care of it. Maybe we'll see you at the diner again It was nice chatting with you and

Ingrid. Jim was happy to meet you both. See you soon.” DOMBROSKI replied, “BTW, If you have a “requirement” feel free include it ...” According to POMBO, she understood DOMBROSKI’s last statement to mean that if she or NAYEE wanted to order anything for their personal use and enjoyment off the government contract, they had DOMBROSKI’s approval to do so.

4. As a result, and at DOMBROSKI’s direction, on or about April 16 through on or about April 22, 2014, POMBO placed orders to the online Apple store and the Rockaway New Jersey Apple Store for approximately \$5,000.00 worth of personal use items. The orders included, but were not limited to, the following items: five (5) women’s luxury handbags from designers such as Michael Khors and Cole Haan; two (2) sets of Dr. Dre Wireless Beats headphones; two (2) Fit Bits; one (1) JBL Micro Wireless speaker; one (1) 13 inch Apple MAC Book Air valued at approximately \$1,880.00; one (1) Apple iPad mini with Retina display, Wi-Fi and cellular for Verizon and the protective case valued at approximately \$880.00; and Apple accessories valued at approximately \$500. None of the items ordered were approved for use on any Company A government contract. As described below in paragraphs 20-22, Federal Agents recovered the Apple MAC Book Air computer and numerous Apple accessories discussed above from DOMBROSKI. DOMBROSKI told the agents that all items recovered from him were for his personal use and enjoyment and were not approved for use on any Government contracts.

5. On or about August 12, 2014, DOMBROSKI sent an email from his government email account to POMBO’s Company A work email account directing POMBO to purchase items of value for DOMBROSKI’s personal use and enjoyment and to charge the purchase against a Company A military contract. In the email, DOMBROSKI stated to POMBO, “Hello my dear, While you are ordering Ray’s GoPro set up, can you get a bundle for me also. I don’t have as many accessories as Ray, my testing is less complicated. Use my slush fund, not Ray’s money. No rush. Thanks :) Bob.” POMBO responded a few moments later, “Certainly Dear!!!” To which DOMBROSKI responded, “And of course, if there is something you “need” to continue your excellent support to ARDEC please be my guest :)” According to POMBO, she understood DOMBROSKI’s statement to mean that if she wanted to order anything for her personal use and enjoyment off the government contract, she had DOMBROSKI’s approval to do so. Moreover, according to POMBO, she understood that the “slush fund” DOMBROSKI directed POMBO to charge the order against was a Company A military contract meant to provide weapon development and software support to the United States military.

6. As a result and at DOMBROSKI’s direction, on or about August 14, 2014, POMBO placed an online order with GoPro.com for the items DOMBROSKI requested, costing approximately \$1,230.00. None of the items ordered from GoPro.com on DOMBROSKI’s behalf were approved for use on Company A’s government contract, but were instead items of value for DOMBROSKI’s personal

use and enjoyment. As described below in paragraphs 20-22, federal agents recovered the GoPro Hero 3+ ordered on August 14, 2014, from DOMBROSKI. In addition to the GoPro Hero 3+, agents recovered numerous GoPro accessories to include various GoPro mounts, protective cases and a carrying bag. As described below in paragraph 20, DOMBROSKI told the agents that all the items recovered from him were for his personal use and enjoyment and were not for use on any government contracts.

7. On or about December 10, 2014, DOMBROSKI sent an email from his government email account to POMBO's Company A work email account directing her to purchase items of value for his personal use and enjoyment and to charge the purchase against a Company A military contract. In the email, DOMBROSKI stated, in sum and substance, "... a few apple items are needed. If we haven't maxed out your CC (credit card) yet. Let me know if it's a problem... we need to have a Xmas lunch next week." POMBO replied, "Oh my! Well, this is nice as there was something at the Apple store that looked nice!!! I can take care of this for you with pleasure!" DOMBROSKI replied, "Oh, what was that? I may want one also. LOL." To which POMBO stated, "A lovely tote that I'm certain your ladies might like also it is attached." According to POMBO, she understood DOMBROSKI's request to be for personal items he wanted for himself or for his family (wife, daughter and daughter-in-law) and not for use on Company A's military contract.

8. As a result, on or about December 11 and 12, 2014, at DOMBROSKI's direction, POMBO placed an online order from Apple.com for approximately \$6,051.72 worth of items using a Company A credit card. POMBO charged the order against a Company A military contract meant to provide support for modernizing and increasing the lethality and accuracy of weapons systems. Some of the items of value DOMBROSKI directed POMBO to order included luxury handbags and clutches from Coach and Michael Khors, valued at approximately \$1,300.00. He also directed POMBO to order Apple electronic products, smart cases, and protection plans valued at approximately \$3,200.00. As discussed below in paragraphs 20-22, federal law enforcement agents recovered numerous items from DOMBROSKI's home to include one of the luxury hand bags discussed above, still in its original packaging. Agents also recovered numerous other items from DOMBROSKI on December 11 and 12, 2014 order to include but not limited to, one Apple iPad mini and three Apple iPod music players, two of which were still in their original packaging. As mentioned below in paragraphs 20-22, DOMBROSKI told federal law enforcement agents that all items recovered from him, to include the luxury handbag, the Apple iPad mini and the Apple iPods, were for his personal use and enjoyment or the personal use and enjoyment of his family and friends and were not for use on any military contracts.

9. On or about December 19, 2014, DOMBROSKI sent an email from his government email account to POMBO's Company A work email account

directing her to purchase another item of value for his personal use and enjoyment and to charge it against a military contract. In the email, DOMBROSKI stated, "Amazon just got a resupply of the bag that I REALLY wanted. [link to the amazon account attached] In the light brown. Would it be too much trouble to order this? Will find a use for this and the one we already got...." POMBO replied, "It comes in Chocolate & black ... I assume you want Chocolate?" According to POMBO, she understood DOMBROSKI to be asking her to order another luxury bag in addition to the ones she order for him on or about December 4, 2014. The items DOMBROSKI directed POMBO to order on December 4, 2015 and on December 19, 2014, were large, brown leather, luxury, weekend travel bags valued at approximately \$250.00 each. The leather luxury weekend travel bags DOMBROSKI directed POMBO to order were not approved for use on a government contract, but instead, were items of value for his personal use and enjoyment.

10. As directed by DOMBROSKI, on or about January 8, 2015, POMBO placed an online order with Amazon.com for a second large, brown leather, luxury, weekend travel bag. As mentioned below in paragraphs 20-22s, federal agents recovered one of the luxury, weekend travel bags from DOMBROSKI and he told the recovering agents that the items recovered from him, to include the luxury, weekend travel bag, were for his personal use and enjoyment or the personal use and enjoyment of his family and friends and not for use on any government contract.

11. On or about June 9, 2015, DOMBROSKI sent an email from his government email account to POMBO's Company A work email account directing POMBO to purchase items of value for his personal use and to charge the purchase against a Company A military contract meant to provide support for the Munitions Engineering Technology Center "METC." In the email, DOMBROSKI stated "Hello Irene, I have a couple of other orders that we need here in addition to the printer. If you need anything also please include. Bob" According to POMBO, she understood DOMBROSKI's statement to mean that if she wanted to order anything for herself off the government contract, she had DOMBROSKI's approval to do so. DOMBROSKI attached two files to the email. One file contained his Apple Shopping cart and the other contained his shopping cart from LifeProof, an electronics accessory company. At DOMBROSKI's direction, POMBO placed an online order with Apple.com for approximately \$3,846.00 worth of Apple products and accessories. The order included an Apple Watch valued at approximately \$1,175, an Apple Thunderbolt Display monitor valued at \$929.00 and approximately \$1,400.00 worth of iPhone accessories to include seven (7) iPhone 6 cases (one in the color purple); four (4) iPhone 5/5s cases; nine (9) iPhone car mounts and three (3) iPhone belt clips. None of the items ordered on June 9, 2015, on DOMBROSKI's behalf were approved for use on Company A's government contract, but were instead items of value for DOMBROSKI's personal use and enjoyment. As described below in paragraphs 20-22, federal law enforcement agents recovered from DOMBROSKI the Apple

Watch and the Apple Thunderbolt Display monitor ordered on June 9, 2015 and DOMBROSKI told federal agents that the items were for his personal use and enjoyment and not for use on any Government contracts.

12. On or about May 19, 2015, GOOCH sent an email from his Government email account to NAYEE and POMBO's Company A email accounts directing NAYEE to purchase items of value for his personal use and enjoyment and to charge the purchase against a military contract. In the email GOOCH stated, "Indra, As discussed yesterday, here are the items I would like to request for order. Thanks! Joe." On or about May 21, 2015, NAYEE ordered approximately \$5,000.00 items of value from the Apple online store. The items include but are not limited to the following: one (1) Limited Addition Artist Barry McGee Beats by Dr. Dre blue tooth portable speakers; one (1) Beats by Dr. Dre wireless headphones; one (1) iPad Air 2 valued at approximately \$830.00; one (1) 15 inch Apple MAC Book Pro valued at approximately \$2,400.00; one (1) Apple Airport Time Capsule; various Apple accessories and software valued at approximately \$800.00. Various items ordered by NAYEE for GOOCH on May 21, 2015, were recovered by federal agents during the investigation. None of the items ordered were approved for use on any Company A military contract.

13. On or about February 18, 2016, PIER sent an email from her Government email account to NAYEE's Company A email account, directing NAYEE to purchase items of value for her personal use and enjoyment and to charge the purchase against a military contract. In the email, PIER stated, "Indra, As discussed. Thank you, Nicole." Attached to the email PIER sent to NAYEE was a "shopping bag" from the online Apple Store for approximately \$3,336.00 worth of Apple products to include one (1) MAC Book Pro valued about approximately \$2,500.00; one (1) Apple Airport Time capsule; and computer software and accessories for the MAC Book Pro.

14. As a result of PIER's February 18, 2016 email, on or about Feb 24, 2016, NAYEE ordered or directed to be ordered, the items requested by PIER. Numerous items ordered by NAYEE on February 24, 2016 were recovered by federal agent during the investigation. All items ordered were for PIER's personal use and enjoyment or the personal use and enjoyment of her family and friend. Moreover, none of the items were approved for use on any Company A military contract.

15. On or about August 22, 2016, DOMBROSKI sent an email from his government email account to POMBO's Company A work email account directing POMBO to purchase items of value for his personal use and enjoyment and to charge the purchase against a military contract. In the email, DOMBROSKI stated the following:

Hi Irene,

Attached you will find a quote for APPLE computers and IPADS to support my office's work on the EPMIS. We are developing a platform independent Enterprise wide data collection and reduction application to support to support [sic] engineering efforts on the Extended Range Canon Program. This app will be used to expedite and manage reporting to a variety of ARDEC's current program/project management systems. This app will also provide an integrated [sic] approach to working with our non-ARDEC customers and stakeholders.

Thanks

Bob

16. As a result, on or about August 26, 2016, at the direction of DOMBROSKI, POMBO placed an online order from the Apple Store for approximately \$7,652.00 worth of Apple products. The order included but was not limited to the following items: two (2) MAC Book Air laptop computers each valued at approximately \$1,600; two (2) high performance iPad Pros tablets each valued at approximately \$1,200; two (2) high performance iPad Pro smart keyboards valued at approximately \$170 each and two (2) Apple Smart Pencils valued at approximately \$99 each. Despite DOMBROSKI's claim that the Apple computers and iPads were to support "my office's work on the EPMIS,"⁴ all items ordered by DOMBROSKI were recovered from his home by federal agents. Significantly, other than one MAC Book Air laptop, all other items recovered were still in their original packaging despite having been ordered six months earlier. DOMBROSKI told federal agents that all items recovered from him were for his personal use and enjoyment and were not for use on any military contracts.

17. In addition, the investigation has revealed that NAYEE used the Company A's credit card to purchase or cause to be purchased at least four Apple computer products for his own personal use and use and enjoyment of his family members. For example, on or about July 13, 2010, one (1) Apple iPad, valued at approximately \$829.00 was purchased using Company A's credit card and was registered with Apple under NAYEE's name and home address.

18. Moreover, on or about September 5, 2013, an Apple iPod Touch- 5th generation, was purchased using Company A's credit card and was registered

⁴ EPMIS stands for "Enterprise Project Management Integrated Support", an IT integration program related to weapons systems.

with Apple under NAYEE's child's name using NAYEE's home address. NAYEE charged the purchase to a Government contract meant to provide support to a program focused on enhancing the lethality and accuracy of the military's heavy weaponry. In addition, on or about October 31, 2012, two (2) 13 inch Apple MAC Book Pro laptop computers valued at approximately \$2,400.00 were purchased using Company A's credit card and charged to the same Government contract. Both Apple MAC Book Pro laptop computers are currently registered to NAYEE and/or his family using NAYEE's home addresses. The investigation revealed that both laptops were in use by NAYEE and/or his family during 2018.

19. During the time of the charged conspiracy, NAYEE was POMBO's direct supervisor and was the most senior manager at Company A's New Jersey office. As a result, according to POMBO and other Company A employees, NAYEE knew about and approved all purchases described above made on behalf of DOMBROSKI, PIER and GOOCH. In addition, NAYEE saw all the merchandise at Company A's New Jersey office while it was stored there waiting for DOMBROSKI, GOOCH and PIER to pick it up. Furthermore, when POMBO confronted NAYEE about the possible illegal nature of the purchases, NAYEE told POMBO that she would be blamed for everything, as NAYEE intentionally kept his name off the purchases and instead had directed POMBO to handle all the paperwork.

20. On or about February 13, 2017, federal agents met with DOMBROSKI at his office on PICA. During that meeting DOMBROSKI stated, in sum and substance, that many of the items of value he requested NAYEE and POMBO to purchase were for his personal use and enjoyment and the personal use and enjoyment of his family and friends. He further stated that he was aware government employees should not purchase personal items or unauthorized products through a government contractor such as Company A. Later, during the same interview, he reiterated that he knew it was wrong for him to have personal items purchased off government contracts through Company A.

21. Later that day, on or about February 13, 2017, federal agents again met with DOMBROSKI; this time at his home. While at his home, they recovered from DOMBROSKI numerous items of value he had requested NAYEE and POMBO purchase for his personal use and enjoyment. DOMBROSKI told federal agents that the approximately 180 items recovered from his home that day were purchased through Company A and were charged to government military contracts. He further stated that the items of value were for his personal use and enjoyment and for the personal use and enjoyment of his family and friends. Some of the items recovered include but are not limited to the following: Five (5) Apple iPads; twelve (12) Apple iPods; seven (7) Apple laptop computers and two (2) Dell XPS gaming laptop computers; four (4) Apple desktop computers; five (5) Apple TVs; one (1) Apple Watch; two (2) Bose speakers sets; four (4) sets of Bose headphones; two (2) sets of Dr. Dre Beats headphones; one (1) Michael Khor's luxury handbag; two (2) luxury leather weekend bags; three (3) JawBone mini

portable jam-box blue-tooth speaker systems and approximately seventy four (74) other accessory items such as keyboards, adaptors, cases, stands, software programs and card readers.

22. At a later date, federal agents recovered additional items DOMBROSKI ordered off Company A's government contracts for his personal use and enjoyment to include, but not limited to: three (3) Apple TVs; seven (7) iPads; four (4) iPods; one (1) Apple MacBook laptop; two (2) Apple IMac personal desktop computers; one (1) Go Pro camera and Go-Pro accessories (July 2017 by attorney); and one (1) digital camera.

23. On or about, February 4, 2014, DOMBROSKI filed an OGE 450 for calendar year 2013 and failed to report any of the items of value he received during that calendar from Company A in furtherance of the conspiracy.

24. On or about February 10, 2015, DOMBROSKI filed an OGE 450 for calendar year 2014 and failed to report any of the items of value he received during that calendar year from Company A in furtherance of the conspiracy.

25. On or about February 22, 2016, DOMBROSKI filed an OGE 450 for calendar year 2015 and failed to report any of the items of value he received during that calendar year from Company A in furtherance of the conspiracy

26. On or about February 22, 2017, DOMBROSKI filed an OGE 450 for the calendar year 2016 and failed to report any of the items of value he received during that calendar year from Company A in furtherance of the conspiracy.

Conclusion

27. Over the course of the conspiracy, more than approximately \$150,000 and less than \$250,000 of items of value were purchased off Company A's government contracts that were not approved for use on any government contract and were instead for the personal use and enjoyment of DOMBROSKI, NAYEE and their co-conspirators or for the personal use and enjoyment of their family and friends.

28. In addition, DOMBROSKI failed to list any of the items of value he received from Company A on any OGE Form 450s he filed during the time of the conspiracy.

29. Based on the above, Your Affiant respectfully submits that sufficient probable cause has been set forth, establishing that DOMBROSKI and NAYEE have committed and have conspired to commit the offenses alleged in Attachment A.