

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal Number: 19-
ROBERT DOMBROSKI : 18 U.S.C. §§ 1001 and 1349

I N F O R M A T I O N

COUNT ONE

(Conspiracy to Commit Wire Fraud)

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

Background

1. At various times relevant to this Information:

Government and Government-Related Entities

- a. Picatinny Arsenal (“PICA”) was a United States Army installation located in Morris County, New Jersey. PICA’s Research, Development, and 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, a co-conspirator not named as a defendant herein, 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 had numerous, multi-million dollar government contracts originating with PICA, and, its New Jersey branch office provided support for the PICA contracts and had employees working as contractors on location at PICA.

c. The Defense Finance and Accounting Service (“DFAS”) was an agency of the DoD. DFAS was created to strengthen and reduce costs of financial management and operations within DoD. DFAS was responsible for administering finance and accounting services for the military and other members of the DoD. DFAS paid all DoD military and civilian personnel, retirees and annuitants, as well as major DoD contractors and vendors.

d. Public officials within the DoD, including employees at PICA, owed a fiduciary duty to the DoD, including its components, and to United States citizens, to perform the duties and responsibilities of their offices in the best interest of the DoD and the citizens of the United States.

e. 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, required certain employees to fully report their financial interests so that agency ethics officials could review the reports for possible conflicts of interest. Title 5, C.F.R., Part 2635.605, set forth

the requirements for each confidential report. The regulations required designated employees to file an annual Confidential Financial Disclosure Report, OGE Form 450, that covered information from the preceding calendar year.

f. Any employee who participated 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 was required to fill out an OGE Form 450. On the OGE Form 450, employees identified their financial interests to determine whether the interests conflicted with their official duties. Ethics officers reviewed the filings to ensure that the agency had complied with the filing requirements and to identify any financial interests that potentially conflicted with a filer's official duties. The OGE Form 450 also required 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.

Individuals

g. Defendant Robert Dombroski ("DOMBROSKI") was a resident of New Jersey and served as a Senior Products Manager for advanced weapons at PICA. DOMBROSKI previously held the position of Senior Associate for Advanced Weapons and worked on and supervised contract projects with Company A. As Senior Associate for Advanced Weapons, DOMBROSKI

influenced the funding for Company A's projects and influenced whether or not Company A would be awarded future government contracts. During the time of the conspiracy, DOMBROSKI was required to file an OGE Form 450 every 12 months.

h. Co-Conspirator One ("CC-1"), a co-conspirator not named as a defendant herein, was a resident of Middlesex County, New Jersey and was the PICA Division Director at Company A. As the PICA Division Director, CC-1 had direct oversight and control over how Company A executed the government contracts it had with PICA, and CC-1 supervised and directly managed all branch employees. CC-1 was the primary point of contact at Company A for PICA employees, including DOMBROSKI. CC-1 reported directly to Company's A senior management.

i. Co-Conspirator Two ("CC-2"), a co-conspirator not named as a defendant herein, was a resident of New Jersey. CC-2 was a Senior Program manager for Company A and worked directly for CC-1. CC-2 had direct contact with PICA employees, including DOMBROSKI, and needed approval from CC-1 in order to place orders on Company A's government contracts for PICA employees. CC-2 was an additional point of contact at Company A for PICA employees, including DOMBROSKI.

The Conspiracy

2. From at least as early as in or about 2010 through in or about December 2017, in Morris County, in the District of New Jersey and elsewhere, the defendant,

ROBERT DOMBROSKI,

did knowingly and intentionally conspire and agree with CC-1, CC-2, and others to devise a scheme and artifice to defraud Company A and the United States Government, and to obtain items of value, 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 communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

Object of the Conspiracy

3. The object of the conspiracy was for DOMBROSKI, CC-1, CC-2 and their co-conspirators to defraud Company A and the United States government by fraudulently obtaining items of value, such as Apple electronic products and other luxury brand items, from Company A's government contracts, by falsely claiming the items of value as materials needed on legitimate Government contracts, when in fact, the items of value were for DOMBROSKI, CC-1 and CC-2's personal use and the personal use of their friends and family. The items of value were neither part of, nor authorized by, the government contracts issued to Company A.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that DOMBROSKI sent numerous emails from his Government email account to CC-1's and CC-2's Company A email accounts for the purpose of fraudulently obtaining items of value, such as Apple electronic products and other luxury items, from Company A's government contracts.

5. It was further part of the conspiracy that on or about April 14, 2014, DOMBROSKI sent an email from his Government email account to CC-1's and CC-2's Company A email accounts requesting that they purchase items of value for DOMBROSKI's personal use and that they charge the purchases against a Company A government contract that was intended to provide support for modernizing and increasing the lethality and accuracy of weapons systems.

6. It was further part of the conspiracy that, from on or about April 16 through on or about April 22, 2014, based upon the email request described above in paragraph 5, CC-2 placed numerous orders at the online Apple store and the Rockaway New Jersey Apple Store for thousands of dollars worth of personal items.

7. It was further part of the conspiracy that on or about June 9, 2015, DOMBROSKI sent an email from his Government email account to CC-2's Company A email account directing CC-2 to purchase items of value for DOMBROSKI's personal use and to charge the purchases against a Company A government contract meant to provide support for the Munitions Engineering Technology Center.

8. It was further part of the conspiracy that on or about August 22, 2016, DOMBROSKI sent an email from his Government email account to CC-2's Company A email account directing CC-2 to purchase items of value for DOMBROSKI's personal use and to charge the purchase against a military contract.

9. It was further part of the conspiracy that on or about August 26, 2016, at the direction of DOMBROSKI, CC-2 placed an online order from the Apple store for thousands of dollars worth of products for DOMBROSKI's personal use and not for use on any military contracts.

10. It was further part of the conspiracy that DOMBROSKI made materially false, fictitious and fraudulent statements and representations on his OGE Form 450s by falsifying and concealing the receipt of any of the items of value he fraudulently obtained through the scheme.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO THROUGH FIVE

(False Statements)

1. The allegations set forth in paragraph 1 and paragraphs 3 through 10 of Count One of this Information are realleged as if set forth in full herein.

2. On or about the dates set forth below, in Morris County, in the District of New Jersey and elsewhere, the 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 on OGE Form 450s, filed with the United States Office of Government Ethics as follows:

COUNT	Approximate Date of Filing	Document Filed
2	February 4, 2014	OGE Form 450
3	February 10, 2015	OGE Form 450
4	February 22, 2016	OGE Form 450
5	February 22, 2017	OGE Form 450

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



CRAIG CARPENITO
United States Attorney
District of New Jersey

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**United States District Court
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UNITED STATES OF AMERICA

v.

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INFORMATION FOR

18 U.S.C. §§ 1001 and 1349

CRAIG CARPENITO

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