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LERK U.S. DISTRICT COUR
SENTAL DISTRICT COUR
SANTA ANA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

STUART CARSON,

SA CR No. 09-00077(C)-JVS

STUART CARSON,

SA CR No. 09-00077(C)-JVS

SA CR No. 09-0007(C)-JVS

SA CR No. 09-0007(C)-

The United States Attorney charges:

INTRODUCTION

At all times relevant to this Superseding Information:

1. The Foreign Corrupt Practices Act of 1977 ("FCPA"), as amended, Title 15, United States Code, Sections 78dd-1, et seq., was enacted by Congress for the purpose of making it unlawful, among other things, for certain United States persons and business entities to act corruptly in furtherance of an offer, promise, authorization, or payment of money or anything of value to a foreign government official (or to any person, while knowing

that the money or thing of value will be offered, given or promised to a foreign official), for the purpose of securing any improper advantage, or of assisting in obtaining or retaining business for and with, or directing business to, any person.

- 2. Control Components, Inc. ("CCI") was a Delaware corporation headquartered in Rancho Santa Margarita, California, that designed and manufactured service control valves for use in the nuclear, oil and gas, and power generation industries worldwide. CCI sold its products to both state-owned enterprises and private companies in approximately thirty countries around the world. Because CCI was organized under the laws of a State of the United States and had its principal place of business in the United States, it was a "domestic concern" as that term is defined in the FCPA, Title 15, United States Code, Section 78dd-2(h)(1).
- 3. Defendant STUART CARSON ("S. CARSON") was the President of Control Components, Inc. ("CCI") from in or around 1989 through in or around 2005. Defendant S. CARSON was a citizen of the United States and an employee and agent of CCI and thus a "domestic concern" as that term is defined and used in the FCPA, Title 15, United States Code, Section 78dd-2(h)(1).
- 4. CCI's customers included Turow Power Plant ("Turow") in Poland. Turow was a department, agency, and instrumentality of a foreign government, within the meaning of the FCPA, Title 15, United States Code, Section 78dd-2(h)(2)(A). The officers and employees of Turow were "foreign officials" within the meaning of the FCPA, Title 15, United States Code, Section 78dd-2(h)(2)(A).

COUNT ONE

[15 U.S.C. § 78dd-2]

- 5. Paragraphs 1 through 4 are realleged and incorporated by reference as through set forth herein.
- 6. On or about March 8, 2000, in the Central District of California and elsewhere, defendant S. CARSON, did willfully make use of the mails and means and instrumentalities of interstate commerce corruptly in furtherance of an offer, payment, promise to pay, and authorization of the payment of any money, offer, gift, promise to give, and authorization of the giving of anything of value to a foreign official, and to a person, while knowing that all or a portion of such money and thing of value would be offered, given, and promised to a foreign official, for purposes of: (i) influencing acts and decisions of such foreign official in his or her official capacity; (ii) inducing such foreign official to do and omit to do acts in violation of the lawful duty of such official; (iii) securing an improper advantage; and (iv) inducing such foreign official to use his influence with a foreign government and instrumentalities thereof to affect and influence acts and decisions of such government and instrumentality, in order to assist defendant S. CARSON and others in obtaining and retaining business for and with, and directing business to, CCI and others, to wit, defendant S. CARSON corruptly caused an e-mail to be sent authorizing the payment of approximately \$16,000 to officials of Turow for the purpose of securing Turow's business.

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In violation of Title 15, United States Code, Section 78dd-1 2 2. ANDRÉ BIROTTE JR. 3 United States Attorney 4 ROBERT E. DUGDALE Assistant United States Attorney 5 Chief, Criminal Division 6 DENNISE D. WILLETT Assistant United States Attorney 7 Chief, Santa Ana Branch Office 8 9 DOUGLAS F. McCORMICK 10 Assistant United States Attorney Deputy Chief, Santa Ana Branch Office 11 KATHLEEN McGOVERN 12 Acting Chief, Fraud Section Criminal Division 13 United States Department of Justice 14 15 CHARLES G. LA BELLA 16 Deputy Chief, Fraud Section Criminal Division 17 United States Department of Justice 18 ANDREW GENTIN Trial Attorney, Fraud Section 19 Criminal Division United States Department of Justice 20 21 22 23 24 25 26 27

28