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U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
SANTA ANA, CALIF.

FILED

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
MARTIN ERIC SELF, )  
 )  
 )  
Defendant. )  
 )  
 )

~~SACR 08 - 00110~~  
I N F O R M A T I O N  
[15 U.S.C. § 78dd-2: Foreign  
Corrupt Practices Act]

The United States Attorney charges:

INTRODUCTORY ALLEGATIONS

At all times relevant to this 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, among other things, making it unlawful for certain classes of persons and entities to act corruptly in furtherance of an offer, promise, authorization, or payment of money or anything of value to a foreign government official for the purpose of securing any improper advantage, or of obtaining or retaining business for, or directing business to, any person.

1 2. Pacific Consolidated Industries, LP ("PCI"),  
2 headquartered in Santa Ana, California, was a company engaged in  
3 the manufacture of Air Separation Units ("ASUs") and Nitrogen  
4 Concentration Trolleys ("NCTs") for defense departments  
5 throughout the world. ASUs and NCTs generate oxygen and nitrogen  
6 in remote, extreme, and confined locations for aircraft support  
7 and on-site military hospitals.

8 3. Defendant MARTIN ERIC SELF was a citizen of the United  
9 States and thus was a "domestic concern" as that term is defined  
10 in the FCPA. Defendant SELF was the President and part owner of  
11 PCI. As President, defendant SELF was a signatory for PCI  
12 agreements and bank accounts.

13 4. The United Kingdom Ministry of Defense ("UK-MOD"),  
14 Defense Logistics Organization, Royal Air Force Base Wyton in  
15 Cambridgeshire, England was a customer of PCI. UK-MOD, including  
16 its Defense Logistics Organization, was a department, agency, and  
17 instrumentality of the United Kingdom.

18 5. The "Project Manager" was a civil servant and an  
19 employee of UK-MOD. As an employee of UK-MOD, the Project  
20 Manager was a "foreign official" as that term is defined in the  
21 FCPA. The Project Manager was involved in the procurement of  
22 certain equipment for UK-MOD and took part in the review of the  
23 requests for proposals otherwise known as "tenders" for UK-MOD  
24 contracts, including the UK-MOD contracts for ASUs and NCTs. As  
25 a result of his position at UK-MOD, the Project Manager was able  
26 to influence the awarding of UK-MOD contracts for services and  
27 equipment.

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1           6.    The "Relative" was a relative of the Project Manager  
2 residing in the United Kingdom. The Relative was listed as a  
3 party to bogus marketing agreements with PCI designed to disguise  
4 bribery payments as commissions on the ASU contracts awarded to  
5 PCI that were allegedly brokered by the Relative.

6           7.    The "Relative's Bank Account," is one of the Relative's  
7 bank accounts located at Lloyds Bank in England.

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COUNTS ONE AND TWO

[15 U.S.C. § 78dd-2, 18 U.S.C. § 2]

On or about the dates set forth below, in the Central District of California, and elsewhere, defendant MARTIN E. SELF, a citizen of the United States and a domestic concern within the meaning of the Foreign Corrupt Practices Act, willfully made use of a means and instrumentality of interstate and international 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 any foreign official for purposes of:

(i) influencing acts and decisions of such foreign official in his 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 foreign governments and instrumentalities thereof to affect and influence acts and decisions of such governments and instrumentalities in order to assist defendant SELF and others, known and unknown to the Grand Jury, in obtaining and retaining business for and with, and directing business to, Pacific Consolidated Industries, LP ("PCI") as described below:

<u>COUNT</u>	<u>DATE</u>	<u>WIRE TRANSFER</u>
ONE	3/14/00	Wire transfer of \$5,000.00 from PCI's Wells Fargo account in Santa Ana, California, to the Relative's Bank Account at Lloyds Bank, England

1	<u>COUNT</u>	<u>DATE</u>	<u>WIRE TRANSFER</u>
2	TWO	4/23/02	Wire transfer of \$14,280.18 from PCI's
3			Comerica account in Costa Mesa,
4			California, to the Relative's Bank
5			Account at Lloyds Bank, England

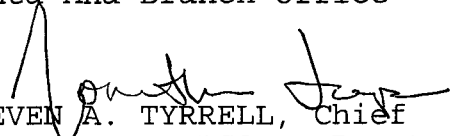
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7 THOMAS P. O'BRIEN  
United States Attorney

8 CHRISTINE C. EWELL  
9 Assistant United States Attorney  
Chief, Criminal Division

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11 

12 ROBB C. ADKINS  
13 Assistant United States Attorney  
Chief, Santa Ana Branch Office

14 JENNIFER WAIER  
15 Assistant United States Attorney  
Santa Ana Branch Office

16  
17   
STEVEN A. TYRRELL, Chief  
18 MARK D. MENDELSON, Deputy Chief  
19 Fraud Section, Criminal Division  
U.S. Department of Justice

20 JONATHAN E. LOPEZ, Trial Attorney  
21 Fraud Section, Criminal Division  
U.S. Department of Justice

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