

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

unsealed

UNITED STATES OF AMERICA

v.

DIANA BAKIR DEMILTA,

Defendant.

~~FILED UNDER SEAL~~

Criminal No.

Filed: November __, 2007

Violation: 18 U.S.C. § 1343

CRIMINAL INFORMATION

THE UNITED STATES OF AMERICA, THROUGH ITS ATTORNEYS, CHARGES:

I DEFENDANT

1. For purposes of this Information, the “relevant period” is from in or about September 2004 until in or about March 2005. During the relevant period, Diana Bakir Demilta worked as the President of Global-Link Distribution LLC, a general contracting company organized and existing under the laws of Delaware, with its principal place of business and operations in the International Zone, Baghdad, Iraq and with an address in Port Orange, FL.

II BACKGROUND

2. On May 11, 2004, the White House issued National Security Presidential Directive 36, assigning principal responsibility for training, developing, and equipping the Iraqi Security Forces to the United States Department of Defense Central Command (“CENTCOM”). As part of its efforts, CENTCOM established the Multi-National Security Transition Command - Iraq (“MNSTC-I”), which reported to CENTCOM through the Multi-National Force (“MNF”).

3. MNSTC-I's mission was to provide regional security by assisting the Iraqi Government in the development of Iraqi Security Forces. During the relevant period, MNSTC-I oversaw the Civilian Police Assistance Training Team ("CPATT").

4. In an email of September 20, 2004, Demilta was advised by Person A, a Senior Contracting Advisor for CPATT, of upcoming CPATT contract #W914NS-05-M-9120 for 540 Level IIIA bullet-proof vests for use by Iraqi security forces.

5. During the relevant period, MNSTC-I's and CPATT's contracting procedures were regulated by the Federal Acquisition Regulations ("FAR").

6. For the award of CPATT contract #W914NS-05-M-9120, FAR §§ 12.203, 13.104 required a competitive bidding process. In order "to promote competition to the maximum extent practicable," the FAR describes a competitive bidding process as one where the contracting office receives at least three independent bids. FAR § 13.104. Contract #W914NS-05-M-9120 was funded by U.S. money allocated by Congress for the reconstruction of Iraq.

III DESCRIPTION OF THE OFFENSE

7. During the relevant period, Demilta knowingly and wilfully devised a scheme to defraud the United States of money by means of materially false and fraudulent pretenses and representations. This scheme consisted of Demilta fraudulently securing contract #W914NS-05-M-9120 for 540 Level IIIA bullet-proof vests, and payment for that contract, by subverting the applicable contracting requirements through the submission of multiple sham bids.

8. As a part of the scheme, Demilta deceptively used dormant and related companies to submit apparently competitive bids for contract #W914NS-05-M-9120, thereby fraudulently

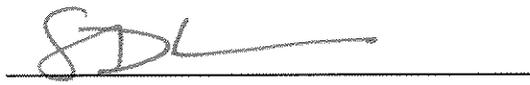
inducing the award of and payment for that contract, by creating the impression of the required competitive contracting process, when in fact, no competition existed.

9. During the relevant period, for purposes of executing this scheme to defraud, Demilta transmitted and caused to be transmitted writings, signs, signals, pictures, and sounds by wire communications in interstate and foreign commerce, including various emails regarding the creation and submission of sham bids sent to and from Demilta's Yahoo! account, located in Sunnyvale, California, from and to places outside the State of California, and email and attached accounting documents transmitted between Iraq and the United States Department of Defense, Defense Finance and Accounting Service in Rome, New York.

ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 1343.


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Dated: October __, 2007