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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA
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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

UNITED STATES OF AMERICA,)	SA CR No. 09-00077(E) -JVS
)	
Plaintiff,)	<u>S U P E R S E D I N G</u>
)	<u>I N F O R M A T I O N</u>
v.)	
)	[15 U.S.C. § 78dd-2: Foreign
DAVID EDMONDS,)	Corrupt Practices Act]
)	
Defendant.)	
)	
)	
)	
)	

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

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

5 2. Control Components, Inc. ("CCI") was a Delaware
6 corporation headquartered in Rancho Santa Margarita, California,
7 that designed and manufactured service control valves for use in
8 the nuclear, oil and gas, and power generation industries
9 worldwide. CCI sold its products to both state-owned enterprises
10 and private companies in approximately thirty countries around
11 the world. Because CCI was organized under the laws of a State
12 of the United States and had its principal place of business in
13 the United States, it was a "domestic concern" as that term is
14 defined in the FCPA, Title 15, United States Code, Section 78dd-
15 2(h)(1).

16 3. Defendant DAVID EDMONDS ("EDMONDS") was Vice-President
17 of Worldwide Customer Service at CCI from in or around 2000
18 through in or around 2007. Defendant EDMONDS was a citizen of
19 the United States and an employee and agent of CCI and thus a
20 "domestic concern" as that term is defined and used in the FCPA,
21 Title 15, United States Code, Section 78dd-2(h)(1).

22 4. CCI's customers included Public Power Corporation of
23 Greece ("Public Power") in Greece. Public Power was a
24 department, agency, and instrumentality of a foreign government,
25 within the meaning of the FCPA, Title 15, United States Code,
26 Section 78dd-2(h)(2)(A). The officers and employees of Public
27 Power were "foreign officials" within the meaning of the FCPA,
28 Title 15, United States Code, Section 78dd-2(h)(2)(A).

1 COUNT ONE

2 [15 U.S.C. § 78dd-2]

3 5. Paragraphs 1 through 4 are realleged and incorporated
4 by reference as through set forth herein.

5 6. On or about May 15, 2000, in the Central District of
6 California and elsewhere, defendant EDMONDS, did willfully make
7 use of the mails and means and instrumentalities of interstate
8 commerce corruptly in furtherance of an offer, payment, promise
9 to pay, and authorization of the payment of any money, offer,
10 gift, promise to give, and authorization of the giving of
11 anything of value to a foreign official, and to a person, while
12 knowing that all or a portion of such money and thing of value
13 would be offered, given, and promised to a foreign official, for
14 purposes of: (i) influencing acts and decisions of such foreign
15 official in his or her official capacity; (ii) inducing such
16 foreign official to do and omit to do acts in violation of the
17 lawful duty of such official; (iii) securing an improper
18 advantage; and (iv) inducing such foreign official to use his
19 influence with a foreign government and instrumentalities thereof
20 to affect and influence acts and decisions of such government and
21 instrumentality, in order to assist defendant EDMONDS and others
22 in obtaining and retaining business for and with, and directing
23 business to, CCI and others, to wit, defendant EDMONDS corruptly
24 caused an e-mail to be sent authorizing the payment of
25 approximately \$45,000 to officials of Public Power for the
26 purpose of securing Public Power's business.

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1 In violation of Title 15, United States Code, Section 78dd-

2 2.

3 ANDRÉ BIROTTE JR.
4 United States Attorney

5 ROBERT E. DUGDALE
6 Assistant United States Attorney
7 Chief, Criminal Division

8 

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