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

FILED

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

2 2.


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7 Chief, Criminal Division

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