

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

| | | |
|--------------------------|---|--|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | |
| |) | |
| LEROY WITTLE |) | Violation: Title 18, United States Code, Section 201(c)(1)(A) |

COUNT ONE

The UNITED STATES ATTORNEY charges:

1. At times material to this count:

a. Lawson Products, Inc. (“Lawson”) was a publicly traded company located in Des Plaines, Illinois, that sold products to various entities in the public and private sectors. Lawson’s products included hardware, tools, and chemicals. Lawson was the parent company of several subsidiaries. Lawson and its subsidiaries combined to generate approximately \$400 million in sales annually.

b. Lawson sold its products through sales agents. These sales agents generally were permitted by Lawson to negotiate with their customers over the prices their customers would pay for Lawson’s products. As a general rule, sales agents’ commissions were greater if they sold products at higher prices.

c. Until approximately December 15, 2005, Lawson maintained programs through which sales agents would provide items of value to individuals for purchasing Lawson products on behalf of those individuals’ employers. As a general rule, sales agents could provide items of greater value to the individuals when those individuals purchased more products and at higher prices on behalf of their employers.

d. Defendant LEROY WITTLE was a district manger with Lawson and was responsible for selling products to Lawson customers located in the Washington, D.C. area.

e. Individual A was an employee of an agency in the Executive Branch of the United States. In Individual A's capacity, Individual A had the authority to request that the agency of the United States purchase items, including hardware, tools, chemicals, and solvents.

2. In or about November 2004, in the Eastern District of Virginia,

LEROY WITTLE,

defendant herein, directly and indirectly, gave, offered, and promised a \$300 gift card to a public official, namely, Individual A, for and because of an official act performed by Individual A, namely, the decision to purchase merchandise from WITTLE and Lawson Products on behalf of an agency in the Executive Branch of the United States;

In violation of Title 18, United States Code, Section 201(c)(1)(A).

UNITED STATES ATTORNEY