

ATTACHMENT “A” TO CRIMINAL COMPLAINT

- (Count 1) Beginning by early 1997, and continuing until the present, the defendant knowingly conspired with others to eliminate competition, fix prices, and rig bids submitted for street, highway, and airport construction projects let by the State of Wisconsin and various other bidding authorities within the state of Wisconsin, in unreasonable restraint of interstate and foreign trade and commerce in violation of Title 15, United States Code, Section 1.
- (Count 2) Beginning by early 1997, and continuing until the present, for the purpose of executing a scheme to defraud the State of Wisconsin and others, a scheme which involved material misrepresentations and omissions, the defendant knowingly caused writings, namely “rigged” bids for publicly-funded construction projects, to be transmitted by means of interstate wire communication between Wisconsin and Florida, in violation of Title 18, United States Code, Section 1343.