

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)

v.)

KENNY INTERNATIONAL CORP.)
_____)

Criminal No. 79-00372

Violation: 15 U.S.C. 78dd-2(a) (2)

FILED

AUG 2 1979

INFORMATION

The United States Attorney charges:

JAMES F. DAVEY, Clerk

COUNT I

(1) At all times relevant herein:

(a) the defendant, KENNY INTERNATIONAL CORP. ("KENNY INTERNATIONAL"), was a domestic concern as that term is defined in Section 104(d)(1) of the Foreign Corrupt Practices Act of 1977 [the "Act"] [15 U.S.C. 78dd-2(d)(1)], to wit, a corporation organized and existing under the laws of the State of New York. It was engaged, directly and through affiliated corporations, in the distribution and sale of postage stamps of the Cook Islands, an independent South Pacific nation of 18,000 persons freely associated with New Zealand for the purposes of external affairs and defense.

(b) Finbar B. Kenny ("Kenny"), has been Chairman of the Board, President and majority shareholder of the defendant KENNY INTERNATIONAL.

(c) The Cook Islands Party was a foreign political party as that term is used in Section 104(a)(2) of the Act [15 U.S.C. 78dd-2(a)(2)], to wit, a political party in the Cook Islands.


GESELL, J.

(d) Sir Albert Henry was an official of a foreign political party, as that term is used in Section 104(a)(2) of the Act [15 U.S.C. 78dd-2(a)(2)], to wit, the Leader of the Cook Islands Party, and was also the Premier of the Cook Islands.

(2) On or about February 17, 1978, Kenny, as an officer and director of, and on behalf of, the defendant KENNY INTERNATIONAL, in the District of Hawaii, corruptly used an instrumentality of interstate commerce, to wit, a commercial aircraft, in furtherance of an offer, payment and promise to pay money, to wit \$NZ337,000., to the Cook Islands Party through Sir Albert Henry, an official of said foreign political party, to induce said party and official to use its and his influence to affect and influence an act of the Government of the Cook Islands, to wit, the renewal of a certain stamp distribution agreement between Kenny and the Government of the Cook Islands, in order to assist the defendant KENNY INTERNATIONAL to retain its business in connection with the distribution of Cook Islands postage stamps, all in violation of Section 104(a)(2) of the Foreign Corrupt Practices Act of 1977 [15 U.S.C. 78dd-2(a)(2)].



 CARL S. RAUP *by P/B*
 United States Attorney



 PETER B. CLARK
 Attorney
 U.S. Department of Justice