

CRIMINAL INFORMATION
NO. 1:94-CR-_____

THE U.S. ATTORNEY CHARGES THAT:

1. At all relevant times:
 - a. Lockheed Corporation (hereinafter Lockheed) was a Delaware corporation based in Calabasas, California. Lockheed manufactured and marketed a wide range of aircraft and armaments, primarily for use in the defense industry.
 - b. As part of U.S. foreign policy, the U.S. Congress authorized certain loans and grants in aid to Egypt. These loans and grants were funded under the Foreign Military Financing (FMF) Program of the U.S. Department of Defense (DoD), which provided financing for foreign governments to purchase military equipment and armaments from U.S. manufacturers.
 - c. Lockheed and certain of its employees and officials were authorized by law of the United States to make and give certificates, other writings, and documents in connection with sales to foreign governments which were financed through the FMF program.

2. On or about August 15, 1990, in the Northern District of Georgia, and elsewhere, the defendant, ALLEN R. LOVE, aided, abetted, and indirectly caused the Lockheed Corporation to knowingly make and deliver as true a writing, to wit, a Termination Agreement which, among other things, falsely represented that a termination payment of \$1 million to Lockheed's consultant, Dr. Leila Takla, Inc., was not made in connection with a sale on April 15, 1989, of three Lockheed-produced C-130-H-30 Hercules aircraft to Egypt. More specifically, Defendant LOVE indirectly caused, assisted and facilitated the final execution of the Termination Agreement by transmitting to Suleiman Nassar in Geneva, Switzerland, via DHL shipment, the Termination Agreement with instructions that it be executed by TAKLA, INC. In truth and in fact, as defendant LOVE well knew, said payment was to be made in connection with, and, in primary part, as a result of the sale of said aircraft to Egypt and, there-

IN THE U.S. DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA:

v.

ALLEN R. LOVE

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fore, was, in effect, a commission, in violation of Title
18, U.S. Code, §§ 1018 and 2.

GERRILYN G. BRILL
FIRST ASST. U.S. ATTORNEY

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