

*DJ*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

JUDGE LEINENWEBER

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 SHERYL A. AYENI, )  
 )  
 )  
 Defendant. )

INFORMATION

**10 CR 831**

Case No.

MAGISTRATE JUDGE MASON

Violation: 18 U.S.C. § 201(b)

**FILED** *epv*

INFORMATION

The United States, by and through its attorneys, charges that:

OCT - 4 2010  
OCT - 4, 2010  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

BACKGROUND

1. For the purposes of this Information, the "relevant period" is that period from in or about March 2004 until in or about April 2005. During the relevant period, SHERYL A. AYENI ("defendant") was a Staff Sergeant in the United States Army, deployed to Bagram Airfield ("BAF"), Afghanistan as the Non-Commissioned Officer in Charge ("NCOIC") of Commercial Vendor Services. During the relevant period, as a Staff Sergeant in the United States Army, defendant was a public official within the meaning of 18 U.S.C. § 201(a)(1).

2. As part of her deployment to BAF, defendant was assigned to work in the Finance Office, where, among other things, she was responsible for making payment to Department of Defense ("DOD") contractors for goods and services provided at BAF. When presented with a properly signed Material Inspection and Receiving Report ("Form DD-250"), defendant would arrange for the contractors to be paid, usually in cash. Pursuant to regulations in place during the relevant period, U.S. citizens were paid in U.S. dollars, whereas Afghan citizens were paid in Afghan dollars.

3. During the relevant period, Person One was President of Contractor A, a military contractor that provided, among other things, concrete bunkers and barriers and trucking services, known as "line haul," at BAF. Person Two was Vice President of Contractor A.

4. During the relevant period, Contractor B was a military contractor doing business at BAF, which defendant understood was owned by an Afghan citizen.

5. Whenever this Information refers to any act, deed, or transaction of any company, it means that the company engaged in the act, deed, or transaction by or through its officers, directors, employees, agents or other representatives while they were actively engaged in the management, direction, control, or transaction of its business or affairs.

**COUNT ONE**  
**18 U.S.C. § 201(b)**  
**(Bribery)**

6. Paragraphs 1 through 5 of this Information are incorporated by reference as if fully stated herein, and the following is further alleged:

7. From in or around March 2004 until in or around April 2005, in Afghanistan and elsewhere, defendant

**SHERYL A. AYENI**

a public official, knowingly and unlawfully, directly and indirectly, corruptly sought, received, accepted, and agreed to receive and accept things of value in return for being influenced in the performance of official acts, in return for being influenced to commit and aid in committing and to collude in and allow fraud on the United States, and in return for being induced to do and omit to do acts in violation of her official duties; that is, defendant corruptly sought, received, and

accepted approximately \$30,000 from Person One, Person Two, and their designees, in return for permitting Contractor B to fraudulently receive payment in United States dollars.

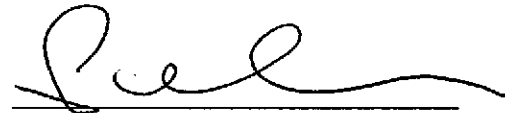
**(All in violation of Title 18, United States Code, Section 201(b)(2)(A), (B), (C), and the extraterritorial venue provision of Title 18, United States Code, Section 3238).**

DATED: Oct. 1, 2010, at Washington, D.C.

FOR THE UNITED STATES

DENIS MCINERNEY  
Chief, Fraud Section  
United States Department of Justice

By:



MARK W. PLETCHER  
EMILY W. ALLEN  
Trial Attorneys, U.S. Department of Justice  
Criminal and Antitrust Divisions