

United States District Court

For The District of Columbia

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

YUSUF ACAR

CASE NUMBER:

XXXXXXXXXXXXXXXXXX, NW
Washington, D.C. 20008
DOB: XXXXXXXXXXXXXX, 1968

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

COUNT ONE
(Conspiracy to Commit Bribery)

Between in or about October 2008 and the present in a continuing course of conduct, in the District of Columbia and elsewhere, YUSUF ACAR and SUSHIL BANSAL did knowingly combine, conspire, confederate and agree with each other and others known and unknown, to commit the offense of bribery of a public official by inducing Yusuf Acar to do an act or omit to do an act in violation of his official duty in return for a thing of value. (Conspiracy to Commit Bribery of a Public Official in violation of Title 18, United States Code, Sections 201 and 371).

COUNT TWO
(Honest Services Wire Fraud)

At all times material to this complaint Yusuf Acar was an officer or employee of the District of Columbia Office of the Chief Technology Officer.

Between in or about October 2008 and the present in a continuing course of conduct, in the District of Columbia and elsewhere, Yusuf Acar and Sushil Bansal devised and intended to devise a scheme and artifice to defraud and deprive the District of Columbia Government and the citizens of the District of Columbia, of their right to the honest services of Yusuf Acar, performed free from deceit, favoritism, bias, self-enrichment, self-dealing, concealment, and conflict of interest.

On or about December 18, 2008, in the District of Columbia, for the purpose of executing the scheme and artifice to defraud and deprive, Yusuf Acar knowingly transmitted and caused to be transmitted by means of wire

communication certain signals in interstate commerce, that is, the falsified timesheets of Khalid Rahman, sent via facsimile from the District of Columbia to the Commonwealth of Virginia. (Wire Fraud Deprivation of Honest Services of a Public Official , in violation of Title 18, United States Code, Sections 1343, 1346).

COUNT THREE
(Conflict of Interest)

Between in or about October 2008 through the present in a continuing course of conduct, in the District of Columbia, Yusuf Acar, being an officer and employee of the District of Columbia, knowingly and willfully participated personally and substantially as a Government officer and employee, through decision, approval, recommendation, the rendering of advice and otherwise, relating to awarding contracts, purchase orders and selecting vendors, in which Yusuf Acar had a financial interest. (Acts Affecting a Personal Financial Interest, in violation of Title 18 U.S.C., Section 208).

COUNT FOUR
(Conspiracy to Launder Monetary Instruments)

Between in or about October 2008 and the present, in a continuing course of conduct, in the District of Columbia and elsewhere, YUSUF ACAR, SUSHIL BANSAL and others conspired to commit the offense of laundering monetary instruments, in violation of 18 U.S.C. § 1956. (Conspiracy to Commit the Offense of Laundering Monetary Instruments, in violation of Title 18 U.S.C., Sections 1956(a)(1)-(2), 1956(h)).

I further state that I am Andrew Sekela, Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

See Attached Affidavit

Continued on the attached sheet and made a part hereof: Yes No

AUSA, Thomas J. Hibarger, (202) 514-7385

AUSA, Glenn Leon, (202) 305-0174

Signature of Complainant

Andrew Sekela, Special Agent

Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

Date

at

Washington, D.C.

City and State

Name & Title of Judicial Officer

Signature of Judicial Officer