

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	Criminal No.
	:	
	:	VIOLATION:
	:	
v.	:	18 U.S. C. §§ 208(a), 216(a)(2)
	:	(Criminal Conflict of Interest)
LONDRA S. WATSON,	:	
	:	
Defendant.	:	

INFORMATION

The United States Attorney informs the Court that:

1. Defendant **LONDRA S. WATSON** was employed with the District of Columbia Water and Sewage Authority ("DC Water") since 1981. His official title was Supervisor of Documents & Permits and his office was located at the DC Water building on 1104 4th Street, SW, Washington, D.C.
2. DC Water was an independent authority of the District of Columbia responsible for, among other things, the delivery of water and wastewater treatment services to the District and regional customers and to improve and replace the water and sewer infrastructure.
3. District of Columbia regulations required that all residents, private companies and government agencies must obtain approval in the form of a permit from DC Water prior to performing any work that directly or indirectly affects the public water and/or sewerage systems. The Permit Operations Department was the starting point for all of DC Water's permit services.
4. Before a permit was issued, the application was reviewed by a DC Water Official to insure that projects were done safely and properly and complied with DC Water requirements.

More complex projects required that plans be reviewed and approved by the Department of Engineering and Technical Services to verify that designs were in conformance with DC Water Standards, before a permit was issued.

5. On or about November 19, 2007, defendant **LONDRA S. WATSON** started a company named ARDNOL of DC LLC (which is "Londra" spelled backwards). ARDNOL of DC prepared permit applications, drawings, designs and related documents that were necessary to expedite the permit application and approval process on behalf of its clients. Defendant **LONDRA S. WATSON** was the registered agent, sole employee and owner of ARDNOL of DC. In addition, he was the sole signatory of all ARDNOL of DC bank accounts.

COUNT ONE
(Criminal Conflict of Interest)

6. Paragraphs one through five are re-alleged and incorporated by reference as if fully set forth herein.

7. From in or about November 2007 through in or about February 2012, in the District of Columbia and elsewhere, defendant **LONDRA S. WATSON**, being an employee of DC Water, willfully participated personally and substantially as a Government officer and employee, through the approval and certification of permit applications prepared and submitted

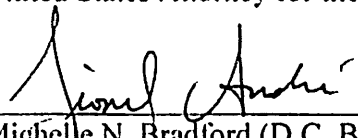
by ARDNOL of DC, in which defendant LONDRA S. WATSON owned, controlled, and in which he had a financial interest.

(Acts Affecting Personal Financial Interests, in violation of 18 United States Code §§208 (a), 216(a)(2))

Respectfully submitted,

CHANNING D. PHILLIPS
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By:


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