

the State of Washington, listing her parents' Belfair, Washington residential address as the location for WBS's principal office.

6. On February 9, 2018, Nicole Meier obtained an employer identification number for WBS from the Department of the Treasury, Internal Revenue Service at her residence in Cameron, North Carolina.

7. Between March 26, 2018, and October 23, 2018, Nicole Meier, as Chief Executive Officer of Defendant WBS, negotiated six advanced commercial truck driver training purchase agreements with the US Army. Defendant WBS promised to provide five soldiers, who already possessed their commercial driver's license, a three-week training session that included workshops and practical training exercises for, among other things, rollout and interstate interchange, tire blowout and recovery, route planning and time allocation, loading, and onboard safety inspection. The cost per soldier was \$4,999 for a total cost of \$24,995 per purchase agreement. Prior to each payment, defendant MEIER or one of his subordinates signed the required GPC Request Form. In total, Defendant WBS received approximately \$149,970.

8. Defendant WBS never provided any of the training as promised.

COUNT ONE

9. Paragraphs 1 through 8 of this Criminal Information are hereby re-alleged.

10. From in or about March 2018 through in or about April 24, 2019, in the Eastern District of North Carolina and elsewhere, Defendant MEIER, being an

employee of the executive branch of the United States Government, knowingly and willfully participated personally and substantially as a Government officer and employee, through decision, approval, recommendation, the rendering of advice, or otherwise, in a contract in which Defendant MEIER's spouse had a financial interest.

All in violation of Title 18, United States Code, Section 208(a).

COUNT TWO

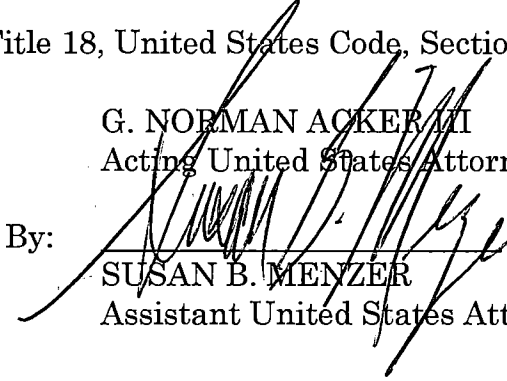
11. Paragraphs 1 through 8 of this Criminal Information are hereby re-alleged.

12. Beginning in or about March 2018 and continuing up to and including August 2018, Defendant WBS, in the Eastern District of North Carolina, and elsewhere, by and through its officer, Nicole Meier, and for the benefit of Defendant WBS, did willfully and knowingly receive, conceal and retain money of the United States and a department and an agency thereof, that is the Department of Defense, including its components, the value of which in the aggregate did exceed the sum of \$1,000, with intent to convert the money to Defendant WBS's use and gain, and the use and gain of others, knowing the money had been embezzled, stolen, purloined, and converted by Defendant WBS from the Department of Defense, an agency of the United States.

All in violation of Title 18, United States Code, Section 641

G. NORMAN ACKER III
Acting United States Attorney

By:


SUSAN B. MENZER
Assistant United States Attorney