

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

FILED

MAR 30 2016

UNITED STATES OF AMERICA

Criminal No.

VIOLATION:

**Clerk, U.S. District & Bankruptcy
Courts for the District of Columbia**

v.

18 U.S. C. § 208

(Criminal Conflict of Interest)

LONDRA S. WATSON,

Defendant.

STATEMENT OF OFFENSE

Pursuant to Fed. R. Cr. P. 11, defendant **LONDRA S. WATSON** agrees and stipulates as follows:

Background

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, in the District of Columbia. Defendant **LONDRA S. WATSON**'s duties and responsibilities included, among other things, supervising the processing of permit applications from applicants seeking to alter and make modifications to existing plumbing connections from DC Water lines to existing structures.

2. On or about November 19, 2007, defendant **LONDRA S. WATSON** started a company named ARDNOL of DC LLC (which is "Londra" spelled backwards) (hereinafter "ARNOL of DC"). Defendant **LONDRA S. WATSON** was the registered agent and sole employee of ARDNOL of DC. Defendant **LONDRA S. WATSON** also created an email account for the company named: ardnolson@gmail.com. In addition, defendant **LONDRA S.**

WATSON opened a bank account at Wells Fargo Bank (formerly, Wachovia Bank), and was the sole signatory of the ARDNOL of DC bank account (Account Ending 9930).

The District of Columbia Water and Sewer Authority

3. The District of Columbia Water and Sewer Authority 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.

4. District of Columbia regulations required that all residents, private companies and government agencies must obtain approval from DC Water prior to performing any work that directly or indirectly affects the public water and/or sewerage systems. The Permit Operations Department is the starting point for all of DC Water's permit services.

5. Before a permit was issued, the application was reviewed by a DC Water Official~~s~~ to ~~permits~~ ^{ensure} ~~insured~~ that projects were done safely and properly and complied with DC Water requirements.

Acts Affecting Personal Financial Interests

6. From in or about November 15, 2007 to February 8, 2012, applicants seeking permits from DC Water provided checks totaling \$141,066.00 to ARDNOL of DC to assist them in preparing design plans, permit applications, plumbing plans, and utility plans, as well as DC Water "permit expediting" services.

7. Many permit applicants were referred to ARDNOL of DC by former clients who already had their permits approved by DC Water with the assistance of ARDNOL of DC. Once an applicant contacted ARDNOL of DC, defendant **LONDRA S. WATSON** advised the applicant that he would draft the complete permit package, including the necessary site plans,

and diagrams, and assured the applicant that the permit application would comply with DC Water format requirements and protocols. Once the applicant paid ARDNOL of DC its required fee, defendant **LONDRA S. WATSON** prepared the complete permit package and delivered it to the client. The client then submitted the permit application to DC Water for approval.

8. In his official capacity as a Supervisor in DC Water's Permit Office, defendant **LONDRA S. WATSON** approved, directly or indirectly through his subordinates, permit applications and issued DC Water permits to a number of applicants who were ARDNOL of DC clients.

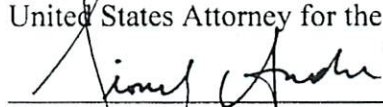
9. Defendant **LONDRA S. WATSON** intentionally failed to disclose his financial interest in ARDNOL of DC to DC Water.

10. This factual proffer is a limited summary of defendant **LONDRA S. WATSON's** conduct in connection with Count One (Criminal Conflict of Interest, in violation of Title 18, United States Code, Sections 208, 216(a)(2) of the Information and is not intended to be a complete accounting of all facts and events that are known to the Government. The limited purpose of this Statement of Offense is to demonstrate that a factual basis exists to support the defendant's guilty plea in this case.

Respectfully submitted,

CHANNING D. PHILLIPS
United States Attorney for the District of Columbia

By:

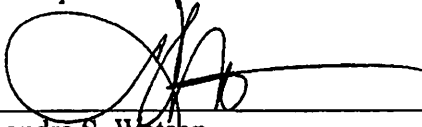

Michelle N. Bradford (D.C. Bar 491910)
Lionel André (D.C. Bar No. 422534)
Assistant United States Attorneys
Fraud and Public Corruption Section
555 4th St., N.W., Room 5245
Washington, D.C. 20530

DEFENDANT'S ACCEPTANCE

I have read every word of this Statement of Offense. Pursuant to Fed. R. Cr. P. 11, after consulting with my attorney, I agree and stipulate to this Statement of Offense.

Date: _____

3/30/16

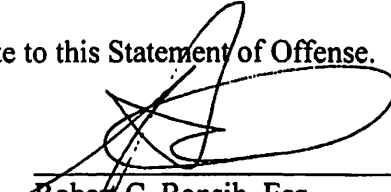


Londra S. Watson
Defendant

I have discussed this Statement of Offense with my client, Mr. Londra S. Watson. I concur with his decision to stipulate to this Statement of Offense.

Date: _____

3/30/16



Robert C. Bonsib, Esq.
Attorney for the Defendant