

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CENTRAL DIVISION

UNITED STATES OF AMERICA,)	No. 15-CR-03008
)	
Plaintiff,)	Count 1
)	18 U.S.C. § 1001(a)(2):
)	Making a Materially
)	False Statement
vs.)	and Representation
)	Count 2
)	18 U.S.C. § 207(a)(1):
ADAM J.J. PUDENZ,)	Violating the Restriction
)	on Post-Employment
Defendant.)	Communications and
)	Appearances

AMENDED INFORMATION

The United States Attorney charges:

COUNT 1
Making a Materially False Statement
and Representation

On or about November 24, 2011, outside of the jurisdiction of any particular State or District, defendant, ADAM J.J. PUDENZ, with a last known United States residence in the Northern District of Iowa, did willfully and knowingly make a materially false statement and representation concerning a matter within the jurisdiction of the Defense Criminal Investigative Service (DCIS), an agency of the executive branch of the United States Government. Specifically, defendant told Special Agents of the DCIS when interviewed in Kabul, Afghanistan, that he first communicated in March or April 2011 with an Afghanistan company, KMTC, with whom the United States contracted for military and police clothing and equipment,

concerning defendant's prospective employment with the KMTC. This statement was false because, as defendant then and there knew, defendant had communicated with an official of KMTC concerning defendant's employment with KMTC as early as December 7, 2010, and multiple times thereafter, prior to March 2011.

This was in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 2
**Violating the Restriction on Post-Employment
Communications and Appearances**

Between at least April 7, 2011, and at least mid-November 2011, outside of the jurisdiction of any particular State or District, defendant, ADAM J.J. PUDENZ, being a former officer and employee of the executive branch of the United States, that is, a United States Air Force Captain assigned to the Combined Security Transition Command at Camp Eggers, Afghanistan and serving there as Deputy Branch Chief responsible administering United States military contracts for provision of clothing and equipment to the Afghan National Army and Police, and who served specifically as program manager for the boot contracting program, as Security Assistance Officer for a boot supply contract, and as a member of a Source Selection Team whose purpose was to select manufacturers to provide boots under a Blanket Purchase Agreement, and who had a last known United States residence in the Northern District of Iowa, did knowingly and willfully make, with the intent to influence, one or more communication(s) to, and appearance(s) before, military

contracting officials of the United States on behalf of another person (KMTC), in connection with particular matters in which the United States was a party and had a direct and substantial interest (military clothing and boot contracts with KMTC); in which defendant had participated personally and substantially as an officer and employee of the United States military, and which involved a specific party or parties, namely KMTC, at the time of defendant's participation.

This was in violation of Title 18, United States Code, Sections 207(a)(1) and 216(a)(2).

KEVIN W. TECHAU
United States Attorney

By, 

RICHARD L. MURPHY
Assistant United States Attorney

and

WILLIAM STELLMACH
Acting Chief, Fraud Section
Criminal Division
United States Department of Justice

L. WADE WEEMS
Trial Attorney