

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
AUGUSTA DIVISION

FILED  
U.S. DISTRICT COURT  
AUGUSTA DIV.

2019 OCT 24 AM 8:39

UNITED STATES OF AMERICA

v.

JOSEPH D. YOUNG

) INFORMATION NO.  
)  
) 18 U.S.C. § 371  
) Conspiracy to Commit Offenses  
) Against the United States  
)

CLERK *M. Allen*  
SO. DIST. OF GA.

**CR 19 - 139**

THE UNITED STATES ATTORNEY CHARGES THAT:

Introduction

At all times relevant to this Information:

1. The United States Department of the Army ("U.S. Army") was a branch of the United States Department of Defense, which was part of the executive branch of the United States Government. In part, the U.S. Army consisted of over one million soldiers and personnel stationed at numerous installations throughout the United States and across the world, including the U.S. Army Garrison Fort Gordon in Augusta, Richmond County, Georgia. Fort Gordon was home to various training and operational components of the U.S. Army, including components related to how the U.S. Army communicates on the battlefield.

2. At times, the U.S. Army contracted with private companies to provide certain services, including services related to the U.S. Army's information and communication networks.

3. Coconspirator Calvin D. Lawyer served for over twenty years in the U.S.

Army, retiring on February 1, 2008 at the rank of Colonel. When Lawyer retired from the U.S. Army in 2008, he was stationed at Fort Gordon and was the U.S. Army's Training and Doctrine Command Capability Manager for Networks and Services. Even before his retirement in 2008, Lawyer established Communications, Research, Engineering, and Consultants Group, LLC ("CREC Group"), with a plan to obtain government contracts from the U.S. Army after his departure.

4. Between 2008 and 2014, coconspirator Anthony Tyrone Roper was a public official employed as an active duty Colonel in the U.S. Army. In that position, Roper's official duties and responsibilities included, among many others, the direction, coordination and oversight of the U.S. Army's efforts to develop doctrine and establish standards to build and modernize its information and communication networks.

5. Defendant Joseph D. Young served for over twenty years in the U.S. Army, retiring in 2005 at the rank of Colonel. In 2008, after **Young** retired from the U.S. Army, **Young** formed his own company referred to herein as **Company J. Y. & Associates**, to provide IT professional and consulting services to the U.S. Government. Among other things, **Young** worked as a subcontractor under contracts obtained by Calvin D. Lawyer and CREC Group.

6. Between 2008 and 2014, Coconspirator Anthony R. Williams was a public official employed as an active duty Colonel in the U.S.

Army. As an active duty Colonel, Defendant Anthony R. Williams had a duty to provide accurate and timely information to the G-8 leadership dealing with the Battle Command; a duty to provide oversight and management of a billion dollar battle command budget, and a duty to provide his Commanders with timely and accurate funding strategies for the best use of limited resources against unlimited requirements.

Anthony R. Williams had more general duties as set forth in 5 C.F.R. Part 3601 (Supplemental Standards of Ethical Conduct for Employees of the Department of Defense); and Executive Order 12674 (Principles of Ethical Conduct). Among other things, those duties required that Anthony R. Williams not use his DOD position for his own private gain or for the private gain of friends, relatives or organizations; and, he may not use or allow the use of nonpublic Government information to further his own private interests or the private interests of others.

**COUNT ONE**  
**(Conspiracy to Commit Offenses Against the United States)**  
**18 U.S.C. § 371**

7. Paragraphs 1 through 6 of this Information are re-alleged and incorporated by reference as if fully set forth herein.

8. Between 2008 and 2014, **Defendant Joseph D. Young** knowingly combined, conspired, and agreed with Calvin Lawyer, Anthony Tyrone Roper, Anthony R. Williams and others, to commit offenses against the United States, namely:

- (a) bribery, by directly and indirectly, corruptly giving, offering, and promising something of value, namely, money, in return for being induced to do and omit to do acts in violation of his official duties, in violation of Title 18, United States Code, Section 201(b)(1)(C); and
- (b) to willfully violate 18 U.S.C. § 208(a) by agreeing to allow Anthony R. Williams, an employee of the executive branch of the United States Government, to participate personally and substantially as a Government employee in a matter in which Anthony R. Williams and his family had a substantial financial interest from in or about March 2009 through at least 2014.

All done in violation of Title 18, United States Code, Section 371.

Manner and Means of the Conspiracy

9. It was part of the conspiracy that **Defendant Joseph D. Young**, Anthony T. Roper, Calvin D. Lawyer, and Anthony R. Williams would meet in Washington D.C. and elsewhere to discuss, among other things, steering and awarding U.S. Army contracts to CREC Group and J.Y. & Associates, in return for payment of bribes to Anthony R. Williams and Anthony T. Roper;

10. It was further part of the conspiracy that **Defendant Joseph D. Young**, Calvin D. Lawyer, and others, aided and abetted by his coconspirators, were provided internal, confidential, and proprietary information during meetings, telephone calls and in electronic communications from Anthony R. Williams, and others, all in an effort to

help steer and award millions in U.S. Army contracts to CREC Group and J.Y. & Associates as a subcontractor;

11. It was further part of the conspiracy that coconspirator Anthony Tyrone Roper, aided and abetted by his coconspirators, would also provide internal, confidential, and proprietary information during meetings, telephone calls and in electronic communications to Calvin D. Lawyer, **Defendant Joseph D. Young**, and others, all in an effort to help steer and award millions in U.S. Army contracts to CREC Group and J.Y. & Associates as a subcontractor;

12. It was further part of the conspiracy that members of the conspiracy would travel to and from Fort Gordon, in the Southern District of Georgia, to discuss, among other things, steering and awarding U.S. Army contracts to CREC Group and J.Y. & Associates;

13. It was further part of the conspiracy that **Defendant Joseph D. Young** would corruptly offer, promise, and give bribes and inducements to Anthony R. Williams, a public official, in exchange for using his status as an active duty Colonel to take actions resulting in the award of U.S. Army contracts to CREC Group and J.Y. & Associates;

14. It was further part of the conspiracy that Anthony R. Williams, would corruptly demand, seek, receive, and accept things of value from **Defendant Joseph D. Young**, in exchange for using his status as an active duty Colonel to take actions resulting in the award of U.S. Army contracts

to CREC Group and J.Y. & Associates;

15. It was further part of the conspiracy that Calvin D. Lawyer would corruptly offer, promise, and give bribes and inducements to Anthony Tyrone Roper, a public official, in exchange for using his status as an active duty Colonel to take actions resulting in the award of U.S. Army contracts to CREC Group and J.Y. & Associates;

16. It was further part of the conspiracy that Anthony Tyrone Roper would corruptly demand, seek, receive, and accept things of value from Calvin Lawyer, in exchange for using his status as an active duty Colonel to take actions resulting in the award of U.S. Army contracts to CREC Group and J.Y. & Associates;

17. It was further part of the conspiracy that Calvin Lawyer would corruptly offer, promise, and give bribes and inducements to Anthony T. Roper, who was also a public official, to include, bribe payments, and other things of value, in exchange for taking actions in connection with the award of U.S. Army contracts;

18. It was further part of the conspiracy that some of the conspirators would provide false and fraudulent documents and information to the U.S. Army, the U.S. SBA, government contractors, and others for the purpose of fraudulently obtaining and maintaining millions of dollars' worth of U.S. Army and private company contracts; and,

19. It was further part of the conspiracy that between 2008 and

2014, Defendant **Joseph D. Young** would hire the spouse of Anthony R. Williams, and pay her more than \$1.2 million in salary and commissions for a "no-show" job at J.Y. & Associates, as bribes and inducements to Anthony R. Williams in exchange for using his status as an active duty Colonel to take actions resulting in the award of U.S. Army contracts to CREC Group and J.Y. & Associates.

Overt Acts

20. In furtherance of the conspiracy and to affect the illegal objects of the conspiracy, the following overt acts, among others, were committed in Richmond County, within the Southern District of Georgia, and elsewhere:

a. Between in or about 2007 and 2008, Anthony R. Williams, Anthony Tyrone Roper, Calvin D. Lawyer, and **Defendant Joseph D. Young** met in Washington D.C. to discuss, among other things, steering and awarding U.S. Army contracts to CREC Group and J.Y. & Associates, in return for payment of bribes to Anthony R. Williams and Anthony T. Roper;

b. In or about April 2008, Anthony R. Williams met with **Defendant Joseph D. Young** and another individual in Herndon, Virginia, to discuss efforts at getting J.Y. & Associates on one or more U.S. Army contracts;

c. From in or about 2008 through at least through 2015, Calvin D. Lawyer, aided and abetted by others, corruptly offered, promised, and paid

\$200,000 in bribes to Anthony T. Roper while Roper was an active-duty Colonel; and

d. From in or about 2008 through 2014, **Defendant Joseph D. Young** paid the spouse of Anthony R. Williams more than \$1.2 million in salary and commissions for a "no-show" job at J.Y. & Associates, as bribes and inducements to Anthony R. Williams in exchange for using his status as an active duty Colonel to take actions resulting in the award of U.S. Army contracts to CREC Group and J.Y. & Associates.

All done in violation of Title 18, United States Code, Section 371.

#### **FORFEITURE ALLEGATION**

21. The allegations contained in Count One of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

22. Upon conviction of the offense in violation of Title 18, United States Code, Section 371 set forth in Count One of this Information, the Defendant, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

23. Additionally, upon conviction of the offense in violation of Title



18, United States Code, Section 371 set forth in Count One of this Information, the Defendant shall forfeit a personal money judgment in the amount of \$1,131,861.66, said sum constituting the proceeds Defendant obtained directly or indirectly as a result of the offense charged in Count 1 of this Information.


24. If any of the property described above, as a result of any act or omission of the Defendant:


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

Signature for Attorneys for the Government:

  
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Bobby L. Christine  
United States Attorney

  
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Tara M. Lyons  
Assistant United States Attorney  
\*Lead Counsel

  
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Patricia G. Rhodes  
Assistant United States Attorney  
Deputy Chief, Criminal Division