

REC'D 16 MAY '14 16:12 USDC-ORP

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

3'14 - CR - 201
Case No. 3:14-CR-_____

HZ

v.

INFORMATION

GEORGE R. LEVEY,

18 U.S.C. §§ 1343 & 1346
(Honest Services Wire Fraud)

Defendant.

FILED UNDER SEAL

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE
(Honest Services Wire Fraud)

At all times relevant to this Information,

General Allegations

1. From 2000 to 2003, defendant GEORGE R. LEVEY was an executive for Schlumberger Industries, Inc. From 2003 through 2011, defendant GEORGE R. LEVEY was the owner and president of Cale Parking Systems, USA, Inc. Schlumberger Industries, Inc. and Cale Parking Systems, USA, Inc. conducted business with the City of Portland in connection with the City of Portland's smart parking meter program.

2. Bribe recipient Ellis K. McCoy was employed as the Transportation Division Manager -- Parking Operations, Portland Bureau of Transportation, in Portland, Oregon. McCoy was the City of Portland employee primarily responsible for the day-to-day operation of the City of

Portland's smart parking meter program.

The Fraud Scheme

3. From approximately January 2002 through July 2011, defendant GEORGE R. LEVEY devised a scheme or artifice to defraud and to deprive the City of Portland, Oregon, of the intangible right of honest services of Ellis K. McCoy by paying bribes to Ellis K. McCoy intending to influence Ellis K. McCoy in connection with the business of, and the transactions of, the City of Portland's Bureau of Transportation, and transmitted wire communications in interstate commerce, principally e-mail communications, for the purpose of executing such scheme or artifice to defraud.

4. It was part of the scheme to defraud that beginning in 2002 and continuing to July 2011, defendant GEORGE R. LEVEY paid some or all of the travel, lodging, meals, and greens fee expenses associated with golf trips defendant Ellis K. McCoy took to golfing destinations.

5. It was further part of the scheme to defraud that beginning in 2002 and continuing to July 2011, defendant GEORGE R. LEVEY paid some or all of the travel, lodging, meals, adult entertainment, and other expenses associated with gambling trips Ellis K. McCoy took to casinos, including casinos located in Las Vegas, Nevada.

6. It was further part of the scheme to defraud that defendant GEORGE R. LEVEY paid some or all of the meals, adult entertainment, and other entertainment expenses associated with Ellis K. McCoy attending parking industry conventions or conferences.

7. It was further part of the scheme to defraud that beginning in 2003 and continuing to July 2011, defendant GEORGE R. LEVEY paid for some or all of the travel, lodging, and meals expenses associated with vacation trips by Ellis K. McCoy.

8. It was further part of the scheme to defraud that in 2003, defendant GEORGE R.

LEVEY used a consulting company owned and operated by a former employee as a conduit for bribe payments characterized as consulting fees to Ellis K. McCoy.

8. It was further part of the scheme to defraud that from June 2003 through December 2006 defendant GEORGE R. LEVEY made bribe payments to Ellis K. McCoy by disguising \$56,675 in bribe payments as consulting fees paid to EKM Consulting, an entity McCoy created to conceal the true nature of the bribe payments.

9. It was further part of the scheme to defraud that from June 2008 through July 2011, defendant GEORGE R. LEVEY maintained a spreadsheet on which he tracked the number of smart parking meters defendant LEVEY's company installed in Portland, Oregon, Hood River, Oregon, and in three cities in the state of Washington, and multiplied the total number of smart parking meters installed by \$100 per meter, intending to pay the resulting amount -- \$137,100 -- to Ellis K. McCoy when McCoy ended his employment with the City of Portland. Defendant LEVEY communicated to McCoy in e-mails that defendant LEVEY intended to pay this amount to McCoy.

10. It was further part of the scheme to defraud that defendant GEORGE R. LEVEY made bribe payments to Ellis K. McCoy in return for McCoy, acting in his official capacity as a Manager in the Portland Bureau of Transportation: 1) speaking favorably about the products and services of defendant LEVEY's companies to public employees in cities other than Portland involved in the decision about which companies to use to supply products and services relating to smart parking meters; and 2) disclosing to defendant LEVEY information that would assist defendant LEVEY's companies in securing contracts to install smart parking meters in cities other than Portland, Oregon, that McCoy had learned during conversations with public employees in these

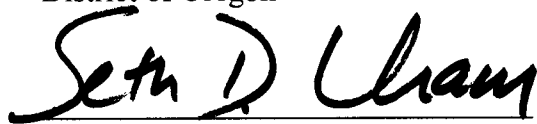
other cities.

11. It was further part of the scheme to defraud that defendant GEORGE R. LEVEY made bribe payments to Ellis K. McCoy so that McCoy, acting in his official capacity as a Manager in the Portland Bureau of Transportation, would assist LEVEY's companies in securing and retaining contracts and contract expansions with the City of Portland. Such assistance from McCoy took the form of, among other actions: 1) McCoy providing advice to defendant LEVEY concerning the drafting of contract proposals to be submitted to the City of Portland; 2) McCoy participating in the drafting and submitting of reports and recommendations to the Portland City Council concerning city action in awarding contracts to defendant LEVEY's companies; 3) McCoy disclosing to defendant LEVEY internal deliberations of the Portland City Council and of the Portland Bureau of Transportation; and 4) McCoy testifying before the Portland City Council in favor of awarding contracts and contract expansions to defendant LEVEY's companies.

All in violation of Title 18, United States Code, Sections 1343 & 1346.

Dated this 16th day of May, 2014.

S. AMANDA MARSHALL, OSB #95347
United States Attorney
District of Oregon

A handwritten signature in black ink that reads "Seth D. Uram". The signature is written in a cursive, flowing style.

SETH D. URAM, Bar No. 376214 (D.C.)
Assistant United States Attorney