

(6) At all times material herein defendant ROBERT B. BREGMAN was the president and the sole stockholder of Bregman Electronics, Inc., with an office at 25 West 43rd Street, New York, New York.

(7) At all times material herein HANS SENN also known as JOHANN SENN was an officer and a director of THE BANK FÜR HANDEL UND EFFEKTEN (Bank for Commerce and Securities), Zurich, Switzerland.

(8) At all times material herein WALTER A. LIPS was Vice-Director of the Union Bank of Switzerland (also known as the Schweizerische Bankgesellschaft) Branch at Aarau, Switzerland.

(9) At all times material herein Scientific Electronics, Limited, was a California corporation with a listed address at 144 South Beverly Hills Drive, Beverly Hills, California.

(10) At all times material herein Western Molded Fibre Products, Inc., of Gardena, California, was a California corporation which sold fairings to CHROMCRAFT under each of the hereinabove described contracts as a subcontractor as that term is defined in Section 52, Title 41, United States Code.

(11) Prior to the award of each of the hereinabove described contracts the Department of the Navy issued a Request For Proposals, in response to which CHROMCRAFT submitted cost and price data on Department of Defense Forms (DD 633).

(12) The aforementioned cost and price data purported to reflect, among other things:

(a) The costs and prices which CHROMCRAFT had incurred and experienced and expected to incur and experience for direct material; and

(b) Proposed general and administrative expenses and also allowances for profits under the hereinabove described contracts.

(13) Prior to the award of each of the hereinabove described contracts, in accordance with the provisions of Section 2306(f) of Title 10, United States Code, CHROMCRAFT submitted to the Department of the Navy, in the District of Columbia, "Certificates of Current Cost or Pricing Data", which documents certified that the aforesaid cost and price data was accurate, complete and current as of the date of their execution.

(14) During and for the purpose of the negotiation of each and all of the hereinabove described contracts ANDREW L. STONE met with representatives of the Department of the Navy, in the District of Columbia, as the representative of CHROMCRAFT.

(15) Each and all of the hereinabove described contracts expressly provided that CHROMCRAFT, as the prime contractor, was itself subject to and would include in all subcontracts, as that term is defined in Section 1213(g), Title 50, United States Code Appendix, provisions in accordance with and as required by Section 1214, Title 50, United States Code Appendix. (The Renegotiation Act of 1951, as amended.)

(16) Each and all of the hereinabove described contracts contained a "Price Reduction for Defective Cost or Pricing Data" clause pursuant to the requirements of Section 2306(f) of Title 10, United States Code.

(17) At all times material herein the Renegotiation Board was an agency of the United States of America charged with the responsibility to ascertain, determine, recoup, and eliminate excessive profits derived from contracts made with the United States, and from related subcontracts, for the procurement of property, and services under the national defense program.

on or about January 1, 1963, and continuously thereafter through 1967, the exact dates being unknown, in the District of Columbia and ANDREW L. STONE, FRANCIS N. ROSENBAUM, EVELYN R. PRICE, ROBERT [redacted] CHROMCRAFT who are the defendants herein, and HANS SENN, [redacted] and THE BANK FÜR HANDEL UND EFFEKTEN who are named herein [redacted] but not as defendants, unlawfully, willfully and knowingly did conspire and confederate among themselves and each with the [redacted] other persons whose names are presently to the Grand Jury [redacted] and the United States of America, that is to say the said [redacted] conspirators did agree, combine, confederate and conspire: [redacted] hinder, frustrate, defeat, impair and impede by craft, trickery, [redacted] means including false, fictitious and fraudulent statements [redacted] concealments of material facts and kickbacks, the lawful [redacted] operations and purposes of [redacted]