

and would and did conceal and cause to be concealed the material fact that Scientific Electronics, Limited and Bregman Electronics, Inc. were shams subject to the direction and control of the DEFENDANTS.

In furtherance of the aforesaid conspiracy and in order to effect the objects thereof the DEFENDANTS did commit, among others, the following overt acts in the District of Columbia and at divers other places.

OVERT ACTS

(1) The said DEFENDENTS did do and cause to be done the acts set forth in the succeeding counts of this indictment on the dates, at the places and in the manner therein set forth, all of which are incorporated herein by reference as though fully set forth and made a part hereof.

(2) On or about January 28, 1963 ANDREW L. STONE and FRANCIS N. ROSENBAUM traveled to Los Angeles, California and met with Leon Schwartz.

(3) On or about March 1, 1963, FRANCIS N. ROSENBAUM caused CT Corporation to form Scientific Electronics, Limited.

(4) On or about April 29, 1963, ANDREW L. STONE dictated a letter and caused it to be delivered to Leon Schwartz.

(5) On or about May 18, 1963, FRANCIS N. ROSENBAUM wrote a letter to Leon Schwartz.

(6) On or about November 20, 1963, EVELYN R. PRICE wrote a letter to Leon Schwartz.

(7) On or about September 9, 1964, EVELYN R. PRICE wrote a letter to Leon Schwartz, a carbon copy of which was prepared for and sent to FRANCIS N. ROSENBAUM.

(8) On or about February 8, 1965, FRANCIS N. ROSENBAUM dictated a letter which he caused to be delivered to Leon Schwartz.

(9) On or about January 19, 1965, EVELYN R. PRICE wrote a letter to Leon Schwartz, a carbon copy of which was prepared for and sent to FRANCIS N. ROSENBAUM.

(10) On or about August 31, 1965, CHROMCRAFT paid an advance of \$10,000 to ROBERT B. BREGMAN.

(11) On or about February 24, 1966, FRANCIS N. ROSENBAUM facilitated the opening of the (ROBERT B.) BREGMAN ELECTRONICS, INC. bank account at the Marine Midland Grace Trust Company.

(In violation of 18 U.S.C. 371.)

COUNTS TWO THROUGH THIRTEEN

(1) The Grand Jury realleges with the same force and effect as though fully set forth at length herein, all of the allegations of paragraphs One through Six and Eleven through Sixteen of Count One of this indictment.

(2) On or about the dates hereinafter set forth in the District of Columbia the DEFENDANTS ANDREW L. STONE, FRANCIS N. ROSENBAUM, EVELYN R. PRICE, ROBERT B. BREGMAN, and CHROMCRAFT in a matter within the jurisdiction of the Department of the Navy, unlawfully, knowingly and willfully did make and cause to be made false, fictitious and fraudulent statements and representations of material facts, that is to say the DEFENDANTS did submit and cause to be submitted to the Department of the Navy in Washington, D.C. the hereinafter described "Certificates of Current Cost or Pricing Data" as required by Section 2306(f), Title 10, United States Code in which certain of the DEFENDANTS did state and represent and cause to be stated and represented that the cost and price data referred to therein was accurate, complete as of the date of execution, whereas in truth and in fact as the

and legitimate functions, the
deceit and dishonesty
(a) To hamper the
defendants, to deprive
unknown, with, and
other, combining, and
agree, conspiratorial
as co-conspirators
WALTER A. LIPS
B. BREGMAN, AND
elsewhere, 196
February 1, 196
(18) From
processes
United