

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA :
 : **CRIMINAL NO.** _____
 v. : **(Conflict of Interest, 18 U.S.C. §§ 208 &**
 : **216(a)(2))**
ROBERT E. COUGHLIN II :
 : **...0000000...**

INFORMATION

The United States charges:

COUNT ONE

1. Between about March, 2001, through and including October, 2003,

ROBERT E. COUGHLIN II,

the defendant, being an officer and employee of the executive branch of the United States Government (to wit, the Department of Justice (“DOJ”)), willfully participated personally and substantially as a government officer and employee, through recommendation, the rendering of advice, investigation and otherwise, in a proceeding, application, request for a ruling and other determination, contract, claim, controversy, and other particular matter in which, to his knowledge, he, and any person and organization with whom he was negotiating concerning prospective employment, had a financial interest, that is, as a DOJ employee **COUGHLIN** provided assistance to a lobbyist and the lobbyist’s law/lobbying firm on particular matters

before DOJ while knowingly receiving a stream of things of value from the lobbyist and his firm because of such assistance, and while having discussions concerning prospective employment with the law/lobbying firm.

18 U.S.C. § 208
18 U.S.C. § 216(a)(2))
18 U.S.C. § 2

Respectfully submitted,

_____/SMG/_____
Stuart M. Goldberg
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