

FILED IN CHAMBERS
U.S.D.C. Atlanta

APR 30 2020

JAMES N. HATTEN, Clerk
By: *[Signature]* Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

HAYAT CHOUDHARY

Criminal Information

No. 1:20-CR- 162

THE UNITED STATES ATTORNEY CHARGES THAT:

CONSPIRACY

Beginning on a date unknown, but from in or about May 2017 until in or about August 2017, in the Northern District of Georgia, defendant HAYAT CHOUDHARY knowingly and willfully conspired and agreed with another person to commit violations of the laws of the United States, that is - to corruptly give and offer a thing of value to an individual intending to influence and reward an agent of the City of Atlanta (a local government that received benefits in excess of \$10,000 in federal assistance in 2017), in connection with a transaction and series of transactions relating to the City of Atlanta that involved at least \$5,000, in violation of Title 18, United States Code, Section 666(a)(2).

Hartfield-Jackson Atlanta International Airport

At all times relevant to this Information:

1. The City of Atlanta (COA) was the capital and most populous city in Georgia, with a metropolitan area population of approximately 5.7 million people. The City of Atlanta owned Hartsfield-Jackson Atlanta International

Airport (“Atlanta’s airport”), which served as the principal airport for Georgia and the southeastern United States. In 2017, Atlanta’s airport handled approximately 104 million passengers, making it the busiest passenger airport in the world.

2. According to COA’s budget for fiscal year 2018 (which began on July 1, 2017), Atlanta’s airport generated more than \$500 million in revenue for COA. Approximately \$8.8 million of that revenue derived from fees and charges on companies providing private ground transportation services to Atlanta’s airport (such as taxicabs, limousines, ridesharing, and hotel and parking lot shuttles).

3. Defendant HAYAT CHOUDHARY served as the owner and Chief Executive Officer of Atlanta Airport Shuttle Services, Inc., a company that provided ground transportation at Atlanta’s airport. Prior to the contract referenced in this Information, neither CHOUDHARY nor Atlanta Airport Shuttle Services, Inc. had ever won a services contract with COA.

Ground Transportation Building Contract

4. COA’s Department of Procurement was responsible for acquiring all services for the City of Atlanta, including the department that operated Atlanta’s airport. According to its website, the Department of Procurement’s “Guiding Principles” commit its personnel, including contracting officers, to “award contracts that are consistent with the policy, regulations, rules, and laws,” and “without regard for personal gain.”

5. On or about May 2, 2017, the Department of Procurement announced that COA sought to enter a services contract with a vendor to establish and operate a

kitchen/restaurant at the Ground Transportation Building at Atlanta's airport. The kitchen/restaurant would serve the large and growing number of taxi, limousine, and rideshare drivers serving passengers traveling to and from Atlanta's airport.

6. The Department of Procurement projected that the kitchen/restaurant would generate annual revenue of \$200,000, with rent to COA of \$13,000 per year. The term of the contract was 10 years, with a three-year renewal option.

7. "COA Official" was the City of Atlanta Department of Procurement official responsible for overseeing the bidding process and influenced the awarding of the kitchen/restaurant contract.

8. By the bid submission deadline, CHOUDHARY's Atlanta Airport Shuttle Services, Inc., d/b/a Meskerem Restaurant, was one of three finalists for the contract.

9. During the conspiracy, in an effort to obtain the contract, CHOUDHARY agreed to pay and paid the COA Official approximately \$20,000 in bribe payments in exchange for receiving the kitchen/restaurant contract.

10. In or about August 2017, the City of Atlanta awarded the airport kitchen/restaurant contract to CHOUDHARY and his business Atlanta Airport Shuttle Services, Inc.

Overt Acts

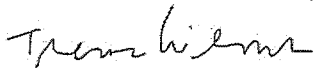
12. In furtherance of the bribery conspiracy, between May and August 2017, CHOUDHARY committed at least one of the following overt acts in the Northern District of Georgia:

a. After the contract was announced, CHOUDHARY gave \$10,000 in cash as payment to the COA Official in order to receive an airport contract from the City of Atlanta.

b. After the first \$10,000 bribe payment, the COA Official instructed CHOUDHARY that he must pay more money to obtain the kitchen/restaurant contract, and, as a result, CHOUDHARY gave another \$10,000 in cash to the COA Official as an additional payment to receive the airport contract.

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

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