

COUNT TWO

(supplementing the Salary of a Government Official by HAKIM)

The Independent Counsel further charges:

1. At all times relevant to this Information, the defendant ALBERT HAKIM was the Chairman of the Board of Directors of Stanford Technology Trading Group International ("STTGI"), with offices located in Vienna, Virginia, and the Mandator, bank account signatory, and principal shareholder of Udall Research Corporation, a Panamanian corporation.

2. At all times relevant to this Information, Richard V. Secord was President of STTGI.

3. At all times relevant to this Information until November 25, 1986, Oliver L. North was a Lieutenant Colonel in the United States Marine Corps detailed to the National Security Council staff, where he held the position of Deputy Director, Political-Military Affairs.

4. In 1986, Richard V. Secord knowingly, willfully, and unlawfully supplemented the salary of Oliver L. North by providing things of value to North as compensation for his services as an officer of the National Security Council, from a source other than the Government of the United States or the treasury of any State, county, or municipality.

5. In 1986, Richard V. Secord arranged for the payment of approximately \$13,800 for the construction of a

security fence at North's personal residence which protected North and his family from threats made by international terrorists.

6. The money for the aforesaid payment was derived from funds in accounts that were under the control of ALBERT HAKIM, Richard V. Secord, and others, and the principal source of funds was the account of Udall Research Corporation.

7. During 1986, ALBERT HAKIM, knowing of Secord's intention to arrange for the construction of the security fence, and knowing of Secord's intention to use funds from the accounts maintained under the control of Richard V. Secord, ALBERT HAKIM, and others, to pay for the security fence, thereafter continued to maintain those accounts in a secret manner in order to hinder the disclosure of any payments and the apprehension of those involved.

8. During 1986, in the District of Columbia and elsewhere, the defendant ALBERT HAKIM knowingly, willfully, and unlawfully aided and abetted the commission of an offense against the United States, to wit, the unlawful supplementation of the salary of a government officer, Oliver L. North, as compensation for his services as an officer of

the National Security Council, from a source other than the Government of the United States or the treasury of any State, county or municipality.

(Violation of Title 18, United States Code,
Sections 209(a) and 2).

LAWRENCE E. WALSH
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