

# MOTION EXHIBIT 'B'

**CORPORATE COMPLIANCE  
INVESTIGATION SUMMARY  
1508-SCG-30014**

**SUBJECTS:**

CompuWorld Purchases through Chicago Bridge & Iron (CB&I)

**ALLEGATION**

In August 2015, Compliance was notified by NND Business & Finance of concerns related to potentially fraudulent furniture purchases for the nuclear construction project at VC Summer. These purchases are billed to project through the target invoice.

**BACKGROUND INFORMATION:**

Beginning in 2013, CB&I began purchasing office furniture from CompuWorld, Inc (CompuWorld). Since that time, SCE&G has been billed more than \$940,000 for purchases from this vendor. Research revealed that CompuWorld is based in Lexington, SC and owned by Alan Saleeby. CompuWorld purchases furniture through a distributor and has the items shipped to the VC Summer site. CompuWorld then bills CB&I for those purchases and they bill the project through the target invoice.

Upon reviewing the target invoice in August 2015, a SCANA employee noticed amounts that he deemed to be excessive for purchases of office furniture, including chairs, desks, and filing cabinets. He brought these items to the attention of CB&I and requested that they consider obtaining bids from different sources such as Amazon or Staples in order to find better pricing. He also asked Corporate Compliance to research CompuWorld to determine if they were a legitimate vendor.

**INVESTIGATIVE PLAN:**

- 1. Research CompuWorld to determine if they are a legitimate vendor.**
- 2. Determine if items purchased from CompuWorld were received at the VC Summer construction site.**
- 3. Analyze competitive bids received for purchases from CompuWorld to determine if they are appropriate.**

**INVESTIGATIVE SUMMARY (FINDINGS):**

**1. CompuWorld**

CompuWorld is owned by Alan Saleeby and based in Lexington, SC. Mr. Saleeby purchases products from a distributor and has them shipped to the buyer. He then invoices for these products. He has done business with the University of SC, Lexington County Sheriff's Department, SelectComfort, and others. He is a legitimate vendor.

**2. Receipt of Items**

Joey Gillespie of SCANA Audit Services selected a recent purchase from CompuWorld and verified that those items were received at the VC Summer site.

**3. CompuWorld Purchases**

Corporate Compliance reviewed bids received from CompuWorld. We noted that handwriting on one of the bids dated February 3, 2014 matched handwriting on a bid from JBE Media dated the same day. Additionally, Compliance noted that the email address used by Mark Jakiela of CB&I to request the bid from JBE Media was sent to an incorrect address. The address used by Mr. Jakiela was [joe@tabmmmediamgt.com](mailto:joe@tabmmmediamgt.com) instead of [joe@tabmediamgt.com](mailto:joe@tabmediamgt.com). Corporate Security contacted

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the owner of JBE Media, Joe Elliott, to request that he confirm he had provided the bid. Mr. Elliott asked to meet with Corporate Security and bring Alan Saleeby. Corporate Security showed Mr. Elliott the bid in question and he confirmed that it was not his handwriting. Corporate Security then showed Alan Saleeby the bid provided by CompuWorld. Mr. Saleeby confirmed he submitted that bid. Corporate Security then showed Mr. Saleeby the JBE Media bid. Mr. Saleeby confirmed he submitted that bid as well and signed Mr. Elliott's name, with Mr. Elliott's permission. During this meeting, Corporate Security confirmed Mr. Elliott and Mr. Saleeby had an agreement that Mr. Saleeby would mark up prices and submit a bid under JBE Media's name.

Corporate Compliance, Corporate Security, and Shirley Johnson met with Mark Jakiela and Eric Wilson of CB&I to discuss this finding and express our concern. Mr. Jakiela admitted that he knew both bids were submitted by Mr. Saleeby. Despite having numerous years of experiences in procurement, Mr. Jakiela stated that he did not see a problem with this practice. Corporate Compliance expressed a concern that these bids are not truly competitive if the two parties have a prearranged agreement that Saleeby will submit and win the bids. Corporate Compliance found that JBE Media never submitted the low price. CompuWorld was the successful bidder for almost every bid it submitted to CB&I for the VC Summer project.

Upon further review, Corporate Compliance discovered that Mr. Saleeby was also submitting bids for Capital Printer Repair and Furniture. Corporate Security met with the owner of Capital Printer Repair and Furniture, James Blackwell, and he confirmed he provided hand written bids to Mr. Saleeby and Mr. Saleeby submitted those for him. The owner stated he had never won any of the bids and would like to know whom he could contact at CB&I to find out the status of his proposals. We reviewed the request for bid sent by Mr. Jakiela. This request for bid was sent to [cprrepair@sc.rr.com](mailto:cprrepair@sc.rr.com) and [assaleeby@sc.rr.com](mailto:assaleeby@sc.rr.com). The email address Corporate Security found online for Capital Printer was [cprepair@sc.rr.com](mailto:cprepair@sc.rr.com). The email address normally used by Jakiela for Alan Saleeby was [asaleeby@sc.rr.com](mailto:asaleeby@sc.rr.com). Additionally, the request was sent to [assaleeby@sc.rr.com](mailto:assaleeby@sc.rr.com) on June 9, 2014. However, the deadline for submitting a bid was May 21, 2014. The bid submitted was dated May 19, 2014. Additionally, we noted a bid submitted by Capital Printer Repair and Furniture on August 30, 2015 was faxed from TAB Media, which is the name of the company used in Mr. Elliott's email address.

Corporate Compliance selected a sample of items purchased from CompuWorld during 2015. We compared the price paid to CompuWorld to prices of the same product from Amazon and Staples. The items could have been purchased from Amazon for 27% less and from Staples for 31% less.

**CCD CONCLUSION AND RECOMMENDATION:**

Based on our investigation, the allegation of fraudulent purchasing practices is confirmed. Alan Saleeby knowingly submitted bids for himself and two other companies. Because he was submitting all three bids, he was able ensure his price would win each time. The bids from JBE Media and Capital Printer were received for the sake of appearance only. Mark Jakiela, of CB&I, knowingly accepted these bids and attempted to convey that they were received from three separate competitors even though he knew each bid was submitted by Mr. Saleeby.

Corporate Compliance recommends that Mark Jakiela be removed from the VCS site for knowingly participating in the CompuWorld scheme. Additionally, CB&I should provide a credit for the excessive amount paid to CompuWorld due to the failure of CB&I to ensure competitive bids were obtained.

**To:** ARCHIE, JEFFREY B[JARCHIE@scana.com]  
**From:** JONES, RONALD A  
**Sent:** Thur 8/27/2015 9:00:58 AM  
**Subject:** FW: Good Business Practice in CB&I Procurement

Some more detail on the potential fraud issue. When Ken sent his note out yesterday morning Skip and I discussed. Once we found out that the business is located in a private home I asked that we pull Iris Griffin into the issue. It went from potential poor procurement practices to potential fraud.

**From:** SMITH, ABNEY A JR  
**Sent:** Wednesday, August 26, 2015 1:30 PM  
**To:** JONES, RONALD A  
**Subject:** Fw: Good Business Practice in CB&I Procurement

Compuworld Inc. Is located in a private home in Lexington. Something fishy here. I plan to discuss with Sean and give them opportunity to address. Didn't want to air out in email.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

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**From:** SMITH, ABNEY A JR <SASMITH@scana.com>  
**Sent:** Wednesday, August 26, 2015 12:48 PM  
**To:** Burk, Sean M; BROWNE, KENNETH JEROME  
**Cc:** JONES, RONALD A; Kenneth W. Hollenbach; White, Charles G; WALKER, CARLETTE L  
**Subject:** RE: Good Business Practice in CB&I Procurement

Sean, we appreciate your looking into the detail of this matter. Please understand that we had identified the same concern on a previous invoices, but made the decision to identify this type of issue on our target invoice log rather than dispute the invoices in an effort to receive your response and resolve. Unfortunately, we haven't been able to bring these "target log" issues to closure, so it's frustrating to us. Also, we have further questions related to Compuworld Inc. that I would like to discuss with you. Thanks.

Abney A. (Skip) Smith  
Manager, Business & Finance  
New Nuclear Deployment  
VC Summer Nuclear Station  
SCE&G  
803-941-9816 (O)  
803-530-5532 (C)

**From:** Burk, Sean M [mailto:sean.burk@cbi.com]  
**Sent:** Wednesday, August 26, 2015 11:56 AM  
**To:** BROWNE, KENNETH JEROME  
**Cc:** SMITH, ABNEY A JR; JONES, RONALD A; Kenneth W. Hollenbach; White, Charles G; WALKER, CARLETTE L  
**Subject:** RE: Good Business Practice in CB&I Procurement

\*\*\*This is an EXTERNAL email. Please do not click on a link or open any attachments unless you are confident it is from a trusted source.

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Ken, I will look into this in detail. If there is a pattern of office equipment ordering that needs corrected, we will take the appropriate actions and let you know. I would however appreciate a more professional request to the issue and not guess what our response and possible justification will be. In the future, please ask me the issue to be addressed and I'll run it to ground. Emails like this do not promote working together to resolve issues.

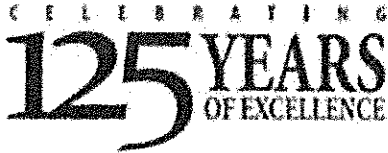


**Sean M. Burk**  
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CB&I  
VC Summer Site  
Jenkinsville, SC

[www.CBI.com](http://www.CBI.com)



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**From:** BROWNE, KENNETH JEROME [<mailto:KENNETH.BROWNE@scana.com>]  
**Sent:** Wednesday, August 26, 2015 10:19 AM  
**To:** Burk, Sean M  
**Cc:** SMITH, ABNEY A JR; JONES, RONALD A; Hollenbach, Kenneth W; White, Charles G; WALKER, CARLETTE L  
**Subject:** Good Business Practice in CB&I Procurement

Sean,  
Attached are three pdf files showing the commercial information for identical office chairs and Excel file with additional Compuworld information. The first one I would like to call to your attention is the file named Compuworld 8492.pdf. This is the backup information, approved by you and provided to SCE&G by CB&I for the purchase of 100 replacement office chairs for the VCS Units 2 & 3 project. The chairs were sourced from a company named Compuworld Inc. located in Columbia, SC. The backup includes a commercial analysis indicating that pricing was requested from JBE Media, Graybar, and

To: Burk, Sean M[sean.burk@cbi.com]  
Cc: SMITH, ABNEY A JR[SASMITH@scana.com]; JONES, RONALD A[RONALD.JONES@scana.com]; Kenneth W. Hollenbach[ken.hollenbach@cbi.com]; White, Charles G[charles.g.white@cbi.com]; WALKER, CARLETTE L[CWALKER@scana.com]  
From: BROWNE, KENNETH JEROME  
Sent: Wed 8/26/2015 10:19:00 AM  
Subject: Good Business Practice in CB&I Procurement  
[StaplesChair.pdf](#)  
[amazonchair.pdf](#)  
[Compuworld Inc Project to Date Amount.xlsx](#)  
[CompuworldLogExamples.xlsx](#)  
[Compuworld 8492.pdf](#)

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Sean,

Attached are three pdf files showing the commercial information for identical office chairs and Excel file with additional Compuworld information. The first one I would like to call to your attention is the file named Compuworld 8492.pdf. This is the backup information, approved by you and provided to SCE&G by CB&I for the purchase of 100 replacement office chairs for the VCS Units 2 & 3 project. The chairs were sourced from a company named Compuworld Inc. located in Columbia, SC. The backup includes a commercial analysis indicating that pricing was requested from JBE Media, Graybar, and Regional Material Handling for competitive analysis. None of these would be the obvious source of an office chair. As indicated in the backup information, and included in the July 2015 Target Price (Expense) billing to SCE&G, CB&I purchased 100 chairs at a cost of \$289.00 each (\$28,900.00 total cost). This same supplier, Compuworld, has been pointed out in numerous Target Log issues by SCE&G due to the lack of competitive pricing in prior purchases of office furnishings by CB&I (see CompuworldLogExamples.xlsx for a few from January 2015). To date, CB&I has purchased over \$941,000.00 from this vendor as shown in the other attached Excel file. A quick review of this information brings many questions to mind, including justification for the wide range in pricing for apparently identical items. For example, 2 Hour Fire Rated, 4 Drawer, File Cabinets have been purchased for prices ranging from \$2,128 to \$3,379. Also, a 2 Hour Fire Rated, 2 Drawer, File Cabinet was just purchased for \$3,499 and included in the July Target Price billing. This very same cabinet (FireKing Model 2-1929-2) is available from numerous sources for \$1,600 - \$1,700!

The additional pdf files provide a true competitive analysis for the chairs purchased. The identical chairs are available from Staples Office Supply at a cost of \$184.99 each, and if you wanted to get really resourceful, you could get them from Amazon for \$145.03 each. This pricing is for one chair, and it is possible that an even better price could be negotiated for 100 chairs purchased. The information was readily available and took only a minute or two to gain access. Both of these vendors also have local presence and one could even be the source for Compuworld to get their supply. At the price available from Amazon, CB&I could have saved almost 50% of the cost (\$14,397) on the very same chairs. Instead, through the purchase from Compuworld, CB&I has spent this amount unnecessarily, and **thus increased the cost to SCE&G by this amount + 3.09% G&A (\$444.86) AND 4.562% PROFIT (\$677.09) to CB&I. A total of \$15,518.95 of unnecessary cost.** How much of the \$941,000 has been unnecessary???

Some would argue that this is just a drop in the bucket in the construction of a \$10 Billion nuclear project and not worth our discussion. I can't reconcile this argument with the CB&I responsibility to SCE&G in the performance of a cost plus EPC Contract, nor can I reconcile this with the responsibility of SCE&G to our customers. This \$15,519 represents to me an indication of the attitude that I see every month as I review the CB&I Target Price invoices to SCE&G. This is not an isolated case, it is only a good and easily understandable example. I prefer to see this as a mere drop in the bucket of cost

reductions that are capable through the practice of making good business decisions as we move forward with this project. Again, CB&I has this responsibility to SCE&G and SCE&G has this responsibility to our customers.

I am sure that CB&I can, and will, provide some justification for making the purchase from Compuworld. In addition you will reply that you checked with three other sources, as you have in the past when questioned (see CompuworldLogExamples.xlsx). Rather than make the same arguments as you have in the past to justify the expense, please provide an explanation to SCE&G of how this practice will be stopped. It is past the time for good business practice to be followed in the purchase of supplies and materials for this project. The Compuworld issues will be put on the Target Log (again) and will not be closed until this practice has been stopped. I will also make a recommendation to SCE&G management to consider other, more meaningful actions to bring about this required change.

Thanks for your prompt attention to this issue, Ken

Ken Browne, P.E.

Senior Engineer

Business and Financial Services

New Nuclear Deployment, SCE&G

(803)941-9817

**To:** SMITH, ABNEY A JR[SASMITH@scana.com]  
**Cc:** WALKER, CARLETTE L[CWALKER@scana.com]; KOCHEMS, KEVIN R[KKOCHEMS@scana.com]  
**From:** BROWNE, KENNETH JEROME  
**Sent:** Mon 10/12/2015 3:33:25 PM  
**Subject:** Quick Look at CB&I Target Expenses Invoiced on October 9th

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Skip,

I made a very quick pass through the October "Expenses" billed from CB&I just to see how bad it was with respect to normal disputes and returns. It is a little worse than what we normally have seen for the past few months. Of a total Target Expense billing of \$3,667,161, Approximately \$632,000 would be in the categories that we have been returning. Approximate values of some of the major areas listed below:

Storage Due to Delays \$350,000

Firm Price Construction Equipment (Including Warehouse Equipment) \$110,000

Compuworld Purchases \$81,000

Unleaded Gasoline \$41,300

OWS Delay Cost \$30,000

Consumables and Min/Max \$15,900

Other Firm Price (Cell Phone/Office Supplies) \$3,800

Depending on execution of the agreement, we need to decide whether we choose to follow our normal process and dispute/return these costs, or pay them and take credit against the \$6B lump sum to complete.

Thanks, Ken

Ken Browne, P.E.

Senior Engineer

Business and Financial Services

New Nuclear Deployment, SCE&G

(803)941-9817



**To:** GRIFFIN, IRIS[Iris.Griffin@scana.com]  
**Cc:** CHASTAIN, WILLIAM K JR[WKCHASTAIN@scana.com]  
**From:** FREUND, WILLIAM  
**Sent:** Tue 9/1/2015 4:35:56 PM  
**Subject:** Investigation Report  
2015-01122.docx

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Iris,

Here is my report to date. If you see anything you would like changed or added, please let me know.

Thanks,

Bill

Bill Freund

Investigator, SCANA Corporate Security

(803) 422-6540 Cell Phone

(803) 217-9163 Office

On Wednesday, August 26<sup>th</sup>, 2015, I was contacted by SCANA's Compliance Officer, Iris Griffin, in reference to a vendor that may have been overcharging the company for supplies at VC Summer. Iris asked me to investigate the company, Compuworld, Inc. I was able to confirm that Compuworld was owned by Alan Saleeby. There have been no criminal complaints brought against either the company or the owner. Additionally, Compuworld has been awarded 8 federal contracts since 2000 as well as being a vendor for Lexington County, the University of South Carolina, and Select Comfort Sleep Number. I reported back to Iris that the company appears to be in good standing.

Later that afternoon, Iris contacted me and informed me that there is a senior vice president at Chicago Bridge and Iron (CB&I) by the name of Joe Saleeby. She requested that I investigate to try and find a link between Alan and Joe. After going through social media and public records, I was unable to find any relationship between the two men.

On the morning of Friday, August 28<sup>th</sup>, 2015, Iris asked me to meet in her office. She presented a bid for office supplies from February 3<sup>rd</sup>, 2014. Two of the bids were completed by hand. The handwriting appeared to be identical. Those bids were from Compuworld and JBE Media Management (JBE). A third bid, made by Carolina Material Handling, was typed when it was submitted. Further inspection of the bid showed that the incorrect email address was used for Joe Elliott, the owner of JBE. An extra letter had been entered into the bid notification email sent by Mark Jakiela, CB&I's procurement manager. That email had been sent on February 2<sup>nd</sup>, 2014.

I called Joe Elliott (803 463-3221) at 1:44 P.M. on Friday, August 28<sup>th</sup>, 2015 and left a voicemail message asking that he call me back. At 4:06 P.M. Joe returned my call. I explained that I was investigating a possible problem with a bid he had made. Joe said that he was leaving for vacation the following week, but I could call him on Monday to set up a time to meet him and show him the paperwork. At 4:47 P.M. Joe called me back. He stated that I had made him "very nervous," and he wanted to speak with me today. He also said that he had called his friend who does business with CB&I, Alan Saleeby, and they wished to meet with me at the Columbia Post Office immediately.

When I arrived at the Post Office at approximately 5:15 P.M., both men were already there. I introduced myself and explained my position at SCANA and why I wanted to see them. I showed Joe Elliott the bid from JBE, and he stated that it was not his handwriting. Alan Saleeby confirmed that the bid from Compuworld was his handwriting, and he then confirmed that the bid from JBE was also written by him. I asked whose signature was on the bottom of the JBE bid, and Alan said that it was Joe's signature, but Alan had signed it with Joe's permission.

Joe stated that he had given Alan permission to make the bid on his behalf because he had not received any email about it. The men said that they had been to a "lunch and learn" at VC Summer right around the time of this bid. Joe stated that this is where he had learned about CB&I. Joe explained that he and Alan are "friendly competitors" and that Alan knows what percentage Joe adds to his bids. Joe explained that Alan has submitted bids for him before, but neither man could provide a number of times it has occurred. Alan did confirm that he had prior dealings with Mark Jakiela while he was employed by Select Comfort Sleep Number. Joe said that he had met Mark at the "lunch and learn."

I then asked Alan what his relationship with Joe Saleeby was. He stated a cousin. He then asked if I meant Joe Saleeby the lobbyist who lives in Irmo. I told him that I was referring to Joe Saleeby who was a Senior Vice President with CB&I. Alan said that he had no knowledge of that Joe Saleeby, and if there is a family connection, he does not know about it. He seemed legitimately surprised by this information. Joe stated that he could definitely see where an auditing group would find these bids suspicious after hearing this information.

Both men asked what would happen at this time. I explained that I was simply following up on a request from the Corporate Compliance Officer, and I would report my findings back to her. Both men provided me with their contact information, and I gave mine to them.

I called and reported this information to Iris. She stated that we would probably need to speak with Mark Jakiela at VC Summer on Monday. I received an email from Iris on Sunday, August 30<sup>th</sup>, 2015, requesting that I meet her around 9:00 A.M. on Monday, August 31<sup>st</sup>, 2015 at VC Summer.

Iris introduced me to Shirley Johnson at VC Summer. She called Mark Jakiela, and he agreed to meet with us at the New Nuclear Deployment (NND) building around 9:15 A.M. Mark also asked his supervisor, Eric Wilson, to attend the meeting. When we sat down, Mark began to explain that he has become "complacent" in his duties. He further stated that he had not used Staples or Office Depot until recently because he did not have the approval to do so. He then explained that he could not use Office Depot because they would not accept a purchase order. However, he was going back for open bids and looking at Staples because they will accept a purchase order.

Mark further stated that Joe Elliott had told him that he allowed Alan Saleeby to submit a bid for him. Mark felt that since Joe had knowledge and approved the submission, he did not see an issue. This information provided by Mark all happened prior to any questions being asked by Iris, Shirley, or me.

When it was explained that this business practice concerned SCE&G as the customer, Eric stated that he was concerned about it as well. He assured us that he believed that this was an isolated incident, and he offered to have an SCE&G audit group come and review bids at anytime. During the discussion, Mark and Eric asked for SCE&G to provide a list of vendors used in the past to attempt to broaden the competition for suppliers.

The main concern I had following the interview was that Mark seemed to be very content with one company submitting a bid for another. It appeared that he was simply interested in having a certain number of bids to check a box as opposed to providing a true competition and value for the customer. This poor business practice appeared to be accepted and normal by Mark. Eric did state several times that it was concerning to him, and he understood the reason that it was being brought forward to their attention.

On Monday, September 14<sup>th</sup>, 2015, I was called by Iris Griffin in reference to more suspicious documentation concerning Compuworld. She asked for me to meet with Shirley Johnson on Tuesday, September 15<sup>th</sup>, 2015 at VC Summer. I met with Shirley at 10:00 A.M. Also in the meeting were Margaret Felkel and Joey Gillespie with SCANA Auditing and Accounting.

Shirley explained that she, Margaret, and Joey had gone to CB&I's offices to look through several files concerning different bids. The files had been preselected by Mark Jakiela. There were four specific bids all over \$25,000 that Shirley asked to see the records on that were not a part of the preselected files. In one of these files, there was more suspicious activity concerning Compuworld and JBE.

I was provided three packets that each represented one purchase order. In all three packets the same three companies had placed a bid: Compuworld, JBE, and Capital Printer Repair and Furniture (CPR). There were a few suspicious items on the CPR bids. The first was that according to the South Carolina Secretary of State, there is not a corporation with that name. The "and Furniture" had been added to the bid. Additionally, the address listed for the company on the bid was 201 Old Chapin Rd Chapin, SC 29036. There is not an Old Chapin Rd in Chapin. The correct address for CPR is 201 Old Cedar Point in Chapin. On the bid itself, I noticed that there was no signature line, yet for all the other bids, there had been one. Furthermore, the bid appeared to be in the exact same format as the JBE bids. Lastly, the email address for CPR that I was able to find on the internet was [cprepair@sc.rr.com](mailto:cprepair@sc.rr.com). However, all of the bid requests sent by Mark were sent to [cprrepair@sc.rr.com](mailto:cprrepair@sc.rr.com). Also, Purchase Order Number 132177F002884 showed that the bid request for CPR was sent to [assaleeby@sc.rr.com](mailto:assaleeby@sc.rr.com). These inconsistencies merited further investigation.

I called James Blackwell, the owner of CPR. He stated that he had done business with Alan Saleeby and Compuworld in the past. Alan would sell office equipment, and James would provide service if that equipment broke. James stated that printer repair was not a lucrative business anymore. He said that he had met Alan in early 2014, and Alan told him that he should bid on office furniture to try and supplement his income. James explained that he has bid on three orders from CB&I, but he has not heard anything back from them. I asked James if I could meet with him, and he told me to come to his residence at 3:00 P.M.

I arrived at James's residence and showed him the bids that his company had submitted. James explained that he received the purchase order from Alan, would price the items on the internet, handwrite his bid, and return it to Alan. James stated that he never typed any bids, and he did not know how to submit them to CB&I directly. I showed James the cover sheet with the email address, and he confirmed that Mark had not sent the bid request to the correct address. I then asked James if he had any copies of the bids that he had handwritten. James stated that he did not have copies, but he had recently asked Alan to provide him with copies of the bids that had been submitted. The copies that James produced had been faxed to him by Tab Media. Tab Media is the former name of JBE, and the email domain still used by Joe Elliott. James provided me with copies of these.

James stated that he was new to the business of bidding, and he was still learning. He asked that his correct email address be provided to CB&I so that he could be contacted directly to place bids. James is a disabled veteran. He was very forthcoming and cooperative in answering all of my questions and providing me with copies of the receipts that he had gotten from Tab Media. James also stated that if there were any further questions, he would be fine with speaking to me again.

After speaking with James, it is apparent that Alan knew what his competitors bid. In addition to Joe's admission that Alan could complete a bid for him because he knew his mark up, James delivered a handwritten bid to Alan. That bid then was apparently sent to Joe to type for submission. After reviewing the copies of the purchase orders, I am not able to ascertain how the bids were submitted back to Mark. There are several emails showing that a company was not bidding on a particular order, but there was no documentation showing how the bids from Compuworld, JBE, and CPR were received.