

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA : CRIMINAL NO. 11-299  
: :  
: : UNDER SEAL  
v. : :  
: : Violations:  
: :  
THEODOROS N. HALLAS, : 18 U.S. C. § 371 (Conspiracy)  
: :  
Defendant. : 28 U.S.C. § 2461 (Criminal Forfeiture)

**FILED**

OCT 13 2011

Clerk, U.S. District & Bankruptcy  
Courts for the District of Columbia

**STATEMENT OF OFFENSE**

1. From on or about November 1, 2007 through on or about December 30, 2010, the defendant, THEODOROS N. HALLAS ("HALLAS"), was the Executive Vice President for Operations of Nova Datacom, LLC ("Nova Datacom").
2. Nova Datacom was a provider of information assurance and security services to federal agencies and commercial companies. Nova Datacom maintained its corporate headquarters in Chantilly, Virginia.
3. In October 2007, the United States Small Business Administration ("SBA"), an agency of the executive branch of the Government of the United States, certified Nova Datacom as an 8(a) small disadvantaged business.
4. Following its certification by the SBA, Nova Datacom submitted written responses to solicitations from federal agencies to provide services and equipment. As part of those responses, Nova Datacom provided past performance references and evaluations from corporate entities that purportedly had contractual relationships with Nova Datacom ("Nova Datacom References").

5. MED Trends, Inc. ("MED Trends") was a provider of information technology equipment and services to federal agencies. MED Trends submitted written responses to solicitations from federal agencies to provide services and equipment. As part of those responses, MED Trends provided past performance references and evaluations from corporate entities that purportedly had contractual relationships with MED Trends ("MED Trends References"). MED Trends identified Nova Datacom as a MED Trends Reference to procure and attempt to procure federal contracts on behalf of MED Trends.

6. RAJESH KUMAR MALIK, a/k/a, ROGER MALIK ("MALIK"), was the Executive Vice President of MED Trends. HALLAS met MALIK in the 1990's when they shared an office while working together for a short period of time at an information technology company. After HALLAS and MALIK left the company, they remained in contact with each other.

7. HALLAS agreed to provide MALIK with false past performance references and evaluations to burnish the qualifications of MED Trends to perform federal contracts and to grow the federal contracting business for MED Trends. HALLAS agreed to allow MALIK to represent falsely to federal agencies that HALLAS'S employers, including Nova Datacom, had contractual relationships with MED Trends. MALIK arranged for HALLAS to provide false information to federal agencies in the event the agencies contacted HALLAS to verify the false information provided to the agencies by MALIK on behalf of MED Trends.

8. Upon joining Nova Datacom, HALLAS employed a similar strategy of using MALIK and others to provide false past performance references to burnish the qualifications of Nova Datacom to perform federal contracts and to grow the federal contracting business for

Nova Datacom. MALIK agreed to allow HALLAS to represent falsely to federal agencies that MED Trends had contractual relationships with Nova Datacom. HALLAS and other agents and employees of Nova Datacom ("Nova Datacom Representatives") arranged for the Nova Datacom References to provide false information to federal agencies in the event the agencies contacted the references to verify the information provided by the references to the agencies.

9. In or about December 2007, Nova Datacom submitted pricing information to the United States General Services Administration ("GSA") on labor categories that Nova Datacom charged and sought to charge federal agencies for contracts awarded to Nova Datacom through a GSA multiple awards schedule. The proposed labor rates purported to reflect discounts off the best customer rate offered by Nova Datacom to three Nova Datacom References. HALLAS and other Nova Datacom Representatives caused Nova Datacom to submit false pricing information to the GSA.

10. On or about July 15, 2008, HALLAS and other Nova Datacom Representatives caused Nova Datacom to submit a written response to the GSA, Office of Inspector General ("OIG"), in Washington, D.C., in response to Solicitation Number GSJ0008PD0013. As part of the response to establish its qualifications for the Solicitation, HALLAS caused Nova Datacom to provide to the GSA OIG a false past performance citation identifying Nova Datacom as a subcontractor to MED Trends for a certain federal contract when, in fact, Nova Datacom was not a subcontractor to MED Trends.

11. On or about December 10, 2007 and March 25, 2008, HALLAS and other Nova Datacom Representatives caused Nova Datacom to submit written responses to the GSA in connection with Solicitation Number FCIS-JB-980001B that falsely represented to the GSA that

Nova Datacom had performed information technology related projects with three Nova Datacom References, including MED Trends. In fact, Nova Datacom had not performed information technology projects for the three references.

12. On or about December 10, 2007 and March 25, 2008, HALLAS and other Nova Datacom Representatives caused Nova Datacom to submit to the GSA the per hour labor rates that Nova Datacom proposed to charge federal agencies for eighteen labor categories in connection with Solicitation Number FCIS-JB-980001B that falsely represented the hourly rates charged by Nova Datacom.

13. On or about May 1, 2009, HALLAS and other Nova Datacom Representatives caused Nova Datacom to submit a written response to the National Indian Gaming Commission ("NIGC") in Washington, D.C., in response to a Request for Quotation ("RFQ") No. 301442. As part of the response to establish its qualifications for the RFQ, HALLAS caused Nova Datacom to provide to the NIGC a false Past Performance Questionnaire identifying Nova Datacom as a subcontractor to MED Trends for a certain federal contract when, in fact, Nova Datacom was not a subcontractor to MED Trends.

14. On or about September 9, 2009, HALLAS and other Nova Datacom Representatives caused Nova Datacom to submit a written response to the Defense Contract Management Agency ("DCMA") in response to RFQ No. S5105A-09-Q-0027. As part of the response to establish its qualifications for the RFQ, HALLAS caused Nova Datacom to provide to the DCMA a false Past Performance Reference identifying Nova Datacom as a subcontractor to MED Trends for a certain federal contract when, in fact, Nova Datacom was not a subcontractor to MED Trends.

15. On or about October 1, 2009, HALLAS and other Nova Datacom Representatives caused Nova Datacom to submit a written response to the GSA in response to Solicitation No. QTA609MCA0010. As part of the response to establish its qualifications for the Solicitation, HALLAS caused Nova Datacom to provide to the GSA a false Past Performance Narrative and a false Past Performance Survey identifying Nova Datacom as a subcontractor to MED Trends for a certain federal contract when, in fact, Nova Datacom was not a subcontractor to MED Trends.

16. On or about November 9, 2009, as directed by MALIK, HALLAS emailed to MALIK a false past performance evaluation for MED Trends addressed to the United States Department of Labor in Washington, D.C. in connection with Solicitation number DOL110RP20830. The evaluation falsely represented that MED Trends had provided "Excellent" and "Good" services to Nova Datacom as part of a six-year, \$5,384,734.20 contract. HALLAS and MALIK knew that MED Trends had provided no such services to Nova Datacom.

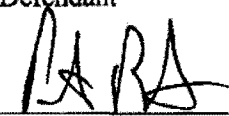
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The preceding statement is a summary, made for the purpose of providing the Court with a factual basis for my guilty plea to the charges against me. It does not include all of the facts known to me regarding this offense. I, THEODOROS N. HALLAS, make this statement knowingly and voluntarily and because I am in fact guilty of the crime charged.

DATE: 10/13/11

  
\_\_\_\_\_  
THEODOROS N. HALLAS  
Defendant

DATE: 10/13/11

  
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Preston Burton  
Attorney for Defendant