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★ FEB 24 2016

ALB:CPK  
F. #2013R00642

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

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FILED UNDER SEAL

UNITED STATES OF AMERICA

COMPLAINT

- against -

M. No.

PAUL SKISCIM,

(18 U.S.C. § 38)

**16-0155M**

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

BRYAN J. O'TOOLE, being duly sworn, deposes and says that he is a Special Agent of the Defense Criminal Investigative Service ("DCIS") of the United States Department of Defense's Office of Inspector General, duly appointed and sworn as a Special Agent. This affidavit is based on information and belief the source of that information and the basis of my belief being discussions with other agents and confidential sources which established that:

From May, 2013 to February, 2016, within the Eastern District of New York and elsewhere, the defendant PAUL SKISCIM, together with others, in and affecting interstate commerce, did knowingly and with the intent to defraud, falsify and conceals a material fact concerning aircraft parts and make material fraudulent representation concerning aircraft parts and make and use a materially false writing, entry, certification, document, record, data plate, label and electronic communication concerning aircraft parts.

(Title 18, United States Code, Section 38)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am Special Agent of the Defense Criminal Investigative Service ("DCIS"), duly appointed according to law and acting as such. I have been employed as Special Agent of the DCIS for approximately eight (8) years and I am currently assigned to the DCIS New York Resident Agency.

2. In or about 2003, the defendant PAUL SKISCIM registered Aerospec Fasteners, Inc. with the United States Government as a contractor. Defendant was President and Owner of Aerospec Fasteners located in Kings Park, New York. Thereafter, defendant, through Aerospec Fasteners, supplied defective and non-conforming airplane parts to the United States Government as a contractor.

3. In or about May 29, 2013, both Aerospec Fasteners, Inc. owned and operated by SKISCIM, and the defendant himself, were debarred from doing any business with the United States Government.

4. After his debarment, and despite his debarment, defendant SKISCIM continued conducting business with the United States Government using shell companies that concealed his involvement.

5. During this post-debarment period, defendant SKISCIM, through these shell companies, including Sun Tech Air Parts, Aerocon Corp. and Specialty Components, Inc. (the "Shell Companies") won bids for supply contracts for airplane parts by concealing the

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.


defendant's involvement in the bids. Instead of using his name, defendant SKISCIM has used the name of relatives and fictitious names as the responsible persons at these shell companies. However, the payments on the contracts from the United States government for the airplane parts supplied by the Shell Companies continue to go to bank accounts controlled by the defendant. Thus, the defendant has concealed from the United States Government, including, but not limited to the Defense Logistics Agency ("DLA"), his involvement during his debarment period in both the Shell Companies and the bids for contracts for airplane parts which the Shell Companies were awarded, many by DLA.

6. During the bidding process for these contracts, defendant SKISCIM, through the Shell Companies made material fraudulent representations concerning, among other things, the defendant's involvement with the Shell Companies and the source of the aircraft parts.

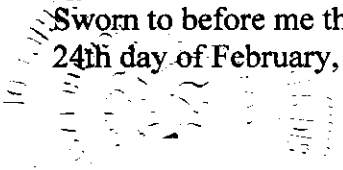
7. During his debarment period, defendant SKISCIM billed the United States Government through the Shell Companies and obtained millions of dollars for airplane parts. During this period, May 2013 to February 2016, defendant received over two million

and eight hundred thousand dollars (\$2,800,000.00) from the United States Government for airplane parts, some of which has been found to be defective and non-conforming.

WHEREFORE, your deponent respectfully requests that the defendants be dealt with according to law.

  
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BRYAN J. O'TOOLE  
Special Agent, Defense Criminal Investigative  
Service

Sworn to before me this  
24th day of February, 2016

  
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/s/ Anne Y. Shields  
THE HONORABLE ANNE Y. SHIELDS  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK