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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALFREDO LIBURD,

Defendant.

Case No. 17CR 2189-JLS

**I N F O R M A T I O N**

18 U.S.C. 208 – Conflict of Interest; and 18  
U.S.C. 2 – Aiding and Abetting

The United States charges:

**INTRODUCTORY ALLEGATIONS**

1. The mission of the United States Navy is to maintain, train and equip combat-ready forces capable of winning wars, deterring aggression and maintaining freedom of the seas.

2. The shore establishment is a critical component of the Navy's mission, which provides vital support to the operating forces by, among other things, repairing ships, machinery, and electronics for the naval fleet.

3. The Southwest Regional Maintenance Center ("SWRMC") is one of the Navy's largest and most diverse intermediate maintenance centers. SWRMC provides intermediate level maintenance support and selective maintenance training to over 100 surface ships, submarines, shore activities and other commands of the U.S. Pacific Fleet.

1 Intermediate level maintenance complements and bridges a gap between two other type of  
2 repairs, the routine shipboard repairs which are performed by ship crew, and depot level  
3 repairs which are extensive industrial repairs performed during periodic ship overhauls and  
4 dedicated repairs availabilities by Navy and commercial shipyards.

5 4. From March 30, 2009 to the date of this Information, in the Southern District  
6 of California, John Nasshan (charged elsewhere) was employed at SWRMC by the  
7 Executive Branch of the United States as a Combat Systems Port Engineer. As a Combat  
8 Systems Port Engineer, Nasshan drafted technical direction letters, recommended which  
9 contractors were qualified for jobs, and verified and certified work performed on Navy  
10 ships by contractors.

11 5. At all times relevant herein, the Defendant was the President and Chief  
12 Executive Officer of NEVWEST, Inc. ("NevWest"). NevWest is a defense contractor  
13 located at 1225 South Exposition Way, Suite 140, in San Diego, California. NevWest  
14 provides, among other services, combat systems engineering support, electronic technical  
15 support, and enterprise management and application development services for a wide-  
16 variety of naval applications – including command, control and communications,  
17 computers, combat systems, surveillance and reconnaissance, and electronics space  
18 modernizations.

19 6. As in all phases of the Government contracting process, it is essential that the  
20 work performed by contractors be done free of undue influence, bias, or favoritism. In this  
21 regard, Defendant recognized that Nasshan was prohibited from working on any matters  
22 that would affect his financial interests, including working with contractors who Nasshan  
23 had loaned money.

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**COUNT 1**

18 U.S.C. §§ 208 and 2

**CONFLICT OF INTEREST**

1. Paragraphs 1 through 6 of the Introductory Allegations are realleged and incorporated by reference.

2. Since at least April 26, 2011 through at least September 2015, DEFENDANT ALFREDO LIBURD aided and abetted Nasshan's willful participation, personally and substantially, as a Government officer and employee, through decision, approval, and recommendation in a contract and other particular matter as a Combat Support Port Engineer, in which Defendant had a financial interest.

**DETAILS OF THE ILLEGAL CONDUCT**

3. Since at least April 26, 2011 through at least September 2015, Defendant recognized that Nasshan had a financial interest in the business affairs of NevWest, and its President and Chief Executive Officer, A.L. In particular, Defendant knew that he and NevWest had received more than \$30,000 in loans from Nasshan during this time.

4. At the same time Defendant was obtaining loans from Nasshan, Defendant recognized that NevWest was engaged in numerous subcontracts with SWRMC. Defendant also recognized that Nasshan's job resulted in his being involved with administering these subcontracts.

5. In order to aid and assist Nasshan's illegal activity, Defendant agreed to: (i) keep his financial arrangement with Nasshan secret; and (ii) deal in cash when exchanging amounts over \$10,000. In this regard, Defendant and Nasshan discussed how it was essential that no one from the government discovered their financial relationship.

6. In order to aid and assist Nasshan, Defendant (on or about June 25, 2014) accepted \$20,000 in cash from Nasshan as a loan.

7. In order to aid and abet Nasshan by hiding and concealing their illegal activity, Defendant (on or about June 27, 2014) structured the \$20,000 from Nasshan by dividing it up into amounts of \$10,000 or less.

1           8.     In order to aid and abet Nasshan, Defendant (on or about October 25, 2014)  
2 gave Defendant \$20,000 in cash to repay the loan.

3           9.     In order to hide and conceal their illegal activity, Defendant (in or about  
4 September 24, 2015) accepted thousands of dollars in cash from Nasshan as a loan.

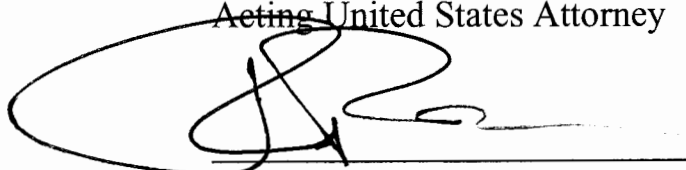
5           10.    In order to hide and conceal Nasshan's illegal conflict of interest with  
6 Nevwest, Defendant (on or about November 13, 2015) falsely told a Defense Criminal  
7 Investigative Service ("DCIS") agent that he never: (i) received any money from Nasshan,  
8 including cash; (ii) paid Nasshan any money; and (iii) obtained any loans from Nasshan.

9           11.    During all times relevant herein, Defendant aided and assisted Nasshan with  
10 knowingly and willfully participating in a government contracting matter in which Nasshan  
11 had a financial interest.

12  
13           All in violation of Title 18, United States Code, Sections 208 and 2.

14 DATED: 7/31/17

ALANA W. ROBINSON  
Acting United States Attorney

  
PHILLIP L.B. HALPERN  
Assistant U.S. Attorney