

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN NASSHAN,

Defendant.

Case No. 17CR 1166-JLS

I N F O R M A T I O N

18 U.S.C. 208 – Conflict of Interest

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, DEFENDANT JOHN NASSHAN 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, Defendant 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. As in all phases of the Government contracting process, it is essential that the  
12 work performed by contractors be done free of undue influence, bias, or favoritism.  
13 Accordingly, Combat System Port Engineers are prohibited from working on any matters  
14 that would affect their financial interests, such as loaning money to a contractor who was  
15 working at SWRMC.

16 6. NEVWEST, Inc. ("NevWest") is a defense contractor located at 1225 South  
17 Exposition Way, Suite 140, in San Diego, California. NevWest provides combat systems  
18 engineering support, electronic technical support, enterprise management and application  
19 development services in command, control and communications, computers, combat  
20 systems, intelligence, surveillance and reconnaissance, government and commercial  
21 services, and electronics space modernizations.

## 22 **COUNT 1**

23 18 U.S.C. § 208

### 24 **CONFLICT OF INTEREST**

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

27 8. Since at least May 20, 2011 through at least September 2015, DEFENDANT  
28 JOHN NASSHAN willfully participated, personally and substantially, as a Government

1 officer and employee, through decision, approval, and recommendation in a contract and  
2 other particular matter as a Combat Support Port Engineer, in which Defendant had a  
3 financial interest.

#### 4 **DETAILS OF THE ILLEGAL CONDUCT**

5 9. Since at least May 20, 2011 through at least September 2015, Defendant had  
6 a financial interest in the business affairs of NevWest, and its President and Chief  
7 Executive Officer, A.L. In particular, Defendant loaned A.L. and NevWest more than  
8 \$30,000 during this time.

9 10. At the same time Defendant was loaning money to A.L. and NevWest,  
10 Defendant recognized that NevWest was engaged in numerous subcontracts with  
11 SWRMC. Defendant also recognized that his job resulted in his being involved with  
12 administering these subcontracts.

13 11. In order to hide and conceal their illegal activity, Defendant and A.L. agreed  
14 to: (i) keep their financial arrangement secret; (ii) deal in cash when exchanging amounts  
15 over \$10,000; and (iii) structure the cash they were exchanging by dividing it up into  
16 amounts of \$10,000 or less.

17 12. In order to hide and conceal his illegal conflict of interest with A.L. and  
18 NevWest, Defendant (on November 2, 2015) falsely told a Naval Criminal Investigative  
19 Service ("NCIS") agent that he did not have a "financial interest . . . in any private  
20 companies or contractors whose work [he had] verified, certified, or recommended."

21 13. In order to aid and abet Defendant, A.L. (on November 13, 2015) falsely told  
22 a Defense Criminal Investigative Service ("DCIS") agent that he never: (i) received any  
23 money from Defendant, including cash; (ii) paid Defendant any money; or (iii) obtained  
24 any loans from Defendant.

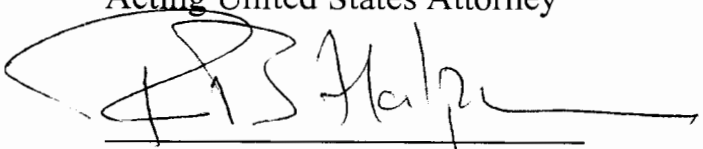
25 14. In order to hide and conceal his illegal conflict of interest with A.L. and  
26 NevWest, Defendant (on November 13, 2015) falsely told a Federal Bureau of  
27 Investigation ("FBI") agent that he: (i) did not have a financial interest with A.L. and  
28

1 NevWest; (ii) never gave A.L. cash or a check; and (iii) never loaned A.L. or NevWest  
2 money.

3 All in violation of Title 18, United States Code, Section 208.

4  
5 DATED: 5/8/17

ALANA W. ROBINSON  
Acting United States Attorney

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