UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. TIMOTHY CASHMAN, Defendant.	Case No. 14CR3621-GPC **Superseding** I N F O R M A T I O N Title 18, U.S.C., Section 371 - Conspiracy to Commit Bribery and Theft of Government Property; Title 26 U.S.C., Section 7206(1) - Filing False Tax Return

The United States Attorney charges:

INTRODUCTORY ALLEGATIONS

At all times relevant herein:

1. Defendant TIMOTHY CASHMAN (hereinafter referred to as ("CASHMAN") was a Building Manager with the General Services Administration ("GSA"), who was responsible for managing a number of GSA facilities in San Diego County. These facilities included the San Ysidro Port of Entry ("POE") and the Otay Mesa POE.

2. Hugo Alonso Inc. ("HAI") was a California corporation owned principally by Hugo Alonso (charged elsewhere), which primarily operated as a government contractor performing construction and painting services at various GSA and Department of Defense facilities.

3. Company "A" was a California corporation, which allegedly was formed to perform energy audits.

4. Company "B" was a GSA prime contractor responsible for overseeing the construction contracts for GSA at the San Ysidro POE.

5. Company "C" was a provider of facility maintenance services with offices located across the country. The stated goal of Company "C" was to maintain and operate each facility as a world class, superior workplace that helped their customers increase effectiveness and efficiency of operations. Company "C" was a GSA prime contractor that managed, among other things, the San Ysidro and Otay Mesa POE's.

6. Company "D" was a company located in Lakeside California, which purchased materials from the public for recycling. These materials included copper, brass, and stainless steel.

7. Company "E" was a San Diego corporation specializing in the production and installation of chain link fences, automated gates and other landscaping features.

COUNT ONE

(Conspiracy - 18 U.S.C. Section 371)

8. The Introductory Allegations contained in paragraphs 1 through 7 of this information are re-alleged and incorporated as if set forth fully herein.

9. Beginning as early as 2007 and continuing up to and including March 2014, in the Southern District of California, and elsewhere, defendant TIMOTHY CASHMAN knowingly conspired and agreed to: (1) corruptly demand, seek and accept things of value in return for being influenced in the performance of his official acts in violation of Title 18, United States Code, Section 201; and (2) knowingly convert to his use and, without authority, sell and dispose of things of value of the United States in violation of Title 18, United States Code, Section 641.

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METHODS AND MEANS OF THE CONSPIRACY

10. As a method and mean of the conspiracy, CASHMAN would corruptly demand and seek things of value from HAI and others in return for assisting HAI to obtain government contracts from GSA.

11. As a further method and mean of the conspiracy, CASHMAN would improperly obtain valuable United States Government building materials for his own benefit and enjoyment by causing GSA contractors and others to remove and transport such materials away from GSA facilities and to sell or use them (without the knowledge of GSA).

12. As a further method and means of the conspiracy, CASHMAN would conceal and perpetuate the conspiracy by giving false and misleading information to GSA and other federal officials about his dealings with contractors and the disposition of GSA building materials.

OVERT ACTS

13. The following overt acts, among others, were committed in the Southern District of California and elsewhere:

a. In or about early 2007, CASHMAN corruptly requested that Hugo Alonso give him $10,000 in exchange for CASHMAN assisting HAI to obtain GSA contracts.

b. In or about late 2007, CASHMAN demanded from an employee of HAI, T.F., that HAI paint his home and replace windows free of charge - in exchange for CASHMAN assisting HAI to obtain GSA contracts.

c. In or about early 2008, CASHMAN demanded that Hugo Alonso pay Company "A" $120,000 in exchange for being awarded a GSA construction contract (number GS09P08KSC0033) at the Otay Mesa POE.

d. On or about June 18 through November 20, 2008, CASHMAN accepted from Company "A", and deposited into his personal account, five checks totaling $32,000.

e. On or about January 26, 2009, CASHMAN accepted a $10,000 check from Company "A," which he deposited into his personal account.

f. On or about June 2, 2009, CASHMAN concealed any of the benefits he received from Company "A" or HAI when submitting his 2008 Form 1040 Federal Income Tax Return.

g. In or about early March 2011, at the San Ysidro POE, CASHMAN instructed two employees of Company "C", R.P. and J.B., to load approximately 25 stainless steel panels belonging to the United States Government into his personal Ford truck.

h. On or about March 12, 2011, CASHMAN sold some of the stainless steel panels he took from the San Ysidro POE, without permission, to Company "D" for $670.67.

i. On or about May 7, 2011, at the San Ysidro POE, CASHMAN instructed the owner of Company "E", I.C., to assist in the transportation of approximately 15 stainless steel panels belonging to the United States Government to Company "D".

j. On or about May 7, 2011, CASHMAN sold some of the stainless steel panels he took from the San Ysidro POE, without permission, to Company "D" for $462.02.

k. In or about June 2011, CASHMAN requested that HAI replace the roof on his home free of charge in exchange for CASHMAN assisting HAI to obtain GSA contracts.

l. On or about January 18, 2012, at the San Ysidro POE, CASHMAN directed an employee of Company "B", G.D., to deliver to the old POE garage a total of 35 heavy brass letters (spelling out "United States Border Inspection Station") belonging to the United States Government.

m. In or about late January 2012, at the San Ysidro POE, CASHMAN instructed an employee of Company "C", G.S. to load the 35 brass letters (weighing approximately 2,000 pounds) into CASHMAN's personal Ford truck.

n. Between February 11, 2012 and April 11, 2012, CASHMAN (without the knowledge of GSA) sold the brass letters to Company "D" for $3,165.95.

o. On or about April 19, 2012, CASHMAN omitted to declare any of the benefits he received from HAI or Company "A" on his 2009 Form 1020 Federal Income Tax Return.

p. In or about December 2012, at the Otay Mesa POE, CASHMAN instructed an employee of Company "C", B.S., to collect approximately 3,000 feet of underground copper cable belonging to the United States Government and to deliver it to, among other places, CASHMAN's personal residence.

q. In or about December 2012, CASHMAN gave B.S. approximately 400 feet of the stolen copper cable in return for his assistance taking the cable to CASHMAN's home.

r. On December 18 and 19, 2012 in Lakeside, California, CASHMAN (without the knowledge of GSA) sold the remaining 2,600 feet of copper cable to Company "D" for $1,308.68.

s. On or about November 14, 2013, at the Otay Mesa POE, CASHMAN instructed B.S. to set aside a large quantity of underground copper cable belonging to the United States Government.

t. In or about late November 2013, CASHMAN instructed I.C. (without the knowledge of GSA) to sell the large quantity of underground copper cable that had been previously set aside (as well as approximately 5 aluminum panels belonging to the United States Government) and give the proceeds to CASHMAN.

u. On or about February 23, 2014, CASHMAN accepted approximately $2,450 in payment for the sale of the underground copper cable and aluminum panels.

v. On or about July 1, 2014, CASHMAN falsely told federal agents that he had never received anything of value from Company "A".

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

(False Tax Return - 26 U.S.C. Section 7206(1))

14. On or about June 2, 2009, in the Southern District of California, TIMOTHY CASHMAN, did willfully make and subscribe a joint United States Individual Income Tax Return, Form 1040, for the calendar year 2008, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter, in violation of Title 26, United States Code, Section 7206(1).

DATED: April 10, 2015.

LAURA E. DUFFY
United States Attorney

By: [signature]
Phillip L.B. Halpern
Assistant U.S. Attorney