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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

February 2017 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARY JEAN HASTINGS,

Defendant.

ED CR NO.

EDCR-17-261-GW

I N D I C T M E N T

[18 U.S.C. §§ 203(a)(1)(B),
216(a)(2): Compensation for
Representational Services in
Matters Affecting the Government;
18 U.S.C. §§ 208(a), 216(a)(2):
Conflict of Interest]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

1. On August 31, 2010, the Department of Defense, United States Army, Army Corps of Engineers awarded a Hazardous Materials Management Program ("HMMP") contract, W91238-10-D-0024, to Company A. Pursuant to that contract, Company A provided worldwide services to Department of Defense installations in the handling and management of hazardous material and hazardous waste.

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DOB

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1 2. During the period February 1, 2011 through October 4, 2014,
2 Company A provided services to Fort Irwin, a United States Army Base
3 located in San Bernardino County, California, pursuant to individual
4 task orders issued under the HMMP contract.

5 3. Beginning on January 15, 2011 and continuing through the
6 present, the United States Army employed defendant MARY JEAN HASTINGS
7 ("HASTINGS") as a civilian, assigned to the Directorate of Public
8 Works, Environmental Division, at Fort Irwin, at a beginning salary
9 of \$86,863 per year plus benefits. As a government employee,
10 defendant HASTINGS was responsible for managing and overseeing
11 environmental compliance at Fort Irwin, including the management of
12 hazardous waste and hazardous materials pursuant to the HMMP
13 contract.

14 4. Beginning on May 19, 2011 and continuing through May 9,
15 2014, Company A also employed defendant HASTINGS as its Site Manager
16 for the HMMP contract at Fort Irwin, with a beginning salary of
17 \$95,000 per year plus benefits. As a Company A employee, defendant
18 HASTINGS supervised several employees who worked for Company A at
19 Fort Irwin, all of whom performed labor in connection with the HMMP
20 contract.

21 5. These Introductory Allegations are hereby incorporated by
22 reference into Counts One and Two of this Indictment as though fully
23 set forth therein.

COUNT ONE

[18 U.S.C. §§ 203(a)(1)(B), 216(a)(2)]


Beginning on or about May 19, 2011, and continuing through on or about May 9, 2014, in San Bernardino County, within the Central District of California, defendant MARY JEAN HASTINGS knowingly and willfully received, accepted, and agreed to receive and accept compensation, other than as provided by law for the proper discharge of her official duties, for representational services personally rendered as an employee to Company A as its Site Manager at Fort Irwin, in relation to a contract in which the Department of Defense, United States Army was a party, namely, the HMMP contract, at a time when she was an employee of an agency of the United States, namely, the Department of Defense, United States Army.

COUNT TWO


[18 U.S.C. §§ 208(a), 216(a)(2)]

Beginning on or about May 19, 2011, and continuing through on or about May 9, 2014, in San Bernardino County, within the Central District of California, defendant MARY JEAN HASTINGS ("HASTINGS"), while employed by the executive branch of the United States Government, namely, the Department of Defense, United States Army, knowingly and willfully participated personally and substantially as a Government officer and employee, through decision, approval, recommendation, the rendering of advice, and otherwise, in an application, contract, claim, and other particular matters, in which both defendant HASTINGS and an organization in which defendant HASTINGS was serving as an employee, namely, Company A, had a financial interest.

A TRUE BILL

Foreperson 

SANDRA R. BROWN
Acting United States Attorney


LAWRENCE S. MIDDLETON
Assistant United States Attorney
Chief, Criminal Division

MACK E. JENKINS
Assistant United States Attorney
Chief, Public Corruption &
Civil Rights Section

DANIEL J. O'BRIEN
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Deputy Chief, Public Corruption &
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