


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

FILED
U.S. DISTRICT COURT
SAVANNAH DIV.

2018 JUN -6 PM 2:47

CLERK 
SO. DIST. OF GA.

UNITED STATES OF AMERICA) INDICTMENT NO.:
)
v.) Violating the Restriction
) On Post-Employment
GLENN JENKINS,) Communications and
) Appearances
Defendant.)
) 18 U.S.C. § 207(a)(1)
)
) False Statements
)
) 18 U.S.C. § 1001(a)(2)

CR 118 - 033

THE GRAND JURY CHARGES THAT:

COUNT ONE

18 U.S.C. § 207(a)(1)

Violating the Restriction on Post-Employment Communications and Appearances

1. Defendant **GLENN JENKINS** was an Officer in the United States Army, serving at Fort Gordon, Georgia.

2. Among other things, **JENKINS** participated personally and substantially in drafting required contracting and procurement sensitive documents for Training and Doctrine Command, Capability Manager, Networks and Services (TCM N & S) while serving at Fort Gordon, Georgia. Jenkins dealt personally and substantially with a number of parties while at TCM N & S, including but not limited to Communications, Research, Engineering, and Consultants Group, LLC ("CREC Group"), a private contractor that attempted to and ultimately obtained contracts and performed work on behalf of TCM N & S.

3. By virtue of his personal and substantial role in drafting required contracting and procurement sensitive documents for the United States Army at TCM N & S, Fort Gordon, Georgia, after leaving active duty service, **JENKINS** was permanently prohibited from conducting any work related to the specific requirements that **JENKINS** personally and substantially worked on while employed by the United States Army. In particular, **JENKINS** was permanently prohibited from obtaining contracts or performing work on behalf of CREC Group involving the specific requirements Jenkins personally and substantially worked on while employed by the United States Army.

4. **JENKINS** retired from the United States Army on October 31, 2014 at the rank of Lieutenant Colonel.

5. From on or about November 2014, and continuing until on or about February 2015, in Richmond County, within the Southern District of Georgia, and elsewhere, **GLENN JENKINS**, the defendant herein, after having terminated his employment with the executive branch of the United States government, that is as Lieutenant Colonel in the United States Army at TCM N & S, Fort Gordon, Georgia, did knowingly and willfully make, with intent to influence, one or more communications on behalf of CREC Group to persons employed with the United States Army at TCM N & S, Fort Gordon, Georgia, in connection with attempts by CREC Group to obtain contracts and perform work on behalf of TCM N & S, particular matters in which the United States Army was a party, and which the United States Army had a direct and substantial interest, and in which the

defendant, **GLENN JENKINS**, participated personally and substantially while he was employed as an Officer in the United States Army at TCM N & S, Fort Gordon, Georgia, and which involved a specific party or parties, namely CREC Group, at the time of **JENKINS'** participation as an Officer in the United States Army at TCM N & S, Fort Gordon, Georgia.

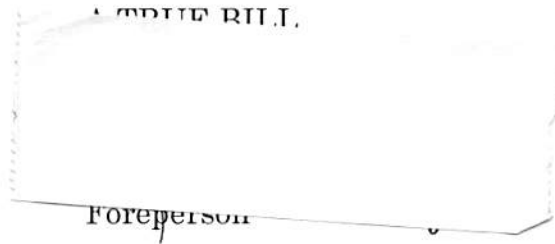
All done in violation of Title 18, United States Code, Sections 207(a)(1) and 216(a)(2).

COUNT TWO
18 U.S.C. § 1001(a)(2)
False Statements

6. The allegations in paragraphs 1 through 5 of this Indictment are hereby realleged and incorporated as if fully set forth herein.

7. That on or about the 6th day of January, 2016, in Richmond County, within the Southern District of Georgia, the defendant herein, **GLENN JENKINS**, did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, to an agent with the United States Army Criminal Investigative Division, by falsely stating that he had not performed any work on the TCM N & S Performance Work Statement and Independent Government Cost Estimate since his retirement from the United States Army in October 2014. The statements and representations were false because, as **GLENN JENKINS** then and there knew, **GLENN JENKINS** worked on the TCM N & S performance work statement and Independent Government Cost Estimate from

almost the day he retired from the United States Army, in an effort to assist CREC Group.



Bobby L. Christine
United States Attorney

A handwritten signature in blue ink, appearing to read "B. T. Rafferty", written over a horizontal line.

Brian T. Rafferty*
Assistant United States Attorney
Chief, Criminal Division

*denotes lead counsel