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SOUTHERN DISTRICT OF CALIFORNIA
BY DEPUTY

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12 Attorneys for the United States

13 UNITED STATES DISTRICT COURT

14 SOUTHERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,

Case No.: 16-CR-1313-JLS

16 INFORMATION

17 v.

Title 18, U.S.C., Sec. 1001 -
False Statements

18 ROBERT GILBEAU,

19 Defendant.
20

21 The United States charges that at all times relevant:

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23 1. From approximately January 2003 to November 2004,
24 defendant ROBERT GILBEAU ("GILBEAU") was a Commander (and Captain-
25 select) in the United States Navy, serving as the Supply Officer
26 onboard the USS Nimitz, where he was responsible for procuring all
27 goods and services necessary for the operation of the ship. From
28 approximately December 2004 to June 2005, now a Captain, GILBEAU

1 was selected as the Head of the Tsunami Relief Crisis Action Team
2 in Singapore, heading the US Navy's logistics response to the
3 Southeast Asia Tsunami in December 2004. In June 2005, GILBEAU went
4 to the office of the Chief of Naval Operations as the Head of
5 Aviation Material Support, establishing policies and requirements
6 for budgeting and acquisitions for the U.S. Navy's air forces,
7 where he served until July 2006. In August 2006, GILBEAU was
8 assigned a year-long position in Baghdad, Iraq, where he was the
9 Chief of Staff for the Joint Contracting Command for Iraq and
10 Afghanistan, responsible for overseeing all military contracting
11 for supplies, services, and construction in support of coalition
12 forces in Operation Iraqi Freedom and Operation Enduring Freedom.
13 After returning from Iraq, GILBEAU became the Deputy Commander for
14 Aviation at the Naval Inventory Control Point in Philadelphia, PA,
15 where he was responsible for aviation support and executing a 3.3
16 billion dollar acquisition budget. In August 2010, having been
17 promoted to Rear Admiral, GILBEAU assumed command of the Defense
18 Contract Management Agency International, where he was responsible
19 for the global administration of the Defense Department's most
20 critical contracts performed outside the United States. In November
21 2012 until November 2013, GILBEAU transferred to Afghanistan as the
22 director of the Operational Contract Support Drawdown Cell, where
23 he was responsible for reorganizing and reducing the military's
24 contracted personnel in Afghanistan as the United States withdrew
25 significant numbers of troops from the country.
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1 2. Glenn Defense Marine Asia ("GDMA") was a multi-national
2 corporation with headquarters in Singapore. As of September 2013,
3 GDMA had operating locations in many countries, including Japan,
4 Thailand, Malaysia, Korea, Hong Kong, Indonesia, Australia,
5 Philippines, and the United States. GDMA's main business was the
6 "husbanding" of marine vessels, which involved the coordination,
7 scheduling, and direct and indirect procurement of items and
8 services required by U.S. Navy vessels when they arrived in port.
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10 3. Leonard Glenn Francis ("Francis") was the President and
11 Chief Executive Officer of GDMA.
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COUNT 1 - FALSE STATEMENTS

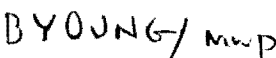
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2 4. Beginning at least in or about November 2012 and
3 continuing until in or about October 2013, outside the
4 jurisdiction of any particular district, defendant Robert
5 GILBEAU knowingly and willfully made false statements and
6 representations as to material facts, in that he misstated and
7 misrepresented to Defense Criminal Investigative Service
8 ("DCIS") agents and Naval Criminal Investigative Service
9 ("NCIS") agents the nature of his relationship and his receipt
10 of things of value over the course of years from Leonard G.
11 Francis; whereas in truth and fact, as defendant then and there
12 well knew, those statements and representations were false, all
13 in violation of Title 18, United States Code, Section 1001.
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15

16 DATED: June 1, 2016.

17
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