

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 14-CR-

RANDY JONES,

Defendant.

4 - CR220

U.S. DISTRICT COURT  
EASTERN DISTRICT OF  
WISCONSIN  
FILED  
2014 NOV 14 P 12:00  
JON W. SANFELI  
CLERK

INFORMATION

COUNT ONE

**THE UNITED STATES ATTORNEY CHARGES:**

Background

At all times relevant to this Information:

1. Shell Pipeline Company, L.P (Shell) operated a pipeline that delivered commercial aviation jet fuel to General Mitchell International Airport in Milwaukee, Wisconsin (MKE). The pipeline ran parallel to a railroad, crossed local streets, and traversed the grounds of MKE.
2. Defendant Randy Jones was employed by Shell as an onshore corrosion coordinator and was responsible for corrosion coordination of the Shell pipeline at MKE. His responsibilities included conducting an annual cathodic protection survey of the pipeline, taking bi-monthly cathodic protection readings from pipeline rectifiers, and recording all of the data into a computer system used to generate reports for the United States Department of Transportation, Pipeline and Hazardous Material Safety Administration (PHMSA).

The Pipeline Safety Act

3. The Pipeline Safety Act was enacted to provide adequate protection against risk to life and property posed by pipeline transportation and pipeline facilities. 49 U.S.C. § 60101 *et seq.* The Secretary of Transportation, through PHMSA, is the primary official responsible for regulating management and movement of hazardous material in pipelines. 49 U.S.C. § 60102. Regulations established by PHMSA, are codified in Sections 190-199 of Chapter 49 of the Code of Federal Regulations. 49 C.F.R. §§ 190-199.

4. In general, buried or submerged pipelines must have a defined level of cathodic protection to prevent corrosion of the pipeline. 49 C.F.R. §§ 195.563 and .571. The operator of the pipeline is required to conduct annual testing, a survey, of the pipeline, and take a bi-monthly voltage reading from the rectifiers. 49 C.F.R. §§ 195.573(a)(1) and (c). Records of all testing, inspections, and surveys of the pipeline required by PHMSA regulations must be maintained for as long as the pipeline is in service. 49 C.F.R. § 195.589.

5. From approximately January through December 2011, in the State and Eastern District of Wisconsin, the defendant,

**RANDY JONES**

did knowingly and willfully violate and cause a violation of a regulation implemented under the Pipeline Safety Act, by failing to conduct an annual survey of the Shell pipeline located at MKE.

All in violation of Title 49, United States Code, Section 60123(a), Title 49, Code of Federal Regulations, Section 195.573(a)(1), and Title 18, United States Code, Section 2.

**COUNT TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES:**

6. Paragraphs 1 through 4 of this Information are realleged and fully incorporated herein by reference.

7. From approximately January through December 2011, in the State and Eastern District of Wisconsin, the defendant,

**RANDY JONES**

did knowingly and willfully violate and cause a violation of a regulation implemented under the Pipeline Safety Act, by failing to take bi-monthly voltage readings from the rectifiers connected to the Shell pipeline at MKE.

All in violation of Title 49, United States Code, Section 60123(a), Title 49, Code of Federal Regulations, Section 195.573(c), and Title 18, United States Code, Section 2.

**COUNT THREE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES:**

8. Paragraphs 1 through 4 of this Infonation are realleged and fully incorporated herein by reference.

9. On or about December 8, 2011, in the State and Eastern District of Wisconsin, the defendant,

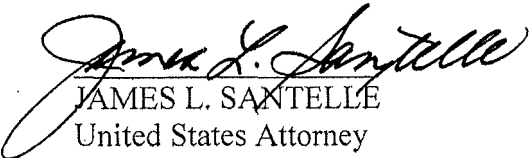
**RANDY JONES**

did knowingly and willfully make a false material statement and representation in a matter within the jurisdiction of an executive branch of the government of the United States, to wit: JONES entered false survey data and false bi-monthly voltage readings for rectifiers connected to the Shell pipeline at MKE, into a computer system used to generated reports for the PHMSA.

All in violation of Title 18, United States Code, Section 1001.

DATE:

*November 14, 2014*

  
JAMES L. SANTELLE  
United States Attorney