

1 BRIAN J. STRETCH (CABN 163973)
United States Attorney

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SUSAN Y. SOONG
CLERK, US DISTRICT COURT
NO. DIST. OF CA.

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

CRB

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 STEPHEN C. ROLFE,

16 Defendant.

CR 17 0123

) **VIOLATION:** 18 U.S.C. § 1519 — Falsification of
) Records with Intent to Impede, Obstruct, and
) Influence a Federal Investigation or the Proper
) Administration of Any Matter within the jurisdiction
) of a Federal Agency; 18 U.S.C. § 2 — Aiding and
) Abetting

) SAN FRANCISCO VENUE

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19 INFORMATION

20 The United States Attorney charges:

21 COUNT ONE: (18 U.S.C. § 1519 — Falsification of Records With Intent to Impede, Obstruct or
22 Influence a Federal Investigation or the Proper Administration of Any Matter
23 Within the Jurisdiction of a Federal Agency)

24 1. On or about August 23, 2012, through on or about August 29, 2012, in the Northern
25 District of California, the defendant,

26 STEPHEN C. ROLFE,

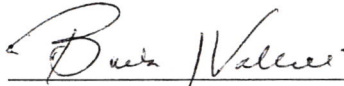
1 knowingly falsified records and documents with the intent to impede, obstruct and influence the
2 investigation and proper administration of a matter within the jurisdiction of a federal agency, *to wit* the
3 United States Navy and the United States Environmental Protection Agency.

4 2. Specifically, defendant falsified and directed the falsification of documents, including
5 chain of custody forms and the Building/Site Area Report and Survey Unit Tracking Sheet generated on
6 August 23, 2012, and on site systematic sampling results emailed to the United States Navy on or about
7 August 29, 2012, all of which purported to record locations for samples 81-100 from Survey Unit 22,
8 regarding radiological remediation work at the Hunter's Point Naval Shipyard Superfund Site.

9 All in violation of Title 18, United States Code, Sections 1519 and 2.

10 DATED: *March 10, 2017*

BRIAN J. STRETCH
United States Attorney



BARBARA J. VALLIERE
Chief, Criminal Division

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17 (Approved as to form: 
AUSA KEARNEY