

ORIGINAL  
FILED

MAY 16 2017

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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

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

CRB

CR17

278

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 JUSTIN E. HUBBARD,

16 Defendant.

) CASE NO.:

) 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 I N F O R M A T I O N

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 May 31, 2012, in the Northern District of California, the defendant,

25 JUSTIN E. HUBBARD,

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

INFORMATION

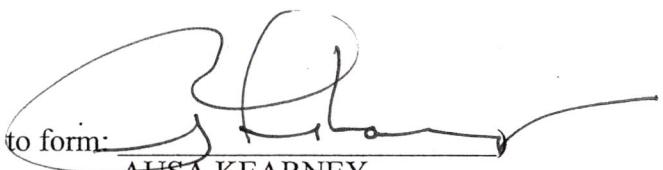
1           2.       Specifically, defendant falsified documents, including chain of custody forms generated  
2 on May 31, 2012, the data from which was incorporated into maps and site systematic sampling results  
3 emailed to the United States Navy on or about June 6, 2012. The forms were false because they  
4 purported to show that soil samples 28-47 in Survey Unit 1 were taken from the 'North Pier' area of the  
5 Hunter's Point Naval Shipyard Superfund Site during radiological remediation work, when in fact they  
6 had been taken from a different location believed to contain non-radioactive soil.

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

8 DATED: *May 9, 2017*

BRIAN J. STRETCH  
United States Attorney

*Barbara J. Valliere*  
BARBARA J. VALLIERE  
Chief, Criminal Division

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15 (Approved as to form: 

AUSA KEARNEY