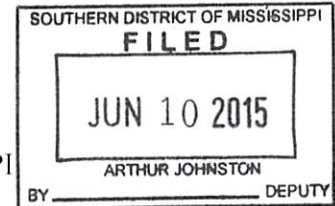


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:15cr42 HSO-RHW

NEIL RILEY HOLDEN and
ROBERT GARY GARDNER

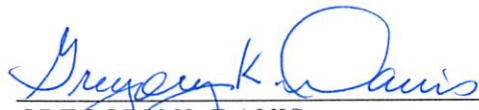
18 U.S.C. § 4

The United States Attorney charges:

That from in or about January 2010 and continuing up through the filing of this Information, in Jackson County in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendants, **NEIL RILEY HOLDEN** and **ROBERT GARY GARDNER**, did knowingly and willfully fail to report to legal authorities a felony cognizable by a court of the United States, in that the defendant failed to report mischarging of time and labor in connection with work performed on Navy and Coast Guard vessels by their employer, a defense contractor; specifically, they failed to report the repeated submission of false, fictitious, or fraudulent invoices to the Navy and Coast Guard in connection with the construction of hulls on behalf of the United States Navy, more particularly designated as 2614, 5403, and 5313, and hulls on behalf of the United States Coast Guard, more particularly designated as 4914 and 4915, for services allegedly performed but were in fact misapplied to the aforementioned hulls, resulting in a total pecuniary harm to the government of greater than one million dollars. Specifically, as supervisors at Huntington Ingalls, defendants **GARDNER** and **HOLDEN** applied pressure to individuals working under their supervisory authority and were aware of the fact that employees misapplied hours devoted to the construction of certain ships, knowing that such hours were false and had been misapplied and that documents submitted for payment were

false, fictitious, or fraudulent and that the funds would be paid by the United States Navy in connection with Navy contract numbers N00024-06-C-2222, N00024-06-C-2304, N00024-11-C-2309 and Coast Guard contract number HSCG23-11-C-2DB043, as prohibited by Sections 287 and 2, Title 18, United States Code.

All in violation of Section 4, Title 18, United States Code.



GREGORY K. DAVIS
United States Attorney