

Title: CALIFORNIA BREAKERS INCORPORATED:  
PRODUCT SUBSTITUTION - COUNTERFEIT CIRCUIT BREAKERS

Vendor:

California Breakers Incorporated  
5755 Tujunga Drive  
North Hollywood, CA 95125

Case No.: 5-89-009

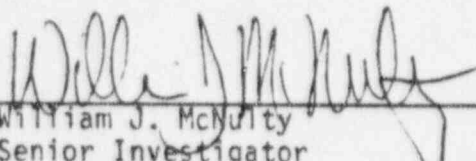
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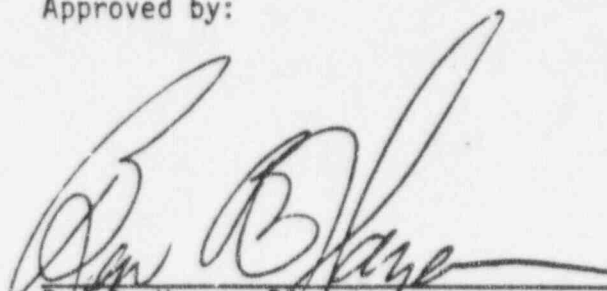
  
William J. McNulty  
Senior Investigator  
Office of Investigations  
Field Office, Region V

  
Robert G. Marsh, Director  
Office of Investigations  
Field Office, Region V

Participating Personnel:

Daniel D. Murphy, OI:HQ  
Robert G. Marsh, OI:RV  
Eugene J. Power, OI:RV  
Philip V. Joukoff, OI:RV  
Vicky Easterling, NASA  
Larry Briggs, DCIS

Approved by:

  
Ben B. Hayes, Director  
Office of Investigations

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## SYNOPSIS

On April 13, 1988, the Office of Investigations (OI) Field Office, Region V, self initiated an investigation based on information received from Pacific Gas and Electric Company that counterfeit or defective circuit breakers (CBs) had been furnished to Diablo Canyon Nuclear Power Plant (DCNPP). At the request of the U.S. Attorney's Office in Los Angeles, California, OI opened a new investigation on July 6, 1989, to separate and detail the circumstances surrounding the sale of these particular CBs. This investigation was conducted during the period from April 13, 1988, through December 1989.

The investigation disclosed that in late February and early March 1988, Anti-Theft Systems (ATS) sold 30 reconditioned Square D KHL 36125 CBs to the Electric Supply Company (ESC) in San Luis Obispo. ESC in turn sold these CBs to DCNPP for use in non-safety related systems. ATS represented the CBs as new to ESC and caused to be delivered by the U.S. Postal Service a certification declaring the CBs to be new, when, in fact, they were reconditioned. The investigation also revealed that in February 1985 California Breakers, Inc. (CBI), sold 10 molded case switches (MCSs) to Palo Verde Nuclear Generating Station (PVNGS). CBI furnished a Certificate of Compliance (CoC) to PVNGS that asserted that the MCSs met the manufacturers specifications, when, in fact, the MCSs did not meet them.

Both ATS and CBI are California corporations located at 5755 Tujunga Drive, North Hollywood, California. The corporate officers of both corporations are the same individuals, and the corporations act in concert for the purpose of buying and selling new, used, and reconditioned CBs.

Since neither DCNPP nor PVNGS invoked the provisions of 10 CFR Part 50, Appendix B, or 10 CFR Part 21 in the purchase orders for the CBs and MCSs, no NRC regulatory violations occurred. However, during the course of this investigation, substantial evidence of violations of Federal criminal law was discovered, to include: 18 U.S.C. 371, Conspiracy; 18 U.S.C. 1341, Mail Fraud, and 18 USC 2320, Trafficking in Counterfeit Goods. Since July of 1988, the U.S. Attorney's Office in Los Angeles, California, has been actively pursuing this investigation. OI has been participating in the joint investigation with the Defense Criminal Investigation Service and the Office of the Inspector General, National Aeronautics and Space Administration.

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## ACCOUNTABILITY

The following portions of this Report of Investigation (Case No. 5-89-009) will not be included in the material placed in the PDR. They consist of pages 3 through 20.

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## APPLICABLE REGULATIONS

10 CFR Part 21, Reporting of Defects and Noncompliance

10 CFR Part 50, Appendix B, Criterion VII, Control of Purchased Material,  
Equipment, and Services



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## DETAILS OF INVESTIGATION

### Purpose of Investigation

This investigation was initiated to determine if California Breakers, Inc. (CBI), fraudulently represented as new, refurbished used circuit breakers (CBs) with counterfeit labels to the Electric Supply Company (ESC) of San Luis Obispo, who in turn sold those CBs to the Diablo Canyon Nuclear Power Plant (DCNPP).

### Background

On April 13, 1988, the Office of Investigations, Region V (OI:RV), initiated an investigation (Case No. 5-88-004), based on information received from Pacific Gas and Electric (PG&E) that counterfeit or defective CBs had been furnished to DCNPP (Exhibit 1). At the request of the U.S. Attorney's Office in Los Angeles, California, an additional investigation (Case No. 5-89-009), was opened on July 6, 1989, to allow CBI to be separated from Case No. 5-88-004, which had developed into an investigation regarding several alleged CB refurbishers in the Los Angeles area (Exhibit 2).

A letter dated April 14, 1988, was received by John B. MARTIN, Regional Administrator, RV, from J. D. SHIFFER, Vice President, Nuclear Power Generation, PG&E. SHIFFER's letter outlined the sequence of events leading to a determination by Square D Corporation representatives that the CBs provided to DCNPP were refurbished used CBs (Exhibit 3).

INVESTIGATOR'S NOTE: PG&E considers the letter to be proprietary information.

In a memorandum dated April 29, 1988, RV Regional Counsel, Michael BLUME, documented a telephonic conversation he had with Michael FEMAL, "in house counsel" for Square D Corporation. FEMAL told BLUME that four or five vendors in Southern California were rebuilding used CBs and selling them as new. FEMAL told BLUME that the vendors involved were General Circuit Breaker, Magnetic Circuit Breaker, HLC and Luckow Electric. FEMAL also told BLUME that he was concerned that the Department of Justice (DOJ) was not pursuing the case aggressively. FEMAL provided BLUME with the name of a Los Angeles attorney retained by Square D (Exhibit 4).

### Interview of Robert McINERNEY, Chief Buyer, DCNPP

On May 3, 1988, Senior Investigator, W. J. McNulty interviewed McINERNEY, Chief Buyer at DCNPP (Exhibit 5).

McINERNEY said that on February 17, 1988, Purchase Order (PO) Number 014409 was issued to ESC for 30 KH36125 Square D CBs (Exhibits 6 and 7). McINERNEY said that the DCNPP buyer, Pamela KRAMER, had queried three authorized Square D distributors and awarded the PO to ESC based on low bid and their ability to expedite delivery. McINERNEY said that on February 23, 1988, the 30 KH36125 CBs were received at DCNPP and determined to be the wrong style. A new PO, Number 014959, was issued to ESC on March 8, 1988, for 30 KHL36125 CBs. These CBs were received on March 10, 1988, at DCNPP (Exhibits 6 and 8).

On March 10, 1988, McINERNEY said that Square D Regional Sales Manager Jim DOWEY contacted DCNPP and expressed doubts about the authenticity of the CBs and requested that a Square D field engineer be allowed to inspect them. McINERNEY said that, as a result, on March 14, 1989, Square D field engineer Brian SMITH inspected and determined the CBs to be of questionable authenticity. SMITH sent one of the CBs to the Square D facility in Cedar Rapids, Iowa, for examination. McINERNEY said the remaining CBs were placed on hold pending the result of the Square D examination. On March 21, 1988, a representative of Square D notified McINERNEY that the CB examined was a rebuilt CB and had counterfeit labels affixed to it.

INVESTIGATOR'S NOTE: McINERNEY provided McNulty with copies of all procurement documents, a typed chronology of events (Exhibit 6) and one KHL 36125 CB in an as received sealed carton (Exhibit 9).

Meeting with Howard PAULSEY, Supervisory Resident Agent, Federal Bureau of Investigation (FBI), Santa Maria, California

On May 4, 1988, McNulty met with PAULSEY (Exhibit 10) at the FBI's Santa Maria Resident Agency Office to discuss FBI involvement in an investigation of the fraudulent representation of used CBs as new, which were supplied to DCNPP. PAULSEY said he did not have the resources to investigate the matter.

Review of Civil Suit and Search Warrants

On May 25, 1988, Square D filed a civil law suit, Case No. CV 88-03012, in the U.S. District Court for the Central District of California to prevent the counterfeiting of Square D products by a group of companies based in the Los Angeles area of California. The suit alleged that the defendant companies, all owned and operated by two families with the last names of CONTRERAS and TREVINO, had supplied remanufactured, defective CBs bearing false Square D trademarks and Underwriter Laboratories (UL) certifications to authorized Square D distributors and others, including nuclear power plants. The complaint sought damages and injunctive relief for: trademark infringement, 15 U.S.C. Sections 1114 and 1125; unfair competition; trademark dilution; and violations of the Racketeer Influenced and Corrupt Organizations Act (RICO), 18 U.S.C. Section 1961. One of the named defendants in the suit was Anti-Theft System, Inc. (ATS), a California corporation conducting its activities at 5755 Tujunga Avenue in North Hollywood and at 1475 North Hundley Street, Anaheim, California. Another defendant was identified as CBI, which was also conducting its activities at 5755 Tujunga Avenue, North Hollywood. Defendant Carlos TREVINO was identified as President of CBI, while defendant Isidro TREVINO was listed as President of ATS and Secretary of CBI. Square D further claimed in their suit that I. TREVINO directed and controlled the activities of ATS. The suit also alleged that the fraudulent acts, in part, included the aforementioned sale of the 30 remanufactured CBs in or about February and March 1988 by ATS to ESC for use at DCNPP. On June 3, 1988, a Civil Search Warrant was executed at CBI and ATS, 5755 Tujunga Dr., North Hollywood, California (Exhibit 11).

Execution of Federal Criminal Search Warrants at ATS

On July 7, 1988, a Federal Search Warrant was executed at CBI and ATS, 5755 Tujunga Dr., North Hollywood, California, by OI Investigators and U.S. Marshals

(Exhibits 12 and 13). Numerous records were seized and evidence of a large scale CB reconditioning operation was observed. A review of the seized records by NRC Vendor Inspection Branch Inspectors and OI Investigators revealed several sales of CBs by ATS/CBI to nuclear utilities. Several NRC Information Notices and Bulletins were generated as a result of the record reviews, which notified the utilities of these sales and advised them to review their procurement records for purchases from ATS/CBI. Several other government agencies were also notified by the NRC of potentially defective CB purchases, including the Department of Defense, Department of Energy, and National Aeronautics and Space Administration.

#### Court Order Allowing NRC Access to Civil Case Materials

On August 5, 1988, a copy of the court order allowing NRC access to protected materials regarding the Square D civil case was received (Exhibit 14). On August 10, 1988, copies of depositions relating to ATS and CBI were received by OI:RV.

#### Review of Deposition of James K. KNOX, CBI

On June 14, 1988, a sworn deposition was taken from J. KNOX by Joseph LEE, of the firm Munger, Tolles & Olson on behalf of the Square D Corporation (Exhibit 15). J. KNOX said he has been employed by CBI at 5755 Tujunga Drive, North Hollywood since 1984. He had been employed in various positions at CBI and is presently the Sales Manager. J. KNOX said ATS purchased CBs, new and used, and sold them to CBI who in turn reconditioned and sold the CBs, primarily to electrical distributors. J. KNOX said on some occasions ATS sold CBs to public customers but that ATS maintained no inventory stock and, therefore, repurchased reconditioned CBs from CBI for resale in such instances. J. KNOX said that the majority of CBs purchased by ATS were used items. He further described the reconditioning process and the recalibration of CBs at the facility located on Tujunga Drive. J. KNOX also said that I. TREVINO was responsible for the day to day operations of ATS and CBI and, in that capacity, purchased Square D labels from Rockne RHODES (Exhibit 15, pp. 9-11, 50-60, 68, 85, and 86).

J. KNOX said he recalled the sale of 30 CBs to ESC and knew that CBs were going to be resold to PG&E. J. KNOX said that 25 of the 30 CBs sold to ESC were rebuilt. He also said he assisted in relabeling the CBs. J. KNOX said that several times he was asked by personnel at ESC if the CBs were new. He said that he told them they were new because he thought they were as good as new. J. KNOX also said he requested that his father, George KNOX, who was sales manager of CBI at the time, send a letter to ESC stating that the CBs were new (Exhibit 15, pp. 104 and 77-82).

J. KNOX said that neither CBI nor ATS had a policy of informing customers that the CBs were reconditioned (Exhibit 15, pp. 113-118).

#### Review of Deposition of Carlos TREVINO, President, CBI

On June 20, 1988, C. TREVINO, President of CBI and Secretary/Treasurer of ATS was deposed by LEE (Exhibit 16). C. TREVINO said he has been associated with CBI since its inception. C. TREVINO said that CBI and ATS sold reconditioned CBs. C. TREVINO said that G. KNOX, J. KNOX, Sherri GRIFFIN, and



Christina PIAINT were the individuals responsible for sales. He also said that several employees worked in the shop areas of 5755 Tujunga under the direction of Samuel JENSEN, Shop Foreman. These employees reconditioned, recalibrated, and relabelled used CBs. C. TREVINO said he obtained labels from RHODES, and that he photocopied other labels. He said his purpose in applying the labels was to identify the CBs. C. TREVINO admitted that the only way purchasers of a CBI reconditioned CB would know if the CB was reconditioned was if they were told the CB had been reconditioned. C. TREVINO also admitted that he had not been authorized by Square D to reproduce or use their trademark on labels (Exhibit 16, pp. 9-14, 25-28, 45, 50-60, 95-98, 109, 128, 152, and 153).

#### Review of Deposition of Isidro TREVINO, President, ATS

On June 21, 1988, a sworn deposition was taken from I. TREVINO by LEE (Exhibit 17). I. TREVINO said he is President of ATS and Secretary/Treasurer of CBI (Exhibit 17, pp. 8-20).

I. TREVINO said he is responsible for the day to day operations of ATS and CBI. He identified G. KNOX and J. KNOX as the individuals primarily responsible as sales managers. I. TREVINO explained the ATS/CBI relationship, wherein ATS bought CBs and sold them to CBI. I. TREVINO said approximately 50% of the CBs bought by ATS or CBI were in a used condition (Exhibit 17, pp. 22-33, 46, and 47).

I. TREVINO further described the reconditioning and recalibration process of CBs by CBI. I. TREVINO said he had purchased manufacturer's labels from RHODES. TREVINO also said ATS/CBI made photocopies of other manufacturer's labels. I. TREVINO said that ATS and CBI replaced the original manufacturers labels on CBs with copies to identify the CBs and make them look better. I. TREVINO also said that neither ATS nor CBI had been authorized by Square D to duplicate the Square D trademark or label (Exhibit 17, pp. 63-73, 120-128, 133, and 151).

#### Review of Deposition of Pamela M. KRAMER, Buyer, DCNPP

On July 21, 1988, a sworn deposition was taken from KRAMER by Helena MAYORKAS, an attorney representing CBI, and M. Edward WHELAN, an attorney representing Square D. Also present was Steven BURKE, an attorney representing PG&E (Exhibit 18).

KRAMER said that she is employed as a buyer at DCNPP. In February 1988, she negotiated a nonsafety related PO with ESC for ?J KH36125 Square D CBs. The PO was placed with ESC, as they were the low bidder and could provide expedited delivery. The 30 CBs were delivered to DCNPP in late February 1988. DCNPP Engineers discovered the CBs were the wrong style and KRAMER initiated a return of the items and issued a new PO for 30 KHL36125 Breakers. KRAMER said she believed the CBs were new. KRAMER also said that the only time DCNPP buyers were allowed to buy used or rebuilt CBs was when the PO specification allowed it. The PO for these CBs did not contain these requirements (Exhibit 18, pp. 15, 16, 19-22, 28-31, and 44-46).

Interview of Rockne RHODES, President, the Electrical Outlet (EO), Golden, Colorado

On January 12, 1989, RHODES was interviewed by McNulty and R. G. Marsh, OI:RV, at his place of business (Exhibit 19). RHODES said that he had been in the CB business for five years. He sold CBs to CBI most of that time and considered CBI one of his best customers. RHODES said that prior to June 1988 he also rebuilt CBs and replaced the labels on the breakers, mainly with photocopied labels. RHODES said he had Square D labels made up by a local printer, and that he sold some of these labels to CBI.

INVESTIGATOR'S NOTE: RHODES provided access to his files and several invoices for labels sold to CBI were noted and copied (Exhibit 20).

Interview of Ed BASS, GDI Printers (GDI), Englewood, Colorado

On January 12, 1989, BASS was interviewed by McNulty and Marsh at his place of business (Exhibit 21). BASS said he operates GDI's printing business at his residence. He said he started doing business with RHODES in late 1987, and that, between January 1988 and July 1988, RHODES ordered and was sold tens of thousands of General Electric (GE), Westinghouse, and Square D labels.

INVESTIGATOR'S NOTE: BASS provided OI with copies of proofs and various samples of such labels, as well as copies of invoices regarding his sales to RHODES (Exhibit 22).

Receipt of CBs from DCNPP

On March 6, 1989, McNulty obtained three KHL36125 CBs that had been maintained in quarantine at DCNPP. These CBs were part of the 30 CBs received from ATS, through ESC, in March 1988 (Exhibit 23).

Interview of Kevin CURRIE, Former Manager, ESC

On March 7, 1989, McNulty interviewed CURRIE at his place of employment, Westinghouse Electrical Supply Company (WESCO), Santa Maria, California (Exhibit 24). CURRIE said that on February 12, 1988, ESC received a request for CBs from KRAMER at DCNPP; and, as the CBs were not available from Square D, a price quote was obtained from ATS. J. KNOX told the ESC buyer the CBs were new. On February 16, 1988, CURRIE received verbal confirmation of the PO from DCNPP for 30 KH36125 breakers; he then contacted ATS and ordered the CBs. J. KNOX told CURRIE during that conversation that the requested CBs were new. On February 23, 1988, the CBs were delivered to DCNPP. On February 25, 1988, CURRIE spoke with G. KNOX, ATS, who also told CURRIE the CBs shipped to ESC were new, and that he would send CURRIE a letter to that effect. On February 26, 1988, CURRIE received a letter from G. KNOX, delivered in the U.S. Mail, declaring the CBs to be new (Exhibit 25). On March 8, 1988, DCNPP requested that the KH36125 CBs be exchanged for KHL36125 CBs. CURRIE again spoke with J. KNOX and again was assured the CBs were new. On March 10 and 16, 1988, the CBs were delivered to DCNPP.

### Examination of Three KHL36125 CBs by Square D Engineers

On April 5, 1989, three KHL36125 CBs were examined and tested at the Square D factory, Cedar Rapids, Iowa (Exhibit 26). External examination to the CBs revealed they were packaged in taped boxes not utilized by Squared D. Also, the labels on the boxes and the CBs were not authentic. One CB was disassembled and determined to be a 150 amp CB that had been unsuccessfully recalibrated, not a 125 amp breaker as labelled.

INVESTIGATOR'S NOTE: Photographs and video tape of examination in possession of U.S. Attorney, Los Angeles, California.

### Results of Field Work at Palo Verde Nuclear Generating Station (PVNGS)

On October 10, 1989, OI:RV was notified of the discovery of alleged counterfeit CBs at PVNGS. On October 11, 1988, Investigator P. Joukoff met with PVNGS personnel and NRC Resident Inspectors regarding what were determined to be counterfeit molded case switches (MCSs) that PVNGS had purchased from CBI (Exhibit 27).

### GE Examination of MCSs at PVNGS

On October 11, 1989, GE Engineers examined the MCSs in Units 1 and 2 (Exhibits 27 and 28). These MCSs were determined to have counterfeit labels and to have been subjected to unauthorized tampering or modification. Photographs were taken of the MCSs by Joukoff (Exhibit 29).

### Meeting with Quality Assurance at PVNGS

On October 13, 1989, McNulty and Joukoff met with J. N. TENSCH, Material Control Manager, and Paul CAUDELL, Director of Site Services (Exhibit 30). CAUDELL furnished copies of procurement records regarding the purchase of the MCSs. TENSCH said that in February 1985 procurement activities at PVNGS were being handled by Bechtel corporation personnel. TENSCH said that as a result of a Nuclear Management and Resource Counsel (NUMARC) initiative, all purchases of equipment from CBI has been traced to non-safety applications, except those obtained under PVNGS Field Material Requisition (FMR)/PO No. F173455. In February 1985, PVNGS PO No. F173455 was issued to CBI for 10 GE MCSs (Exhibit 31). The buyer was listed as Al DAVIS and the vendor price quote on behalf of CBI was made by PIANT. Among the procurement documents was a Certificate of Conformance (CoC) from CBI to Arizona Public Service, dated February 15, 1985, and signed by G. KNOX (Exhibit 32). TENSCH said that based on that certificate and an engineering evaluation the MCSs were upgraded to safety related components. TENSCH said that an internal investigation is being considered at PVNGS to determine if the engineering evaluation was appropriate.

INVESTIGATOR'S NOTE: NRC RV staff is conducting an in-depth inspection of PVNGS/Bechtel procurement and dedication procedures. If irregularities suggest wrongdoing, another separate OI:RV investigation will be initiated.

### Interview with Albert DAVIS, Buyer, Turkey Point

On December 8, 1989, telephone contact was made with DAVIS, a former buyer for Bechtel Corporation at PVNGS (Exhibit 33). DAVIS said he had been a buyer at PVNGS from 1978 to 1987. He said that on 20-30 occasions he had purchased electrical equipment from CBI. DAVIS said he assumed the CBs were new and was never told they were reconditioned or used. DAVIS said if he knew the CBs were reconditioned or used he would not have bought them. DAVIS believes that he received a product line card from CBI and used that to place POs with them. He recalled no language on the card indicating that reconditioned or used CBs were sold by CBI.

### Willfulness/Intent

#### DCNPP CBs

1. DCNPP buyer KRAMER ordered 30 KHL36125 CBs from an authorized Square D distributor, ESC (Exhibit 18, pp. 28-30 and pp. 44-46).
2. The PO's issued to ESC cited commercial grade, non-safety related. No 10 CFR Part 50, Appendix B, or 10 CFR Part 21 requirements were incorporated into the POs (Exhibits 7, 8, and 18, p. 31).
3. ESC ordered 30 KHL36125 CBs from ATS and requested that new CBs be provided (Exhibit 24).
4. J. KNOX represented the CBs as new, knowing the CBs were reconditioned (Exhibit 15, p. 77).
5. ESC requested a letter certifying that the CBs were new (Exhibit 15, p. 78; Exhibits 24 and 25).
6. ATS sent reconditioned CBs with counterfeit labels to ESC (Exhibit 15, pp. 74-82; Exhibit 26).
7. RHODES had several thousand counterfeit manufacturer's labels made up by GDI Printers (Exhibits 19, 20, 21, and 22).
8. RHODES sold Square D labels to CBI/ATS (Exhibit 15, p. 85; Exhibit 16, p. 97; Exhibit 17, pp. 120-129; and Exhibit 19).

#### PVNGS MCSs

1. Bechtel's buyer, DAVIS, ordered 10 MCSs from CBI (Exhibits 30, 31, and 33).
2. The PO issued to CBI was for commercial grade, non-safety related. The PO did not invoke the requirements of 10 CFR Part 21 or 10 CFR Part 50, Appendix B (Exhibits 30 and 31).
3. The PO required a CoC (Exhibits 30 and 31).
4. CBI provided a CoC reflecting that the MCSs met manufacturer's specifications (Exhibit 32).



5. The MCSs provided by CBI were not in accord with manufacturer's specifications and bore counterfeit labels (Exhibit 28).
6. CBI reconditioned MCSs and placed counterfeit labels on them (Exhibit 15, pp. 56-73, pp. 78-82; Exhibit 16, pp. 26-31, p. 97; and Exhibit 17, pp. 66-71, pp. 120-129, p. 133).

#### Agent's Conclusions

Since neither DCNPP nor PVNGS invoked 10 CFR Part 21 or 10 CFR Part 50, Appendix B, in their POs to ESC or CBI/ATS, no violations of NRC regulations occurred. The OI investigation did, however, develop substantial evidence indicating potential violations of 18 U.S.C. 371, Conspiracy; 18 U.S.C. 1341, Frauds and Swindles; and 18 U.S.C. 2320, Trafficking in Counterfeit Goods. The investigation disclosed that RHODES, C. TREVINO, I. TREVINO, and J. KNOX conspired to traffic in counterfeit goods and trafficked in counterfeit goods by reproducing the trademark of the Square D company and placing it on reconditioned CBs sold to ESC. Further, G. KNOX, J. KNOX, C. TREVINO, and I. TREVINO utilized the U.S. Mail to promote and effect a fraud; specifically, the sale of reconditioned CBs that were represented as new in a letter placed in the U.S. Mail, when they were not new, and by utilizing the U.S. Mail to request payment for them.

Further, it is concluded that C. TREVINO, I. TREVINO, and G. KNOX committed mail fraud by representing in a letter mailed to PVNGS that the MCSs sold to PVNGS met GE manufacturer specifications, when they did not. Also, C. TREVINO, I. TREVINO, and G. KNOX conspired to traffic in counterfeit goods and trafficked in counterfeit goods by reproducing the GE trademark and placing it on reconditioned MCSs sold to PVNGS.

#### SUPPLEMENTAL INFORMATION

Because of the potential violations of 18 U.S.C. discovered during this investigation, this matter has been referred to the U.S. Department of Justice.

Several employees of CBI/ATS have been subpoenaed to testify before a U.S. Grand Jury in Los Angeles, California, in regards to the business practices and overall operations of CBI/ATS. It is anticipated that RHODES, C. TREVINO, I. TREVINO, G. KNOX, and J. KNOX, will be invited to appear before the Grand Jury and offer testimony.

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## LIST OF EXHIBITS

<u>Exhibit No.</u>	<u>Description</u>
1	Request for Investigation, dated April 13, 1988, Robert G. Marsh to Ben B. Hayes.
2	Request for Investigation, dated July 6, 1989, Robert G. Marsh to Ben B. Hayes.
3	Letter dated April 14, 1988, J. D. SHIFFER, PG&E, to John B. MARTIN, Regional Administrator, Region V.
4	Memo to File from Michael BLUME, Regional Attorney, Region V, dated April 29, 1988, re: Bogus Square D Circuit Breakers.
5	Report of Interview with Robert McINERNEY, conducted May 3, 1988.
6	Chronology of Events prepared by Robert McINERNEY, dated March 22, 1988.
7	DCNPP PO #014409, dated February 17, 1988.
8	DCNPP PO #014959, dated March 8, 1988.
9	1 - KHL 36125 CB.
10	Memorandum to Case File from McNulty, Subject: Meeting with FBI, Santa Maria, California, on May 4, 1988.
11	Complaint and Application for Search Warrant, Civil Case No. CV 88-03012, dated May 25, 1988.
12	Federal Search Warrant and Complaint, Case #88-923M, dated July 6, 1988.
13	Report on Results of Search of ATS Circuit Breakers, with attachments, search conducted on July 11, 1988.
14	Court Order to Provide NRC Access to Protected Materials, Case No. CV 88-3012-WDK, filed July 29, 1988.
15	Deposition of James K. KNOX, dated June 14, 1988.
16	Deposition of Carlos F. TREVINO, dated June 20, 1988.
17	Deposition of Isidro Santiago TREVINO, dated June 21, 1988.

<u>Exhibit No.</u>	<u>Description</u>
18	Deposition of Pamela M. KRAMER, dated July 11, 1988.
19	Report of Interview with Rockne RHODES, conducted January 12, 1989.
20	Invoices to California Breakers, Inc., for General Electric and Square D Labels.
21	Report of Interview with Ed BASS, conducted January 12, 1989.
22	Invoices of Sales to the Electrical Outlet and Proofs and Samples of Labels.
23	Three KHL 36125 CBs received from DCNPP on March 6, 1989.
24	Report of Interview with Kevin CURRIE, conducted on March 7, 1989.
25	Letter to Electric Supply Company from G. KNOX, dated February 25, 1988.
26	Memorandum for Case File 5-88-004 from McNulty, dated June 26, 1989, Subject: Inspection of Square D Circuit Breakers.
27	Results of Field Work at PVNGS, conducted October 11-13, 1989.
28	GE memorandum to PVNGS documenting examination of MCSs, dated October 12, 1989.
29	15 Polaroid Photographs of MCSs at PVNGS, taken on October 12, 1989.
30	Memorandum for Case File 5-89-009 from McNulty, dated January 5, 1990, Subject: Meeting with PVNGS QA Personnel.
31	PVNGS FMR/PO #173455, dated January 25, 1985.
32	CoC from G. KNOX to Arizona Public Service, dated February 15, 1985.
33	Report of Interview with Albert DAVIS, conducted on December 8, 1989.