

FILED

Aug 21 2026

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY s/ William Alarcon DEPUTY

ORDERED UNSEALED on 09/03/2026 s/ Greta Wes

~~SEALED~~

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2026 Grand Jury

UNITED STATES OF AMERICA,
Plaintiff,

v.

ALVIN McDONALD RUIS JR. (1),
aka "Mick,"
ISAIAH LEVI DIEHL (2),
aka "Levi,"
SHAWN PEILUN HUANG (3),
Defendants.

Case No. '26 CR3292 JO

I N D I C T M E N T

Title 18, U.S.C., Secs. 1343
and 1349 - Conspiracy to Commit Wire
Fraud; Title 18, U.S.C., Sec. 1030 -
Major Fraud Against the United
States; Title 18, U.S.C.,
Secs. 981(a)(1)(C), and Title 28,
U.S.C., Sec. 2461(c) - Criminal
Forfeiture

The grand jury charges, at all times material:

INTRODUCTORY ALLEGATIONS

1. The United States Department of the Navy, through the Naval Sea Systems Command ("NAVSEA"), oversaw the operations and management of the Navy's Regional Maintenance Centers ("RMCs"). Two of the five Regional Maintenance Centers were the Southwest Regional Maintenance Center ("SWRMC") in San Diego, California and the Southeast Regional Maintenance Center ("SERMC") in Mayport, Florida.

2. SWRMC and SERMC both utilized small business set aside contracts called Commercial and Industrial Services ("CIS") contracts.

1 3. Multiple award contracts ("MAC") and indefinite delivery,
2 indefinite quantity contracts ("IDIQ") were contracts where the
3 government solicited to award contracts to multiple companies who then
4 could compete for individual delivery orders as the need for those orders
5 arose.

6 4. On or about March 17, 2020, SWRMC released a solicitation for
7 a CIS Scaffolding Contract ("2020 SWRMC CIS Contract"). The contract was
8 a MAC and IDIQ contract. Per the terms of the contract solicitation,
9 contractors had to be a "small business" within the definition of the
10 solicitation to apply, and the Request for Proposals ("RFP") included
11 language requiring work history performed from October 28, 2016 to
12 October 28, 2019. The total contract ceiling for the 2020 SWRMC CIS
13 Contract was \$17,614,515.

14 5. On or about July 22, 2021, SERMC released a solicitation for
15 a separate CIS Scaffolding Contract ("2021 SERMC CIS Contract"). The
16 contract was once more going to be a MAC and IDIQ contract. Per the
17 terms of the contract solicitation, contractors had to be a "small
18 business" within the definition of the solicitation to apply, and the
19 RFP included language requiring work history performed within the three-
20 year period preceding the date of the RFP relating to work called out
21 in the solicitation, i.e., experience with installation and removal of
22 scaffolding on U.S. Government vessels/crafts. The total contract
23 ceiling for the 2021 SERMC CIS Contract was \$7,000,000.

24 6. Company A was a California corporation, incorporated in about
25 2015, primarily operating in the construction business providing
26 commercial shoring services. Company A was awarded the 2021 SERMC CIS
27 Contract on or about September 20, 2021.

1 conspired with each other and with others known and unknown to the grand
2 jury, to commit wire fraud, in violation of Title 18, United States
3 Code, Section 1343, that is to knowingly devise a material scheme and
4 artifice to defraud and to obtain money and property by means of
5 materially false and fraudulent pretenses, representations, and
6 promises, and by intentional concealment and omission of material facts,
7 and in executing said scheme, caused writings, signs, signals, and sounds
8 to be transmitted by means of wire in interstate and foreign commerce.

9 Manner and Means

10 14. The objects of the conspiracy were carried out, and were to
11 be carried out, in substance, in the following manner:

12 15. Members of the conspiracy worked together to submit proposals
13 for and to obtain U.S. Navy contracts that were restricted to companies
14 that met specific qualification requirements, such as being a small
15 business and meeting minimum experience requirements, with the intent
16 to have the actual work done by a different company, also controlled by
17 members of the conspiracy, that did not meet the specific qualification
18 requirements.

19 16. Members of the conspiracy worked together to submit proposals
20 to the U.S. Navy in the name of Company A for both the 2020 SWRMC CIS
21 Contract and the 2021 SERMC CIS Contract, knowing Company A was not
22 going to perform work on the contracts and that Company B and/or Company
23 C would instead perform the work.

24 17. Members of the conspiracy knew neither Company B nor Company
25 C met the specific contract qualification requirements to perform either
26 contract.

27 18. Members of the conspiracy submitted materially false,
28 misleading, and inaccurate information, via interstate wire

1 communications, including emails, throughout each contract proposal
2 process, such as misrepresenting the name, control, and structure of
3 Company A, including submitting an organizational chart for Company A
4 that included individuals who had never worked for Company A, and
5 misrepresenting that Company A was the company intending to fulfill the
6 contracts for which it was submitting proposals.

7 19. Members of the conspiracy created and used a separate email
8 account within Company A's existing domain name ("Company A ADMIN
9 account"), which they used to communicate with both SWRMC and SERMC
10 throughout each of the separate contract processes, and to hide the fact
11 that individuals associated with Company B and/or Company C were also
12 associated with Company A.

13 20. Members of the conspiracy incorporated a separate company,
14 Company C, under a similar name to that of Company A, and created logos
15 for Company A and Company C which were nearly identical in appearance,
16 to conceal the fact that the members of the conspiracy intended to have
17 Company C perform the 2020 SWRMC CIS Contract for which the members of
18 the conspiracy had caused Company A to submit a proposal.

19 21. Members of the conspiracy intermingled the names of Company A
20 and Company C in communications and submissions related to the 2020
21 SWRMC CIS Contract proposal, with the intent to confuse the SWRMC
22 contracting personnel and to provide an opportunity to switch out Company
23 C for Company A in the proposal.

24 22. Members of the conspiracy switched out Company A for Company
25 C in a final revised proposal for the 2020 SWRMC CIS Contract, failing
26 to highlight the change as was required, and retaining in the revised
27 proposal work history for Company A that was required under the RFP and
28 which Company C did not possess.

1 23. Members of the conspiracy also submitted a proposal on behalf
2 of Company A for the 2021 SERMC CIS Contract, with no intention of
3 Company A fulfilling the contract, instead intending Company B to fulfill
4 it. At that time the Members of the conspiracy knew that Company B did
5 not qualify to submit a proposal as it did not qualify as a small
6 business.

7 24. The members of the conspiracy intended to have Company B
8 perform the work of Company A under the 2021 SERMC CIS Contract once it
9 was awarded to Company A.

10 All in violation of Title 18, United States Code, Section 1349.

11 Count 2

12 (Major Fraud Against the United States)

13 [18 U.S.C. § 1031]

14 25. Paragraphs 1 through 24 are re-alleged and incorporated
15 herein.

16 26. Beginning on a date unknown to the grand jury, but no later
17 than in or about March 2020, and continuing up to and including on or
18 about January 6, 2021, within the Southern District of California and
19 elsewhere, defendants ALVIN McDONALD RUIS JR., aka "Mick," ISAIAH LEVI
20 DIEHL, aka "Levi," and SHAWN PEILUN HUANG, in connection with the 2020
21 SWRMC CIS Scaffolding Contract that Company A submitted a proposal for
22 on or about April 27, 2020 and that Company C was awarded on or about
23 January 6, 2021, and was valued at \$1 million or more, knowingly executed
24 and attempted to execute a scheme to defraud with the intent to defraud
25 the United States and to obtain money and property by means of materially
26 false and fraudulent pretenses, representations, and promises.

27 All in violation of Title 18, United States Code, Section 1031.

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FORFEITURE ALLEGATIONS

27. The allegations contained in Count 1 of this Indictment are realleged and incorporated by reference for the purpose of alleging forfeiture to the United States of America pursuant to Title 18, United States Code, 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

28. Upon conviction of the offense alleged in Count 1 of this Indictment and pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), defendants ALVIN McDONALD RUIS JR., aka Mick, ISAIAH LEVI DIEHL, aka Levi, and SHAWN PEILUN HUANG, shall forfeit to the United States any property, real and personal, constituting or derived from proceeds traceable to such offense.

29. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

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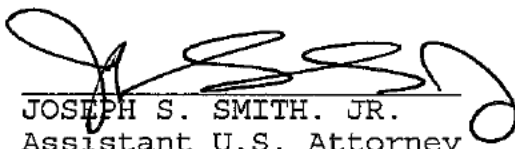
1 the United States of America shall be entitled to forfeiture of
2 substitute property pursuant to Title 21, United States Code,
3 Section 853(p), as incorporated by Title 28, United States Code,
4 Section 2461(c) and Title 18, United States Code, Section 982(b).
5 All pursuant to Title 18, United States Code, Sections 981(a)(1)(C), and
6 Title 28, United States Code, Section 2461(c).

7 DATED: August 21, 2026.

8 A TRUE BILL:

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10
11 ADAM GORDON
12 United States Attorney

13 By:

14 
JOSEPH S. SMITH, JR.
15 Assistant U.S. Attorney
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