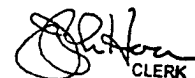


UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
CENTRAL DIVISION

FILED

SEP 14 2010


CLERK

UNITED STATES OF AMERICA,

CR 10-30076

Plaintiff,

INDICTMENT

v.

BRIBERY CONCERNING
PROGRAMS RECEIVING
FEDERAL FUNDS

EDWARD RHAЕ WASHBURN

18 U.S.C. § 666

Defendant.

The Grand Jury charges:

COUNTS I-VII

At all times material to this indictment,

1. the Cheyenne River Housing Authority was an organization and agency of a tribal government that received federal assistance in excess of \$10,000 during each one-year period beginning January 1, and ending December 31, for the years 2005, 2006, 200, and 2008.

2. Edward Rhae Washburn was an agent of the Cheyenne River Housing Authority, whose duties included advertising bids, bidding out projects, verifying that the contractors' bids met the bid requirements, identifying the lowest bidder, obtaining United State Department of Housing and Urban Development approval for sole source bidding, preparation of

contract documents, monitoring progress of the project, reviewing the inspector's report as to work done on the project, making a determination whether to approve contractor's payment request and determine whether to approve any change orders on the project.

COUNT I

On or about September 20, 2005, in the District of South Dakota, Edward Rhae Washburn, Defendant, did corruptly accept and agree to accept a thing of value from a person, intending to be influenced and rewarded in connection with a transaction and series of transactions of the Cheyenne River Housing Authority involving \$5,000 and more, all in violation of 18 U.S.C. § 666(a)(1)(B).

COUNT II

On or about December 22, 2005, in the District of South Dakota, Edward Rhae Washburn, Defendant, did corruptly accept and agree to accept a thing of value from a person, intending to be influenced and rewarded in connection with a transaction and series of transactions of the Cheyenne River Housing Authority involving \$5,000 and more, all in violation of 18 U.S.C. § 666(a)(1)(B).

COUNT III

Between on or about April 18, 2006, and on or about May 11, 2006, in the District of South Dakota, Edward Rhae Washburn, Defendant, did

corruptly accept and agree to accept a thing of value from a person, intending to be influenced and rewarded in connection with a transaction and series of transactions of the Cheyenne River Housing Authority involving \$5,000 and more, all in violation of 18 U.S.C. § 666(a)(1)(B).

COUNT IV

On or about December 11, 2006, in the District of South Dakota, Edward Rhae Washburn, Defendant, did corruptly accept and agree to accept a thing of value from a person, intending to be influenced and rewarded in connection with a transaction and series of transactions of the Cheyenne River Housing Authority involving \$5,000 and more, all in violation of 18 U.S.C. § 666(a)(1)(B).

COUNT V

On or about December 22, 2007, in the District of South Dakota, Edward Rhae Washburn, Defendant, did corruptly accept and agree to accept a thing of value from a person, intending to be influenced and rewarded in connection with a transaction and series of transactions of the Cheyenne River Housing Authority involving \$5,000 and more, all in violation of 18 U.S.C. § 666(a)(1)(B).

COUNT VI

On or about September 20, 2008, in the District of South Dakota, Edward Rhae Washburn, Defendant, did corruptly accept and agree to

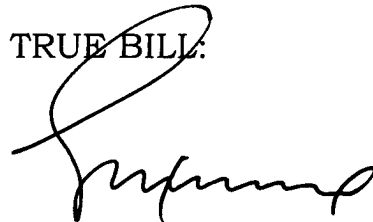
accept a thing of value from a person, intending to be influenced and rewarded in connection with a transaction and series of transactions of the Cheyenne River Housing Authority involving \$5,000 and more, all in violation of 18 U.S.C. § 666(a)(1)(B).

COUNT VII

On or about October 3, 2008, in the District of South Dakota, Edward Rhae Washburn, Defendant, did corruptly accept and agree to accept a thing of value from a person, intending to be influenced and rewarded in connection with a transaction and series of transactions of the Cheyenne River Housing Authority involving \$5,000 and more, all in violation of 18 U.S.C. § 666(a)(1)(B).

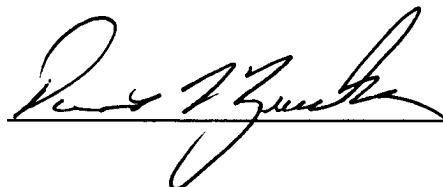
Archie Baumann's behalf all in violation of 18 U.S.C. § 1001.

A TRUE BILL:



Foreperson

BRENDAN V. JOHNSON
United States Attorney

By:  _____