

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION

UNITED STATES OF AMERICA

v.

INFORMATION

DONALD P. BUNCH
_____ /

3:15 cr 51 /RV

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

A. Introduction

At all times material to this Information, unless specific dates are otherwise noted:

1. Bagram Airfield (Bagram) was the largest United States military base in Afghanistan. The Humanitarian Aid Yard (HA Yard) at Bagram purchased supplies from local Afghan vendors that were provided as part of the Commander's Emergency Response Program. That program enabled U.S. military commanders to respond to urgent humanitarian relief requirements in Afghanistan, and the projects under that program were intended to benefit the local Afghan populace until larger, more formal reconstruction projects could be initiated.

2. From in or about February 2009 until in or about August 2009, Defendant **DONALD P. BUNCH** worked as an United States Navy E8 Senior Chief at the HA Yard. Defendant's role at the HA Yard was that of Yard Boss, meaning that he was responsible for replenishing supplies such as rice, beans, and clothing at the HA Yard. In addition to

ordering supplies, Defendant oversaw the loading of trucks that transported the supplies off the base.

3. Defendant Bunch overlapped with his predecessor at the HA Yard, whose last name was Dennis, for about a month. Dennis instructed Defendant on how to do the job assignment at the HA Yard. As Dennis instructed, Defendant selected from a list the vendors to replenish the HA Yard. Defendant, as he had been instructed, rotated the vendors through the list, using the next vendor on the list to provide whatever supplies were needed.

4. After Dennis ended his assignment at the HA Yard, new and current vendors started to offer Defendant money to influence his official acts at the HA Yard. Defendant agreed to accept the money. Defendant received payments from multiple vendors, which consisted of individual payments between approximately \$5,000 and \$1,000, made in \$100 bills. Defendant corruptly received a total of approximately \$25,000 from the vendors. The vendors benefitted in paying Defendant because he would then give them work sooner than they otherwise would have received contracts, and he would give them bigger, more lucrative contracts.

5. Defendant sent most or all of the money he received from the vendors home to his wife in greeting cards at their residence in the Northern District of Florida. Defendant and his wife primarily used this money in the construction of a home they were building.

B. The Charge

6. From in or about February 2009 until in or about August 2009, in the Northern District of Florida and elsewhere, the defendant,

DONALD P. BUNCH

a public official, directly and indirectly did corruptly demand, seek, receive, accept, and agree to receive and accept something of value personally, in return for being influenced in the performance of an official act; that is, he accepted approximately \$25,000 in cash from Afghan vendors for preferential treatment in the awarding of contracts under the Commander's Emergency Response Program at the HA Yard.

In violation of Title 18, United States Code, Section 201(b)(2)(A), and pursuant to the extraterritorial venue provision of Title 18, United States Code, Section 3238.

**FORFEITURE ALLEGATION UNDER
28 U.S.C. § 2461(c) AND 18 U.S.C. § 981(a)(1)(C)**

1. The violation alleged above in Count One of this Information is realleged and incorporated by reference herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

2. Upon conviction of the offense alleged in this Information, the defendant,

DONALD P. BUNCH

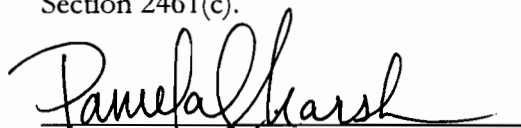
shall forfeit to the United States any interest he has in property, real or personal, constituting, or derived from, proceeds traceable to the offense of receiving bribes by a public official, in violation of Title 18, United States Code, Section 201(b)(2)(A), including, but not limited to:

\$25,000 in U.S. currency, which represents the sum of money equal to the amount of proceeds constituting and derived from proceeds traceable to bribery, in violation of 18 U.S.C. § 201(b)(2)(A).

3. If any of the property described above as being subject to forfeiture pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C), as a result of any act or omission of the defendant:

- 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 that cannot be subdivided without difficulty;

the United States shall be entitled to seek the forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).



PAMELA C. MARSH
United States Attorney
Northern District of Florida

7/21/2015
Date


DAVID L. GOLDBERG
Assistant United States Attorney

8/1/15
Date

ANDREW WEISSMANN
Chief, Fraud Section


for DANIEL P. BUTLER
Trial Attorney, Fraud Section
Criminal Division
United States Department of Justice

9/1/15
Date