

6. From in or about 2009 until in or about May 2019, **LAUFER** was a public official and civilian employee of the Department of Defense, who worked as the Chief of the Prosthetics and Orthotics Department at Walter Reed, and represented Walter Reed in ordering and purchasing prosthetics and orthotics materials.

7. A Blanket Purchase Agreement (“BPA”) was a simplified government contracting method that allowed a government department to obligate funds to purchase materials so that employees could order materials without charging a credit card each time or engaging in a formal contract for each purchase of materials.

8. From at least in or about 2012 to in or about 2019, Company B provided prosthetics and orthotics materials to the Prosthetics and Orthotics Department at Walter Reed in return for payments from the government.

9. Person B lived in Montgomery County, Maryland. Person B owned, operated and controlled Company B, which was located in Germantown, Maryland.

10. Person B regularly interacted with **LAUFER** about Company B’s business with Walter Reed.

11. Walter Reed awarded Company B multiple BPAs, pursuant to which the Prosthetics and Orthotics Department at Walter Reed ordered and purchased prosthetics and orthotics materials from Company B.

12. Company B purchased prosthetics and orthotics materials from other manufacturers and distributors, and resold the materials to the Prosthetics and Orthotics Department at Walter Reed at a higher price.

13. The prosthetics and orthotics materials that Company B sold to Walter Reed were often delivered directly from the manufacturers and distributors to Walter Reed.

14. From 2011 to in or about May 2019, **LAUFER** repeatedly ordered materials and caused the ordering of materials from Company B.

15. On or about August 5, 2014, **LAUFER** sent an email to the Walter Reed contracting office, writing that “BPA 10-A-0071” to Company B needed to be “renew[ed]” for “575,000.”

16. On or about October 8, 2014, **LAUFER** requested and caused to be sent a purchase request document for the 2015 first quarter funding requirements for Company B’s BPA at \$1,250,000.

17. On or about January 28, 2015, **LAUFER** ordered and caused orders to be sent for prosthetics and orthotics materials to Company B.

18. On or about March 23, 2015, **LAUFER** ordered and caused orders to be sent for prosthetics and orthotics materials to Company B.

19. On or about May 4, 2015, **LAUFER** requested and caused to be sent a purchase request document, and Company B thereafter received a BPA with a funding limit of more than \$5 million.

20. On or about May 6, 2015, **LAUFER** ordered and caused Walter Reed to order more than \$1 million of materials from Company B.

21. On or about July 15, 2015, **LAUFER** ordered and caused Walter Reed to order more than \$1 million of materials from Company B.

22. On or about August 18, 2015, **LAUFER** requested and caused to be sent a request for more than \$100,000 of materials from Company B.

23. On or about September 25, 2015, **LAUFER** requested and caused to be sent a request for more than \$1 million of materials from Company B.

24. On or about September 26, 2015, **LAUFER** ordered and caused orders to be sent for prosthetics and orthotics materials to Company B.

25. In or about 2015, **LAUFER** caused the Prosthetics and Orthotics Department at Walter Reed to obligate more than \$5 million to Company B for prosthetics and orthotics materials.

26. From 2011 to in or about May 2019, the Prosthetics and Orthotics Department at Walter Reed and **LAUFER** caused Company B to be paid more than \$20 million for prosthetics and orthotics materials.

27. In or about March 2015, **LAUFER** and his wife were celebrating their wedding anniversary.

THE CHARGE

28. On or about March 16, 2015, in the District of Maryland and elsewhere, the defendant,

DAVID LAUFER,

being a public official, otherwise than as provided by law for the proper discharge of official duties, directly and indirectly demanded, sought, received, accepted, and agreed to receive and accept something of value personally, that is, the defendant and his wife received and accepted air travel benefits from Washington, D.C. to Las Vegas, Nevada, for and because of any official

act performed and to be performed by such official, that is for and because of LAUFER's official acts as the Chief of the Prosthetics and Orthotics Department at Walter Reed and LAUFER's official acts in connection with the purchase of prosthetics and orthotics materials from Company B.

18 U.S.C. § 201(c)(1)(B)
18 U.S.C. § 2.

Date: October 20, 2020



ROBERT K. HUR
United States Attorney