

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

FEB 04 2015

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

JAMES W. MCCORMACK, CLERK
Rally Swanson
DEPUTY CLERK

UNITED STATES OF AMERICA)	
)	No. 4:15-CR00029 BSM
v.)	18 U.S.C. § 208
)	18 U.S.C. § 216(a)(2)
LARRY DUNKIN)	18 U.S.C. § 1001

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

On or about November 18, 2014, in the Eastern District of Arkansas, the defendant,

LARRY DUNKIN,

did willfully and knowingly make a materially false representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by representing that his wife, Cheryl Young Dunkin, was not an Officer or Employee of Young Enterprises, LLC, a company to whom he awarded various federal contracts. Dunkin made the representation to Kevin Porter, a Special Agent of the Office of Inspector General, USDA, during an investigatory interview that took place at the Federal Building in Little Rock, Arkansas. The statement was false because Larry Dunkin then and there knew that Cheryl

Young Dunkin was an Officer or Employee of Young Enterprises, all in violation of Title 18 United States Code, Section 1001.

COUNT 2

On or about May 15, 2013, in the Eastern District of Arkansas, the Defendant,

LARRY DUNKIN,

an employee of the USDA, Natural Resources Conversation Service, knowingly and willfully participated personally and substantially as a Government officer and employee, through the awarding of a contract, to an organization in which his spouse, Cheryl Young Dunkin, was an officer or employee, in violation of Title 18 United States Code Sections 208(a) and 216(a)(2).

[END OF TEXT. SIGNATURE PAGE ATTACHED.]