

SUPREME COURT OF THE UNITED STATES

UNITED STATES OF AMERICA

)

CRIMINAL NO. 0003

)

Demanding, Seeking, and Accepting Bribes  
for Representational Service, 18 U.S.C. §  
203 (Counts One and Two)

)

v.

)

)

Offer to Procure Appointive Public Office 18  
U.S.C. § 210 (Counts Three)

)

/U/BALTHAZARFUHRER,

)

Acceptance of Bribes to Procure Appointive  
Public Office 18 U.S.C. § 211 (Count Four)

)

Defendant.

)

Extortion by an Officer of the United States  
18 U.S.C. § 872 (Count Five)

Blackmail 18 U.S.C. § 872 (Count Six)

Gathering, transmitting or losing defense  
information 18 U.S.C. § 793 (Count Seven)

## **INDICTMENT**

THE GRAND JURY CHARGES THAT:

### **GENERAL ALLEGATIONS**

At all times relevant to this Indictment:

1. Since May 2016, /U/BALTHAZARFUHRER, the defendant, was a Member of the United States Senate, representing the Midwestern State. As such, he was a public official within the meaning of Title 18, United States Code, § 203(a)(1)(A).

### **The Congress of the United States, Responsibilities and Standing Rules of Members of the United States Senate**

2. The Congress of the United States, comprised of a Senate and House of Representatives, was established by Article I of the United States Constitution. Since that time, Members of Congress have played an important role in the system of government in the United States by proposing and passing laws, taking actions to protect citizens, and providing services and assistance to their constituents.
3. At the beginning of each Congress, every Member was required to take the following oath of office:

I, AB, do solemnly swear (or affirm) that I will support and defend the Constitution of the United States against all enemies, foreign and domestic; that I will bear true faith and allegiance to the same; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the duties of the office on which I am about to enter. So help me God.
4. In addition to the above-referenced oath, the Standing Rules of the United States Senate Rule XXXVII set forth certain rules and codes of conduct that:

- a. prohibited a Member, officer, or employee of the Senate from receiving any compensation, nor granted permission for any compensation to accrue to his beneficial interest from any source, the receipt or accrual of which would occur by virtue of influence improperly exerted from his position as a Member, officer, or employee.
  - b. prohibited a Member, officer, or employee engagement in any outside business or professional activity or employment for compensation which is inconsistent or in conflict with the conscientious performance of official duties.
  - c. prohibited a Member, officer, or employee from knowingly using his official position to introduce or aid the progress or passage of legislation, a principal purpose of which is to further only his pecuniary interest, only the pecuniary interest of his immediate family, or only the pecuniary interest of a limited class of persons or enterprises, when he, or his immediate family, or enterprises controlled by them, are members of the affected class.
5. Consistent with his oath of office and the duties of the office he held, Defendant /U/BALTHAZARFUHRER owed the citizens of the United States and the United States Senate a duty to perform the responsibilities of his office free from deceit, fraud, concealment, bias, conflict of interest, self-enrichment, and self-dealing.

#### **Relevant Individuals**

6. **/u/kovr "kovr"**: Since November 2016, has been the Secretary of Agriculture.
7. **/u/SomeOfTheTimes "SomeOfTheTimes"**: Since November 2016, has been Secretary of Homeland Security.
8. **/u/gaidz "gaidz"**: Since November 2016, has been Secretary of State.

**COUNT ONE:**

**18 U.S.C. § 203**

**(Demanding, seeking, and accepting bribes for representational service)**

THE GRAND JURY FURTHER CHARGES THAT:

9. Paragraphs 1 through 8 of this Indictment are realleged as if fully set forth herein.

10. Beginning in or about November 20, 2016 through in or about December 1, 2016, within the District of Columbia and elsewhere, the defendant, /U/BALTHAZARFUHRER, being a public official, did, directly and indirectly, knowingly and corruptly demand, seek, and agree to receive and accept anything of value personally and for any other person and entity, in return for being influenced in the performance of any official acts, to wit:

Defendant /U/BALTHAZARFUHRER did demand, seek, and agree to receive and accept things of value from /u/kovr, in the form of weekly reports of cabinet meetings, in return for Defendant /U/BALTHAZARFUHRER's confirmation vote for /u/kovr's nomination to Secretary of Agriculture.

(All in violation of Title 18, United States Code, Sections 203(a)(1)(A))

**COUNT TWO:**

**18 U.S.C. § 203**

**(Demanding, seeking, and accepting bribes for representational service)**

THE GRAND JURY FURTHER CHARGES THAT:

11. Paragraphs 1 through 8 of this Indictment are realleged as if fully set forth herein.

12. Beginning in or about November 20, 2016 through in or about December 1, 2016, within

the District of Columbia and elsewhere, the defendant, /U/BALTHAZARFUHRER, being a public official, did, directly and indirectly, knowingly and corruptly demand, seek, and agree to receive and accept anything of value personally and for any other person and entity, in return for being influenced in the performance of any official acts, to wit:

Defendant /U/BALTHAZARFUHRER did demand, seek, and agree to receive and accept things of value from /u/SomeOfTheTimes, in the form of weekly reports of cabinet meetings, in return for Defendant /U/BALTHAZARFUHRER's confirmation vote for /u/SomeOfTheTimes' nomination to Secretary of Homeland Security.

(All in violation of Title 18, United States Code, Sections 203(a)(1)(A))

**COUNT THREE:**  
**18 U.S.C. § 210**  
**(Offer to procure appointive Public office)**

THE GRAND JURY FURTHER CHARGES THAT:

13. Paragraphs 1 through 8 of this Indictment are realleged as if fully set forth herein.

14. Beginning in or about November 20, 2016 through in or about December 1, 2016, within the District of Columbia and elsewhere, the defendant, /U/BALTHAZARFUHRER, did directly offer or promise things of value to another person in consideration of the use or promise to use any influence to procure any appointive office or place under the United States for another person, to wit: Defendant /U/BALTHAZARFUHRER did offer or promise things of value from /u/kovr and /u/SomeOfTheTimes, in the form of weekly reports of cabinet meetings, in return for Defendant /U/BALTHAZARFUHRER's confirmation vote for their respective nominations as Secretary of Agriculture and Secretary of Homeland Security.

(All in violation of Title 18, United States Code, Sections 210)

**COUNT FOUR:**  
**18 U.S.C. § 211**  
**(Acceptance of bribes to procure appointive public office)**

THE GRAND JURY FURTHER CHARGES THAT:

15. Paragraphs 1 through 8 of this Indictment are realleged as if fully set forth herein.

16. Beginning in or about November 20, 2016 through in or about December 1, 2016, within the District of Columbia and elsewhere, the defendant, /U/BALTHAZARFUHRER, did directly, knowingly and corruptly solicit, either political contribution, or personal emolument, any thing of value, in consideration of the promise of support or use of influence in obtaining for any person any appointive office or place under the United States, to wit: Defendant /U/BALTHAZARFUHRER did solicit for political contribution or personal emolument things of value from /u/kovr and /u/SomeOfTheTimes, in the form of weekly reports of cabinet meetings, in return for Defendant /U/BALTHAZARFUHRER's confirmation vote for their respective nominations as Secretary of Agriculture and Secretary of Homeland Security.

(All in violation of Title 18, United States Code, Sections 211)

**COUNT FIVE:**  
**18 U.S.C. § 872**  
**(Extortion by an officer of the United States)**

THE GRAND JURY FURTHER CHARGES THAT:

17. Paragraphs 1 through 8 of this Indictment are realleged as if fully set forth herein.

18. That on December 1, 2016, within the District of Columbia, the defendant,

/U/BALTHAZARFUHRER, being a public official, representing himself to be or assuming to act as such, under the pretense of office, directly and indirectly, committed an act of extortion against the Secretary of State, to wit: Defendant /U/BALTHAZARFUHRER did commit or attempt to commit an act of extortion by demeaning the office of the Secretary of State and ignoring its autonomy claiming that at the "whim of the Senate" does it "operate." The defendant /U/BALTHAZARFUHRER did this, directly and knowingly, through the pretense of his position as Senator with the intent of extorting Secretary of State /u/gaidz.

(All in violation of Title 18, United States Code, Section 872.)



**COUNT SIX:**  
**18 U.S.C. § 872**  
**(Blackmail)**

19. This charge is hereby dropped.

**COUNT SEVEN:**  
**18 U.S.C. § 793**  
**(Gathering, transmitting or losing defense information)**

THE GRAND JURY FURTHER CHARGES THAT:

20. Paragraphs 1 through 8 of this Indictment are realleged as if fully set forth herein.

21. That beginning in or about November 20, 2016 through December 1, 2016, within the District of Columbia or elsewhere, the defendant, /U/BALTHAZARFUHRER, for the purpose of obtaining information respecting the national defense agreed or attempted to receive or obtain from any person, or from any source whatever, any document, writing, plan, or note, of anything connected with the national defense, knowing or having reason to believe, at the time he agreed or attempted to receive or obtained, to wit: Defendant /U/BALTHAZARFUHRER did agree or attempt to receive information respecting the national defense of the United States from /u/kovr and /u/SomeOfTheTimes, in the form of weekly reports of cabinet meetings, knowing he agreed or attempted to receive this information.

(All in violation of Title 18, United Stations Code, Section 79(c) and (d))

A True Bill,

FOR THE UNITED STATES OF AMERICA

*Wildorca*

/u/wildorca  
Solicitor General