

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	Cr. No.
	:	Violation:
v.	:	18 U.S.C. §§ 1343, 1346, 2
	:	(Honest Services Wire Fraud)
	:	
EDGAR AMOS JOHNSON,	:	
	:	
Defendant.	:	
	:	

INFORMATION

The United States Attorney informs the Court that:

INTRODUCTION

At times material to this Information:

1. Defendant EDGAR AMOS JOHNSON (hereinafter "JOHNSON") lived in Bowie, Maryland, and was employed by the United States government for nearly 30 years. During 2006 and 2007, the period most relevant to this Information, JOHNSON was employed by the United States Department of the Interior (hereinafter "Interior Department"), in Washington, D.C., as the Director of the Technical Assistance Division in the Office of Insular Affairs (OIA). At the conclusion of his federal service, in or around December 2007, JOHNSON's federal pay grade was a GS-15-4, which amounted to an annual salary of approximately \$121,000.00, plus benefits.

2. OIA's Technical Assistance Division provided discretionary funding to the insular governments, institutions, and private firms that fell under OIA jurisdiction in territories, including the U.S. Virgin Islands. OIA's mission was to increase self-sufficiency in the insular areas by promoting sound financial practices in the insular governments, encouraging private sector economic development, and increasing federal responsiveness to the unique needs of the island communities. The OIA's budget request for fiscal year 2008 was approximately \$403 million, of which approximately \$16 million was allocated for technical assistance.

THE SCHEME TO DEFRAUD

3. From in or about 2006 through 2007, in the District of Columbia and elsewhere, JOHNSON knowingly and willfully devised and intended to devise a scheme and artifice to defraud and deprive the Interior Department of its right to JOHNSON's honest and faithful services as Director of the Technical Assistance Division, performed free from deceit, favoritism, bias, self-enrichment, self-dealing, and concealment.

PURPOSES OF THE SCHEME

4. The purposes of JOHNSON's scheme were (1) to use his position at the Interior Department to obtain money from individuals associated with private business entities through bribery, self-dealing, and deceit, and (2) to conceal those activities from his supervisors and others at the Interior Department. In return for cash, and for an expected cut in future business deals, JOHNSON agreed to introduce individuals to senior government officials in the Virgin Islands—officials he dealt with on a regular, ongoing basis as the Director of OIA's Technical Assistance Division and, most importantly, who would trust his judgment and recommendations. It was JOHNSON's intent to assist the individuals in obtaining business in the U.S. Virgin Islands.

MANNER AND MEANS OF THE SCHEME

5. On or about August 21, 2007, JOHNSON accepted \$10,000.00 in return for introducing individuals to senior officials in the government of the U.S. Virgin Islands, so those individuals could pitch insurance business to the government officials.

Use of Interstate Wires to Execute the Scheme

6. On or about the following dates, in the District of Columbia and elsewhere, for the purpose of executing the scheme and artifice to defraud, JOHNSON transmitted and caused to be transmitted by means of wire communications in interstate commerce writings, signals, and sounds, including the following:

- A. August 27, 2007, email from JOHNSON's computer at the Interior Department, in Washington, D.C., to senior government official in the U.S. Virgin Islands, providing contact information for friend whom JOHNSON was recommending for insurance business in the U.S. Virgin Islands; and
- B. August 29, 2007, email from senior government official in the U.S. Virgin Islands to JOHNSON's email account at the Interior Department thanking JOHNSON for the August 27, 2007, email and promising to contact the individual JOHNSON was recommending.

(Honest Services Wire Fraud, in violation of 18 U.S.C. §§ 1343, 1346, 2)

JEFFREY A. TAYLOR
UNITED STATES ATTORNEY FOR THE
DISTRICT OF COLUMBIA
D.C. Bar No. 498610

By:



Timothy G. Lynch (D.C. Bar No. 456506)
Assistant United States Attorney
Fraud & Public Corruption Section
555 Fourth Street, NW
Washington, D.C. 20530
(202) 353-4862
timothy.lynch2@usdoj.gov