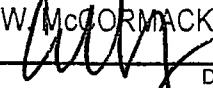


JUN - 5 2013

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

JAMES W. MCCORMACK, CLERK
By:  DEP. CLERK

UNITED STATES OF AMERICA)	4:13CR00158 JLH
)	
v.)	18 U.S.C. § 1951(a)
)	18 U.S.C. § 666(a)(1)(B)
MARTHA ANN SHOFFNER)	

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNTS 1-6

From in or about mid 2010 and continuing through in or about December 2012, in the Eastern District of Arkansas,

MARTHA ANN SHOFFNER,

did knowingly obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by extortion, as those terms are defined in Title 18, United States Code, Section 1951; that is, defendant MARTHA ANN SHOFFNER, while the Treasurer of the State of Arkansas, knowing that the payments were made in return for official acts, engaged in a course of conduct whereby defendant MARTHA ANN SHOFFNER, with the broker's consent, obtained \$6,000 payments not due defendant MARTHA ANN SHOFFNER under her office from a broker doing business with the State of Arkansas for the benefit of defendant MARTHA ANN SHOFFNER, all under color of official right, as follows:

Count	Date	Amount of payment
1	In or about mid 2010	\$6,000
2	In or about late 2010	\$6,000
3	In or about mid 2011	\$6,000
4	In or about late 2011	\$6,000
5	In or about mid 2012	\$6,000
6	In or about December 2012	\$6,000

All in violation of Title 18, United States Code, § 1951(a).

COUNT 7

From in or about January 2013 and continuing through on or about May 18, 2013,
in the Eastern District of Arkansas, defendant

MARTHA ANN SHOFFNER,

did knowingly attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by extortion, as those terms are defined in Title 18, United States Code, Section 1951; that is, defendant MARTHA ANN SHOFFNER, while the Treasurer of the State of Arkansas, knowing that the payment was made in return for official acts, engaged in a course of conduct whereby defendant MARTHA ANN SHOFFNER, with the broker's consent, obtained \$6,000 not due defendant MARTHA ANN SHOFFNER under her office from a broker doing business with the State of Arkansas for the benefit of defendant MARTHA ANN SHOFFNER, all under color of official right.

All in violation of Title 18, United States Code, § 1951(a).

COUNTS 8-14

From in or about mid 2010 and continuing through on or about May 18, 2013, in the Eastern District of Arkansas,

MARTHA ANN SHOFFNER,

being the Treasurer of the State of Arkansas, a state government that received in excess of \$10,000 in federal assistance per year in 2010, 2011, and 2012, corruptly solicited, demanded, accepted, and agreed to accept money and things of value for her own benefit, that is payments of approximately \$6,000, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of the government of the State of Arkansas involving a thing of value of \$5,000 or more, that is, for the use of her official action and influence to benefit a broker who did business with the State of Arkansas, as follows:

Count	Date	Amount of payment
8	In or about mid 2010	\$6,000
9	In or about late 2010	\$6,000
10	In or about mid 2011	\$6,000
11	In or about late 2011	\$6,000
12	In or about mid 2012	\$6,000
13	In or about December 2012	\$6,000
14	On or about May 18, 2013	\$6,000

All in violation of Title 18, United States Code, § 666(a)(1)(B).

FORFEITURE ALLEGATION 1

Upon conviction of the offense set forth in Count 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, or 14 of this Superseding Indictment, Defendant shall forfeit to the United States, under Title 18, United States Code, § 981(a)(1)(c) and Title 28, United States Code, § 2461, any property, real or personal which constitutes or is derived from the proceeds of such an offense. The property to be forfeited is a sum of money in the amount of \$4,020.00.

[End of Text. Signature page attached.]