

FILED
At Albuquerque NM

IN THE UNITED STATES DISTRICT COURT

APR 13 2011

FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LAURIE CHAPMAN,

Defendant.

CRIMINAL NO. 11-904

Counts 1-30: 18 U.S.C. §§ 666(a)(1)(B)
and 2: Theft or bribery concerning
programs receiving Federal funds; Aiding
and abetting.

INDICTMENT

The Grand Jury charges:

Introduction

1. From on or about February 22, 2007, and continuing through on or about August 19, 2009, in Santa Fe County and elsewhere within the District of New Mexico, the defendant, **LAURIE CHAPMAN**, while serving as an agent of the New Mexico Corrections Department (NMCD), an agency that received federal funds, corruptly solicited bribes in violation of Title 18, United States Code, Section 666(a)(1)(B), as more fully described below.

2. The NMCD is a state agency that administers and maintains the correctional facilities in the State of New Mexico. For all times relevant to this indictment, the NMCD directly received annual benefits in excess of \$10,000 under Federal programs of the United States Department of Justice.

3. The Facilities Manager for NMCD is charged with the responsibility, among others, of selecting vendors to perform maintenance and repairs on buildings operated by the NMCD. For all times relevant to this indictment, the defendant, **LAURIE CHAPMAN**, acted as

Facilities Manager for NMCD. In that capacity, the defendant, **LAURIE CHAPMAN**, was an agent of NMCD.

4. In or about March 2007, the defendant, **LAURIE CHAPMAN**, was instrumental in implementing a "price agreement" procedure that permitted the defendant, **LAURIE CHAPMAN**, to select a roofing company to do work for NMCD without requiring the roofing company to compete for NMCD contracts through the competitive Request For Proposal (RFP) process. The procedure meant that the defendant, **LAURIE CHAPMAN**, could select at will any company placed on a price agreement to do work at NMCD instead of using the RFP process.

5. At all times relevant to the indictment, Omni Development Corporation (Omni) was a roofing company that performed work on buildings for NMCD. In 2007, Omni was the only company listed on the NMCD's roofing company price agreement. In 2008, the defendant, **LAURIE CHAPMAN**, was instrumental in implementing a second roofing company NMCD price agreement, which was extended in 2009. In 2008 and 2009, Omni was again the only company listed on the NMCD roofing company price agreement.

6. Between on or about January 2007, and on or about July 2009, the defendant, **LAURIE CHAPMAN**, selected Omni to perform numerous facilities maintenance and construction jobs at NMCD, for which Omni was paid a total of approximately \$4 million. In selecting Omni to do that work, the defendant, **LAURIE CHAPMAN**, relied upon the NMCD price agreements she had helped put into place.

7. From on or about February 2007, through on or about August 2009, the defendant, **LAURIE CHAPMAN**, corruptly solicited and accepted monetary payments from Omni and its

owner in exchange for selecting Omni to do work at NMCD facilities. These payments included cash, online transfers, checks, and credit card payments.

8. On or about July 10, 2008, while serving as Facilities Manager for NMCD, the defendant, **LAURIE CHAPMAN**, incorporated Zia Construction, Inc. (Zia), using her maiden name.

9. At times relevant to this indictment, Omni and its owner provided the defendant, **LAURIE CHAPMAN**, monetary payments, including checks to Zia. The payments constituted some of the bribes for NMCD work that the defendant, **LAURIE CHAPMAN**, awarded to Omni. Zia never actually performed any work for Omni in exchange for the payments to Zia.

10. Paragraphs 1 through 9 are re-alleged in Counts 1 through 30 as though fully set forth therein.

Counts 1-30

On or about the dates listed below, in the District of New Mexico, the defendant, **LAURIE CHAPMAN**, did knowingly and corruptly solicit, demand, accept, and agree to accept something of value, to wit: a total of approximately \$237,080, as delineated more specifically in each count below, intending to be influenced and rewarded in connection with a business, transaction or series of transactions of the NMCD, involving \$5,000 or more, to wit: job assignments valued at approximately \$4 million:

<u>Count</u>	<u>On or About Date That Defendant Received Payment</u>	<u>Approximate Amount of Payment to Defendant</u>
1	2/22/2007	\$4,000
2	9/11/2007	\$3,000

<u>Count</u>	<u>On or About Date That Defendant Received Payment</u>	<u>Approximate Amount of Payment to Defendant</u>
3	2/19/2008	\$4,000
4	2/26/2008	\$4,000
5	3/19/2008	\$5,000
6	4/4/2008	\$5,000
7	4/30/2008	\$1,000
8	5/2/2008	\$1,000
9	5/7/2008	\$1,000
10	5/15/2008	\$1,000
11	5/19/2008	\$1,000
12	5/27/2008	\$1,000
13	5/28/2008	\$4,000
14	6/23/2008	\$1,000
15	6/25/2008	\$4,000
16	7/3/2008	\$1,000
17	7/11/2008	\$10,540
18	8/4/2008	\$5,540
19	8/25/2008	\$5,000
20	9/2/2008	\$15,000
21	10/17/2008	\$5,000
22	12/11/2008	\$10,000
23	2/17/2009	\$15,000
24	2/24/2009	\$10,000
25	4/8/2009	\$15,000
26	5/20/2009	\$1,000
27	5/29/2009	\$39,000

<u>Count</u>	<u>On or About Date That Defendant Received Payment</u>	<u>Approximate Amount of Payment to Defendant</u>
28	7/7/2009	\$20,000
29	8/4/2009	\$15,000
30	8/19/2009	\$30,000

In violation of 18 U.S.C. §§ 666(a)(1)(B) and 2.

FORFEITURE ALLEGATION

The allegations contained in Counts 1 through 30 of this Indictment are hereby alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 18 U.S.C. § 982(a)(1).

Upon conviction of one or more of the offenses alleged in Counts 1 through 30 of this Indictment, the defendant, **LAURIE CHAPMAN**, shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

Property to be forfeited to the United States includes but is not limited to the following:

MONEY JUDGMENT:

A sum of money equal to at least **\$237,080.00** in United States currency, representing the amount of money derived from or involved in the offenses.

If any of the above described forfeitable property, as a result of any act or omission of the defendant:



- A. cannot be located upon exercise of due diligence;
- B. has been transferred or sold to, or deposited with, a third person;
- C. has been placed beyond the jurisdiction of the Court;

D. has been substantially diminished in value; or

E. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of defendant up to the value of the forfeitable property described above.

A TRUE BILL:


Assistant United States Attorney

04/13/11 10:10am

_____/s/_____
FOREPERSON OF THE GRAND JURY