

UNITED STATES DISTRICT COURT

for the
Middle District of Pennsylvania

United States of America

v.

BRIAN DUNN

Defendant

Case No. 5:MJ-09-44

FILED
WILKES BARRE
APR 21 2009
MARY E. D'ANDREA, CLERK
DEPUTY CLERK

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of [blank] in the county of LUZERNE in the MIDDLE District of PENNSYLVANIA, the defendant violated 18 U.S.C. § 666

, an offense described as follows:

between on or about January 1, 2005 and on or about December 31, 2008, the defendant, in his capacity as a member of the Board of Education for the Wilkes-Barre Area School District, did knowingly, intentionally and unlawfully corruptly solicit and demand, accept and agree to accept, tens of thousands of dollars in cash from other persons, for the benefit of the defendant, intending to be influenced and rewarded in connection with the hiring of teachers and in connection with the awarding of contracts by the Wilkes-Barre Area School District, involving a thing of value of \$5,000 and more; and, within a one year period from the date of the commission of the offense, the Wilkes-Barre Area School District received benefits in excess of \$10,000 under a federal program involving a grant, contract, subsidy, loan, guarantee, insurance and other form of federal assistance.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

[checked] Continued on the attached sheet.

[Signature of Richard G. Southerton]

Complainant's signature

SA Richard G. Southerton

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/21/2009

[Signature of Malachy Mannion]

Judge's signature

City and state: Wilkes-Barre, Pennsylvania

Malachy Mannion, U.S. Magistrate Judge

Printed name and title