

**FILED**

JUN 01 2016

Clerk, U.S. District Court  
District Of Montana  
Great Falls

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**ATTORNEY FOR PLAINTIFF  
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
HELENA DIVISION**

<p><b>UNITED STATES OF AMERICA,</b></p> <p style="text-align: center;"><b>Plaintiff,</b></p> <p style="text-align: center;"><b>vs.</b></p> <p><b>WILLIAM DONALD FLEINER,</b></p> <p style="text-align: center;"><b>Defendant.</b></p>	<p><b>CR 16-08 -H-SEH</b></p> <p><b>INDICTMENT</b></p> <p><b>THEFT FROM A LOCAL GOVERNMENT RECEIVING FEDERAL FUNDING (Counts I-III) Title 18 U.S.C. § 666(a)(1)(A) (Penalty: Ten years imprisonment, \$250,000 fine, and three years supervised release)</b></p>
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THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this indictment:

1. Broadwater County, Montana, was a government organization that 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 in any one year period.

2. The defendant, WILLIAM DONALD FLEINER, was the Disaster and Emergency Services (“DES”) Coordinator for Broadwater County, Montana.

3. The defendant, WILLIAM DONALD FLEINER, was the sole registered agent for Paradigm Communication and Preparedness Solutions, LLC (“PCPS”). PCPS performed project management and grant writing services for government organizations including Broadwater County.

4. While the defendant, WILLIAM DONALD FLEINER, was employed as Broadwater County DES Coordinator, PCPS received payments for program management and grant writing from Broadwater County.

#### COUNT I

5. Paragraphs 1 through 4 of this indictment are incorporated by reference as if set forth in full.

6. Between on or about July 6, 2012, and on or about September 24, 2012, in Broadwater County, in the State and District of Montana, the defendant, WILLIAM DONALD FLEINER, an agent of Broadwater County, a local government, embezzled and intentionally misapplied property valued at \$5,000 or more, specifically \$19,363.52 of grant money from the United States Department

of Homeland Security, which was then owned by and under the care, custody and control of Broadwater County, in violation of 18 U.S.C. § 666(a)(1)(A).

#### COUNT II

7. Paragraphs 1 through 4 of this indictment are incorporated by reference as if set forth in full.

8. On or about September 27, 2012, in Broadwater County, in the State and District of Montana, the defendant, WILLIAM DONALD FLEINER, an agent of Broadwater County, a local government, embezzled and intentionally misapplied property valued at \$5,000 or more, specifically \$7,464 received from the United States Forest Service, which was then owned by and under the care, custody and control of Broadwater County, in violation of 18 U.S.C. § 666(a)(1)(A).

#### COUNT III

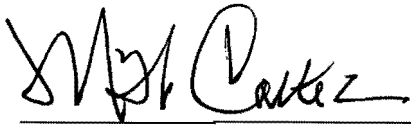
9. Paragraphs 1 through 4 of this indictment are incorporated by reference as if set forth in full.

10. Between on or about May 18, 2012, and on or about July 5, 2012, in Broadwater County, in the State and District of Montana, the defendant, WILLIAM DONALD FLEINER, an agent of Broadwater County, a local government, embezzled and intentionally misapplied property valued at \$5,000 or more, specifically \$7,501.54 of Payment in Lieu of Taxes (“PILT”) funds received

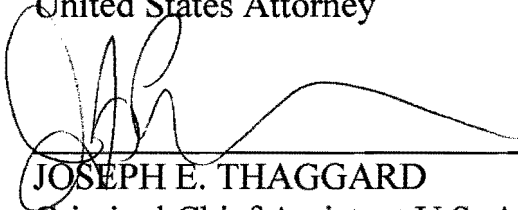
from the United States Department of the Interior, which were then owned by and under the care, custody and control of Broadwater County, in violation of 18 U.S.C. § 666(a)(1)(A).

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.



MICHAEL W. COTTER  
United States Attorney



JOSEPH E. THAGGARD  
Criminal Chief Assistant U.S. Attorney

Crim. Summons

Warrants

Bail

I.A set for  
6/22/16 @ 1:30pm

Msta w/ Judge Lynch