

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	CAUSE NO. 4:14-cr-0015-TWP-MGN-01
)	
DANIEL N. RODDEN,)	
)	
Defendant.)	

STIPULATED FACTUAL BASIS

Comes now the United States of America, by counsel, Bradley A. Blackington, Senior Litigation Counsel, and the defendant, Daniel N. Rodden, by counsel, James H. Voyles, and file this Stipulated Factual Basis of the Parties:

From January 1, 2013 through the present date, Daniel N. Rodden was employed as the elected Sheriff of Clark County, Indiana. On May 14, 2013, Rodden provided a female prostitute (“Individual #1”) with official law enforcement credentials and an official deputy’s badge of the Clark County Sheriff’s Department so that Individual #1 could obtain a government employee’s rate at hotels.

On or about May 29, 2013, RODDEN met Individual #1 in the bedroom of the Hyatt Regency Hotel in Louisville, Kentucky. At this time, RODDEN provided Individual #1 with a uniform shirt and other clothing bearing the insignia of the Clark County Sheriff’s Department. RODDEN then engaged in oral sex with Individual #1 and paid Individual #1 approximately \$300 in currency for the oral sex.

On or about May 8, 2014, Individual #1 became a confidential informant of the FBI and told the FBI about her relationship with Rodden. The FBI opened an investigation into wire fraud (18 U.S.C. § 1343) and enticing an individual to travel in interstate commerce to engage in prostitution (18 U.S.C. § 2422).

On May 27, 2014, FBI agents from Indianapolis interviewed Rodden by telephone. Rodden told the agents that he had never engaged in sexual activity with Individual #1 and that he had never paid Individual #1 for sex. Immediately after this interview, Rodden placed a telephone call to Individual #1. Rodden told Individual #1 about his interview with the FBI agents and directed Individual #1 to "get rid of" the official law enforcement credentials and uniform shirt of the Clark County Sheriff's Department that Rodden had provided to her on May 29, 2013.

On June 5, 2014, FBI agents interviewed Rodden again. After the agents advised Rodden that providing a false statement to a federal agent constituted a crime, Rodden provided a statement to the FBI agents. Rodden again denied engaging in sexual activity with Individual #1 and denied paying Individual #1 for sex. Rodden also told the agents that he did not possess Individual #1's telephone number.

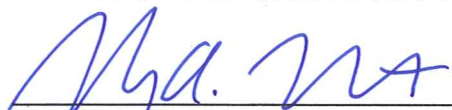
The parties agree that the facts outlined above are true and correct to the best of their knowledge, information, and belief. The parties further agree that these facts constitute a

sufficient factual basis to support the defendant's plea of guilty. Finally, the parties agree that the purpose of this document is to present sufficient facts to the Court to support the defendant's plea of guilty and that this document does not constitute a complete statement of the defendant's participation in the offenses to which he intends to plead guilty.


Respectfully submitted,

JOSH J. MINKLER
ACTING UNITED STATES ATTORNEY

By:

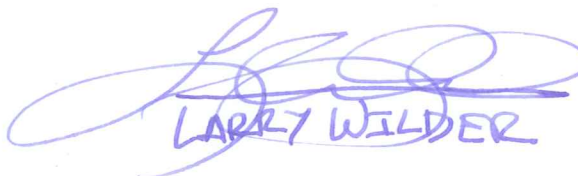


Bradley A. Blackington
Senior Litigation Counsel



Daniel N. Rodden
Defendant

James H. Voyles
Attorney for Daniel N. Rodden


LARRY WILDER