

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
WESTERN DIVISION

UNITED STATES OF AMERICA,

CR 5:22-cr-50128

Plaintiff,

REDACTED INDICTMENT

vs.

Wire Fraud
(18 U.S.C. § 1343)

JULIAN BEAR RUNNER,

Larceny
(18 U.S.C. §§ 661 and 1153)

Defendant.

Embezzlement and Theft from an
Indian Tribal Organization
(18 U.S.C. § 1163)

The Grand Jury charges:

**WIRE FRAUD
(18 U.S.C. § 1343)
Scheme and Artifice to Defraud**

1. At all times relevant to this Indictment, the defendant, Julian Bear Runner, was a resident of South Dakota and the President of the Oglala Sioux Tribe.

2. Beginning in January 2019 and continuing through January 2020, Bear Runner, while acting in his capacity as President of the Oglala Sioux Tribe, developed a scheme and artifice to defraud the Oglala Sioux Tribe and enrich himself.

3. As part of the scheme and artifice to defraud, Bear Runner would plan work-related travel to locations outside of the boundaries of the Pine Ridge

Reservation, including Rapid City, South Dakota, Minnesota, North Dakota, Colorado, New Mexico, Washington, Oklahoma, and other locations.

4. While Bear Runner was on official travel, his travel, including his airline flights, hotel accommodations, and a daily allowance for food-related expenses were paid for in advance by the Oglala Sioux Tribe. The Oglala Sioux Tribe would pay the travel expenses by writing a check to Bear Runner. Bear Runner knew that he was not entitled to work-related travel compensation if he did not actually travel.

5. Beginning in January 2019 and continuing through January 2020, Bear Runner began scheduling official travel and receiving checks for related costs when in fact he was not traveling or incurring the costs of airline flights, hotels, or food. Despite knowing he had not traveled and that he was not entitled to the travel funds, Bear Runner fraudulently submitted vouchers claiming he was going to travel and was entitled to travel funds. Bear Runner would then take the travel checks and would use the embezzled funds for his own personal use, including cashing the checks and spending the funds at the Prairie Wind Casino on the Pine Ridge Reservation.

6. Between January 2019 and January 2020, Bear Runner received approximately \$80,000 in checks for work-related travel expenses, when in fact Bear Runner was not traveling or incurring the expenses.

**WIRE FRAUD
(18 U.S.C. § 1343)**

7. All of the allegations set forth in paragraphs 1-6 inclusive are hereby realleged and incorporated by reference as though fully set forth herein.

8. On or about the dates listed below, in the District of South Dakota, and elsewhere, the defendant, Julian Bear Runner, devised the above-described scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, and for the purposes of executing such scheme and artifice and attempting to do so, unlawfully, willfully, and knowingly did cause to be transmitted by means of wire communications in interstate commerce writings, signs, signals, and sounds, to wit, the defendant, Julian Bear Runner, did fraudulently cause checks to be written on the Oglala Sioux Tribe's bank account at First National Bank in Gordon, Nebraska, in the approximate amounts as set out below and then cashed the checks knowing he was not entitled to the funds:

COUNT	DATE	METHOD	AMOUNT
1	03/2/2019	Check # 212747	\$1,204.20
2	06/21/2019	Check # 216556	\$1,724.96
3	07/02/2019	Check # 216599	\$1,657.50
4	07/13/2019	Check # 217942	\$2,369.69
5	09/23/2019	Check # 219166	\$1,948.51
6	10/18/2019	Check # 218908	\$2,238.01

COUNT VII

On or about between January 2019 and January 2020, in Indian country, in the District of South Dakota, the defendant, Julian Bear Runner, an Indian, did unlawfully take and carry away, with intent to steal or purloin, the personal property of another, namely: United States currency exceeding \$1,000.00, all in violation of 18 U.S.C. § 661 and § 1153.

COUNT VIII

On or about between January 2019 and January 2020, in the District of South Dakota, the defendant Julian Bear Runner, did embezzle, steal, willfully misapply, willfully permit to be misapplied, and convert to his own use more than \$1,000 of monies, funds, credits, goods, assets, and other property belonging to the Oglala Sioux Tribe, an Indian Tribal Organization, in violation of 18 U.S.C. § 1163.

A TRUE BILL:

Name Redacted

FOREPERSON

ALISON J. RAMSDELL
United States Attorney

By:  _____