

and completed the necessary procedures to secure the release of AB, then offered to give her a ride home. The defendant, however, drove AB to his own house on the Cherokee reservation.

3. Once inside his house, the defendant started kissing AB and removing her clothes. He informed her that if she would have sex with him he would forgive the fee she owed him for having executed the bond. AB was very familiar with bond procedures and feared that if she did not have intercourse with the defendant he would surrender her back into custody. AB thereby felt pressured to engage in actions that she otherwise would not have done. Therefore, in order to ensure that the defendant would not surrender her back into custody, and to have the fee forgiven, she engaged in sexual intercourse with the defendant.

4. The laws regarding the bail process in the State of North Carolina and Cherokee Tribal Court were not designed or intended to achieve sexual favors for a bondsman from a client defendant. The defendant abused that legal process in order to pressure or coerce AB to provide him with labor or services.

R. ANDREW MURRAY
UNITED STATES ATTORNEY



RICHARD LEE EDWARDS
ASSISTANT UNITED STATES ATTORNEY

Defendant's Counsel's Signature and Acknowledgment

I have read this Factual Basis, the Second Superseding Bill of Indictment, and the plea agreement in this case, and have discussed them with the defendant. Based on those discussions, I am satisfied that the defendant understands the Factual Basis, the Second Superseding Bill of Indictment, and the plea agreement. I hereby certify that the defendant does not dispute this Factual Basis.



Anthony G. Scheer, Attorney for Defendant

DATED: 1/23/18