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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
GABRIEL CHAVEZ,  
  
Defendant.

CR No. 2:22-cr-00462-MWF  
  
I N F O R M A T I O N  
  
[18 U.S.C. § 666(a)(2):  
Federal Program Bribery]

The United States Attorney charges:  
  
[18 U.S.C. §§ 666(a)(2), 2(a)]

At times relevant to this Information:

A. PERSONS AND ENTITIES

1. The City of Baldwin Park, California (the "City") was a local government located within Los Angeles County in the Central District of California. The City received in excess of \$10,000 under federal programs in both 2017 and 2018.

2. The City was governed, in part, by its City Council, which adopted legislation, set policy, adjudicated issues, and established the budget for the City.

1           3.       The City Council was comprised of four City Council  
2 members and a mayor, all of whom were elected at large by the City's  
3 registered voters.

4           4.       Ricardo Pacheco ("Pacheco") was first elected to the City  
5 Council in 1997 and held that elected position until 2020. He also  
6 previously served as the City's Mayor Pro Tempore. In both roles,  
7 Pacheco was an agent of the City.

8           5.       Defendant GABRIEL CHAVEZ founded Market Share Media Agency,  
9 an internet marketing company, in 2012.

10 B.    THE SCHEME

11           6.       In or around June 2017, the City started the process of  
12 permitting the sale, cultivation, and manufacture of marijuana within  
13 the City's limits. Shortly thereafter, Pacheco decided to corruptly  
14 solicit bribe payments from companies seeking marijuana development  
15 agreements and related permits ("marijuana permits") in the City. In  
16 exchange for the payments, Pacheco would agree to assist and assist  
17 the companies, using his official City position, with obtaining  
18 marijuana permits.

19           7.       Pacheco elected to use an intermediary to funnel the bribe  
20 payments to himself in an effort to disguise the true nature of the  
21 payments. The scheme would operate as follows: a company seeking a  
22 marijuana permit would pay the intermediary for supposed "consulting"  
23 services, the intermediary would then split a portion of the money  
24 with Pacheco, and Pacheco would then vote in favor of the company's  
25 desired marijuana permit in exchange for the payment. Pacheco would  
26 also agree to use his influence as a City Council member to ensure  
27 that other members of the City Council voted in favor of the  
28 marijuana permit as well.

1           8.     Defendant CHAVEZ was asked by Pacheco to act as an  
2 intermediary to funnel bribes to Pacheco, and defendant CHAVEZ  
3 agreed.

4           9.     To help conceal the bribery scheme, defendant CHAVEZ  
5 obtained a template for a sham consulting agreement from Person 1,  
6 which defendant CHAVEZ thereafter used to facilitate and disguise the  
7 scheme.

8           10.    Defendant CHAVEZ used his company, Market Share Media  
9 Agency, to funnel bribe payments to Pacheco in exchange for Pacheco's  
10 votes and influence over the City's permitting process to secure  
11 marijuana permits for two companies, Marijuana Company 3 and  
12 Marijuana Company 4.

13          11.    Defendant CHAVEZ obtained bribe payments to pass to Pacheco  
14 from Person 14, who was helping Marijuana Company 4 obtain its  
15 marijuana permit. To conceal the true nature of the payments, the  
16 bribes defendant CHAVEZ accepted were disguised as consulting  
17 payments from Person 14's consulting company to defendant CHAVEZ's  
18 company, Market Share Media Agency. Defendant CHAVEZ kept the  
19 remainder of the payments not provided to Pacheco in exchange for  
20 defendant CHAVEZ's services as an intermediary for the bribe  
21 payments.

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1 C. THE BRIBERY

2 12. Beginning in or around August 2017 and continuing to in or  
3 around March 2018, in Los Angeles County, within the Central District  
4 of California, defendant CHAVEZ, aiding and abetting Pacheco, Person  
5 14, and others, corruptly gave, offered, and agreed to give something  
6 of value to a person, namely, at least \$125,000 from Marijuana  
7 Company 3 and at least \$45,000 from Person 14 through Person 14's  
8 consulting company, intending to influence and reward Pacheco, an  
9 agent of the City, in connection with a business, transaction, and  
10 series of transactions of the City having a value of \$5,000 or more,  
11 specifically, the City's approval and awarding of marijuana  
12 development agreements and related permits.

13  
14 E. MARTIN ESTRADA  
15 United States Attorney

16 

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