FILED
CHARLOTTE, NC
MAY 12 2014
US District Court
Western District of NC

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

UNITED STATES OF AMERICA	)	**BILL OF INFORMATION**
	)	
	)	**UNDER SEAL**
	)	
v.	)	DOCKET NO: 3:14CR87-FDW
	)	
(1) PATRICK DEANGELO CANNON	)	18 U.S.C. § 1343
	)	18 U.S.C. § 1346
	)	18 U.S.C. § 2

The United States Attorney charges that:

INTRODUCTION

At all times material to this Bill of Information:

1. Beginning on or about December 7, 2009, and continuing through March 26, 2014, PATRICK DEANGELO CANNON ("CANNON")—then an elected member of the City Council, and/or Mayor Pro Tem or Mayor of the City of Charlotte, North Carolina ("Charlotte" or the "City")—devised and intended to devise a scheme and artifice to defraud and deprive the citizens of Charlotte and the government of Charlotte of their right to CANNON's honest and faithful services through bribery and the concealment of material information. The purpose of the scheme and artifice was for CANNON to secretly use his official positions to enrich himself by soliciting and accepting gifts, payments, and other things of a total value of at least $50,000 from persons doing and wanting to do business in Charlotte in exchange for CANNON's official action, including, but not limited to, the use of his official influence to encourage any Council member, City employee, and/or others to act in a manner favorable to those persons who were secretly paying CANNON.

Pertinent Words and Phrases Defined

2. The term "scheme" as used herein refers to a course of action in which CANNON solicited, accepted and agreed to secretly accept cash, paid travel and other things and services of value from persons doing and wanting to do business in Charlotte in exchange for the use of CANNON's elected office as requested by the payors and as opportunities arose to assist the payors with favorable official action such as influencing City officials responsible for planning, zoning and the alignment of the City's proposed LYNX Blue line Extension.

3. As an elected official, CANNON owed a fiduciary duty to provide his honest services to the public, including the citizens and government of Charlotte. To owe a fiduciary duty to the public means that CANNON had a duty to act with honesty and loyalty in the public's interest, not for his own enrichment. When an elected official such as CANNON devises or participates in a bribery scheme, he violates the public's right to his honest services. While CANNON outwardly purported to be exercising independent judgment in his official work and contacts with City employees, he instead received secret personal benefits for such official work and contacts. The public was defrauded through CANNON's undisclosed acceptance of cash and other things of value because it did not receive what it expected and was entitled to, namely, CANNON's honest services.

4. The term "bribery" as used herein connotes a "*quid pro quo.*" The phrase "*quid pro quo*" means "this for that" or "these for those." While the "bribery" alleged in this Bill of Information involved CANNON's intent to affect an exchange of money or other thing of value for official action, the payments and other things of value he received were not always correlated with a specific official act. In this regard, the bribery alleged in this Bill of Information also involved a "course of conduct" in which cash and other things of value flowed to CANNON in exchange for a pattern of official actions favorable to the persons who secretly paid him. Payments were made and/or accepted by CANNON with the intent that he would be retained by his secret benefactors on an "as needed" basis, so that whenever the opportunity presented itself CANNON would take specific official actions on the payor's behalf. Such official actions included influence over local government planning decisions and local government officials.

5. The term "official act" as used herein includes any act within the range of CANNON's official duty of a public official—or within the range of any other City Council members' or employee's official duty—including, but not limited to any decision, recommendation, or action on any question, matter, cause, suit, proceeding or controversy, which may at any time be pending, or which may by law be brought before CANNON or any such public official, in CANNON's or any such public official's official capacity. Official acts include the decisions or actions generally expected of CANNON and those in City government whom CANNON contacted on behalf of his secret benefactors. CANNON's "official action" included the exercise of both formal official influence and informal official influence.

The City of Charlotte, North Carolina

6. The City of Charlotte is a political subdivision of the State of North Carolina and the largest municipality in Mecklenburg County, North Carolina ("Mecklenburg County"). Charlotte has a council-manager form of government. The Mayor and City Council are elected every two years, with no term limits.

    a. The City Council is comprised of eleven members (seven from districts and four at-large). The City Charter provides the City Council with all legislative powers and the power to employ the City Manager, the City Attorney and the City Clerk.

All policy proposals must have the Council's approval before they become law. City Council meetings provide a forum in which policy proposals are deliberated, debated and finally decided. City Council members vote on a wide range of matters involving the City, including, but not limited to, zoning variances, the budget, tax rates, approval of contacts, planning proposals and condemnation by eminent domain. The City Council also makes two-thirds of the citizen appointments to the City's *ad hoc* and permanent boards, committees and commissions and nominates representatives to various County and regional boards, associations and committees.

b. The Mayor is *ex officio* chairman of the City Council, and only votes in case of a tie. The Mayor also has the power to veto ordinances passed by the Council; which vetoes can be overridden by a two-thirds majority of the Council. The City Charter defines the role of Mayor to include acting as the executive and ceremonial head of the City, presiding over City Council meetings, and serving as spokesman for the Council. The Mayor also votes on all rezoning petitions in which a valid three-quarter protest petition has been filed and generally makes one-third of the citizen appointments to the City ad hoc and permanent committees.

c. The Mayor Pro Tem is elected by a vote of the City Council. The Mayor Pro Tem assumes all duties, powers and obligations of the Office of Mayor in the Mayor's absence.

7. The City's employees are organized into Departments, which include the Charlotte Area Transit System ("CATS"), the Charlotte-Mecklenburg Planning Department ("Planning Department"), the Charlotte-Mecklenburg Police Department ("CMPD"), the Engineering and Property Management, and the Neighborhood and Business Services Department.

8. While City employees report in a chain of command that leads to the City Manager, City Council members and the Mayor often call or contact City employees on behalf of constituents who are having problems or questions about the provision of City services. Constituent services by the City's elected and appointed officials are official acts provided free of charge.

9. The City Council and the Mecklenburg County Board of County Commissioners (BOCC) have entered into agreements providing for coordination of certain governmental functions and services. For example, the Charlotte-Mecklenburg Planning Commission advises both the City Council and the BOCC with respect land use, design plans, zoning, transportation and economic development. However, the County Government also has direct responsibility for certain functions within the City, such as building codes enforcement and environment health, including restaurant inspections.

Zoning and Permits

10. The City Council has passed ordinances governing how, when and where business is conducted, buildings and residences are constructed and public safety and order is maintained. Included within these ordinances are land use planning and zoning regulations. Zoning approval is required to operate a business in Charlotte-Mecklenburg and to obtain a Charlotte-Mecklenburg business license.

    a. Plans for commercial site development located within the City must be submitted for review by various City and County Departments, including the Planning Department. Building permit applications and, if necessary, re-zoning applications are submitted concurrently to Mecklenburg County Codes Enforcement for required building permits.

    b. Zoning regulations are the rules that determine how parcels of land may be used. Zoning districts are established by the City Council upon recommendation of the Planning Commission. The Official Zoning Map determines the ordinance standards, rules, regulations and conditions of which developments and businesses within a particular zoning district must conform. When land owners want to develop or use their property in ways that do not conform to the Official Zoning Map, they must apply for a change to their zoning classification, also commonly referred to as a "rezoning." Examples of zoning ordinances in Charlotte include how many feet a bar or night club must be from a school, church or residential neighborhood. In this regard, the Charlotte City Council enacted an adult zoning ordinance strictly limiting where and how adult clubs could operate. The City Council has the power and duty to initiate and make amendments to City Zoning ordinances and zoning maps

11. The Charlotte-Mecklenburg Planning Commission (the "Planning Commission") has the power and duty to review and make recommendations to the City Council for amendments to zoning regulations and maps. The Planning Commission is comprised of 15 members, of which the Council appoints five, the Mayor two and the BOCC seven members. The Commission is divided into two major working committees: the Zoning Board of Adjustment and the Planning Committee.

    a. The Zoning Board of Adjustment (the "Zoning Board") has the power and duty to hear appeals from and to review any specific order, requirement, decision and/or determination by the Zoning Administrator. The Zoning Board also hears and decides petitions for certain types of zoning variances, but may not grant variances for use changes.

    b. The Planning Committee develops recommendations on land use, urban design, transportation and other policy plans and on ordinance text amendments.

    c. The day-to-day functions of the Planning Commission and City Council are carried out by the professional staff of the City's Planning Department. The Planning Staff is led

by the Planning Director. The powers and duties of the Planning Commission Staff include, but are not limited to, reviewing certain applications for building permits, recommending and commenting on amendments to zoning regulations and the zoning map, determining street classifications, reviewing rezoning petitions, informing applicants with regard to zoning requirements and procedures. The Zoning Administrator reports to the Planning Director and is responsible for, among other duties, rendering interpretations of zoning regulations and zoning district boundaries.

12. Building inspections, permits and certificates of occupancy in Mecklenburg County are issued by the County Codes Enforcement, a division of the County's Land Use and Environmental Services Agency ("LUESA"). Codes Enforcement employees report to the County Manager. It is established practice and procedure for County employees to respond to constituent inquiries from the elected officials of Charlotte, the County's largest municipality. Such constituent services are official acts provided free of charge regardless of whether they are received directly from a constituent or through an elected official.

Proposed Mass Transit and Development Projects:

13. CATS is the agency responsible for operating mass transit in Charlotte and Mecklenburg County. CATS operates light rail transit, historical trolleys, express shuttles, and bus services serving Charlotte and its immediate suburbs. The LYNX light rail system is presently comprised of a 9.6-mile north–south line known as the Blue Line.

14. The Blue Line Extension (BLE) is an extension of the existing LYNX Blue Line light rail service. The approximately 9 mile extension presently under construction will extend from Ninth Street in Center City through the North Davidson and University areas, terminating on the UNC Charlotte campus. The alignment of the BLE was published in 2011. The alignment determined how property owners in the right of way and adjacent areas would be impacted, including whether the properties would be purchased by the City or taken by eminent domain. Certain business owners in the BLE's proposed alignment were required to change or relocate their businesses. Such relocations would require approvals from various City and County officials, including Zoning, Planning and CATS officials.

15. The LYNX Gold Line Project is a proposed street car line that would provide an east-west link through Charlotte's Central Business District. The first phase of the Gold Line project is currently under construction. The second phase of the Gold Line is to extend from the Central Business District west to French Street near the Johnson C. Smith University. The proposed Gold Line was the subject of considerable debate by the City Council, which initially voted against City funding. On or about May 28, 2013, the City Council led by then Mayor Pro Tem CANNON voted to approve City funding of the Gold Line. At its May 28, 2013 business meeting, the City Council authorized the City Manager to apply for federal grants to fund the Gold Line extension.

Relevant Individuals and Entities

16. Defendant CANNON was an at-large member of the Charlotte City Council from December 7, 2009 until December 2, 2013. On June 14, 2010, the City Council selected CANNON to be the Mayor Pro Tem. On November 5, 2013, CANNON was elected to be the Mayor of Charlotte and was sworn in as the 56th Mayor of Charlotte on December 2, 2013. CANNON resigned from the Office of Mayor on March 26, 2014.

17. Businessman No. 1 ("BM1") is the owner of a company that owns and operates a certain live adult entertainment club in Charlotte (the "Club"). The Club was impacted by the proposed BLE extension alignment. The proposed BLE alignment required the City to acquire land on which the Club is located. In order to continue operating as an adult club, either the BLE alignment needed to be changed or BM1 needed to relocate the Club. Changing the BLE alignment required approval from CATS and the City's Planning Department. Moving the Club required variances and approvals from the City's Zoning Administrator and Planning Department, as well as building permits issued by the County's LUESA.

18. Undercover Employee No. 1 ("UCE1") was an undercover agent with the Federal Bureau of Investigation ("FBI") who represented himself as a business manager for a venture capital company based in Chicago, Illinois. UCE1 was first introduced to CANNON on or about November 18, 2010. UCE1 and CANNON ultimately established a close working relationship. UCE1 informed CANNON and others that he and his investors were very interested in conducting business in Charlotte and wanted to "test the waters" by opening a nightclub/bar. During 2012 and 2013, CANNON, UCE1 and others had numerous conversations regarding a possible location to open a nightclub/bar. CANNON, who was also a part of these discussions, recommended several properties. UCE1 selected a property in the Uptown Charlotte area that UCE1, CANNON and the businessman called the "Firehouse." This property had parking problems and would require several zoning changes, as well as permitting requirements; thereby potentially requiring CANNON's influence and intervention.

19. Undercover Agent No. 2 ("UCE2") was an undercover FBI agent who represented himself as a real estate developer from Las Vegas, Nevada who was attempting to secure major investments from a group of foreign investors to build mixed use commercial real estate developments in Charlotte. UCE1 introduced UCE2 to CANNON and stated that he had previously worked with UCE2 on real estate projects.

20. While UCE1 and UCE2 dealt with CANNON separately and proposed different business plans to CANNON, they also represented to CANNON that they knew each other and had worked together on certain projects. On several occasions, UCE1 and UCE 2 met with CANNON together.

THE SCHEME TO DEFRAUD

The Scheme to Solicit and Accept Cash and Things of Value from BM1

21. Beginning no later than CANNON's installation as City Councilman At-Large on or about December 7, 2009, and continuing until on or about March 26, 2014, CANNON secretly solicited, accepted and agreed to accept periodic cash payments and checks from or on behalf of BM1 in exchange for CANNON's use of his elected offices to make contacts and exert official influence over City zoning, planning and transportation officials. Specifically, in and around January 2013, CANNON accepted a cash payment of approximately $2,000 from BM1 in exchange for the use of CANNON's influence in relocating the Club away from the proposed BLE alignment so that it could remain open as an adult club. CANNON's official acts on behalf of BM1 included, but were not limited to:

    a. Soliciting the support of the Councilman in whose District the Club was located;

    b. Contacting the City Zoning Administrator and other City and County officials in order to urge them to approve zoning approvals to move and reconstruct the Club on the same property; and

    c. Arranging a meeting between BM1 and CATS officials so that the Club could remain open prior to reconstruction during an annual racing event in which the Club earned significant revenue.

    d. During the above acts, CANNON wilfully failed to disclose the extent of his relationship with BM1 and cash payments and other items of value he received from BM1 to the City and County employees whom he contacted on behalf of BM1. Moreover, CANNON intended to engage in a *quid pro quo* exchange with BM1 in which he would receive cash and other things of value in exchange for the use of his official office as needed or as required by BM1.

The Scheme to Solicit and Accept Cash and Things of Value from UCE1

22. Beginning no later than December 12, 2012, and continuing until on or about March 26, 2014, CANNON secretly solicited, accepted and agreed to accept $12,500 in cash and the occasional use of an apartment in exchange for CANNON's use of his elected offices to make contacts and exert official influence over City and County officials considering building permits, zoning variances and other permits necessary to open a night club/bar in the "Firehouse" location. CANNON's official acts on behalf of UCE1, included, but were not limited to:

    a. Contacting the City Zoning Administrator to request information on behalf of UCE1;

b. Promising to use his influence as an elected City official to move UCE1's applications for business licenses, planning and building permits to "the top of the pile;"

c. Talking to the "right people to see the [Firehouse] project through;" and

d. Being available as needed to assist UCE1 with City and County officials so that UCE1 would not have "any real problems."

e. During the above acts, CANNON wilfully failed to disclose to the City employees whom he contacted on behalf of UCE1 that UCE1 had paid him cash and allowed him occasional free access to an apartment. Moreover, CANNON intended to engage in a *quid pro quo* exchange with UCE1 in which he would receive cash and other things of value in exchange for the use of his official office as needed or as required by UCE1.

The Scheme to Solicit and Accept Cash and Things of Value from UCE2

23. Beginning no later than May 21, 2013, and continuing until on or about March 26, 2014, CANNON secretly solicited, accepted and agreed to accept a total of $36,000 in cash, a trip to Las Vegas, and the occasional use of an apartment in exchange for CANNON's use of his elected offices to create and make false representations to investors whom CANNON then believed were interested in investing in Charlotte real estate developments, promising to make contacts and exert official influence over City and County officials considering commercial development plans, building permits, and zoning variances necessary to open for a mixed-use residential/ commercial development. CANNON's official acts on behalf of UCE2, included, but were not limited to:

a. Agreeing to tell UCE2's investors that he had used his official assistance to address zoning and permitting issues on behalf of a mixed-use development in Charlotte;

b. Traveling to Las Vegas and delivering a presentation in his capacity as Mayor Pro Tem of Charlotte to a group he then believed were potential foreign investors, which presentation utilized a story that CANNON had created and included the false representation that he had previously used his influence on behalf of UCE2 in a certain mixed commercial-residential development in Charlotte;

c. Contacting the City Manager for information on the construction schedule for the Lynx Gold Line and promising to give UCE2's company preferential treatment over other potential developers;

d. Promising to use his new position as Mayor to secure federal financing for the BLE and Gold Line to the benefit of UCE2's company;

e. Offering to use and then actually using the Mayor's office as the place to persuade a purportedly skeptical investor to follow through with his investment in UCE2's company; and

f. Promising to introduce UCE2 to the City's Planning Director and "position" her in case UCE2 needed official help with his development in the future.

g. During the above acts, CANNON wilfully failed to disclose to the City employees whom he contacted on behalf of UCE2 that UCE2 had paid him cash, a trip to Las Vegas and allowed him occasional free access to an apartment. Moreover, CANNON intended to engage in a *quid pro quo* exchange with UCE2 in which he would receive cash and other things of value in exchange for the use of his official office as needed or as required by UCE2.

COUNT ONE

Violation: 18 U.S.C. §§ 1343, 1346 & 2
(Honest Services Wire Fraud)

24. Paragraphs 1 through 23 of the Introduction to this Bill of Information are hereby realleged and incorporated into Count One by reference herein.

The Scheme

25. Between on or about December 7, 2009, and continuing until on or about March 26, 2014, in Mecklenburg County within the Western District of North Carolina and elsewhere, the defendant

PATRICK DEANGELO CANNON,

aided and abetted by others known and unknown to the United States Attorney, devised and intended to devise a scheme and artifice to defraud and deprive the citizens of Charlotte and the Charlotte government of their right to CANNON's honest and faithful services through bribery and the concealment of material information.

Purpose of the Scheme

26. The purpose of the scheme and artifice was for CANNON to secretly use his official positions to enrich himself by soliciting and accepting gifts, payments, and other things of value from businessmen conducting and wanting to conduct business in Charlotte in exchange for CANNON's official action, including the use of his influence to encourage Council members, City employees and others to act in a manner favorable to those persons who were secretly paying CANNON as further described in the introductory paragraphs of this Bill of Information.

Manner and Means

27. The scheme and artifice was carried out in the manner and by the means described in the Introductory paragraphs of this Bill of Information and the following, among others:

Date(s)	Payor	Bribe ("Quid")	Official Act(s) ("Quo")
Jan. 1-31, 2013	BM1	$2,000 cash	CANNON urged a Council Member to intervene with City official on behalf of the Club.
Jan. 17, 2013	UCE1	$12,500 cash	CANNON promised to use his influence to move UCE1's applications for business licenses, planning and building permits to "the top of the pile."
July 1, 2013	UCE1 UCE2	$1,000 cash Hotel Room Air Fare	CANNON traveled to Las Vegas to give a false presentation as Charlotte Mayor Pro Tem to a group of UCEs posing as foreign investors.
July 2, 2013	UCE2	$5,000 cash	CANNON gave a false presentation as Mayor Pro Tem to a group of UCEs posing as foreign investors and promised to use his official position as needed to benefit UCE2's real estate projects.
July 19, 2013	UCE2	$10,000 cash	CANNON used his official position as Mayor Pro Tem to successfully recruit a payment to UCE2's company from a UCE posing as a foreign investor and called the City's Zoning Administrator on behalf of UCE1.
Dec. 11, 2013	UCE2	Key and Use of Apartment	CANNON called the City Manager on behalf of UCE2, provided UCE2 with the Planning Director's contact information, and advised UCE2 to tell the Planning Director that he had previously had a conversation with CANNON and the City Manager.
Feb. 21, 2014	UCE2	$20,000 cash	CANNON used the Mayor's office and his elected position to convince a UCE posing as a skeptical foreign investor to "close" on a $25 million payment to UCE2's company.

Execution of the Scheme

28. CANNON, for the purpose of executing the above-described scheme and artifice to defraud Charlotte of his honest services, transmitted and caused to be transmitted by means of wire

communication in interstate commerce, certain signals, and sounds, including a call he directed a certain City employee (the "City Employee") to make from Charlotte, North Carolina, to UCE1's Chicago mobile phone number.

a. On or about July 19, 2013, while in a meeting with UCE2 in which he received $10,000 cash, CANNON called the City Employee in the presence of UCE2 and stated in pertinent part:

> [Receives voicemail] [City Employee] how are you? This is your brother in Greekdom Patrick Cannon giving you a call hope all is well. Listen [City Employee], I need for you to see if you might take a moment out of your busy schedule to call a gentleman by the name of [spelling out UCE1's name] phone number 773-XXX-XXXX. Again 773-XXX-XXXX. He is, uh, I need to see if you can talk to him in regards to a piece of property um that I'm sure you're familiar with. It's the old firehouse um up where a - I think it was Engine Number One used to be located there. It's right there at Graham Street and Fifth and so he had a few questions uh with regard to it and I wanted to know if you'd be so kind as to give him a call. And um field some of his questions for him please. After doing so would you give me a call to follow up and let me know how that went. 704-XXX-XXXX. 704-XXX-XXXX. Thanks so much [City employee]. Talk to you later. Bye now.

b. At approximately 9:30 AM on July 23, 2013, the City Employee placed a call from Charlotte, North Carolina to UCE1's mobile telephone beginning with area code 773, which is a Chicago, Illinois area code, in which he/she left a voice mail stating:

> Hello Mr. [UCE1], this is [City Employee] with the City of Charlotte Planning Department. Council member Patrick Cannon asked that I give you a call to see if I can answer your questions. If you still need assistance, please call me at 704-XXX-XXXX. Thank you, Bye.

c. At approximately 9:48 AM on July 23, 2013, UCE1, then in Miami, Florida, returned the City Employee's call in Charlotte, North Carolina. During the call, UCE1 and the City Employee discussed the Firehouse property and residential setbacks that might preclude outdoor entertainment. They also discussed the possibility of getting waivers for outdoor entertainment and contacting persons with responsibility and oversight of building code compliance.

All in violation of Title 18, United States Code, Sections 1343, 1346 and 2.

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

29. Notice is hereby given of the provisions of 18 U.S.C. §§ 981 and 982, 21 U.S.C. § 853, and 28 U.S.C. § 2461(c). Under section 2461(c), criminal forfeiture is applicable to any offenses for which forfeiture is authorized by any other statute, including but not limited to 18 U.S.C. § 981 and all specified unlawful activities listed or referenced in 18 U.S.C. § 1956(c)(7), which are incorporated as to proceeds by section 981(a)(1)(C). The defendant has or had a possessory or legal interest in the following property that is subject to forfeiture in accordance with sections 981, 982, 853, and/or 2461(c):

    a. all property which constitutes or is derived from proceeds traceable to the violations alleged in this Bill of Information;

    b. all property involved in the violations alleged in this Bill of Information;

    c. all property used or intended to be used to commit the violations alleged in this Bill of Information;

    d. In the event that any property described in (a), (b), or (c) cannot be located or recovered or has been substantially diminished in value or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant, to the extent of the value of the property described in (a), (b), and (c).

30. The United States Attorney finds probable cause to believe that the following properties are subject to forfeiture on one or more of the grounds stated above:

    a. All currency and monetary instruments constituting or derived from proceeds traceable to the offenses alleged in this Bill of Information and,

    b. Approximately $7,680 in cash.

ANNE M. TOMPKINS
UNITED STATES ATTORNEY

Michael E. Savage
Craig Randall
Assistant United States Attorneys

Revised AO 45 (WDNC - 3/07)

NEW CRIMINAL CASE COVER SHEET

U. S. DISTRICT COURT

(To be used for **all** new Bills of Indictments and Bills of Information)

CASE SEALED: ◉ YES ○ NO

DOCKET NUMBER: 3:14CR87-FDW

*If case is to be sealed, a Motion to Seal and proposed Order **must** be attached.)*

CASE NAME :US vs Patrick DeAngelo Cannon

COUNTY OF OFFENSE : Mecklenburg

RELATED CASE INFORMATION :

Magistrate Judge Case Number : 3:14-MJ-37

Search Warrant Case Number :

Miscellaneous Case Number :

Rule 20b :

SERVICE OF PROCESS : Summons

U.S.C. CITATIONS *(Mark offense carrying greatest weight):* ○ Petty ○ Misdemeanor ◉ Felony

18 U.S.C. Sections 1343, 1346 and 2

JUVENILE: ○ Yes ◉ No

ASSISTANT U. S. ATTORNEY : Savage, Mike

VICTIM/WITNESS COORDINATORS:

INTERPRETER NEEDED : N/A

LIST LANGUAGE AND/OR DIALECT:

REMARKS AND SPECIAL INSTRUCTIONS: ***To Be Filed Under Seal***

(Maintain form in the Attorney Work Product folder / purge before archiving)