

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

FILED
2015 JUN 16 PM 12:06
CLERK US DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY [Signature]
DEPUTY

UNITED STATES OF AMERICA

v.

HELENA TANTILLO

FILED UNDER SEAL

A15 CR0162 SS

INDICTMENT

The Grand Jury Charges:

At all times material to this Indictment, unless otherwise indicated:

Background

1. The Dallas Office of the Federal Bureau of Investigation (FBI) conducted an investigation Dallas County Commissioner John Wiley Price and others regarding a bribery conspiracy and other offenses in the Dallas Division of the Northern District of Texas (hereinafter, "Corruption Investigation").

2. One aspect of the Corruption Investigation included that Price solicited and accepted a stream of benefits to corruptly influence and reward him for taking action or refraining from taking negative action, as specific opportunities arose, concerning certain businesses' pursuit of Dallas County contracts.

3. As part of the Corruption Investigation, FBI Special Agents contacted defendant **Helena Tantillo**, an employee of Business B (a company known to the Grand Jury). Business B submitted a bid in 2004 for the Dallas County Recording, Indexing, and Imaging System Request for Proposals No. 2004-064-1485 (hereinafter, DCRIIS

RFP), a contract with Dallas County to digitize County records.

4. Shortly before Business B submitted its proposal to Dallas County, Business B hired a consultant, Christian Campbell, to assist in the DCRIIS RFP process. Business B paid Campbell \$5,000 per month and promised a success fee if Business B was awarded the contract. Business B's bid also included a lobbyist/consultant, Kathy Nealy, as a subcontractor. Nealy had been Price's campaign manager and advertised herself as someone with influence at Dallas County. An aspect of the Corruption Investigation concerned Nealy's and Campbell's roles in the financial benefits paid to Price, including transfers of money from Business B to Campbell during the DCRIIS RFP process, and the concealment of the bribery scheme by Price, Nealy, Campbell, and others.

5. During the DCRIIS RFP process, the selection committee recommended eliminating Business B from further consideration. However, on Price's motion, the Commissioners Court voted to keep Business B in the selection process for the DCRIIS RFP. Soon after this vote, **Tantillo** signed an amendment to Campbell's contract with Business B, which increased Campbell's monthly pay from \$5,000 to \$10,000 for two subsequent months. Campbell then gave Nealy a check for \$7,500 in payment of a purported invoice Nealy prepared for "Consulting Services – Dallas County Bearing Point." The next day, Nealy paid Price \$2,500.

6. When the two months of Campbell's amended contract with Business B ended, **Tantillo** signed a second amendment to Campbell's contract, reverting his monthly pay back to \$5,000 per month.

7. Price subsequently voted in favor of approving Business B as the selected DCRIIS vendor and authorizing the County to begin contract negotiations with Business B.

Tantillo's Interviews with the FBI

8. On or about August 6, 2013, **Helena Tantillo** was interviewed in Dallas, Texas, within the Northern District of Texas, by Special Agents of the FBI regarding the Corruption Investigation. When asked in the interview about the two-month, \$5,000 increase in Campbell's salary, **Tantillo** stated that she could not recall the reason for the increase.

9. On or about January 29, 2014, **Tantillo** was interviewed in Austin, Texas, within the Western District of Texas, by Special Agents of the FBI regarding the Corruption Investigation. **Tantillo** stated that after meeting with FBI agents on August 6, 2013, she had a conversation with G.M., a person known to the Grand Jury, that caused her to remember that the increase in monthly payment to Campbell was a means to make a charitable donation to curry favor with another Dallas County Commissioner, in contravention of Business B's company policy.

10. On or about June 19, 2014, **Tantillo** was interviewed in Austin, Texas, within the Western District of Texas, by Special Agents of the FBI regarding the Corruption Investigation. When questioned about the increase in Campbell's monthly payment in or about August 2004, **Tantillo** again stated that, after her August 2013 meeting with FBI agents, she called and talked with G.M. and that conversation caused her to remember that the increase in Campbell's monthly payment was a means to make a

charitable donation to a favorite charity of another Dallas County Commissioner.

Tantillo stated that the increase in payment was the idea of, and at the direction of, G.M.

Count One
False Statement to Law Enforcement
(Violation of 18 U.S.C. § 1001(a)(2))

11. The Grand Jury realleges, and incorporates by reference herein, as if fully set forth, the allegations contained in Paragraphs 1-10 of this Indictment.

12. On or about June 19, 2014, in Austin, Texas, in the Western District of Texas, defendant **Helena Tantillo** willfully and knowingly made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by stating that the increase in Christian Campbell's monthly payment in or about August 2004 was to make a charitable donation to a favorite charity of another Dallas County Commissioner, an individual known to the Grand Jury. The statement and representation was false because, as **Helena Tantillo** then and there knew, the increase in Christian Campbell's monthly payment was at least in part in order to pay Kathy Nealy.

All in violation of 18 U.S.C. § 1001(a)(2).

Count Two
False Statement to Law Enforcement
(Violation of 18 U.S.C. § 1001(a)(2))

13. The Grand Jury realleges, and incorporates by reference herein, as if fully set forth, the allegations contained in Paragraphs 1-10 of this Indictment.

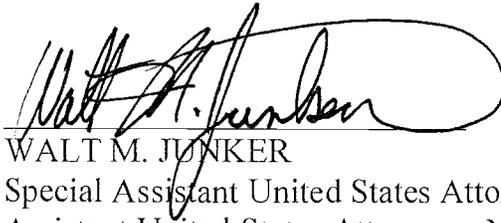
14. On or about June 19, 2014, in Austin, Texas, in the Western District of Texas, defendant **Helena Tantillo** willfully and knowingly made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by stating that after an interview with FBI agents on or about August 6, 2013, she spoke with G.M. by telephone, who provided an explanation for the increase in Christian Campbell's monthly payment in or about August 2004. The statement and representation was false because, as **Helena Tantillo** then and there knew, she had not spoken with G.M. by telephone following her meeting with FBI agents in August 2013.

All in violation of 18 U.S.C. § 1001(a)(2).

A TRUE BILL:

SIGNATURE REDACTED PURSUANT
TO E-GOVERNMENT ACT OF 2002

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