

transactions of such government involving anything of value of \$5,000 or more, in violation of 18 U.S.C. § 666(a)(2), and (2) conspiracy to commit the same, in violation of 18 U.S.C. § 371. Additionally, your affiant respectfully submits that there is probable cause to believe that SON has committed the additional federal offense of corruptly soliciting and demanding for his own benefit, and accepting and agreeing to accept, a bribe payment, in connection with any business or transaction of the State of Maryland, involving anything of value of \$5,000 or more, in violation of 18 U.S.C. § 666(a)(1)(B). (Collectively, these offenses are called the TARGET OFFENSES.)

IDENTITY AND EXPERTISE OF AFFIANT

2. I am an “investigative or law enforcement officer” of the United States, within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for federal offenses.

3. Your affiant has been employed with the FBI since May 2010. Before joining the FBI, your affiant served for 10½ years as a police officer with the Clearwater Police Department in Clearwater, Florida, and approximately 2½ years as a police officer with the Gainesville Police Department in Gainesville, Florida. During my tenure as an FBI Agent, your affiant has participated in criminal investigations involving police corruption, corruption of state and local public officials, violations of election law, drug trafficking, and other unlawful activities. In addition, your affiant has participated in investigations involving wiretaps and has reviewed intercepted and consensually recorded conversations pertaining to public corruption. Your affiant has participated in debriefings of individuals involved in corruption and participated in numerous searches, arrests, and seizure warrants involving a variety of federal offenses.

4. I have personally participated in the investigation of the offenses referred to herein and have reviewed reports and had discussions with other Special Agents and employees of the

FBI and other law enforcement agencies related to the instant investigation. I am fully familiar with the facts and circumstances of this investigation. Through training, education, and experience, I am familiar with investigations involving corrupt public officials.

5. The facts set forth in this affidavit are based upon my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other investigators, my and other investigators' review of documents in relation to this investigation, communications with others, including individuals involved in the TARGET OFFENSES who have personal knowledge of the events and circumstances described herein, information gained from the interception of wire communications, and information gained through your Affiant's training and experience. To the extent that this affidavit contains statements by witnesses, those statements are set forth only in part and in substance and are intended to accurately convey the information but not to be verbatim recitations, unless indicated otherwise. This affidavit is submitted for the limited purpose of establishing probable cause in the support of the applications and warrant, and thus, it does not contain every fact known to me or the United States.

STATEMENT OF PROBABLE CAUSE

Introduction

The Defendants

6. SON was appointed in 2005 by the Governor of Maryland to serve as a commissioner on the Prince George's County Board of License Commissioners ("Liquor Board"), a position he held continuously until late 2014. Among other things, the Board enforces the state's Alcohol Beverage Laws in Prince George's County. During the 2015 Maryland legislative session, SON served as a liaison for the Prince George's County Senate Delegation. Later in 2015, SON returned to the Liquor Board, this time as its Director.

7. At all times relevant, **PAIG**, a Maryland resident, was the owner of Central Avenue Restaurant & Liquor store and the resident agent of Weeping Willow, Inc., in Prince George's County, Maryland.

8. At all times relevant, **LEE**, a Maryland resident, was the owner of Palmer Liquor Store and the resident agent of Multi-Bil, Inc., in Prince George's County, Maryland.

Other Organization and Persons

9. The CHS ("Confidential Human Source") is a registered FBI informant since approximately March 2012. The CHS has pleaded guilty, under seal, to bank fraud, in violation of 18 U.S.C. § 1344, in the United States District Court for the Eastern District of Virginia. The CHS has no other criminal convictions. Based on the CHS's cooperation, the Government moved for a U.S.S.G. § 5K1.1 downward departure, and the United States District Court for the Eastern District of Virginia sentenced the CHS below the otherwise applicable advisory guideline range in June 2015. The information provided by the CHS has been corroborated by independent investigation, including public source information, surveillance, consensual monitoring, and information provided by an FBI undercover employee (hereafter referred to as "UCE-2"). Your affiant believes the information provided by the CHS described herein is credible and reliable.

10. UCE-2 is an FBI undercover employee. UCE-2 has posed as a business investor and a personal friend of the CHS. For the purposes of this investigation, UCE-2 is listed as the resident agent of a Maryland based non-profit organization.

11. CHS-6 was an elected official who became a cooperating witness with the FBI in approximately June 2014 and ceased cooperating in approximately July 2015. CHS-6 has no criminal convictions but is a target of an on-going public corruption investigation and has signed a plea agreement in which he/she admitted to certain incriminating facts and agreed to plead guilty

to an Information charging him/her with violations of 18 U.S.C. §§ 371 and 666. CHS-6 was providing information to law enforcement in the hope of receiving a more lenient sentence. The information described herein as provided by CHS-6 has been corroborated by independent investigation, including public source information, surveillance, consensual monitoring, Title III intercepts, and information provided by other source reporting. Your affiant believes the information provided by CHS-6 described herein is credible and reliable.

12. CHS-7 is a Confidential Human Source. In July 2015, CHS-7 began cooperating with the FBI as a registered informant. CHS-7 has a close business and personal relationship with SON. CHS-7 has no criminal convictions but is the target of an ongoing public corruption investigation. Your affiant believes that CHS-7 ultimately will be the subject of criminal charges related to the ongoing investigation. CHS-7 is providing information to law enforcement in the hope of receiving a more lenient sentence, when CHS-7 ultimately is charged. The information provided by CHS-7 has been corroborated by independent investigation, including public source information, surveillance, consensual monitoring, Title III intercepts, and information provided by other source reporting. Your affiant believes the information received from CHS-7 described herein is credible and reliable.

13. CHS-8 is an elected official who became a cooperating witness with the FBI in approximately April 2016. CHS-8 has a close personal relationship with SON. CHS-8 has no criminal convictions but is a target of an on-going public corruption investigation. Your affiant believes that CHS-8 ultimately will be the subject of criminal charges related to the on-going investigation. CHS-8 was providing information to law enforcement in the hope of receiving a more lenient sentence, when CHS-8 ultimately is charged. The information described herein as provided by CHS-8 has been corroborated by independent investigation, including public source

information, surveillance, consensual monitoring, Title III intercepts, and information provided by other source reporting. Your affiant believes the information provided by CHS-8 described herein is credible and reliable.

Maryland State Government

14. The General Assembly was the State of Maryland's legislative body. The bicameral legislature was composed of the Senate, with 47 Senators, and the House of Delegates, with 141 Delegates.

15. The State of Maryland was a state government that received, in each relevant one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan guarantee, insurance, and other form of Federal assistance.

16. Maryland state law prohibited a person from giving a State officer or employee, and prohibited a State officer or employee from demanding or receiving, a bribe, fee, reward or testimonial in exchange for influencing the performance of the official duties of the public employee, or neglecting or failing to perform the official duties of the public employee, as provided by Maryland Criminal Law Article Section 9-201.

17. House Bill 931 (Prince George's County Bill 318-15) ("PG 318-15" or "Sunday Sales Bill") established up to 100 Sunday liquor sales permits in Prince George's County. PG 318-15 passed the House on or about March 23, 2015, was returned passed by the Senate on April 9, 2015, and was approved by the Governor on April 14, 2015.

18. House Bill 1311 (Prince George's County Bill 305-16) ("PG 305-16" or "Additional Sunday Permits Bill") raised the limit of Sunday liquor sales permits in Prince George's County from 100 to 105, and authorized the additional five permits "only to holders of a Class B beer, wine, and liquor license with an off-sale privilege that acquired the license on or

after January 1, 2016. As written, the bill was expressly designed to encompass only a limited number of potential recipients, including campaign contributors such as Business Owner C and Business Owner D. On March 15, 2016, PG 305-16 passed the House Economic Matters Committee, with CHS-8 voting in favor. PG 305-16 unanimously passed the full House on March 17, 2016, was returned passed by the Senate on April 11, 2016, and was approved by the Governor on April 26, 2016.

SON's Bribe Payments to CHS-6 in 2012 and 2013

19. According to the CHS, CHS-6, and consensual recordings reviewed by your affiant, SON facilitated three bribe payments from the CHS to CHS-6 between December 2012 and April 2014. The bribe payments from the CHS to CHS-6 were in order for the CHS to obtain CHS-6's assistance in moving the CHS's business to Prince George's County and to obtain County grants controlled by CHS-6.

20. For example, on December 19, 2012, during a consensually recorded meeting at a restaurant in College Park, Maryland, SON asked if the CHS wanted to pursue certain specific Economic Development ("EDI") funding through CHS-6. SON told the CHS, "Here's what I want you to do. Hypothetically right. You understand they all understand this is a business deal. If I were you, I would get a little envelope going for [CHS-6]." The CHS asked what would be a good number, and SON responded, "Usually right. It's upwards of 5. That's like Joe Blow. I am in the middle. I will let [CHS-6] know I [SON] will be involved. Three [3]. That will perk [CHS-6]." Based on my training, experience, and the investigation, your affiant believes that SON was advising that an individual would normally provide CHS-6 with a \$5,000 bribe payment; however, because SON is involved and has a preexisting relationship with CHS-6, the bribe payment will be \$3,000. Your affiant further believes that this reduced payment is the result of the corrupt

relationship between **SON** and CHS-6.

21. On December 20, 2012, during a consensually recorded conversation at an event in Largo, Maryland, **SON** told the CHS that when the CHS meets CHS-6 the following day, the CHS should not “bring a check. ‘Cause for a county when you start writing a check for that kind of money, raises a lot of flags.” The CHS asked **SON** if **SON** should give the money to CHS-6, and **SON** responded, “I don’t want your money. You give it to him.” **SON** advised that **SON** would text CHS-6 to determine a place to meet. Based on my training, experience, and the investigation, your affiant believes that **SON** was instructing the CHS to bring the \$3,000 for CHS-6 in cash rather than writing a check. Your affiant further believes that **SON** was stating that a check would create a record of the payment and could result in attention from law enforcement.

22. On December 21, 2012, the CHS, CHS-6, and **SON** met at a restaurant located in College Park, Maryland. The meeting was consensually recorded and monitored. During the meeting, the CHS had \$3,000 in an envelope as instructed by **SON**. The \$3,000 was marked U.S. Currency, provided by the FBI. **SON** was seated next to the CHS and tapped on the seat between the CHS and **SON**, indicating he wanted the CHS to put the envelope on the seat. The CHS removed the envelope containing \$3,000 and placed it on the seat. **SON** took possession of the envelope and shortly thereafter left the table to go to the bathroom. CHS-6 also left the table to go to the bathroom. FBI agents inside the restaurant observed both CHS-6 and **SON** enter the bathroom. After a few minutes, **SON** returned to the table alone. The CHS asked **SON** if CHS-6 got the money, and **SON** responded affirmatively. The CHS asked if CHS-6 was happy with the money, and **SON** responded, “What do you think [CHS-6] is going to count it right now?”

23. After CHS-6 began cooperating, CHS-6 admitted that **SON** gave CHS-6 the bribe money in the bathroom. According to CHS-6, CHS-6 gave back to **SON** a portion of the CHS’s

money, believed to be \$1,000.

24. Thereafter, on February 6, 2013, at a consensually recorded and monitored meeting at a restaurant in College Park, Maryland, SON gave the CHS a check for \$5,000 in County grant funds controlled by CHS-6 made payable to a non-profit affiliated with the CHS.

25. On July 12, 2013, during a consensually recorded meeting between the CHS, CHS-6, and SON at a restaurant in Washington, D.C., CHS-6 discussed the CHS receiving additional County grant funds and stated that CHS-6 could use an “advance” for an upcoming vacation. SON cautioned the CHS about how the CHS should use the grant money so there are no “blowbacks.” Based on my training, experience, and the investigation to date, your affiant believes SON was aware of the corrupt scheme and did not want any undue attention from law enforcement. Thereafter, in a consensually recorded meeting between the CHS and CHS-6 in Lanham, Maryland, the CHS gave CHS-6 \$3,000 in cash in exchange for CHS-6 causing County grant funds to be distributed to the CHS in the future. CHS-6 caused \$5,000 in County funds to be distributed to a non-profit affiliated with UCE-2 later that year, in approximately November 2013.

26. On April 4, 2014, at SON’s request, the CHS met with SON at a gas station in Kent, Maryland. During the meeting, SON informed the CHS that CHS-6 needed \$10,000 to pay a campaign-related expense. SON told the CHS that SON had spoken with CHS-6 about the CHS giving cash to CHS-6 in exchange for CHS-6 arranging for another \$5,000 grant to be awarded to a non-profit organization (“NPO”) selected by the CHS. The CHS and SON discussed how much money the CHS had previously given CHS-6, and SON directed the CHS to give CHS-6 “3,” which the CHS understood to mean \$3,000 in U.S. currency.

27. On April 9, 2014, SON met the CHS at a coffee shop in Lanham, Maryland. The meeting was consensually recorded by the CHS. While both were standing in the parking lot of

the coffee shop, the CHS retrieved \$3,000 in U.S. currency from the CHS's vehicle, located outside the coffee shop. SON asked the CHS, "What is that?" The CHS responded, "That's the 3," meaning the \$3,000 which the CHS had agreed to give to CHS-6 in exchange for a \$5,000 grant to a NPO. SON then stated, "I can't do that. You gotta leave me out of this." SON subsequently stated, "I can't believe you have me doing some crazy shit like this. As much as I look out for you man. You gonna put dirt on me, man." SON directed the CHS to get into SON's vehicle. SON sat in the driver's seat and the CHS sat in the front passenger seat. SON stated, "as far as I'm concerned, I didn't see that." The CHS then placed the cash in a bank envelope and attempted to hand the envelope to SON. SON instead directed the CHS to place the bank envelope in the glove box, which the CHS did. Thereafter, SON delivered the \$3,000 to CHS-6, which was later confirmed via a recorded meeting between the CHS and CHS-6. It was also confirmed via CHS-6's admission after CHS-6 began cooperating.

28. Aside from the three bribe payments between CHS and CHS-6 that were facilitated by SON, CHS-6 acknowledged that SON facilitated other bribe payments from business owners in Prince George's County. For example, in approximately 2007, SON facilitated a \$1,000 bribe payment from a nightclub owner in Hyattsville, Maryland, who needed help with a liquor license renewal. On another occasion, SON facilitated a \$4,000 or \$5,000 bribe payment in order for CHS-6 to use his official position to help a company with a zoning matter.

The April 2015 Bribe Payment

29. As of February 6, 2015, CHS-7 was a registered lobbyist with the State of Maryland, with clients of mainly liquor businesses.

30. On February 12, 2015, CHS-6 consensually recorded a meeting with SON, who told CHS-6 that a specific Chamber of Commerce wanted a bill pending in the Maryland House

of Delegates to pass. The bill was the Sunday Sales Bill. When CHS-6 asked SON to tell the Chamber of Commerce that CHS-6 “could use some help,” SON replied, “You help them, they need to help you.” Based on my training, experience, and the investigation to date, your affiant believes that when SON stated, “you help them, they need to help you,” SON meant that in exchange for CHS-6’s official acts, the Chamber of Commerce would give CHS-6 a thing of value—namely, money.

31. On February 20, 2015, in a consensually recorded meeting, CHS-6 told SON that CHS-6 had “talked to” an elected official about the Sunday Sales Bill, as SON had instructed.

32. On February 23, 2015, the Sunday Sales Bill was presented to the Economic Matters Committee in the Maryland House.

33. On February 27, 2015, SON sent a text message to CHS-6, asking CHS-6 to ask the same elected official to meet for lunch.

34. On March 9, 2015, CHS-6 and CHS-7 met for lunch. CHS-6 consensually recorded the meeting. CHS-6 asked if CHS-7 had heard from SON, and CHS-7 stated that CHS-7 talked to SON all the time. CHS-7 stated that SON was pushing for the Sunday Sales Bill. CHS-7 stated, “I actually drafted the initial legislation. You know. That’s my shit.” “This one that’s up right now. Yeah, that was me. [SON] was like, ‘Look, we gotta put something in there.’ And I said OK. They gave me all of like...three hours to do it.” “I hope to God it passes. I’ve been working too hard on that shit.” Twenty minutes later in the conversation, after talking about being tight on money that year, CHS-7 stated, “If seven day sales goes through, I’m good. You know, cause I’m going to get paid money. I’m registered as a lobbyist for it. You know, I’ve got like five or six stores that are going to pay me. So I need it to go through.”

35. On March 13, 2015, the Prince George's County delegation voted on the Sunday Sales Bill. The bill passed with 15 ayes and 3 nays. The same day, CHS-6 sent a text message to SON stating that the Sunday Sales Bill had passed and that the elected official to whom CHS-6 previously said he had spoken had supported it. SON texted back that CHS-6 was now an "honorable adopted" member of a group with which SON was affiliated.

36. On March 20, 2015, the Maryland House Economic Matters Committee voted on the Sunday Sales bill. Your affiant knows CHS-8 voted favorably for the bill.

37. On or about March 23, 2015, the Sunday Sales Bill passed the House with 133 ayes and 3 nays. CHS-6 voted in favor of the bill.

38. On April 9, 2015, SON sent a text message to CHS-6, stating "7 days passed 3rd reader in the Senate! Thanks brother!" Based on my training and experience, and the investigation to date, your affiant believes that this text was in reference to the Sunday Sales Bill getting its third and final reading in the Maryland Senate, after having crossed over from the House.

39. On April 15, 2015, CHS-6 planned to meet with CHS-7 for lunch at a restaurant. CHS-6 consensually recorded the meeting. When CHS-6 arrived, SON already was present. SON stated, "You hooking up with [CHS-7], right?" CHS-6 started to say, "I didn't know we, uh," and SON interrupted, "That's how we do things, man. On the DL." SON stated, "They did a ceremony on the seven day yesterday. The Governor signed it yesterday." SON also stated, "I'm circling back with the Chamber on Friday, and probably sometime next week I'll give it to you in hard, core cash [laughter]." After CHS-7 arrived, SON asked how long CHS-6 would be gone on an upcoming trip, and stated, "I wanna...we...want to take care of you before you go."

40. On April 22, 2015, CHS-6 planned to meet SON for lunch at a restaurant in Maryland. CHS-6 consensually recorded the meeting. When CHS-6 arrived inside the restaurant,

SON was with PAIG and LEE. SON stated that “they are very appreciative of the fact that you rallied up some support and helped us out with the seven day,” that it was not easy, and that CHS-6’s support definitely helped.

41. CHS-7 arrived approximately twenty minutes into lunch. Approximately fifteen minutes after CHS-7’s arrival, SON talked to PAIG, who then left the table. SON then asked CHS-7, “Can you follow [PAIG] and give...you got the one?” CHS-7 responded, “[unintelligible] this one?” CHS-7 asked SON if SON wanted CHS-7 to do it, but SON told CHS-7 to sit and SON would take care of it. SON then left the table and returned a minute later. Another minute later, SON asked CHS-6 to follow SON, and they walked toward the bathroom. SON told CHS-6, “Got you three, brother. Have a good trip.” SON then instructed CHS-6 to go into the men’s bathroom and said, “He’s going to hook you up, alright?” When CHS-6 entered the bathroom, PAIG handed CHS-6 a white envelope and confirmed that it was for the “seven day sales” Sunday Sales Bill.

42. Later, after CHS-6 had returned to the table and then was leaving the restaurant, SON followed CHS-6 toward the door of the restaurant and told CHS-6, “you know how we always stay true to our words, man.” Based on my training and experience, and the investigation to date, your affiant believes that, by this statement, SON was confirming that SON provided cash from SON and CHS-7 for CHS-6’s official action.

43. CHS-6 provided the envelope described above to your affiant. The envelope contained \$3,000 in cash, as well as another envelope that contained \$1,000 in cash.

The November 2015 Bribe Payment

44. On October 19, 2015, during a consensually recorded meeting, SON and CHS-7 discussed the Sunday Sales licenses. The meeting also was arranged for SON to receive a \$4,000 bribe payment from CHS-7, for SON’s assistance in ensuring that CHS-7’s clients received

Sunday Sales licenses. SON advised that he talked to CHS-8, and CHS-8 asked, ““You guys ready?” He’s talking about you [CHS-7]. ‘You guys ready? For next session? Said he [believed to be CHS-7] was going to do some lobbying or what?’” CHS-7 advised that he/she needed a name who he/she was going to be lobbying for. SON discussed at least one “solid thing” with CHS-7. According to SON, CHS-8 told SON that CHS-8 had talked to a Maryland State Senator who was upset with how many Sunday Sales licenses were issued. SON advised that he saw an “opening” because LEE and PAIG want a “mile radius restriction” that would limit the number of Sunday Sales licenses within a mile. SON talked to CHS-8 about a moratorium on any more licenses and then brought the issue to PAIG. SON told CHS-7 that “[CHS-8] is on board.” SON told CHS-7 that PAIG was willing to pay \$50,000 for the Sunday Sales moratorium. At the end of the meeting, CHS-7 entered into SON’s vehicle and stated “this is the Sunday Sales” while handing over the \$4,000 cash bribe payment to SON. Based on my training, experience, and the investigation to date, your affiant knows that SON was in a position to help CHS-7’s clients obtain Sunday Sales licenses/permits. Your affiant knows that SON has had several recorded conversations with CHS-7 about obtaining licenses/permits for some of CHS-7’s clients.

45. Around the time CHS-7 exited SON’s vehicle, PEN data shows that SON placed an outgoing call to CHS-8; the call lasted for less than 30 seconds. Law enforcement followed SON as he drove directly to the parking lot of Panera Bread in Bowie, Maryland. SON was observed meeting outside with CHS-8 near the parking lot.

46. On October 21, 2015, during a consensually recorded meeting, SON and CHS-7 discussed CHS-8. CHS-7 asked, “How we going to do it with [CHS-8]? [CHS-8].” SON said, “[CHS-8] wants to push...”, and “So, [CHS-8] goes, ‘you know, I need your help. You know, I need, I need a couple thousand. I need, two...two thousand.’” SON stated he asked when CHS-

8 needed it by and it was like “yesterday type of shit.” SON told CHS-8 that he was not sure how he could approach that, and CHS-8 replied, “Well look. What do we need regarding the Sunday Sales shit?” SON told CHS-7 that he discussed a moratorium and the issue with the one mile radius with CHS-8. CHS-8 and SON discussed keeping the Sunday Sales license with the location where it is assigned. SON said CHS-8 asked “would that satisfy your [SON’s] folks?”, and SON said he thought so. SON then said CHS-8 was going to “put it in now. Would that, would that, you know, kinda get your guys excited about it? We’ll get it done.” SON said that he is going to have to “circle back” with PAIG and LEE to explain the proposal. SON advised he was not going to “get involved. You need, you [believed to be referring to LEE and PAIG] need take care of him [believed to be CHS-8].” SON would set up a meeting so that PAIG and LEE can “do what you all need to do.” Based on my training, experience, and the investigation to date, your affiant believes that CHS-8 was willing to set up legislation that would benefit PAIG and LEE and that PAIG and LEE would pay CHS-8 in cash. Your affiant further believes that SON acted as the middle man for the deal, but did not want to be directly involved in cash being given to CHS-8 so that SON could not be implicated in the bribe. CHS-7 stated, “I know [CHS-8] likes to work in cash.” SON replied, “See that’s why I don’t want to get involved in it. I wanna just hook up and...” SON told CHS-7 that “they [believed to be PAIG and LEE] want it bad” and “for them 5 or 10 is nothing for them.” Based on my training, experience, and the investigation to date, your affiant believes that SON was suggesting that because PAIG and LEE would benefit from the legislation they would be willing to pay \$5,000 or \$10,000 in cash in order to get the legislation approved. SON then stated, “My thought was, why do we need to get our hands dirty on that. Let em be direct” and “that’s what we did last time.” Based on my training, experience, and the investigation to date, your affiant believes that SON was confirming that PAIG and LEE paid

CHS-8 directly for a prior legislative matter.¹ Later, SON advised, “So I will go out of my way to meet with those folks [believed to be PAIG and LEE] and be like look, consider this as a deposit. Um. You all could just sort that shit out. I think the matching number is this. You all meet and you all could just take care of that. He’ll [believed to be CHS-8] take care of the rest. I mean getting a bill sponsored, is like...is hard. They don’t want anything blowing back and shit like that. He’s [believed to be CHS-8] will to do it.” Based on my training, experience, and the investigation to date, your affiant believes that SON was confirming he would meet with PAIG and LEE to tell them to pay CHS-8 a certain amount of cash in order for CHS-8 to sponsor the legislation. At the end of the conversation, CHS-7 confirmed with SON that PAIG and LEE were to “carry the two for [CHS-8], right?” Based on my training, experience, and the investigation to date, your affiant believes CHS-7 was confirming that PAIG and LEE would provide a bribe payment of \$2,000 to CHS-8 in exchange for his official assistance.

47. On October 23, 2015, at approximately 9:45 am, PEN data showed SON place an outgoing call to a phone believed to be used by LEE. On October 23, 2015, at approximately 10:43 am, PEN data showed SON place an outgoing call to CHS-8.

48. On October 28, 2015, PEN data showed that there were numerous text messages exchanged between SON and CHS-8. These text messages were between the hours of approximately 7:54 a.m. and 2:26 p.m. On October 28, 2015, at approximately 2:33 p.m., FBI agents conducted surveillance of SON. FBI agents observed SON depart his place of employment

¹ On November 12, 2014, CHS-8 deposited, or caused to be deposited, two checks into his personal Capital One x1674 account. The first check, in the amount of \$1,000, was on the account of Multi-Bil, Inc., and had the handwritten notation “Palmer Liquor” and “Shin LEE.” The second check, also in the amount of \$1,000, was on the account of Weeping Willow, Inc., and had the handwritten notation “Central Ave. Restaurant & Liquor.” Both checks were made payable directly to CHS-8, not to any campaign committee.

and head to a grocery store in Lanham, Maryland. Inside the grocery store, SON was observed meeting with CHS-8 for approximately thirty minutes. SON then departed and headed back to his place of employment.

49. On October 29, 2015, during a consensually recorded meeting, SON and CHS-7 discussed CHS-8. CHS-7 advised SON that CHS-8 had called CHS-7 on October 28, 2015, and SON replied that SON was with CHS-8. SON advised that he met with “Palmer [believed SON is referring to LEE] and Peck [believed SON is referring to PAIG]” on Tuesday, October 27, 2015. SON told PAIG and LEE that they will be clients of CHS-7 and will be on a retainer, and “Already in talks with um, [CHS-8]. And he’s gonna draft something.” SON again talked about the restrictions on transferring the Sunday Sales license, a one mile radius, and capping the licenses at 100. Based on my training, experience, and the investigation to date, your affiant believes that SON was confirming that CHS-8 was willing to propose legislation that would benefit PAIG and LEE.

50. On November 9, 2015, from approximately 8:47 a.m. to 8:51 a.m., PEN data showed several text messages being exchanged between SON and CHS-8. Based on my training, experience, and the investigation to date, your affiant believes SON and CHS-8 were communicating to confirm the meeting between CHS-8, SON, LEE, and PAIG that was scheduled for November 10, 2015.

51. On November 9, 2015, at approximately 10:37 a.m., during a consensually recorded meeting, SON and CHS-7 discussed CHS-8, LEE, and PAIG. SON told CHS-7 that they [believed to be LEE and PAIG] are “down. 100%.” SON went on to say that he met with them at a restaurant over the weekend. LEE and PAIG told SON that they want to change their licenses to a class “A.” SON told them that, during the next “renewal period”, “it’s done.” SON told CHS-

7 that “[CHS-8]” will be meeting with **LEE** and **PAIG** to “ink the deal” and they are “putting a down payment on it.” **SON** advised they will meet on November 10, 2015. **SON** advised that he will be there to just “say hello,” and that **SON** does not want “to be in the middle” of it. Based on my training, experience, and the investigation to date, your affiant believes that **SON** was referring to the deal where CHS-8 is creating legislation that will benefit **LEE** and **PAIG** in exchange for which **LEE** and **PAIG** will give CHS-8 cash for the official act. Your affiant further believes that **SON** did not want to be in the “middle” because he knew the deal was illegal and wanted to limit his exposure. Later in the conversation, CHS-7 confirmed that **LEE** and **PAIG** were meeting with CHS-8 on November 10, 2015.

52. On November 10, 2015, law enforcement agents conducted surveillance of CHS-8. CHS-8 was observed driving to the parking lot of the Panera Bread restaurant in Bowie, Maryland. CHS-8 parked and stayed in his vehicle. **SON**, **LEE**, and **PAIG** were also observed driving to and parking in the same parking lot. CHS-8, **SON**, **PAIG**, and **LEE** then were observed seated together at a table inside Panera Bread. Eventually, the four were observed exiting Panera Bread and standing near the front entrance of the restaurant. Law enforcement agents then observed CHS-8 and **PAIG** walk toward CHS-8’s vehicle. CHS-8 was then observed seated in the driver seat, and **PAIG** was observed seated in the front passenger seat. After several minutes, **PAIG** exited CHS-8’s vehicle and rejoined **SON** and **LEE**, who were still standing at the front entrance of Panera Bread. CHS-8 was observed leaving the parking lot of Panera Bread and driving directly to the Capital One Bank, which was in the same shopping area as Panera Bread. CHS-8 pulled up to the drive-thru teller/ATM. Shortly afterwards, CHS-8 parked in front of the Capital One bank and entered it. Based on my training, experience, and the investigation to date, your affiant believes that, as **SON** advised CHS-7 during the November 9, 2015 meeting, **PAIG** and **LEE** met

with CHS-8 on November 10, 2015, to discuss Sunday Sales legislation. Your affiant further believes that when **PAIG** entered CHS-8's vehicle, **PAIG** did so to pay a bribe payment to CHS-8 in exchange for CHS-8's official action with regard to legislation that would benefit **PAIG** and **LEE**. Your affiant believes **PAIG** and CHS-8 met in CHS-8's vehicle because it would help to conceal their illicit activities from law enforcement.

53. Subpoenas were served on Capital One Bank for interior/exterior surveillance video and bank records. Your affiant viewed the surveillance video for November 10, 2015. The exterior video from the ATM showed CHS-8 pull up to the ATM and then, some minutes later, drive away; the exterior camera recorded based on motion, so the frame was still while CHS-8's car remained idle. The interior video showed CHS-8 approach a teller. CHS-8 pulled a stack of cash out of his/her right pocket and handed it to the teller. CHS-8 then pulled a stack of cash out of his/her left pocket and, again, handed it to the teller. Your affiant reviewed the bank records for CHS-8 provided by Capital One Bank. The bank records revealed, on November 10, 2015, a \$2,000 ATM cash deposit and a \$2,000 customer deposit. On November 12, 2015, a \$4,000 ACH (Automatic Clearing House) withdrawal was made to AMEX EPayment ACH PMT. Based on my training, experience, and the investigation to date, your affiant believes that CHS-8 used the \$4,000 cash deposit from November 10, 2015 to make a \$4,000 electronic payment to American Express. Your affiant further believes that the \$4,000 was comprised of two \$2,000 bribe payments from each of **PAIG** and **LEE**, instead of the lone \$2,000 bribe payment that seemed likely from the prior conversation described above.


54. On November 13, 2015, at approximately 10:50 a.m., CHS-7 received a call from CHS-8. CHS-7 discussed Sunday Sales and how he/she was going to put his/her thoughts together about the possible legislation. CHS-7 mentioned limiting the number of Sunday Sales permits

available. CHS-8 advised, “actually I was just having a conversation with, with David [SON] the other day. So initially, what we did was there was like 166 licensees eligible for Sunday Sales; a combination of A’s, B’s, and B+’s. And so 166 was the total number but we initially opened up Sunday Sales with a 100 permits available.” Your affiant is aware that Class A licenses authorize their holders to sell, for consumption off the premises, beer, wine, and liquor six days per week; Class B licenses authorize their holders to sell, for consumption on the premises, beer and wine seven days per week and liquor every day except Sunday; and Class B+ licenses authorize their holders to sell, for consumption on the premises, beer, wine, and liquor from 6 a.m. to 2 a.m. Monday through Saturday, and for consumption on the premises, beer and wine from 6 a.m. to 2 a.m. on Sundays, provided that food is available at all times. CHS-8 said that only 130 “something” businesses applied to obtain the 100 permits. CHS-8 stated, “I think there are like 97 out with the liquor board still holding 3 permits.” CHS-8 advised he anticipated that “this session” someone will try to get the class “D’s” in. Your affiant is aware that Class D licenses authorize their holders to sell, for consumption on and off the premises, beer and wine seven days per week. CHS-8 was “not keen on the idea of D’s, now morphing themselves into A’s. They’re saying that well, you know, with the Sunday Sales it’s going to hurt our business.” CHS-8 did not support the idea of D’s converting. CHS-7 mentioned putting a cap at 100 for the Sunday Sales permits, and CHS-8 responded “that’s what I would prefer to do.” CHS-8 discussed how his district has more liquor stores than any other district. CHS-7 mentioned how he/she thinks the legislation should look and CHS-8 stated “we can take a look at it. You know see if we need to do some tweaking and turning.”

CONCLUSION

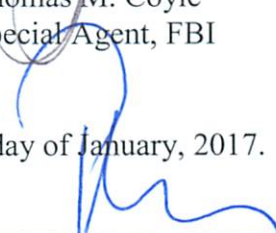
55. Your affiant respectfully submits that probable cause exists to issue an arrest warrant and criminal complaint for **SON**, **PAIG**, and **LEE** for committing the **TARGET OFFENSES**.

Your Affiant affirms under penalty of perjury that the facts and circumstances outlined in this affidavit are true and accurate to the best of his knowledge and belief.



Thomas M. Coyle
Special Agent, FBI

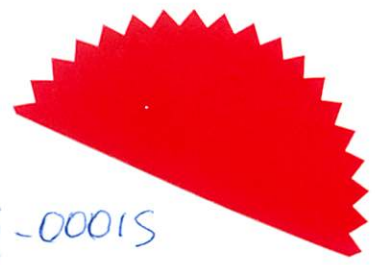
Sworn to and subscribed before me on this 4th day of January, 2017.



Hon. Paul W. Grimm
United States District Judge

UNITED STATES DISTRICT COURT

for the
District of Maryland



United States of America
v.

Case No. 8:17-mj-00015

David Dae Sok Son

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2012 through 2016 in the county of Prince George's in the
District of Maryland, the defendant(s) violated:

Table with 2 columns: Code Section (18 U.S.C. § 666(a)(1)(B), 18 U.S.C. § 371) and Offense Description (Bribery Involving Agent of a Program Receiving Federal Funds Conspiracy)

This criminal complaint is based on these facts:
See attached affidavit of Special Agent Thomas M. Coyle.

[X] Continued on the attached sheet.

Complainant's signature
Thomas M. Coyle, Special Agent, FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: 01/04/17

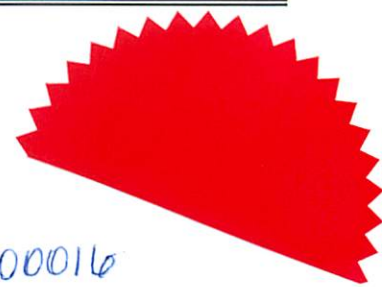
Judge's signature
Paul W. Grimm, United States District Judge
Printed name and title

City and state: Greenbelt

UNITED STATES DISTRICT COURT

for the

District of Maryland



United States of America

v.

Young Jung Paig

Defendant(s)

Case No. 8:17-mj-00016

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

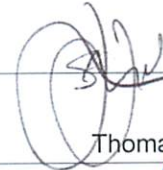
On or about the date(s) of 2012 through 2016 in the county of Prince George's in the District of Maryland, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 666(a)(1)(B) 18 U.S.C. § 371	Bribery Involving Agent of a Program Receiving Federal Funds Conspiracy

This criminal complaint is based on these facts:

See attached affidavit of Special Agent Thomas M. Coyle.

Continued on the attached sheet.


 Complainant's signature
 Thomas M. Coyle, Special Agent, FBI
 Printed name and title

Sworn to before me and signed in my presence.

Date: 01042017

City and state: Greenbelt


 Judge's signature
 Paul W. Grimm, United States District Judge
 Printed name and title

UNITED STATES DISTRICT COURT

for the
District of Maryland



United States of America
v.

Case No. 8:17-mj-00017

Shin Ja Lee

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2012 through 2016 in the county of Prince George's in the
District of Maryland, the defendant(s) violated:

Table with 2 columns: Code Section (18 U.S.C. § 666(a)(1)(B), 18 U.S.C. § 371) and Offense Description (Bribery Involving Agent of a Program Receiving Federal Funds Conspiracy)

This criminal complaint is based on these facts:
See attached affidavit of Special Agent Thomas M. Coyle.

[X] Continued on the attached sheet.

Complainant's signature
Thomas M. Coyle, Special Agent, FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: 01/04/17

Judge's signature
Paul W. Grimm, United States District Judge
Printed name and title

City and state: Greenbelt