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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA

vs.

Case:2:16-cr-20732
Judge: Cleland, Robert H.
MJ: Whalen, R. Steven
Filed: 11-02-2016 At 03:40 PM
INDI USA V DEAN REYNOLDS (LG)

VIOLATION: 18 U.S.C. § 666(a)

D-1 DEAN REYNOLDS,

Defendant.

_____ /

INDICTMENT

The Grand Jury charges:

COUNT ONE

(18 U.S.C. § 666(a) – Bribery Concerning Programs Receiving Federal Funds)

D-1 DEAN REYNOLDS

From in or about 2009, and continuing until in or about March 2013, in the Eastern District of Michigan, Southern Division, the defendant, **DEAN REYNOLDS**, while an agent of the Charter Township of Clinton, Michigan, an entity that received more than \$10,000 in federal funding during calendar years 2009 to 2013, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept, \$9,000 in cash and a \$7,000 check from a representative of

Company C, intending to be influenced and rewarded in connection with business and transactions of the Charter Township of Clinton, involving \$5,000 or more.

All in violation of Title 18, United States Code, Section 666(a).

COUNT TWO

(18 U.S.C. § 666(a) – Bribery Concerning Programs Receiving Federal Funds)

D-1 DEAN REYNOLDS

From in or about December 2012 and continuing until in or about December 2015, in the Eastern District of Michigan, Southern Division, the defendant, **DEAN REYNOLDS**, while an agent of the Charter Township of Clinton, Michigan, an entity that received more than \$10,000 in federal funding during calendar years 2012 to 2015, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept, at least \$50,000 in cash, as well as other items of value, from a representative of Company A, intending to be influenced and rewarded in connection with business and transactions of the Charter Township of Clinton, involving \$5,000 or more.

All in violation of Title 18, United States Code, Section 666(a).

COUNT THREE

(18 U.S.C. § 666(a) – Bribery Concerning Programs Receiving Federal Funds)

D-1 DEAN REYNOLDS

On or about March 7, 2016, in the Eastern District of Michigan, Southern Division, the defendant, **DEAN REYNOLDS**, while an agent of the Charter Township of Clinton, Michigan, an entity that received more than \$10,000 in federal funding during calendar year 2016, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept, \$2,000 in cash from a representative of Company A, intending to be influenced and rewarded in connection with business and transactions of the Charter Township of Clinton, involving \$5,000 or more.

All in violation of Title 18, United States Code, Section 666(a).

COUNT FOUR

(18 U.S.C. § 666(a) – Bribery Concerning Programs Receiving Federal Funds)

D-1 DEAN REYNOLDS

On or about March 14, 2016, in the Eastern District of Michigan, Southern Division, the defendant, **DEAN REYNOLDS**, while an agent of the Charter Township of Clinton, Michigan, an entity that received more than \$10,000 in federal funding during calendar year 2016, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept, \$2,000 in cash from a representative

of Company A, intending to be influenced and rewarded in connection with business and transactions of the Charter Township of Clinton, involving \$5,000 or more.

All in violation of Title 18, United States Code, Section 666(a).

COUNT FIVE

(18 U.S.C. § 666(a) – Bribery Concerning Programs Receiving Federal Funds)

D-1 DEAN REYNOLDS

On or about March 25, 2016, in the Eastern District of Michigan, Southern Division, the defendant, **DEAN REYNOLDS**, while an agent of the Charter Township of Clinton, Michigan, an entity that received more than \$10,000 in federal funding during calendar year 2016, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept, \$6,000 in cash from a representative of Company A, intending to be influenced and rewarded in connection with business and transactions of the Charter Township of Clinton relating to both Company A and Company B, involving \$5,000 or more.

All in violation of Title 18, United States Code, Section 666(a).

COUNT SIX

(18 U.S.C. § 666(a) – Bribery Concerning Programs Receiving Federal Funds)

D-1 DEAN REYNOLDS

On or about March 31, 2016, in the Eastern District of Michigan, Southern Division, the defendant, **DEAN REYNOLDS**, while an agent of the Charter

Township of Clinton, Michigan, an entity that received more than \$10,000 in federal funding during calendar year 2016, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept, \$2,000 in cash from an undercover FBI agent, intending to be influenced and rewarded in connection with business and transactions of the Charter Township of Clinton, involving \$5,000 or more.

All in violation of Title 18, United States Code, Section 666(a).

COUNT SEVEN

(18 U.S.C. § 666(a) – Bribery Concerning Programs Receiving Federal Funds)

D-1 DEAN REYNOLDS

On or about April 27, 2016, in the Eastern District of Michigan, Southern Division, the defendant, **DEAN REYNOLDS**, while an agent of the Charter Township of Clinton, Michigan, an entity that received more than \$10,000 in federal funding during calendar year 2016, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept, \$2,000 in cash from an undercover FBI agent, intending to be influenced and rewarded in connection with business and transactions of the Charter Township of Clinton, involving \$5,000 or more.

All in violation of Title 18, United States Code, Section 666(a).

COUNT EIGHT

(18 U.S.C. § 666(a) – Bribery Concerning Programs Receiving Federal Funds)

D-1 DEAN REYNOLDS

On or about May 18, 2016, in the Eastern District of Michigan, Southern Division, the defendant, **DEAN REYNOLDS**, while an agent of the Charter Township of Clinton, Michigan, an entity that received more than \$10,000 in federal funding during calendar year 2016, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept, \$3,000 in cash from an undercover FBI agent, intending to be influenced and rewarded in connection with business and transactions of the Charter Township of Clinton, involving \$5,000 or more.

All in violation of Title 18, United States Code, Section 666(a).

THIS IS A TRUE BILL

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

BARBARA L. MCQUADE
United States Attorney

s/R. Michael Bullotta
R. MICHAEL BULLOTTA
Assistant United States Attorney

s/David A. Gardey
DAVID A. GARDEY
Assistant United States Attorney
Chief, Public Corruption Unit

Dated: November 2, 2016

Case:2:16-cr-20732

Judge: Cleland, Robert H.

MJ: Whalen, R. Steven

Filed: 11-02-2016 At 03:40 PM

INDI USA V DEAN REYNOLDS (LG)

United States District Court
Eastern District of Michigan**Criminal Case Cover Sheet**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>RMB</i>

Case Title: USA v. D-1 DEAN REYNOLDSCounty where offense occurred : MacombCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty☐ Indictment/ ☐ Information --- no prior complaint.☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 16-MJ-30459]☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**

Superseding to Case No: _____ Judge: _____

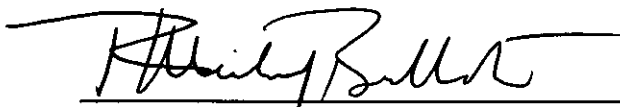
- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

November 2, 2016

Date


R. MICHAEL BULLOTTA
Assistant United States Attorney
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Attorney Bar #: 163401 (CA)

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.