

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

11

United States of America

v.

CHRISTOPHER CRAIGMILES,
Defendant.

Case: 2:17-mj-30011
Assigned To : Unassigned
Assign. Date : 1/11/2017
Description: CMP USA v. SEALED MATTER (SO)

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 August 3, 2016 in the county of Macomb in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 666	Theft or Bribery Concerning Programs Receiving Federal Funds

This criminal complaint is based on these facts:
See attached Affidavit.


Continued on the attached sheet.


Complainant's signature

Special Agent Robert F. Beeckman, FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: January 11, 2017


Judge's signature

City and state: Detroit, Michigan

R. Steven Whalen, United States Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

I, Robert F. Beeckman, Special Agent of the Federal Bureau of Investigation (FBI), having been duly sworn, depose and state that:

1. I have been a Special Agent with the FBI for more than 21 years.

Nearly all of my career has been spent investigating public corruption. I am currently assigned to the Public Corruption Squad of the Detroit Field Division, which is located in the Eastern District of Michigan. I have been involved personally in numerous investigations concerning corruption of public officials.

2. This investigation is being conducted by the Macomb Resident Agency of the FBI, and the Detroit Area Corruption Task Force, a multi-agency task force comprised of the FBI, IRS, Michigan State Police, and other agencies. I am familiar with all aspects of this investigation. Because this affidavit is submitted for the limited purpose of establishing probable cause, I have not set forth every fact known to me about this investigation.

3. This is an extensive investigation into systemic corruption in multiple municipalities in Southeast Michigan, primarily Macomb County. The investigation has uncovered corruption of multiple public officials who have

criminally conspired with people in a variety of industries. The investigation employed telephone wiretaps, an undercover FBI Agent, and numerous covert consensual recordings of telephone calls and in-person meetings.

Christopher Craigmiles

4. CHRISTOPHER CRAIGMILES is an elected Trustee of the Village of New Haven, Michigan. New Haven is located in the Eastern District of Michigan. It is a village in Lenox Township, Macomb County, Michigan. There is probable cause to believe that CRAIGMILES has violated 18 U.S.C. § 666, which provides, in pertinent part:

(a) Whoever, if the circumstance described in subsection (b) of this section exists –

(1) Being an agent of . . . a State, local, or Indian tribal government, or any agency thereof –

(B) corruptly solicits or demands for the benefit of any person, or accepts or agrees to accept, anything of value from any person, intending to be influenced or rewarded in connection with any business, transaction, or series of transactions of such organization, government, or agency involving any thing of value of \$5,000 or more;

...

shall be fined under this title, imprisoned not more than 10 years, or both.

5. Subsection (b) of the statute requires that the governmental agency in this case must receive “in any one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, or other form of Federal assistance.” The Village of New Haven receives in excess

of \$10,000 per year, including 2016, in federal funds in the form of federal Community Development Block Grants and other federal assistance, satisfying the jurisdictional requirement of 18 U.S.C. § 666.

Undercover Investigation

6. An undercover FBI employee (UCE) met on several occasions with Brett Harris, an elected Trustee of the Village of New Haven during the spring of 2016. UCE represented to Harris that he was working for a company with contracts with multiple municipalities in Southeast Michigan (Company A), and he met with Harris on March 31, 2016, April 27, 2016, and May 18, 2016. On those dates, UCE paid bribes to Harris which totaled \$9,000, in exchange for Harris' support on a contract between New Haven and Company A, which would be going out to bid at a future date. The conversations were consensually audio and video recorded. During these meetings, Harris confirmed that his friend and fellow New Haven Trustee, CRAIGMILES, would offer his (CRAIGMILES') assistance to Company A as well.

7. During Harris' conversations with UCE, Harris indicated that CRAIGMILES would accept a bribe. Harris suggested at different times that the bribe may take the form of cash or campaign assistance. In one conversation, Harris discussed how he was going to support Company A's contract. Harris said that he needed the support of CRAIGMILES, and that they needed to get

CRAIGMILES reelected. CRAIGMILES had been appointed to fill a vacancy, and he needed to run for the position he currently occupies. On May 18, 2016, UCE paid Harris a \$5,000 cash bribe. During the audio and video-recorded conversation on that date, Harris said that he intended to share some of the cash with CRAIGMILES. Harris apparently changed his mind about this plan, because when UCE asked about it on a later occasion, Harris said that he did not give CRAIGMILES any of this cash.

8. During conversations between Harris and UCE, the UCE asked Harris about CRAIGMILES' willingness to accept bribes given the fact that CRAIGMILES is a former Detroit transit police officer. In response, Harris assured UCE that CRAIGMILES would take bribe money. The following conversation took place on June 14, 2016, between Harris and the UCE. The conversation was audio and video recorded:

UCE: Uh, so I met up with [*CHSI*] and uh...

Harris: Ok.

UCE: Obviously I didn't want to do this over the phone or text or anything like that.

Harris: Right.

UCE: Um, he wa . . . he wasn't really concerned, but we were talking about uh, Chris uh, Craigmiles, right?

Harris: Yeah. Yeah.

UCE: And uh, he wanted to make sure that you were comfortable with him. The fact that he was a former cop and all that. [*According to media*

sources, and other recorded conversations in this case, CRAIGMILES is a retired Detroit Transit Police Officer.]

Harris: Yeah, I know he's a former cop, yeah.

UCE: Ok.

Harris: I mean I did all the investigation on him.

UCE: Ok, but I-I just want . . .

Harris: Yeah . . .

UCE: To make sure that that's not gonna be an issue.

Harris: No, actually, Chris, Chris . . . I, actually, me and um,

* * *

Harris: I mean I'm not all . . . gonna say I got a hundred percent trust in nobody . . .

UCE: Yeah, yeah. No, no, no, no, I got you.

Harris: But I think, I, he, he's, I got him where he's lea . . . I mean, I'm leading him.

UCE: Ok.

Harris: And he'll, kind of like you know, he's listening, he's listening to me.

UCE: Ok.

Harris: We got this other deal . . . [*Harris gave a lengthy explanation about how marijuana growers want to operate in the village, and what would be necessary to assist them.*] I've sat down with Chris and that was my test.

UCE: Ok.

Harris: You know, with him, with the police officer . . .

UCE: Yeah.

Harris: And the ex . . . and he said, "Man, I'm a ex-police officer."

UCE: Ok. Hey, that's all we got . . .

Harris: He said, "Motherf***er, I do just as much sh*t you do."

* * *

The following conversation occurred on July 15, 2016. It was audio and video recorded:

UCE: Were you able to talk to Chris [*CRAIGMILES*] at all though?

Harris: Yeah.

UCE: Yeah?

Harris: He's on board. [*From the context, it is obvious that "on board" means that CRAIGMILES is in agreement with accepting money from UCE in exchange for help with the contract, as the next comment makes clear.*].

UCE: Ok.

Harris: Um, and um, I told him uh, like . . . I told him it's a possibility uh, got, we'll get some help for him.

UCE: Ok.

9. On August 3, 2016, UCE met with *CRAIGMILES* and Harris inside the garage at Harris' residence. UCE was wearing audio and video recording devices during the meeting. UCE paid *CRAIGMILES* \$5,000 in FBI funds, in exchange for *CRAIGMILES*' vote on a contract with Company A. The value of the contract greatly exceeds the five thousand dollar "thing of value" requirement in subsection (a) of the statute quoted above.

10. The following is a transcript of pertinent parts of the conversation. During the conversation, UCE spoke about the principal of Company A. This

principal was the subject of an FBI telephone wiretap. The principal was confronted with the evidence against him. At the time of this recording, the principal was cooperating with the investigation, and he is referred to here as CHS1:

UCE: So anyway, uh, I talked to uh, I talked to [CHSI] uh, uh, quite a bit, you know, and uh, like that email that we . . .

Harris: [CHSI]'s a good friend, that he (unintelligible).

UCE: [CHSI's last name] there.

Harris: [CHSI].

UCE: And obviously, our big concern is the bid that is gonna come up in, what is it? 2018?

Harris: Uh yeah.

UCE: 2018. Right. It may be sooner.

Harris: May be sooner.

UCE: May, may, may be sooner.

Harris: That's what we talked about.

UCE: You know, and you know if there's... from that email that we talked about, there's . . . I told [CHSI] about that, if there's a reason to speed up that, the bid, obviously that comes . . . that, that's huge for us. I mean that's a huge, you know, money maker, you know? So whatever it is that, that you all can do for [CHSI], you, you know, obviously, it, it's, it's much appreciated.

* * *

UCE: And you and I had texted about uh, about the election and all that, and the one thing, you know, [CHSI] wants to make sure that, that he steers kind of clear of that, obviously . . .

Harris: Yeah. Ok, right.

UCE: So, w-what you do with what I give you, that-that's, that's up to you.

CRAIGMILES: Ok.

UCE: You know, but it was just something that we gotta make sure that we are square when the bid comes up, or . . .

Harris: Right.

UCE: If it can be sped up a little bit.

CRAIGMILES: Right.

UCE: We-we're good to go, you know?

CRAIGMILES: Ok.

UCE: Um, but, you know, whatever you all need from, from [CHSI or Company A] also, just let us know, but let's just try to keep the, the election out of it.

Harris: Right, right, that's what I'm saying, anything that was, was given, it's not for campaign.

* * *

Harris: Well, I wouldn't want his [CHSI]'s name to come up anyway.

UCE: No, and that's the thing.

* * *

UCE: (To CRAIGMILES) I saw [CHSI] yesterday, he wanted me to give you five [i.e., five thousand dollars]. You know, make sure you help us out. Obviously you got some, if you want to give him some of that, that's why he didn't give me anything for you today (laughs, joking

that he did not give Harris any money, so perhaps CRAIGMILES will share his bribe with Harris).

Harris: Why, where's my f***in' money?

UCE: I'll, I'll talk to him. (Laughing).

Harris: (Unintelligible).

UCE: But uh . . . you know, here's five for you. You know, look out for us. I appreciate it.

CRAIGMILES: Ok.

UCE: We appreciate it. Obviously, we get the contract, there might be more down, down the line. Um, but just let us know what [*CHSI or Company A*] can do for you, and we'll go uh, we'll go from there, you know? Um. . .

CRAIGMILES: It sounds good on my part.

* * *

11. Based on all of the above evidence, probable cause exists that CHRISTOPHER CRAIGMILES has committed the offense of Theft or Bribery Concerning Programs Receiving Federal Funds, contrary to 18 U.S.C. § 666.

Respectfully submitted,



ROBERT F. BEECKMAN
Special Agent, Federal Bureau of
Investigation

Subscribed and sworn to before me
on January 11, 2017, at Detroit, Michigan.



R. STEVEN WHALEN
United States Magistrate Judge