

10/8/13

# UNITED STATES DISTRICT COURT

for the

District of Maryland

United States of America )

v. )

SHANE ANDERSON )

Case No. 13-2406 SKG

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 July 2013 to present in the county of Baltimore in the District of Maryland, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. 201

Bribery of a public official

This criminal complaint is based on these facts:


See attached Affidavit of FBI Special Agent Gregg Domroe

Continued on the attached sheet.

  
Complainant's signature  
SA Gregg Domroe  
Printed name and title

Sworn to before me and signed in my presence.

Date: 10/8/13

  
Judge's signature  
The Honorable Susan K. Gauvey  
Printed name and title

City and state: Baltimore, Maryland

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v.  
SHANE ANDERSON

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Defendant

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) SHANE ANDERSON

who is accused of an offense or violation based on the following document filed with the court:

- Indictment       Superseding Indictment       Information       Superseding Information       Complaint
- Probation Violation Petition       Supervised Release Violation Petition       Violation Notice       Order of the Court

This offense is briefly described as follows:

Bribery of Public Official, in violation of 18 USC 201

Date: 10/8/13

  
Issuing officer's signature

City and state: Baltimore, Maryland

The Honorable Susan K. Gauvey  
Printed name and title

### Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_  
Arresting officer's signature

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Gregg Domroe of the Federal Bureau of Investigation ("FBI") being duly sworn, state as follows:

1. 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 empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

2. I am a duly sworn member of the FBI and have been so employed since August 2003. I am currently assigned to the Baltimore Division of the FBI in Baltimore, Maryland.

3. This Affidavit is submitted in support of a criminal complaint charging **Shane ANDERSON** with bribery, in violation of 18 U.S.C. § 201. The probable cause for this criminal complaint can be found in the Affidavit attached as Exhibit A, which was authored and offered by FBI Special Agent Mia Winkley in support of search warrants for several locations associated with the ongoing investigation into bribery, mail and wire fraud, and drug trafficking.

4. Section 201(b)(2) of Title 18 of the US Code prohibits:

Whoever . . . directly or indirectly, corruptly gives, offers or promises anything of value to any public official . . . , with intent—

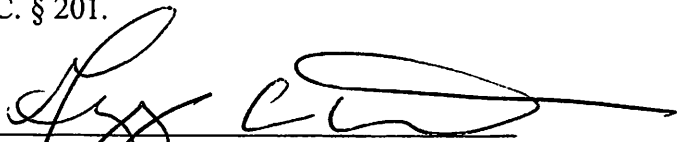
(B) to influence such public official . . . to commit or aid in committing, or collude in, or allow, any fraud, or make opportunity for the commission of any fraud, on the United States; or

(C) to induce such public official . . . to do or omit to do any act in violation of the lawful duty of such official or person.

5. As is described in Attachment A, the defendant, Shane ANDERSON, has engaged in a bribery and mail and wire fraud scheme from July 2013 to present, with the Station Managers of the Waverly and Pikesville Post Offices, both public officials. In that scheme, ANDERSON has made payments to these public officials to induce them to approve false

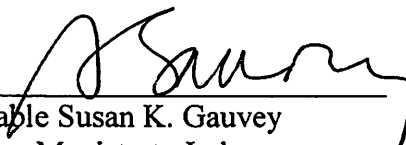
invoices for payment by the USPS. The payments to the public officials were made to induce them to aid ANDERSON in committing a fraud on the United States and to induce them to approve the false invoices, in violation of their official duties as USPS Station Managers.

WHEREFORE, I request that this Court issue a criminal complaint charging Shane ANDERSON with bribery, in violation of 18 U.S.C. § 201.

  
Special Agent Gregg Domroe  
Federal Bureau of Investigation

Subscribed and sworn to before me.

10/8/13  
DATE

  
The Honorable Susan K. Gauvey  
United States Magistrate Judge

12:15 pm  
TIME