

UNITED STATES DISTRICT COURT

for the District of Maryland

United States of America v.

RICHARD LOUIS WRIGHT, III

Case No. 13-2404 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 October 2007 to present in the county of Baltimore in the District of Maryland, the defendant(s) violated:

Code Section 18 U.S.C. 201 Offense Description 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

UNITED STATES DISTRICT COURT

for the
District of Maryland

United States of America
v.
RICHARD LOUIS WRIGHT, III

Case No. 13-2404 SKG

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) RICHARD LOUIS WRIGHT, III,
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 **Richard Louis WRIGHT, III** 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 . . . being a public official . . . , directly or indirectly, corruptly demands, seeks, receives, accepts, or agrees to receive or accept anything of value personally or for any other person or entity, in return for:

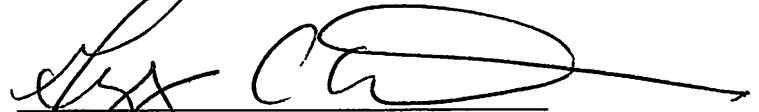
(B) being influenced to commit or aid in committing, or to collude in, or allow, any fraud, or make opportunity for the commission of any fraud, on the United States; or

(C) being induced to do or omit to do any act in violation of the official duty of such official or person;

5. As is described in Attachment A, the defendant, Richard Louis WRIGHT, III, has engaged in a bribery and mail and wire fraud scheme from October 2007 to present, using his position as Station Master of the Waverly Post Office in Baltimore, Maryland to approve false

invoices for payment by the USPS and then divide the proceeds with other members of the scheme. The payments to WRIGHT were made to induce him to aid in committing a fraud on the United States and to induce him to approve the false invoices, in violation of his official duties as Station Manager of the Waverly Post Office.

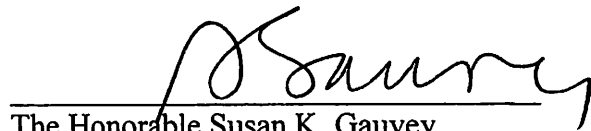
WHEREFORE, I request that this Court issue a criminal complaint charging Richard Louis WRIGHT, III with bribery, in violation of 18 U.S.C. § 201.


Special Agent Gregg Domroe
Federal Bureau of Investigation

Subscribed and sworn to before me.

10/8/13
DATE

12:15 pm
TIME


The Honorable Susan K. Gauvey
United States Magistrate Judge