

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	Criminal Number:
	:	
	:	VIOLATION:
v.	:	
	:	Count One:
	:	18 U.S.C. § 1519
CECELIA M. GRIMES	:	(Destruction of Evidence)

INFORMATION

The United States of America informs the Court that:

COUNT ONE – DESTRUCTION OF EVIDENCE

Introduction

1. At all relevant times hereto, defendant CECELIA M. GRIMES (“GRIMES”) was a registered lobbyist with the United States House of Representatives. GRIMES was one of two partners in “Firm A,” a lobbying firm based in Southeastern Pennsylvania.

2. From in or about January 1987 through January 2007, “Representative A” was a Member of the United States House of Representatives. Prior to his defeat for re-election in November 2006, Representative A was the Vice Chairman of both the House Committee on Armed Services and the House Committee on Homeland Security.

3. As part of its lobbying activities, Firm A submitted requests for appropriations to Representative A’s office and to other congressional offices.

4. Beginning well prior to October 2006, the Washington Field Office of the Federal Bureau of Investigation (“FBI”) opened an investigation into certain activities by and related to Representative A. Part of that investigation focused on whether Representative A agreed to support appropriations requests made by Firm A as a *quid pro quo* for the payment of fees to Firm A by its clients.

5. As part of the FBI investigation, on or about October 16, 2006, two FBI agents interviewed GRIMES at her residence. During the interview, the federal agents questioned GRIMES about the following topics, among others: the origin of Firm A; the identity of Firm A's clients; the nature of the services performed by Firm A; Firm A's contacts with Representative A and his office; and certain travel by GRIMES.

6. At the conclusion of the October 16, 2006 interview, the FBI agents served GRIMES with two grand-jury subpoenas. One was for the custodian of records of Firm A and the other was for the custodian of records of "Firm B," another lobbying firm based in Southeastern Pennsylvania, of which GRIMES was the sole proprietor. Both subpoenas were issued on behalf of a grand jury of the United States District Court for the District of Columbia.

7. The subpoenas instructed the custodians of records to produce, by October 27, 2006, a series of records, including all documents relating or incident to: several of Firm A's clients; Representative A; Representative A's campaigns; or GRIMES's travel. The subpoena defined "records" broadly, to include not just paper documents, but also email and computer records, and called for the production of documents dating back to January 1, 2003, or, in some instances, January 1, 2002.

Destruction of Evidence

8. Within six days of the FBI's service of the two grand-jury subpoenas upon GRIMES, GRIMES placed some documents that she had stored in her house into trash bags, which she then brought to the front of her house for collection as garbage. These documents included: an American Airlines boarding pass for a flight taken by GRIMES on August 20, 2003; an email with an attached travel itinerary, including hotel reservations, for a trip for GRIMES on

August 19-20, 2003; Amtrak receipts for trips for GRIMES on June 18, 2003, July 3, 2003, and September 2, 2004; a copy of an invitation from the National Marine Manufacturers Association to the Congressional Boating Caucus, dated May 6, 2003, with a handwritten note, “. . . you are attending a [Representative A Campaign] Event”; check stubs dated 2003 or later from three of Firm A’s clients who were identified in the grand-jury subpoenas; fourteen RSVP cards and envelopes for a dinner honoring Representative A, calling for responses to be sent to GRIMES; and torn paper with an email header associated with Representative A and with a message from an unknown sender praising Representative A and expressing a desire to join Representative A’s re-election campaign.

9. On or about October 22, 2006, FBI agents surreptitiously retrieved the garbage bags that contained the above documents. The bags were located in trash cans next to GRIMES’s house.

10. In or about November 2006, after receiving a time extension, Firm A and Firm B, through their counsel, produced certain documents responsive to the grand-jury subpoenas. On or about November 27, 2006, counsel for Firm A and Firm B represented to the government that the document production was complete. Neither Firm A nor Firm B produced any of the items identified in Paragraph 8.

11. GRIMES frequently sent and received emails from a Blackberry device.

12. In or about early November 2006, GRIMES placed her Blackberry device in a trash can near an Arby’s restaurant in Southeastern Pennsylvania. GRIMES discarded her Blackberry for the purpose of keeping the FBI from reviewing certain of her emails that would be of interest to the FBI.

The Statutory Violation

13. From in or about mid-October 2006 through in or about early November 2006, in the District of Columbia and elsewhere, the defendant, CECELIA M. GRIMES, did knowingly destroy, conceal, and cover up records, documents, and tangible objects with the intent to influence the investigation of a matter within the jurisdiction of a department or agency of the United States; that is, after being served with two federal grand-jury subpoenas from FBI agents, defendant GRIMES knowingly discarded paper documents and electronic data with the intent of influencing the FBI's investigation.

(Destruction of Evidence, in violation of Title 18, United States Code, Section 1519)

Respectfully submitted,

Jeffrey A Taylor/HS

BRUCE G. OHR
Chief
Organized Crime and
Racketeering Section

JEFFREY A. TAYLOR
United States Attorney
D.C. Bar No. 498610

WILLIAM M. WELCH II
Chief
Public Integrity Section

Gregory C.J. Lisa/HS

GREGORY C.J. LISA
Trial Attorney
D.C. Bar No. 457739
Organized Crime and
Racketeering Section
Criminal Division
U.S. Department of Justice
1301 New York Ave., NW
7th Floor
Washington, DC 20005
T: 202-514-3594
F: 202-514-3601

Howard R. Sklamberg

HOWARD R. SKLAMBERG
Deputy Chief
D.C. Bar No. 453852
Fraud & Public Corruption
Section
555 Fourth Street, NW
Room 5247
Washington, DC 20001
T: 202-514-6961
F: 202-305-8537

Armando O. Bonilla/HS

ARMANDO O. BONILLA
Trial Attorney
Public Integrity Section
Criminal Division
U.S. Department of Justice
1400 New York Ave., NW
12th Floor
Washington, DC 20005
T: 202-616-2983
F: 202-514-3003