AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINTS

Your Affiant, Wendy H. Munoz, Special Agent of the Federal Bureau of Investigation (FBI), being duly sworn, deposes and states as follows:

INTRODUCTION

1. I am an "investigative or law enforcement officer" of the United States, within the meaning of Section 2510 (7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Sections 666 (Bribery), 1512 (Witness and Evidence Tampering), 1519 (Destruction, Alteration, and Falsification of Records in a Federal Investigation), and 1951 (Extortion Under Color of Official Right), 2 (Aiding and Abetting), and related offenses.
2. I have been employed as a Special Agent of the FBI since February 1998. During my tenure as an FBI Agent, I have participated in numerous criminal investigations involving police corruption, corruption of state and local public officials, white collar crime, drugs, fugitive apprehensions, and other unlawful activities. In addition, I have participated in investigations involving wiretaps and have reviewed intercepted and consensually recorded conversations. I have been an Affiant on several federal Title III affidavits and have participated in numerous debriefings of individuals involved in corruption, including police officers and confidential human sources. I have also participated in numerous searches, arrests, and seizure warrants involving a variety of federal offenses.
3. I have personally participated in the investigation of the offenses referred to herein and reviewed reports and had discussions with other Special Agents and employees of

the FBI and other law enforcement agencies related to the instant investigation. I am fully familiar with the facts and circumstances of this investigation. Through training, education and experience, I am familiar with investigations involving corrupt public officials.

4. The facts set forth in this affidavit are based upon my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other investigators, my and other investigators' review of documents in relation to this investigation, communications with others, including individuals involved in bribery and extortion, and related offenses, more fully described below, who have personal knowledge of the events and circumstances described herein, information gained from the interception of wire communications, and information gained through your Affiant's training and experience. To the extent that this affidavit contains statements by witnesses, those statements are set forth only in part and in substance and are intended to accurately convey the information, but not to be verbatim recitations, unless indicated otherwise. This affidavit is submitted for the limited purpose of establishing probable cause in support of an application for a criminal complaint, and thus, it does not contain every fact known by me or the United States.

5. With regard to any reported quotations contained in this affidavit, it should be noted that audio recordings reviewed by your affiant or other law enforcement officers vary in quality and exact wording can be difficult to ascertain. However, a diligent effort has been made by your affiant to report quotations and the context of any referenced recording as accurately as possible. Where your affiant has included direct quotes

from recordings and telephonic interceptions, those quotes are taken from draft transcripts, which your affiant and/or other investigators have reviewed.

6. This affidavit is submitted in support of criminal complaints charging JACK BRUCE JOHNSON and LESLIE JOHNSON with Tampering with a Witness and Evidence Relating to the Commission of a Federal Offense, in violation of title 18, United States Code, Sections 1512(b)(2)(B) and 1512 (c)(1 and 2), Destruction, Alteration, and Falsification of Records in a Federal Investigation, in violation of 18 United States Code, Section 1519, and aiding and abetting, in violation of United States Code, Section 2.

Overview of Investigation

7. This case is being investigated by the Baltimore Division of the FBI, the Internal Revenue Service-Criminal Investigation ("IRS"), and other federal and local law enforcement agencies. Your affiant has personally participated in this investigation and makes this affidavit based upon my personal participation in this investigation and based upon reports made to your affiant by other law enforcement officers and authorities, as well as information provided to them by the confidential informants discussed in more detail below. The information set forth in this affidavit has been provided by your affiant or to your affiant by other law enforcement agents/officers who have assisted in the investigation and have knowledge of the information set forth herein.

8. Through an investigation initiated in January 2006, FBI agents learned that certain real estate developers based in Prince George's County ("the County") and their associates were regularly providing things of value to public officials in exchange for

official acts that were favorable to these individuals and their companies.

9. This and a related investigation led to a series of authorizations for the interception of wire communications by the Honorable J. Frederick Motz, United States District Judge, District of Maryland, from September 2009 through the present. Those interceptions confirmed, among other things, investigators' information concerning official corruption and extortion in Prince George's County.

STATEMENT OF PROBABLE CAUSE

10. JACK BRUCE JOHNSON ("JACK JOHNSON") is a black male, who your affiant knows resides at 1509 Brady Court, Mitchellville, MD 20721. JACK JOHNSON has held the elected position of Prince George's County Executive since 2002. Prior to 2002, JACK JOHNSON was the elected State's Attorney for Prince George's County.

11. LESLIE JOHNSON ("LESLIE JOHNSON") is a black female, who your affiant knows is the spouse of JACK JOHNSON and resides at 1509 Brady Court, Mitchellville, MD 20721. Your affiant knows LESLIE JOHNSON was elected to a seat on the Prince George's County Council, representing District 6, on November 2, 2010.

12. From November 1990 to the present, the County operated under a "home rule" Charter, which provided that the County's local government be composed of the Executive Branch and the Legislative Branch.

13. The Executive Branch is charged with enforcing the laws and administering the day-to-day business of the County and conducts its business through its staff and the various departments, which are managed by department directors. Department

directors report to and are supervised by an elected County Executive, who is responsible for the administration of all areas of the Executive Branch of the County government.

14. The Legislative Branch consists of a nine-member elected County Council and its staff. All legislative powers of the County are vested in the County Council. In addition, the County Council sits as the District Council on zoning and land use matters, and as the Board of Health on health policy matters.

15. The United States Department of Housing and Urban Development ("HUD") maintains a program entitled HOME Investment Partnerships ("HOME"), regulated by Title 24, Code of Federal Regulations, Part 92, which provides grants to states and localities to fund activities that build, buy, and/or rehabilitate affordable housing for rent or home-ownership or provide direct rental assistance to low-income individuals. HOME is the largest federal block grant to state and local governments and was allocated approximately $2,000,000,000 nationwide in federal funds per fiscal year.

16. The Prince George's County Department of Housing and Community Development ("DHCD") is a subordinate agency of the Executive Branch and was responsible for overseeing housing and community development projects in the County. DHCD's responsibilities include, among others, the administration and oversight of all aspects of County housing programs, including planning, program development and management, community services and housing rehabilitation.

17. The Director of DHCD is appointed by the County Executive and is responsible for directing DHCD's annual $80 million dollar budget and administering programs that were supported by federal grants, such as HOME funds. In this capacity, the Director

has the authority to recommend which developers should receive HOME funds for their development projects in the County. The County Council approves the Director's recommended distributions of the County's HOME funds at the request of the County Executive. The Director also has the authority to except developers from the regulatory requirements necessary to obtain HOME funds as prescribed by 24 C.F.R. Part 92.

18. Developer A is a developer in Prince George' s County, who sought and obtained HOME funds from the County for his/her development projects in the County.

19. Your affiant knows through investigation, including court-authorized wiretaps, cooperating sources, and other information, that beginning at least as early as 2007, JACK JOHNSON, obtained, under color of official right, the property of Developer A, in the form of United States currency and checks, including one check for $100,000, from Developer A and not otherwise due to JACK JOHNSON and his office, in return for JACK JOHNSON, in his capacity as County Executive, helping to secure HOME funds for Developer A's projects in the County, and other official assistance from JACK JOHNSON in his capacity as County Executive.

20. On or about November 5, 2010, during an audio and video recorded meeting in the County, Developer A provided JACK JOHNSON $5,000 in United States Currency in return for JACK JOHNSON using his official influence and authority for the benefit of Developer A and his companies.

21. On or about November 12, 2010, during an audio and video recorded meeting in the County, Developer A provided JACK JOHNSON $15,000 in United States Currency in return for JACK JOHNSON using his official influence and authority for the

benefit of Developer A and his companies.

22. Following the November 12, 2010 payment, FBI agents entered the room where the payment took place, identified themselves as FBI agents, and asked JACK JOHNSON about the payments made to him by Developer A. JACK JOHNSON told FBI investigators that the cash was for a party marking the end of his tenure as County Executive. He further advised the FBI agents that he had no business dealings with Developer A. Based upon investigation, your affiant believes that JACK JOHNSON made a series of false statements to interviewing FBI agents regarding his relationship with Developer A and monies he had received from him.

23. Following this discussion of the payments to JACK JOHNSON and the relationship between him and Developer A, FBI agents conducted a search of JACK JOHNSON. They recovered from JACK JOHNSON's person the $15,000 he had just been provided by Developer A. The agents also seized certain items from him, including his cellular telephone, which your affiant knows through investigation is assigned call number 301-520-1120, IMEI 012339006132540 (the "Target Phone"). Pursuant to the authorization by Judge Motz discussed above, FBI agents have been intercepting telephone calls over the Target Telephone since January 2010. JACK JOHNSON was not arrested and was advised that he was free to leave. After FBI agents imaged the telephone, they returned the phone to JACK JOHNSON, who then left the area.

24. FBI agents had also obtained search warrants for various sites in the County from the United States District Court for the District of Maryland, including a search warrant for the home of JACK JOHNSON and LESLIE JOHNSON, located at 1509 Brady Court, Mitchellville, MD 20721.

25. Through investigation and review of court-authorized interceptions of calls between JACK JOHNSON and LESLIE JOHNSON, your affiant knows that once JACK JOHNSON departed the site of his meetings with Developer A and the FBI agents after the search of his person, JACK JOHNSON and LESLIE JOHNSON made a series of phone calls to/from each other.

26. At approximately 10:10 a.m., FBI agents knocked on the front door of the home of JACK JOHNSON and LESLIE JOHNSON, located at 1509 Brady Court, Mitchellville, MD 20721.

27. On November 12, 2010 at approximately 10:12 a.m., LESLIE JOHNSON called JACK JOHNSON on the target telephone. LESLIE JOHNSON explained that "two women are at the door." JOHNSON replied, "Don't answer it." JACK JOHNSON then told LESLIE JOHNSON to go upstairs in their bedroom and to go "my drawer" and you will see a "check in there that [Developer A] wrote to me." Based on investigation your affiant believes that the check is the $100,000 check that Developer A provided to JACK JOHNSON in return for his official assistance. LESLIE JOHNSON interrupted JACK JOHNSON and asked if she should take the "cash out of here too." JACK JOHNSON replied, "Yes." JACK JOHNSON then told LESLIE JOHNSON to put the cash in her underwear. LESLIE JOHNSON then asked, "Where is the check? Where is the check?" JACK JOHNSON repeatedly described a box within a drawer in their bedroom. LESLIE JOHNSON is overheard shuffling through items. JACK JOHNSON then explained that the check was under the underwear drawer. LESLIE JOHNSON then asked if it was in the box where they stored liquor. JACK JOHNSON replied "Yes." LESLIE JOHNSON then stated,

"Yes, there is a check in there." JACK JOHNSON then stated, "Tear it up! That is the only thing you have to do." LESLIE JOHNSON then questioned if JACK JOHNSON "had the cash down in the basement" and if JACK JOHNSON wanted her to move it also. JACK JOHNSON replied, "Put it in your bra and walk out or something, I don't know what to do." LESLIE JOHNSON then asked, "What do you want me to do with the check?" JACK JOHNSON replied, "Tear up the check!" LESLIE JOHNSON then stated "they're saying FBI Jack" and asked, "Do you want me to put it down the toilet?" Your affiant believes that LESLIE JOHNSON is asking JACK JOHNSON if she should destroy the $100,000 check by flushing it down their toilet. JACK JOHNSON replied, "Yes, flush that." Investigating agents overheard a flushing toilet thereafter in the background. JACK JOHNSON then told LESLIE JOHNON to put "the cash" in her underwear. LESLIE JOHNSON replied, "I have it in my bra."

28. Thereafter, FBI agents entered the home and met LESLIE JOHNSON at the door. FBI agents then searched the person of LESLIE JOHNSON incident to her arrest and recovered $79,600 in United States currency from her underwear.

CONCLUSION

29. Based on the foregoing, there is probable cause to believe that on or about November 12, 2010, within the District of Maryland, JACK BRUCE JOHNSON and LESLIE JOHNSON Tampered with Witness and Evidence in violation of Title 18, United States Code, Sections 1512(b)(2)(B) and 1512 (c)(1 and 2), and engaged in Destruction, Alteration, and Falsification of Records in a Federal Investigation, in

violation of Title 18, United States Code, Section 1519, and aiding and abetting, in violation of United States Code, Section 2.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

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Wendy H. Munoz
Federal Bureau of Investigation

Subscribed and sworn before me this _____ day of November, 2010.

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UNITED STATES MAGISTRATE JUDGE