

125. On or about September 11, 2002, Abramoff emailed the nonprofit's consultant: "I am not sure what role she should play and it does not have to be significant. She should just be helpful to you as you need her. I don't want her to have to do too much, though, since she has responsibilities at home as a mother and wife."

126. On or about September 16, 2002, defendant RING sent an email to Abramoff in which he reported that Representative 5's Legislative Director was complaining that he was in a suite at which alcohol was unavailable and was "in a really low box in the end zone. View is obviously not very good." Defendant RING asked whether that was "a mistake."

127. On or about February 19, 2003, defendant RING sent an email to Representative 5's Legislative Director in which he stated, "[I] also think we should discuss a [municipal client's] post office soon. [T]hey didn't do what they said they would."

128. On or about March 7, 2003, after Representative 5's Legislative Director had asked defendant RING for tickets to the first NFL game of the season and promised that he would never ask for anything again, defendant RING forwarded the email to Abramoff, stating, "So much for not asking for tix . . . . [Representative 5]'s LD is looking for 2 tix for the Skins-Jets game."

129. On or about March 13, 2003, defendant RING sent an email to Representative 5's Legislative Director in which defendant RING submitted an earmark request for a client's "interchange project."

130. On or about March 17, 2003—after an executive branch agency official had sent an email to Representative 5's office about a \$1.8 million earmark inserted into the agency's budget, but which did not list the name, address, or any contact information concerning the earmark—defendant RING received the email from a Representative 5 staffer, who had forwarded it

with the message, "I understand you are the representation on this request. Can you fill in the below information please?"

131. In or about March 2003, Abramoff canceled the charity event on which the wife of Representative 5 was working, but Abramoff continued to pay the wife of Representative 5 \$5000 per month, purportedly for "marketing ideas" for Signatures.

132. On or about April 21, 2003, defendant RING sent an email to Representative 5's Legislative Director to which defendant RING attached a \$1 million appropriation request for a municipal client's cultural and business center, which was handled by Albaugh.

133. On or about May 1, 2003, defendant RING sent to a congressional staffer an email in which he stated that Representative 5 would support the Congressional Gold Medal for one of Firm B's clients and that Representative 5's Legislative Director would be the point of contact, "but you don't need to call him."

134. On or about June 4, 2003, defendant RING and a tribal client met with Representative 5 in his office and discussed their issues regarding a tribal-governance dispute that had caused the closure of the tribal casino on their reservation in Iowa.

135. On or about June 12, 2003, defendant RING sent an email to Representative 5's Legislative Director to which he attached a draft letter for Representative 5 to sign and send to the DOI that supported defendant RING's tribal client in the tribal-governance dispute and the reopening of the Iowa casino.

136. On or about June 12, 2003, defendant RING and Representative 5 caused a letter to be sent under his signature to the DOI in which he asked the Bureau of Indian Affairs to take a role

in resolving the tribal-governance dispute, justifying the request in part on the fact that the dispute had led to the closure of the tribal casino.

137. On or about July 8, 2003, after Representative 5's Legislative Director had asked defendant RING if he could "score" "that box for ozzfest at merriweather post," defendant RING responded that he was checking on it and then asked if the Legislative Director had heard anything more on an appropriations request.

138. On or about July 14, 2003, Representative 5's Legislative Director thanked defendant RING for tickets to a Bruce Springsteen concert for two staffers for two other Representatives, one of whom eventually emailed defendant RING and stated, "Please don't hesitate to contact me if the [Representative's] office can ever be of assistance. Also, my girlfriend . . . is a counsel to [another Representative]. I'm sure she would be happy to be of assistance[]in the future as well."

139. On or about July 21, 2003, defendant RING expensed catering for an event for Representative 5.

140. On or about July 22, 2003, defendant RING sent an email to Representative 5 in which he stated that Representative 5's Legislative Director had been an incredible asset to the office, noting that the Legislative Director had been "tenacious on the appropriations front to the benefit of the [municipal client]," and concluding, "It was good to see you today and I hope we can get together soon."

141. On or about October 2, 2003, defendant RING arranged a meeting between himself, a Massachusetts tribal client, and Representative 5 in Representative 5's congressional office.

142. On or about October 7, 2003, defendant RING sent an email to Representative 5's Legislative Director in which he stated, "Assuming [Representative 5] never called [a high level DOI official] after our meeting last week, I thought the attached letter would be okay to send to [the Secretary of the DOI]. Pretty non-controversial—says he doesn't take position on their petition for recognition, but thinks they deserve an answer. Assuming this is fine, please fax signed copy to me at [deleted]. Thanks. You the man."

143. On or about October 7, 2003, Representative 5 caused a letter to be sent under his signature to the Secretary of the DOI in which he asked that the DOI respond to the Massachusetts tribal client's request for recognition expeditiously.

144. On or about February 10, 2004, Representative 5's Communications Director, who had been helping defendant RING with tax legislation benefiting one of his clients, emailed defendant RING, "Haha! [J]ust earning my Sigs Sushi ;)," to which defendant RING replied, "Exactly. I will keep you occupied," to which the staffer responded, "Keep it coming—this is the fun stuff."

145. On or about February 23, 2004, Representative 5's wife deposited her last paycheck from Firm B, the final \$5000 payment of approximately \$96,000 that Firm B paid her.

#### **Honest Services Fraud Relating to Ney's Office**

146. On or about March 14, 2001, defendant RING and another Firm B lobbyist attended a meeting with Ney in Ney's office to secure his agreement to cosponsor legislation that would allow Abramoff's clients, who were garment manufacturers, to use "Made in the USA" labels on garments manufactured in the CNMI, while exempting the manufacturers from federal labor laws applicable to manufacturers operating in the continental United States.

147. On or about April 18, 2001, defendant RING sent an email to Abramoff and another member of the lobbying team in which defendant RING endorsed providing the “Camden Box” to the office of another Representative who intended to cosponsor with Ney the “Made in the USA” bill, stating, “I think he should be groomed to help us down the road.”

148. On or about July 11, 2002, defendant RING and others received an email from a congressional staffer advising them of an amendment to a DOI appropriation bill that proposed the creation of a commission to study Indian gaming and predicted that “the tribes are going to be extremely upset” about the amendment if not stricken, which defendant RING then forwarded to Abramoff and other members of the lobbying team, noting his agreement with the staffer’s assessment and the need to take action.

149. On or about July 15, 2002, defendant RING received a second email from the congressional staffer in which the staffer stated that the commission proposed by the amendment would kill Indian gaming, because the commission “would be stacked with anti-Indian gaming members” and attached a draft letter that opposed the amendment as a violation of a House rule, which defendant RING then forwarded to Heaton, stating in the body of the email that he (defendant RING) “was asked to share this with you. Thanks for your help.”

150. On or about July 15, 2002, defendant RING thanked Heaton for an email in which Heaton informed him that Ney had agreed to sign the letter opposing the commission and “[w]anted to know if anything stronger would be coming out later and he is glad to help.”

151. On or about July 16, 2002, Volz expensed about \$2200 worth of food and drinks at Signatures for Ney, his staff, and others during a birthday party for Heaton.

**Other Honest Services Fraud Relating to Work Done for the New Mexico Tribe**

152. On or about March 21, 2002, defendant RING emailed Abramoff, “We need to talk about what you can do to help on [the New Mexico tribe] to freeze the linebackers—like calling [a senior DOI official] or others and letting them know we are on the case. The position is easy: they should support the settlement, which is binding on them (at least until it expires).”

153. On or about March 27, 2002, defendant RING emailed other Firm B employees that he had given two tickets to opening-day at Camden Yards to a certain executive-branch official involved in intergovernmental affairs.

154. On or about April 4, 2002, defendant RING emailed other lobbyists at Firm B informing them that the executive-branch office on intergovernmental affairs had called the DOI in support of a settlement agreement benefiting the New Mexico tribe.

155. On or about July 17, 2002, defendant RING emailed the New Mexico tribe’s governor and others to inform them that the executive branch official had called a U.S. Senator to support the settlement agreement.

156. On or about January 30, 2003, a lobbyist at Firm B emailed a staffer for the New Mexico tribe’s U.S. Representative, “Sorry I couldn’t hangout last night. I greatly appreciate your taking the time to han[g]out with the [New Mexico tribe]. It meant a lot to [K]evin and I [sic]. BTW, you should be all set for the [Los Angeles] Clippers [basketball] game.”

157. On or about February 10, 2003, defendant RING emailed Abramoff to ask whether they could give the executive-branch official four “floor tickets (3rd row is fine)” for a Washington Wizards game, because the executive-branch official “keeps asking me and I want to help her.”

158. On or about February 14, 2003, a lobbyist at Firm B forwarded an email from the staffer for the New Mexico tribe's U.S. Representative to defendant RING in which the staffer had written, "How did Kevin's meetings with the [New Mexico tribe] go? If you guys lose that contract I would be disappointed."

159. On or about February 20, 2003, defendant RING sent an email to the executive-branch official asking whether she was "[a]ll set to use the fruit [i.e., tickets] on new date?," to which the executive-branch official replied, "I need to talk to you ASAP about [the New Mexico tribe.]"

160. On or about February 20, 2003, defendant RING emailed the New Mexico tribe's governor and lawyer to inform them that the executive-branch official had "put [the New Mexico tribe] on the list of people [the federal government] can work with."

161. On or about March 4, 2003, a lobbyist at Firm B emailed defendant RING, "I'm going to kill [the New Mexico tribe] with [its U.S. Representative] if we don't get hired."

162. On or about March 7, 2003, a lobbyist at Firm B emailed defendant RING, "[The staffer for the New Mexico tribe's U.S. Representative] is going to be in the meeting with [the New Mexico tribe] when they come to town. He's going to give the 'are you guys staying with [Firm B] this cycle? They did a great job on . . . legislation . . . and really cleared the path for you guys. . . . yadda yadda.' He's gonna gather as much intel as possible for us."

163. On or about November 10, 2003, defendant RING emailed the Senate appropriations staffer, "I didn't know you put the [New Mexico tribe] settlement money in the Senate bill. You are a stud—not that that's news to you." In the same email chain, defendant RING wrote, "Next time I will read the Senate bill to see what other surprises you have in their [sic] for my clients."

### **Honest Services Fraud Relating to the DOJ**

164. On or about April 16, 2001, defendant RING sent an email to Coughlin in which defendant RING asked Coughlin for assistance on a federal grant matter for one of his tribal clients, which sought a \$16.3 million federal grant from the DOJ to build a jail.

165. On or about April 19, 2001, defendant RING asked Coughlin to attend a tribal jail grant meeting with other DOJ officials, “[e]ven if it is just at the beginning to say hello, [because] it would be good if you were there so some of the clowns there know that I have friends, if you get my drift.” Coughlin agreed to attend the meeting.

166. On or about April 19, 2001, after the DOJ meeting regarding the tribal jail grant issue, defendant RING expensed a dinner at Olive’s for Coughlin, one of many meals at various restaurants that defendant RING bought for Coughlin and expensed back to Firm B.

167. On or about April 24, 2001, during an email in which Coughlin thanked defendant RING for the dinner, defendant RING asked for more information about the tribal-jail grant from Coughlin, who in turn told defendant RING that the DOJ had approved the tribe’s receipt of only \$9 million and volunteered to help “come [up] with some strategy in order to make sure they [i.e., defendant RING’s tribal client] get the rest of the money.”

168. On or about May 1, 2001, defendant RING again invited Coughlin to dinner after Coughlin emailed defendant RING with the name of “our friendly in OJP” (i.e., the Office of Justice Programs) and offered to call the “friendly” and set up a meeting regarding the jail grant.

169. On or about October 15, 2001, defendant RING sent an email to Abramoff in which defendant RING asked Abramoff to approve a ticket for Coughlin to an upcoming Washington

Redskins football game and justified his request by stating, “[Two others and] Bob Coughlin (DOJ)—all have been and are being helpful.”

170. On or about October 17, 2001, defendant RING sent an email to Coughlin in which defendant RING asked Coughlin for assistance in interpreting certain language in the USA PATRIOT Act on behalf of a client, and stated, “If there are others in your office that might want to go to the Skins game Sunday, let me know.” This was one of many occasions that defendant RING offered tickets to sporting events and concerts to Coughlin and other DOJ officials.

171. On or about November 12, 2001, defendant RING sent an email to Coughlin and another DOJ official in which defendant RING stated that Firm B had “reached a crisis point” in its effort to obtain the \$16.3 million federal grant and explained that “[m]y senior partner, Jack Abramoff, has made abundantly clear to me that this is the highest priority. . . . PLEASE let me know how to make this happen. THANKS to you both in advance.”

172. On or about December 5, 2001, Coughlin emailed defendant RING that he would forward a letter defendant RING had sent from the Senate minority and majority leaders, regarding the jail, along to higher ranking DOJ officials and thanked him “for everything” the other night. Defendant RING replied that he believed that the next letter concerning the tribal-jail grant would be signed by three senior members of the House Republican leadership, asked Coughlin to keep that information in confidence, and asked, “As for the other night . . . [p]lease tell me the waiter didn’t charge you guys for dinner.”

173. On or about December 27, 2001, defendant RING sent an email regarding the tribal-jail grant to Coughlin in which defendant RING stated, “Please see the attached [House leadership letter] and feel free to distribute within the Department,” causing Coughlin on or about the next day

to agree to distribute the letter to “the appropriate people within the Department” and then ask if he and his cousin “could watch the [Wizards] game in the suite?”

174. On or about December 28, 2001, defendant RING agreed to give Coughlin four suite tickets to the Wizards game at the MCI Center on January 26, 2002, some of the many tickets for entertainment events that defendant RING gave to Coughlin free of charge.

175. On or about January 8, 2002, defendant RING sent an email to the other lobbyists indicating that he had received a call from the DOJ’s Office of Legislative Affairs regarding the reaction to the House leadership letter of the DOJ official overseeing the tribal-grant issue.

176. On or about January 17, 2002, defendant RING sent an email to Coughlin in which defendant RING sought Coughlin’s assistance in determining whom defendant RING should contact about a land dispute between two tribes, causing Coughlin to respond, “I will look into it and get back to [you] asap.”

177. About an hour later, on or about January 17, 2002, defendant RING asked if Coughlin wanted to go to an upcoming Elton John and Billy Joel concert and Coughlin responded, “I would love to.” Defendant RING asked how many tickets Coughlin wanted and Coughlin replied, “I contacted our Indian Affairs office . . . . I am trying to track down who the right person is to talk to in ENRD [Environment and Natural Resources Division] because I don’t know if we have any ‘friends’ in that component.”

178. On or about January 22, 2002, defendant RING sent an email regarding the tribal-jail grant to Abramoff in which defendant RING advised Abramoff that he had heard “COMPLETELY confidential” news from his source at DOJ’s Office of Legislative Affairs that the DOJ official

overseeing the tribal grant issue had “kicked the final decision on the jail upstairs” to more senior DOJ officials.

179. On or about January 26, 2002, while out with Coughlin before a Washington Wizards basketball game, defendant RING sent an email to Abramoff and another lobbyist stating that Coughlin just told him that a senior DOJ official “will get the joke. We’ll see Monday,” referring to a scheduled telephone conference between defendant RING and the official, regarding the jail grant. The other lobbyist responded, “I love it when they get the joke.”

180. On or about January 28, 2002, defendant RING had a teleconference with the senior DOJ official.

181. On or about January 30 or 31, 2002, the DOJ reversed its prior decision and decided to award a \$16.3 million federal grant to defendant RING’s tribal client for construction of the jail. Thereafter, defendant RING continued to lobby the DOJ seeking a waiver of the DOJ’s requirement that the contract to construct the tribal jail be competitively bid.

182. On or about February 4, 2002, defendant RING sent an email to Abramoff in which defendant RING informed Abramoff that Coughlin wanted two tickets for the upcoming Dave Matthews Band concert and justified his request by stating, “Bob really helped on the [tribal client] jail.”

183. On or about February 4, 2002, defendant RING sent an email to another member of the lobbying team in which defendant RING informed the lobbyist that he had the MCI Center suite for the Dave Matthews Band concert “filling up with DOJ staffers that just got our client \$16 million,” causing the lobbyist to respond, “[A]s for DOJ staffers, those guys should get anything

they want for the rest of the time they are in office—opening day tickets, Skins v Giants, oriental massages, hookers, whatever.”

184. On or about February 8, 2002, another lobbyist on the Abramoff team sent an email to a Senate staff member in which he explained that “the demand [for tickets to the Dave Matthews Band concert] is simply too high from people who do ‘dirt’ for us on a regular basis.”

185. On or about March 12, 2002, Abramoff emailed defendant RING and other lobbyists regarding what considerations should govern a request from a Member of Congress for use of an MCI Center suite during the NCAA basketball tournament: “[T]he question for any request like this . . . is whether there is a Member out there who has done more for us or whether this ask (which is a huge prize) will make sure that this Member does do stuff for us in the future. We need to get the most from this request.”

186. On or about March 14, 2002, defendant RING asked for approval to give NCAA men’s basketball tournament tickets to the senior DOJ official whom defendant RING had lobbied regarding the tribal jail. Abramoff approved the request.

187. On or about March 16, 2002, defendant RING sent an email to another member of the lobbying team, who had been present at an NCAA men’s basketball tournament game with the senior DOJ official, indicating that defendant RING needed the official’s further assistance regarding the lobbying efforts on the \$16.3 million grant. Defendant RING wrote, “Glad he got a chance to relax. Now he can pay us back.”

188. On or about April 5, 2002, defendant RING asked Coughlin to attend an April 11 dinner with defendant RING, another lobbyist, and a client in order “to fill this guy’s schedule with meetings.” Coughlin agreed and defendant RING and the other lobbyist gave the client an itinerary

for the dinner which read, in part, "Dinner with Bob Coughlin, Professional Staff, Department of Justice Inter-government Affairs Office."

189. On or about April 11, 2002, defendant RING and another Firm B lobbyist expensed a meal at Signatures to Coughlin.

190. On or about April 23, 2002, Coughlin told defendant RING that he would be attending a Senate committee hearing relating to a land claim on behalf of the New Mexico tribe and agreed to provide RING with a copy of a DOJ Assistant Attorney General's testimony as soon as it was cleared.

191. On or about May 1, 2002, Coughlin transferred from the Office of Legislative Affairs to the Office of Intergovernmental and Public Liaison, where Coughlin continued to contact DOJ officials in order to answer numerous inquiries from defendant RING about the tribal-jail grant and to advise defendant RING about whom he should contact.

192. On or about June 25, 2002, after defendant RING and other members of the lobbying team learned that their request to waive the competitive-bidding requirement for the \$16.3 million federal grant had been approved, defendant RING wrote an email to the other lobbyists in which he stated, "Don't thank me—thank your friends on the Hill and in the Administration. In fact, thank them over and over this week—preferably for long periods of time and at expensive establishments. . . . Thank them until it hurts—and until we have a June bill that reflects the fact that our client is about to get a \$16.3 million check from the Department of Justice!!!!!"

193. On or about June 25, 2002, defendant RING sent an email captioned "FW: [Tribe]: CHA-CHING!!!!" to Coughlin in which defendant RING stated, "Thanks is not strong enough. We need to celebrate this issue finally being over."

194. On or about June 28, 2002, defendant RING expensed a lunch at Signatures for Coughlin and two other DOJ officials.

195. On or about February 7, 2003, defendant RING sent an email to Coughlin regarding the need for assistance relating to Eshkol Academy, a school owned by Abramoff, in which defendant RING stated, "Eshkol Academy needs an expedited review and approval of the I-17 (application[] to admit F non-immigrant students) including expedited site visit. In the alternative, they can request to issue interim approval while application is pending. . . . A site visit must be conducted ASAP."

196. On or about February 7, 2003, Coughlin forwarded defendant RING's email request to two DOJ employees, including an employee of the INS, to whom Coughlin wrote, "Thank you for looking into this. I do not know if anything can be done but I said I would look into it. If, for any reason, nothing can be done, please email me so I can pass that along. Thank you very much for you[r] assistance."

197. On or about February 10, 2003, after Coughlin notified defendant RING that INS had agreed to expedite the review of Eshkol Academy, defendant RING notified Abramoff of the success, prompting Abramoff to reply, "Kevin, you are the greatest. Unfortunately the way my nutty life is structured, these things mean everything in the world to me and often more than so many other things. Thanks my friend." Defendant RING thereupon sent an email to Coughlin in which defendant RING stated, "I cannot thank you enough for helping on this. Jack [Abramoff] was very appreciative. You really helped me out. Drinks Thursday night?" Coughlin accepted that invitation.

198. On or about February 11, 2003, in reply to defendant RING's invitation to drinks, Coughlin requested from defendant RING four Wizards tickets on both March 15th and March 18th, which Defendant RING relayed to Abramoff and justified the ticket request by stating, "Bob Coughlin (DOJ). . . . Helped on the school and is now looking for tickets to the Wizards on both March 15 and 18." Abramoff replied, "Totally!!!! Give him CC's [third-row seats] for both games please. Thanks again Kevin."

All in violation of 18 U.S.C. § 371.

**COUNT II**  
(Payment of Gratuities)

1. Paragraphs 1 through 19, 21 through 31, and 164 through 198 of Count I are realleged and incorporated here.

2. Between on or about February 7, 2003 and on or about March 18, 2003, in the District of Columbia, the defendant,

**KEVIN A. RING,**

otherwise than as provided by law for the proper discharge of official duty, directly and indirectly gave, offered and promised anything of value (to wit, eight tickets total to two Washington Wizards basketball games) to a public official (to wit, Robert Coughlin, an official of the United States Department of Justice), for and because of an official act performed and to be performed by such public official (to wit, contacting an employee of the Immigration and Naturalization Service and requesting an expedited review and approval of the application to admit nonimmigrant students, relating to Eshkol Academy).

All in violation of 18 U.S.C. §§ 201(c)(1)(A) and 2.

**COUNTS III-VIII**  
(Honest Services Wire Fraud)

1. Paragraphs 1 through 19 of Count I are realleged and incorporated here.

2. From at least as early as January 2000 through at least October 2004, in the District of Columbia and elsewhere, defendant RING devised and intended to devise a scheme and artifice to defraud and deprive the United States and its citizens of their right to the honest services of certain public officials within the legislative and executive branches, performed free from deceit, fraud, concealment, bias, conflict of interest, self-enrichment, and self-dealing, as set forth in paragraphs 21 through 198 of Count I, which are realleged and incorporated here.

**The Use of Interstate Wires in Execution of the Scheme**

3. On or about the date of each Count listed below, in the District of Columbia and elsewhere, the defendant

**KEVIN A. RING,**

for the purpose of executing the above-described scheme and artifice to defraud and attempting to do so, did knowingly transmit and cause to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds listed below:

<b>COUNT</b>	<b>APPROXIMATE DATE OF WIRE</b>	<b>MATTER/THINGS WIRED</b>
III	February 11, 2003	An email from ringk@gtlaw.com to Robert.Coughlin@usdoj.gov with the subject line, "RE:RE:FW:FW: Eshkol SEVIS issue"
IV	November 17, 2003	An email from ringk@gtlaw.com to john.albaugh@mail.house.gov with the subject line, "Things"

V	November 20, 2003	An email from ringk@gtlaw.com to john.albaugh@mail.house.gov with the subject line, "RE: Nov 30 skins"
VI	November 24, 2003	An email from ringk@gtlaw.com to john.albaugh@mail.house.gov with the subject line, "FW: Sunday's Redskins game against the Saints"
VII	January 13, 2004	An email from the address john.albaugh@mail.house.gov to the address ringk@gtlaw.com with the subject line, "RE: hope you had a nice break"
VIII	February 23, 2004	A check for \$5000 drawn from a Wachovia Bank, National Association account of Firm B and deposited into a Wright Patman Congressional Federal Credit Union account controlled by Representative 5's wife

All in violation of 18 U.S.C. §§ 1343, 1346, and 2.

**COUNT IX**  
(Obstruction of Justice)

1. Paragraphs 1 through 19 and 21 through 198 of Count I are realleged and incorporated here.

**The New Mexico Tribe**

2. On or about December 20, 2001, defendant RING sent an email captioned "[New Mexico tribe] (sp?)" to Abramoff in which he wrote, "Need to talk to you about a potential new client. Would need Scanlon, too." A few months later, on or about February 14, 2002, Abramoff sent an email to Scanlon in which Abramoff informed Scanlon that "[o]ur Kevin Ring New Mexico Ship has just arrived!! We have a meeting 11 am Wednesday next week with the [New Mexico tribe] here in DC. They are desperate and rich. Kevin is desperate for some \$ and a big client. We'z gonna be rich(er) . . . ."

3. About a week later, on or about February 20, 2002, defendant RING, Abramoff, and Scanlon met with representatives of the New Mexico tribe to pitch them on the lobbying services of Firm B, specifically those of defendant RING and Abramoff, and Scanlon's grassroots services for an effort concerning a land-claim dispute in New Mexico.

4. Sometime between February 14, 2002 and March 12, 2002, defendant RING, in order to secure the New Mexico tribe as a client, agreed to Abramoff's reducing Firm B's fee from \$125,000 per month to \$50,000 per month and, unknown to the New Mexico tribe, further agreed with Abramoff to personally accept approximately five percent of \$2.75 million (Scanlon's expected fee for the grassroots services), or \$135,000. As a result, on or about March 12, 2002, the new Mexico tribe hired Firm B at a rate of \$50,000 per month.

5. On or about that same day, defendant RING sent Abramoff an email in which he stated that he knew that Scanlon was "taking a boatload than more than 5 percent" from the deal with the New Mexico tribe. Less than a week later, on or about March 18, 2002, the New Mexico tribe agreed to pay CCS \$2.75 million for grassroots lobbying, in addition to the fees to be paid to Firm B.

6. On or about March 21, 2002, Scanlon sent an email to Abramoff in which he advised Abramoff that "I gave [defendant RING] 67,500 or half of his total. He gets the rest when the full [CCS] payment comes in." Shortly thereafter, on or about March 25, 2002, defendant RING deposited a CCS check for \$67,500 into his personal bank account. On or about April 10, 2002, the New Mexico tribe wired Scanlon \$875,000. A week later, on or about April 17, 2002, defendant RING deposited a second CCS check for \$67,500 into his personal bank account.

7. During the summer and fall of 2002, the New Mexico tribe complained to defendant RING and Abramoff about Scanlon's and CCS's performance on the contract. At no time during their discussion with the New Mexico tribe did defendant RING and Abramoff disclose that Scanlon had paid a portion of the \$2.75 million CCS fee to defendant RING and Abramoff.

#### **Newspaper Articles**

8. On or about September 22, 2003, defendant RING forwarded to Abramoff a newspaper article discussing payments made between Abramoff and Scanlon, and wrote, "Not a good article." On or about February 3, 2004, during an interview at which defendant RING was present, Abramoff falsely denied to a newspaper reporter, in sum and substance, that he had any financial relationship with Scanlon or CCS.

9. On or about February 22, 2004, a newspaper printed the first of a series of articles about Abramoff, Scanlon, and the fees they charged for lobbying and public relations services to four tribal clients. In particular, the initial newspaper article highlighted the lack of services being provided in relation to the large fees Abramoff and Scanlon charged and raised the possibility of a financial relationship between Abramoff, Scanlon, and CCS.

10. On or about that same day, defendant RING responded to an email from Representative 5 entitled, "What did you think of the article," by writing, "Not good, but fair and truthful. Lots of FBI talk, too. I am tainted by knowing the truth." Also on or about that same day, defendant RING emailed another person, "I know more than article and the truth is worse."

#### **Interviews with Outside Counsel and Meeting with the New Mexico Tribe**

11. In or about February 2004, Firm B retained outside legal counsel to conduct an internal investigation into Abramoff's lobbying activities and practices. Over time, the internal

investigation expanded to include an examination of the lobbying activities and practices of defendant RING and other members of the lobbying team. The internal investigation examined not only defendant RING's and Abramoff's relationships with Scanlon and CCS, but also the providing of things of value to induce or reward official actions from public officials that benefited defendant RING's and Abramoff's clients. The internal investigation examined, among other things, defendant RING's and Abramoff's role in Firm B's employment of Representative 5's wife.

12. During multiple interviews with outside legal counsel beginning on or about March 2, 2004, defendant RING made several material false statements, material misrepresentations, and material omissions regarding his knowledge of and participation in those subject matters, as well as other matters of interest to Firm B's outside legal counsel. Outside counsel informed defendant RING that anything defendant RING said might be communicated to entities investigating Abramoff's lobbying activities, including the DOJ and the U.S. Senate Committee on Indian Affairs. Outside counsel specifically informed defendant RING that there were pending investigations by Congress and the DOJ into Abramoff's employment of Representative 5's wife.

13. On or about March 2, 2004, after being advised that Firm B had retained outside counsel to conduct an internal investigation into Abramoff's conduct with his clients, particularly the Native American Indian clients, defendant RING falsely stated to outside counsel that he did not know of any facts supporting the possibility that Abramoff had reduced Firm B's monthly retainer with the New Mexico tribe because money had been paid to Abramoff.

14. On or about March 18, 2004, during an interview with the outside counsel for Firm B, defendant RING falsely explained his receipt of the \$135,000 payment from CCS by stating that, after the New Mexico tribe retained Firm B, Abramoff handed him an envelope at Signatures and

stated, in sum and substance, "This is for you," and that, upon arriving home, defendant RING opened the envelope to find a check for \$135,000 from CCS, which defendant RING thought came from Abramoff.

15. On or about April 6, 2004, during an interview with Firm B's outside counsel, defendant RING falsely stated that he did not know that Abramoff had reduced Firm B's proposed monthly retainer with the New Mexico tribe in order to ensure that the New Mexico tribe signed the proposed \$2.75 million grass roots contract with Scanlon or CCS, that he did not know that the \$135,000 that he received related to the pitch of the New Mexico tribe, that he had only a sense that CCS was connected to Scanlon, and that Abramoff had never told defendant RING to what the reduction in Firm B's fee was tied.

16. On or about July 1, 2004, during an interview with Firm B's outside counsel, defendant RING stated that he believed that outside counsel or other lawyers for Firm B were providing information to the DOJ or the U.S. Senate Committee on Indian Affairs. Defendant RING also informed outside counsel that he was aware that Representative 5's wife and Firm B had received federal grand jury subpoenas.

17. On or about July 1, 2004, during an interview with Firm B's outside counsel, defendant RING falsely stated that he did not recall conversations about getting a job for Representative 5's wife.

18. On or about July 1, 2004, during an interview with the outside counsel for Firm B, defendant RING falsely stated that he did not have an agreement or understanding with Abramoff or Scanlon that defendant RING would be given a portion of the money generated by the New Mexico tribe account prior to defendant RING's receipt of the \$135,000, that he did not know that the

\$135,000 was from the New Mexico tribe, and that there was never any deal to share Scanlon's profits from the New Mexico tribe contract with defendant RING.

19. Between on or about March 2, 2004, and on or about August 13, 2004, in the District of Columbia, the defendant,

**KEVIN A. RING,**

did knowingly engage in misleading conduct toward outside legal counsel for Firm B by making materially false statements, intentionally omitting material information, and intentionally concealing material facts, with the intent to hinder, delay, and prevent the communication of information to the Federal Bureau of Investigation, relating to the commission or possible commission of a federal offense, namely conspiracy, mail fraud, wire fraud, and payment of a gratuity.

All in violation of 18 U.S.C. §§ 1512(b)(3) and 2.

**COUNT X**

(Obstruction of Justice)

1. Paragraphs 1 through 19 and 21 through 198 of Count I and 2 through 18 of Count IX are realleged and incorporated here.

2. Between on or about March 2, 2004, and on or about August 13, 2004, in the District of Columbia, the defendant,

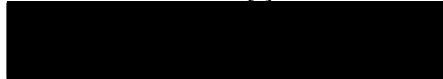
**KEVIN A. RING,**

did corruptly obstruct, influence, impede, and attempt to do so, any official proceeding, that is, a congressional investigation by the U.S. Senate Committee on Indian Affairs and a federal grand jury investigation, by making materially false statements, intentionally omitting material information, and intentionally concealing material facts, to cause and in an attempt to cause such false and

misleading information to be provided by outside legal counsel for Firm B to U.S. Senate  
Committee on Indian Affairs and the federal grand jury.

All in violation of 18 U.S.C. §§ 1512(c)(2) and 2.

A TRUE BILL



FOREPERSON

WILLIAM M. WELCH II  
Chief  
Public Integrity Section

STUART M. GOLDBERG  
Acting U.S. Attorney  
District of Maryland  
Special Attorney to  
the Attorney General

STEVEN A. TYRRELL  
Chief  
Fraud Section

By:

A handwritten signature in black ink, appearing to read "Nathaniel B. Edmonds".

NATHANIEL B. EDMONDS  
Senior Trial Attorney  
Fraud Section

MICHAEL LEOTTA  
Assistant U.S. Attorney  
District of Maryland  
Special Attorney to the Attorney General

MICHAEL FERRARA  
Trial Attorney  
Public Integrity Section

United States District Court  
For the District of Columbia  
A TRUE COPY  
NANCY MAYER WHITTINGTON, Clerk  
By Deputy Clerk