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U.S. DISTRICT COURT  
CENTRAL DISTRICT OF CALIF.  
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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2017 Grand Jury

17 CR00459

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
MICHAEL KIMBREW,  
  
Defendant.

CR No. 17-

I N D I C T M E N T

[18 U.S.C. § 872: Attempted  
Extortion by an Employee of the  
United States; 18 U.S.C.  
§ 201(b)(2)(A): Bribery of a  
Public Official]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

1. At all times relevant to this Indictment, defendant MICHAEL KIMBREW ("KIMBREW") was a public official and federal employee working for a Member of the United States Congress (the "Congressmember").

2. At all times relevant to this Indictment, Marijuana Shop A was a business located in the City of Compton (the "City"), within the Central District of California, that illegally sold marijuana, in violation of local and federal law.

3. In or about March 2015, defendant KIMBREW visited Marijuana Shop A. Defendant KIMBREW told an employee of Marijuana Shop A that

1 he worked for the City and that Marijuana Shop A was not in  
2 compliance with local law. Defendant KIMBREW stated that he could  
3 get the required documents for Marijuana Shop A to be in compliance.  
4 Defendant KIMBREW warned, however, that if the owners of Marijuana  
5 Shop A did not reach an agreement with defendant KIMBREW, Marijuana  
6 Shop A would be shut down.

7 4. On or about March 30, 2015, defendant KIMBREW met the  
8 owners of Marijuana Shop A at an office inside Compton City Hall.  
9 Defendant KIMBREW stated that he was working with federal and state  
10 agencies, including the Federal Bureau of Investigation ("FBI"), to  
11 make sure medical marijuana dispensaries in the City were filing the  
12 appropriate permits. Defendant KIMBREW claimed that he could "make  
13 things happen" and stated that it would cost the owners of Marijuana  
14 Shop A \$5,000 for defendant KIMBREW to help them navigate the City's  
15 permit process.

16 5. On or about May 7, 2015, defendant KIMBREW met an  
17 undercover FBI Special Agent (the "UC"), who was posing as a business  
18 partner of the owners of Marijuana Shop A, at an office inside  
19 Compton City Hall. Defendant KIMBREW told the UC that he worked for  
20 the federal government and oversaw all activities in the City.  
21 Defendant KIMBREW claimed that, in exchange for \$5,000: (a) he would  
22 take action to prevent the shutdown of Marijuana Shop A; (b) he would  
23 not send local or federal authorities to shut down Marijuana Shop A;  
24 (c) he would help obtain a permit to allow Marijuana Shop A to  
25 continue operating; (d) he would convince various other officials not  
26 to shut down Marijuana Shop A; and (e) he would not inform the  
27 Congressman about Marijuana Shop A, eliminating the possibility  
28

1 that the Congressman would inform the FBI about Marijuana Shop A's  
2 illegal activities.

3 6. On or about May 19, 2015, defendant KIMBREW and the UC met  
4 at a restaurant in the City. The UC hid \$5,000 in cash inside of a  
5 menu and handed the menu to defendant KIMBREW. Defendant KIMBREW  
6 took the \$5,000 from the menu and placed it in his pocket.

7 7. These Introductory Allegations are hereby incorporated by  
8 reference into each count of this Indictment as though set forth  
9 fully therein.

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COUNT ONE

[18 U.S.C. § 872]

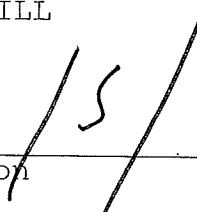
Beginning in or about March 2015, and continuing to on or about May 19, 2015, in Los Angeles County, within the Central District of California, defendant MICHAEL KIMBREW, an employee of the United States and who represented himself to be and assumed to act as such, attempted to commit an act of extortion under color and pretense of such office and employment, with the value of the amount so extorted and demanded exceeding \$1,000.

COUNT TWO


[18 U.S.C. § 201(b)(2)(A)]

On or about May 19, 2015, in Los Angeles County, within the Central District of California, defendant MICHAEL KIMBREW, a public official, directly and indirectly, corruptly demanded and received something of value, namely, approximately \$5,000 from the UC, in return for being influenced in the performance of an official act.

A TRUE BILL

Foreperson 

SANDRA R. BROWN  
Acting United States Attorney

  
LAWRENCE S. MIDDLETON  
Assistant United States Attorney  
Chief, Criminal Division

MACK E. JENKINS  
Assistant United States Attorney  
Chief, Public Corruption and  
Civil Rights Section

DANIEL J. O'BRIEN  
Assistant United States Attorney  
Deputy Chief, Public Corruption  
and Civil Rights Section

LINDSEY GREER DOTSON  
Assistant United States Attorney  
Public Corruption and Civil  
Rights Section