

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
EDWIN PAWLOWSKI SCOTT ALLINSON JAMES HICKEY	:	VIOLATIONS: 18 U.S.C. § 371 (conspiracy to commit mail fraud, wire fraud, honest services fraud, federal program bribery, and Travel Act bribery – 1 count) 18 U.S.C. § 666(a)(1)(b) (federal program bribery/soliciting – 14 counts) 18 U.S.C. § 666(a)(2) (federal program bribery/offering – 1 count) 18 U.S.C. § 1341 (mail fraud – 9 counts) 18 U.S.C. § 1343 (wire fraud – 9 counts) 18 U.S.C. § 1341, 1346 (honest services mail fraud – 2 counts) 18 U.S.C. § 1343, 1346(honest services wire fraud – 6 counts) 18 U.S.C. § 1951 (attempted Hobbs Act extortion under color of official right – 3 counts) 18 U.S.C. § 1952 (Travel Act Bribery – 3 counts) 18 U.S.C. § 1001 (material false statements to the FBI – 7 counts) 18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The City of Allentown constituted an "organization" which received annual benefits in excess of \$10,000 in each of the calendar years 2012, 2013, 2014, and 2015

under federal programs involving grants, contracts, subsidies, loans, guarantees, insurance, and other forms of federal assistance.

2. The citizens of the City of Allentown had an intangible right to the honest services of their public officials.

3. Defendant EDWIN PAWLOWSKI was the elected Mayor of the City of Allentown. Defendant PAWLOWSKI's office vested him with actual and perceived authority and influence over, among other things, the awarding of certain municipal contracts by the City of Allentown.

4. Defendant EDWIN PAWLOWSKI's office also vested him with actual and perceived authority over certain other public officials, including Managing Director Francis Dougherty, Finance Director Garret Strathearn, and Assistant City Solicitor Dale Wiles, all charged elsewhere.

5. Defendant EDWIN PAWLOWSKI took office in January 2006 and was re-elected in 2009 and 2013. Defendant PAWLOWSKI sought the Democratic Party's nomination for Governor of Pennsylvania between September 8, 2013 and February 3, 2014. On April 17, 2015, PAWLOWSKI announced that he was seeking the Democratic Party's nomination for the United States Senate. He suspended that senatorial campaign in July 2015.

6. Defendant EDWIN PAWLOWSKI used political action committees controlled by his campaign operatives for campaign fundraising, including the Friends of Ed Pawlowski ("FOEP"), Pawlowski for Governor ("PFG"), and Pawlowski 2016 ("P2016").

7. Michael Fleck, charged elsewhere, was a political consultant and principal owner of H Street Strategies, and its predecessor corporations, Fleck Consulting Inc. and 7 Points Consulting, a political advisory firm located in Allentown, Pennsylvania. Fleck, working

individually, and through H Street Strategies, provided incumbent elected officials and individuals seeking elected office, including defendant EDWIN PAWLOWSKI, with advice about raising campaign funds and positioning themselves for elections to public office. Fleck also owned Hamilton Development Partners, which represented private individuals and companies seeking to conduct business with local governments, including giving advice related to the acquisition of government contracts. S.R. was an employee of Fleck's and assisted Fleck in representing candidates for political office, including defendant PAWLOWSKI, and individuals and companies seeking to conduct business with local government. Fleck and S.R. actively sought campaign contributions for PAWLOWSKI and actively sought contracts from the City of Allentown for Fleck's business clients.

Allentown Public Officials and Employees

8. Francis Dougherty, charged elsewhere, was the managing director for the City of Allentown, and owed the public a duty of honest services in the performance of his official position. Through his office, Dougherty had actual and perceived authority over almost all other City of Allentown offices, including Finance, Public Works, Information Systems, Communications and Technical Services, Purchasing, Planning and Zoning, Building Standards and Safety, Parks, Recreation Events, and the City Solicitor.

9. Garret Strathearn, charged elsewhere, was the Finance Director for the City of Allentown, and owed the public a duty of honest services in the performance of his official position. Through his office, Strathearn had actual and perceived authority and influence over certain other public officials, including the City of Allentown's Purchasing Agent.

10. Dale Wiles, charged elsewhere, was an Assistant City Solicitor for the City of Allentown, and owed the public a duty of honest services in the performance of his

official position. His duties included coordinating the outsourcing of certain Allentown municipal projects to attorneys in the private sector.

The Contracting Process in Allentown

11. For all City of Allentown contracts valued at over \$40,000, a Request for Proposal (RFP) had to be issued by the city. Vendors seeking the contract had to respond to the RFP within a designated period of time.

12. Legal services contracts were exempted from the RFP process, even if valued at over \$40,000, and were awarded within the discretion of the mayor and the city solicitor.

13. Prior to the issuance of an RFP, the city could issue a Request for Qualifications (RFQ) in order to determine companies qualified to respond to an eventual RFP.

14. For contracts valued between \$10,000 and \$40,000, at least three competitive cost estimates had to be obtained by the City of Allentown.

15. RFPs contained language that the City of Allentown would make an award of the contract to that responsive and responsible proposer whose proposal, conforming to specifications, would be most advantageous to the City, with price and other factors considered, such as delivery time, quality, and service. Proposals would be evaluated in terms of the firm's ability to meet RFP requirements, the qualifications of the specified persons who would be performing the requested services, and the prior experience and reputation of the firm in similar projects.

16. Evaluation teams, generally composed of city employees, initially determined which company had won the contract with the City of Allentown. The committee considered the submitted RFPs, and could conduct interviews and do reference checks.

Individuals and Businesses Seeking Contracts in Allentown

17. Defendant SCOTT ALLINSON was an attorney at Law Firm #2 in Allentown, Pennsylvania and practiced in economic development law, business law, and construction law. Defendant ALLINSON caused and attempted to cause others at Law Firm #2 to make a stream of campaign contributions to defendant EDWIN PAWLOWSKI.

18. Defendant JAMES HICKEY was a business consultant. In connection with his attempts to obtain a contract for Company #1 to replace street lights in Allentown, defendant HICKEY made, and caused to be made, a stream of campaign contributions to defendant EDWIN PAWLOWSKI.

19. Patrick Regan, charged elsewhere, was the vice-president of street lighting/smart cities for Company #1. In connection with his attempts to obtain a contract for Company #1 to replace street lights in Allentown, Regan made, and caused to be made, a stream of campaign contributions to defendant EDWIN PAWLOWSKI.

20. Ramzi Haddad, charged elsewhere, was a business and property owner in Allentown who lived in New York. In 2014 and 2015, Haddad owned the property at 1324 North Sherman Street, Allentown, Pennsylvania. In connection with his attempts to obtain contracts from the City of Allentown and to obtain favorable treatment from the City of Philadelphia, Haddad made, and caused others to make, a stream of campaign contributions to defendant EDWIN PAWLOWSKI.

21. Matthew McTish, charged elsewhere, was an employee of Company #3, an engineering firm, which heavily relied on contracts with governmental organizations in Pennsylvania, including the City of Allentown. In connection with his attempts to obtain

contracts with the City of Allentown, McTish made, and caused others to make, a stream of campaign contributions to defendant EDWIN PAWLOWSKI.

22. J.R. was a real-estate developer and political fundraiser from New York City, who was attempting to obtain a cyber-security contract from the City of Allentown. Defendant EDWIN PAWLOWSKI solicited campaign contributions from J.R. in connection with the the cyber-security contract.

Requests for Proposals and Qualifications

23. The City of Allentown issued RFP 2013-33, entitled Collection of Delinquent Real Estate Taxes and Municipal Claims for the City of Allentown, on November 11, 2013. The contract had an estimated value of \$3,000,000.

24. The City of Allentown issued RFP 2013-39, entitled Construction Inspection Services for the Basin Street Improvements Construction Project, on December 13, 2013. The contract had an estimated value of \$52,000.

25. The City of Allentown issued RFP 2014-30, entitled Consulting and Engineering Services for the Aquatic Facilities Renovations, on December 19, 2014. The contract had an estimated value of \$3,000,000.

26. The City of Allentown issued RFQ 2015-05, entitled Lighting Design and Installation Project/GESA Contract, on February 27, 2015. The contract had an estimated value of approximately \$3,000,000.

Campaign Contributions

27. Under federal law, individuals could contribute a maximum of \$2,700 to a federal candidate for each election. Primary elections and general elections were considered

separate elections, so a contributor individually could contribute a maximum of \$5,400 to a federal candidate for each election cycle.

28. Contributions to a federal candidate could be bundled so that a husband and a wife could each contribute the maximum amount for the election cycle, that is, \$5,400 individually and \$10,800 combined, even if only one of them had income.

29. Federal law permitted individuals to contribute a maximum of \$5,000 to a political action committee (PAC) that supported federal candidates. PACs could contribute a maximum of \$1,000 per election to federal candidates.

30. Under Pennsylvania state law, there was no limitation on the amount of money that individuals or PACs could contribute to candidates for state office.

THE CONSPIRACY

31. From at least February 2012 until on or about July 2, 2015, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendants

**EDWIN PAWLOWSKI,
SCOTT ALLINSON, and
JAMES HICKEY,**

together with Francis Dougherty, Michael Fleck, Ramzi Haddad, Matthew McTish, Patrick Regan, Garret Strathearn, and Dale Wiles, all charged elsewhere, and S.R., and others known to the grand jury, conspired and agreed to commit mail fraud, wire fraud, honest services fraud, federal program bribery-soliciting, federal program bribery-offering, and Travel Act bribery in violation of federal criminal law, that is, the defendants committed:

a. mail fraud, by devising a scheme to defraud and for obtaining and trying to obtain money and property by means of false and fraudulent pretenses, in violation of 18 U.S.C. Section 1341;

b. wire fraud, by devising a scheme to defraud and for obtaining and trying to obtain money and property by means of false and fraudulent pretenses, in violation of 18 U.S.C. Section 1343;

c. mail fraud, by devising a scheme to defraud the public of its right to the honest services of public officials, in violation of 18 U.S.C. Sections 1341 and 1346;

d. wire fraud, by devising a scheme to defraud the public of its right to the honest services of public officials, in violation of 18 U.S.C. Sections 1343 and 1346;

e. federal program bribery, in violation of 18 U.S.C. Sections 666 (a)(1)(B) and 666 (a)(2);

f. interstate travel with intent to carry on unlawful activity, that is, bribery in violation of Pennsylvania law, that is, 18 P.C.S.A. Section 4701, in violation of 18 U.S.C. Section 1952;

MANNER AND MEANS

32. Knowing that he required substantial amounts of money to finance his statewide campaigns for Governor of Pennsylvania in 2013, and for the United States Senate in 2015, defendant EDWIN PAWLOWSKI:

a) personally solicited, and used campaign operatives Michael Fleck and S.R., to solicit vendors and consultants for vendors, who were doing business with the City of Allentown, or hoping to do business with the City of Allentown, for campaign contributions;

b) used lists of vendors obtained from the City of Allentown records, which contained information about past contracts awarded to vendors by the City,

to determine how much money defendant PAWLOWSKI would solicit from those vendors in campaign contributions;

c) communicated to vendors, using Michael Fleck and S.R., who were working both for defendant PAWLOWSKI and prospective vendors, that the vendors were expected to provide campaign contributions for past and prospective official action by defendant PAWLOWSKI and contracts with the City of Allentown;

d) held regularly scheduled fundraisers to which it was expected that vendors would contribute for the benefit of defendant PAWLOWSKI's campaigns;

e) bypassed the contracting procedures in place in the City of Allentown, and violated his duty of honest services, causing other public officials, including Francis Dougherty, Garret Strathearn, Dale Wiles, and others, to take official action favorable to those vendors who had provided, or were expected to provide, campaign contributions to defendant PAWLOWSKI;

f. traveled out of state to meet with others, including J.R. and Ramzi Haddad, to obtain promises of campaign contributions in return for contracts with the City of Allentown and for official action by defendant PAWLOWSKI;

g. deleted his own emails and advised his campaign operatives to delete their emails concerning communications with vendors;

h. had his own office "swept" and advised his campaign operatives to have their offices "swept" to try to find any listening devices that he believed law enforcement may have installed to record incriminating conversations.

33. To obtain contracts with the City of Allentown, defendants SCOTT ALLINSON and JAMES HICKEY, and Ramzi Haddad, Matthew McTish, and Patrick Regan, charged elsewhere, and others known to the grand jury, made campaign contributions and caused others to make campaign contributions, to defendant EDWIN PAWLOWSKI's campaigns for mayor, governor and senator, in return for which they received, and anticipated receiving, favorable treatment from defendant PAWLOWSKI in obtaining contracts with the City of Allentown.

OVERT ACTS

In furtherance of this conspiracy, defendants EDWIN PAWLOWSKI, SCOTT ALLINSON, and JAMES HICKEY, and Francis Dougherty, Michael Fleck, Ramzi Haddad, Matthew McTish, Patrick Regan, Garret Strathearn, and Dale Wiles, all charged elsewhere, and S.R., and others known to the grand jury, committed the following overt acts, among others:

Zoning and Inspection of 1324 North Sherman Street

1. On or about February 11, 2013, Ramzi Haddad contributed \$1,000 to the Friends of Ed Pawlowski.
2. On or about September 26, 2013, Ramzi Haddad contributed \$2,500 to Pawlowski for Governor.
3. On or about December 6, 2013, Ramzi Haddad contributed \$2,500 to Pawlowski for Governor.
4. On or about March 3, 2014, Ramzi Haddad contributed \$2,500 to the Friends of Ed Pawlowski.

5. On or about October 17, 2014, Ramzi Haddad caused S.B. to contribute \$2,500 to the Friends of Ed Pawlowski.

6. On or about December 10, 2014, Ramzi Haddad contributed \$2,500 to the Friends of Ed Pawlowski and told S.R. that he needed help with a zoning issue for one of his properties in Allentown.

7. On or about December 19, 2014, Francis Dougherty asked the City of Allentown Zoning Supervisor to review a zoning request of Ramzi Haddad for 1324 North Sherman Street, Allentown, PA.

8. On or about December 19, 2014, because of the request made by Francis Dougherty, the City of Allentown Zoning Supervisor expedited the zoning request of Ramzi Haddad and notified Francis Dougherty of the zoning use approval by email.

9. On or about March 16, 2015, Ramzi Haddad contributed \$2,500 to the Friends of Ed Pawlowski.

10. On or about March 16, 2015, Ramzi Haddad caused S.B. to contribute \$2,500 to the Friends of Ed Pawlowski.

11. On or about April 19, 2015, defendant EDWIN PAWLOWSKI told Michael Fleck to have S.R. talk to Ramzi Haddad about having someone else contribute money to defendant PAWLOWSKI so that Haddad's name would not show up as a major contributor to defendant PAWLOWSKI. This request by defendant PAWLOWSKI occurred during the same time that defendant PAWLOWSKI was helping Haddad with City of Allentown matters.

12. On or about May 18, 2015, defendant EDWIN PAWLOWSKI traveled to New York City to meet with Ramzi Haddad and to obtain a promise to contribute to his Senatorial campaign.

13. On or about May 18, 2015, defendant EDWIN PAWLOWSKI told Michael Fleck that he was going to ask Ramzi Haddad to raise at least \$50,000 for his Senatorial campaign.

14. On or about May 18, 2015, defendant EDWIN PAWLOWSKI and Michael Fleck said that they needed to have a frank conversation with Ramzi Haddad about what he wanted, and to tell Haddad that he should never talk to defendant PAWLOWSKI about those things again.

15. On or about May 18, 2015, after being told that Ramzi Haddad had an inspection scheduled for his Sherman Street property, and to help Haddad in return for his political contributions, defendant EDWIN PAWLOWSKI said that he had to find out who the inspector of that property would be.

16. On or about May 18, 2015, to keep secret his efforts to help Haddad in return for political contributions, defendant EDWIN PAWLOWSKI told Haddad that in the future he would rather have Haddad talk to Francis Dougherty about what he wanted done because defendant PAWLOWSKI was usually calling Haddad about fundraising.

17. On or about May 18, 2015, after Haddad said that he could raise \$25,000 for defendant Edwin PAWLOWSKI by the end of June 2015, defendant PAWLOWSKI told Haddad that he was working on the inspectors for the Sherman Street property.

18. On or about May 21, 2015, to help expedite Ramzi Haddad's inspection, defendant EDWIN PAWLOWSKI caused Francis Dougherty to call the City of Allentown's Director of Building Standards and Safety Bureau and tell him to review several building inspection issues, including those at 1324 North Sherman Street.

19. On or about May 21, 2015, because of the inquiry made by defendant EDWIN PAWLOWSKI, a City of Allentown building inspector expedited the inspection of 1324 North Sherman Street.

20. On or about June 30, 2015, Ramzi Haddad caused S.B. to contribute \$2,700 to Pawlowski 2016.

21. On or about June 30, 2015, Ramzi Haddad caused J.B. to contribute \$2,700 to Pawlowski 2016.

RFP 2013-33
Collection of Delinquent Real Estate Taxes and Municipal Claims
(Delinquent Tax Collection Contract)

22. On or about August 19, 2013, defendant EDWIN PAWLOWSKI met with J.Ro., the President of Company #4, S.K., an attorney employed by Law Firm #1, which was then associated with Company #4, Garret Strathearn, and others, to discuss the Delinquent Tax Collection Contract.

23. On or about September 26, 2013, J.Ro. contributed \$4,000 to the Pennsylvania Liberty Fund, a political action committee of Law Firm #1.

24. On or about September 26, 2013, D.B., a marketing employee of Company #4, contributed \$3,000 to the Pennsylvania Liberty Fund.

25. On or about September 30, 2013, S.K., employed by Law Firm #1, contributed \$10,000 to the Pennsylvania Liberty Fund.

26. On or about October 7, 2013, S.K. contributed \$2,500 to the Pennsylvania Liberty Fund.

27. On or about October 23, 2013, S.K. contributed \$18,000 to the Pennsylvania Liberty Fund.

28. On or about October 23, 2013 the Pennsylvania Liberty Fund contributed \$2,500 to the Friends of Ed Pawlowski.

29. On or about October 25, 2013, defendant EDWIN PAWLOWSKI told S.K. and D.B. of Company #4 that M.P., the current holder of the Delinquent Tax Collection Contract, had not done anything for him.

30. On or about November 21, 2012, S.K. contributed \$2,500 to the Pennsylvania Liberty Fund.

31. On or about December 3, 2013, S.K. contributed \$500 to the Pennsylvania Liberty Fund.

32. On or about December 10, 2013, before the City had awarded the delinquent tax collection contract, defendant EDWIN PAWLOWSKI made a telephone call to M.P. from Law Firm #5, which was bidding on the contract, and solicited a contribution for his gubernatorial campaign.

33. On or about December 18, 2013, before the City had awarded the delinquent tax collection contract, defendant EDWIN PAWLOWSKI made a telephone call to S.K., associated with Company #4, which was bidding on the contract, and solicited a contribution for his gubernatorial campaign.

34. On or about December 18, 2013, S.K. contributed \$1,500 to the Pennsylvania Liberty Fund.

35. On or about December 18, 2013, the Pennsylvania Liberty Fund PAC contributed \$2,500 to Pawlowski for Governor.

36. Between on or about December 18, 2013 and January 4, 2014, S.R. called S.K. and said that defendant EDWIN PAWLOWSKI wanted to go to the Philadelphia Eagles playoff game on January 4, 2014.

37. On or about December 30, 2013, J.Ro. contributed \$10,000 to the Pennsylvania Liberty Fund.

38. On or about January 2, 2014, Michael Fleck told Francis Dougherty that Company #4 was the preferred choice of defendant EDWIN PAWLOWSKI for the delinquent tax collection contract.

39. On or about January 4, 2014, defendant PAWLOWSKI, S.R., J.Ro., and S.K. ate dinner at Del Frisco's restaurant and attended a Philadelphia Eagles Football playoff game, the costs for which were paid by S.K. and Company #4.

40. In or around January 2014, defendant PAWLOWSKI told Garret Strathearn that he wanted Company #4 to win the Delinquent Tax Collection Contract.

41. In or around January 2014, Garret Strathearn removed D.B. from the RFP evaluation committee for the Delinquent Tax Collection Contract and took D.B.'s place.

42. In or around January 2014, Dale Wiles told K.C., a member of the RFP evaluation committee for the Delinquent Tax Collection Contract, to destroy her initial score sheet because Company #4 had to win this contract.

43. On or about January 24, 2014, Gary Strathearn falsely told the RFP evaluation committee that he had not been able to contact some of the references for contract competitor Company #5.

44. On or around January 24, 2014, Dale Wiles changed the initial score sheets of the RFP evaluation committee, and falsely scored Company #4 as the highest scoring competitor.

45. On or about January 30, 2014, Michael Fleck told Garret Strathearn that he should use the name of E.D.'s company as the Spanish-speaking component of Company #4's contract to ensure that Company #4 would win the Delinquent Tax Collection Contract.

46. On or about June 13, 2014, S.K. contributed \$1,500 to the Pennsylvania Liberty Fund.

47. On or about July 14, 2014, S.K. contributed \$1,500 to the Pennsylvania Liberty Fund.

48. On or about July 15, 2014, the Pennsylvania Liberty Fund contributed \$5,000 to the Friends of Ed Pawlowski before the renewal of the Delinquent Tax Collection Contract.

49. On or about December 23, 2014, S.K. contributed \$1,500 to the Pennsylvania Liberty Fund.

50. On or about December 29, 2014, the Pennsylvania Liberty Fund contributed \$5,000 to the Friends of Ed Pawlowski on or about the same day that the Delinquent Tax Collection Contract was extended.

51. On or about February 26, 2015, defendant EDWIN PAWLOWSKI requested that Company #4 contribute \$5,000 to the City of Allentown to offset expenses of the Pennsylvania Municipal League.

52. On or about June 1, 2015, defendant EDWIN PAWLOWSKI told Michael Fleck to talk to Company #4 and tell them that they needed to put a fundraiser together for defendant PAWLOWSKI.

RFQ 2015-05

Lighting Design and Installation Project/GESA Contract (Street Lights Contract)

53. On or about November 20, 2013, defendant JAMES HICKEY caused Company #2 to contribute \$1,000 to Pawlowski for Governor.

54. On or about February 26, 2014, Michael Fleck told Patrick Regan that Francis Dougherty had set up a process in which Regan could rewrite the RFP and give it to defendant JAMES HICKEY, who would then give it to Fran Dougherty, thereby giving Dougherty a “degree of separation.”

55. Sometime between February 2014 and February 2015, defendant JAMES HICKEY gave Francis Dougherty a thumb drive with language that Company #1 wanted in the RFQ and RFP to help assure that Company #1 would receive the Street Lights Contract.

56. Between February 2014 and February 2015, Francis Dougherty gave the information received from defendant JAMES HICKEY to City of Allentown employees writing RFQ 2015-05 to help assure that Company #1 would receive the Street Lights Contract.

57. On or about February 28, 2014, Patrick Regan contributed \$1,000 to the Friends of Ed Pawlowski.

58. On or about February 28, 2014, T.G., an officer of Company #1, contributed \$1,000 to the Friends of Ed Pawlowski.

59. On or about October 3, 2014, defendant JAMES HICKEY sent an email to Patrick Regan advising him to attend a fundraiser and contribute money to defendant EDWIN PAWLOWSKI.

60. On or about October 8, 2014, defendant JAMES HICKEY caused Company #2 to contribute \$1,000 to the Friends of Ed Pawlowski.

61. On or about October 24, 2014, Patrick Regan contributed \$1,000 to the Friends of Ed Pawlowski.

62. On or about October 24, 2014, T.G., an officer of Company #1, contributed \$500 to the Friends of Ed Pawlowski.

63. On or about December 16, 2014, defendant JAMES HICKEY caused Company #2 to contribute \$500 to the Friends of Ed Pawlowski.

64. On or about December 24, 2014, defendant JAMES HICKEY caused Company #2 to contribute \$500 to the Friends of Ed Pawlowski.

65. On or about January 28, 2015, defendant EDWIN PAWLOWSKI and Patrick Regan discussed the Street Lights Contract at a breakfast meeting.

66. On or about January 28, 2015, after S.R. told Patrick Regan that the mayor had plans and that S.R. needed to get vendors to give back “a little bit,” Regan agreed.

67. On or about February 13, 2015, Patrick Regan contributed \$1,500 to the Friends of Ed Pawlowski.

68. On or about February 25, 2015, S.R. told Patrick Regan that the Street Lights contract is “teed up and ready to go,” and defendant Regan said that he knew what to do. Regan also talked about sending a donation to defendant EDWIN PAWLOWSKI.

69. On or about February 27, 2015 defendant EDWIN PAWLOWSKI confronted Francis Dougherty about missing language, favorable to Company #1, in RFQ 2015-05.

70. Between on or about February 27, 2015 and on or about May 1, 2015, defendant JAMES HICKEY received an advance copy of the RFP from Francis Dougherty.

71. On or about March 12, 2015, defendant EDWIN PAWLOWSKI told S.R. that he believed that the Company #1 contract was “on track.”

72. On or about March 13, 2015, Company #1 contributed \$5,000 to the City of Allentown for the Pennsylvania Municipal League Convention in Allentown at the request of defendant EDWIN PAWLOWSKI.

73. On or about March 31, 2015, Francis Dougherty received the RFQ tabulation memo on the Street Lights Contract and sent it to S.R., who sent it to Patrick Regan.

74. On or about April 30, 2015, after S.R. told defendant JAMES HICKEY that Company #6 was on the short list for the Street Lights Contract, defendant HICKEY said that “the cake is already baked,” that is, that the decision was already made.

75. On or about May 5, 2015, defendant EDWIN PAWLOWSKI told Michael Fleck that he would want more money from defendant JAMES HICKEY once the Street Lights Contract was done but that he did not want the money contributed directly from defendant HICKEY, in an effort to conceal the connection between the contract award and political contributions.

76. On or about May 5, 2015, defendant EDWIN PAWLOWSKI told S.R. that he wanted defendant JAMES HICKEY to contribute \$50,000 to his campaign.

77. On or about May 6, 2015, defendant JAMES HICKEY told S.R. that he wrote the RFP for the Street Lights Contract.

78. On or about May 6, 2015, defendant JAMES HICKEY told S.R. that he would contribute to defendant EDWIN PAWLOWSKI but that he had not received much business from Allentown in the past.

Contract Awarded to Company #7

79. On or about January 7, 2014, defendant EDWIN PAWLOWSKI told Michael Fleck that J.R. said that he would contribute \$100,000 to defendant PAWLOWSKI.

80. On or about September 26, 2014, Francis Dougherty, referring to Company #7, told S.R. that “We’re gonna give them a job, okay? That’s my instructions from the Mayor.”

81. In or about August 2014, defendant EDWIN PAWLOWSKI traveled to New York City to meet with J.R. to talk about political contributions and potential contracts with the City of Allentown.

82. In or about August 2014, Francis Dougherty told the City of Allentown’s Information Systems Director to make sure that he had money in his budget for a contract for Company #7.

83. On or about February 6, 2015, defendant EDWIN PAWLOWSKI traveled to New York City to meet with J.R. to talk about political contributions and potential contracts with the City of Allentown.

84. On or about March 10, 2015, defendant EDWIN PAWLOWSKI traveled to New York City to meet with J.R. to talk about political contributions and potential contracts with the City of Allentown.

85. On or about May 11, 2015, defendant EDWIN PAWLOWSKI's office sent an email to City of Allentown departments concerning a needs assessment to be conducted by Company #7 on the security contract.

86. On or about May 18, 2015, defendant EDWIN PAWLOWSKI traveled to New York City to meet with J.R. to discuss political contributions and the Company #7 contract.

87. On or about May 18, 2015, defendant EDWIN PAWLOWSKI told J.R. that the contract for Company #7 was approved.

88. On or about May 18, 2015, defendant EDWIN PAWLOWSKI told J.R. that he was beating up all the City of Allentown departments and telling them that they had to share information with Company #7.

89. On or about May 18, 2015, defendant EDWIN PAWLOWSKI asked J.R. for a \$100,000 campaign contribution.

90. On or about June 24, 2015, defendant EDWIN PAWLOWSKI's office sent an email to City of Allentown departments concerning a meeting regarding the Company #7 contract.

91. On or about June 30, 2015, defendant EDWIN PAWLOWSKI caused J.R. and J.R.'s family members to contribute \$30,000 to Pawlowski 2016.

RFP 2013-39
Construction Inspection Services
for the Basin Street Improvements Construction Project (Basin Street Contract)

92. On or about February 16, 2012, Matthew McTish caused D.M. to contribute \$1,250 to the Friends of Ed Pawlowski.

93. On or about February 24, 2012, Matthew McTish contributed \$1,250 to the Friends of Ed Pawlowski.

94. On or about December 17, 2012, Matthew McTish contributed \$2,500 to the Friends of Ed Pawlowski

95. On or about December 17, 2012, Matthew McTish caused D.M. to contribute \$1,250 to the Friends of Ed Pawlowski.

96. On or about October 30, 2013, defendant EDWIN PAWLOWSKI asked Matthew McTish to make a contribution to his gubernatorial campaign.

97. On or about December 30, 2013, Matthew McTish contributed \$1,000 to Pawlowski for Governor.

98. In or about January 2014, Francis Dougherty told the then Public Works Director that defendant EDWIN PAWLOWSKI owed Matthew McTish a favor and that he should find a contract for McTish.

99. On or about April 2, 2014, defendant EDWIN PAWLOWSKI caused the city of Allentown to award the Basin Street contract to Matthew McTish and Company #3.

100. On or about December 19, 2014, Matthew McTish contributed \$1,125 to the Friends of Ed Pawlowski.

101. On or about December 19, 2014, Matthew McTish caused D.M. of Company #3 to contribute \$1,125 to the Friends of Ed Pawlowski.

102. On or about April 27, 2015, defendant EDWIN PAWLOWSKI asked Matthew McTish for a \$21,600 contribution for his U.S. Senate campaign.

103. On or about April 27, 2015, Matthew McTish received an email from a fundraiser for defendant EDWIN PAWLOWSKI, asking for a contribution of \$21,600 to defendant PAWLOWSKI.

104. On or about June 30, 2015, Matthew McTish contributed \$2,500 to Pawlowski 2016.

RFP 2014-30
Consulting and Engineering Design Services
for the Aquatic Facilities Renovation Project (Pools Contract)

105. In or about January 2015, defendant EDWIN PAWLOWSKI told Francis Dougherty that he wanted to give Company #8, an architectural firm, a contract.

106. In or about January 2015, defendant EDWIN PAWLOWSKI told Francis Dougherty that Company #8 had decided to give him financial help with his campaign.

107. Between on or about February 20, 2015 and on or about April 9, 2015, Francis Dougherty told the RFP evaluation committee for the Pools Contract to “take another look” at Company #8.

108. Between on or about February 20, 2015 and on or about April 9, 2015, Francis Dougherty told defendant EDWIN PAWLOWSKI that one of Company #8’s references had provided a negative evaluation. Defendant PAWLOWSKI told Dougherty to contact S.R. in order to obtain a new reference from another source.

109. On or about June 2, 2015, before the Pools Contract was signed, defendant EDWIN PAWLOWSKI talked on the telephone with J.B., a Design Principal from Company #8, and asked him to contribute \$2,700 to defendant PAWLOWSKI’s U.S. Senate campaign.

110. On or about June 24, 2015, defendant EDWIN PAWLOWSKI and Michael Fleck caused a fundraiser for defendant PAWLOWSKI to send an email to J.B. from Company #8, asking him for a contribution to defendant PAWLOWSKI's campaign.

111. On or about June 29, 2015, defendant EDWIN PAWLOWSKI and Michael Fleck caused a fundraiser for defendant PAWLOWSKI to send an email to J.B. from Company #8, asking him for a contribution to defendant PAWLOWSKI's campaign.

112. On or about July 2, 2015, the contract for RFP 2014-30 was signed by defendant EDWIN PAWLOWSKI.

Scott Allinson and Law Firm #2

113. On or about February 22, 2012, defendant SCOTT ALLINSON contributed \$500 to the Friends of Ed Pawlowski.

114. On or about August 27, 2012, defendant SCOTT ALLINSON contributed \$250 to the Friends of Ed Pawlowski.

115. On or about January 23, 2013, defendant SCOTT ALLINSON contributed \$500 to the Friends of Ed Pawlowski.

116. On or about October 2, 2013, defendant SCOTT ALLINSON, contributed \$100 to the Friends of Ed Pawlowski.

117. On or about December 10, 2014, defendant SCOTT ALLINSON told S.R., a consultant to defendant EDWIN PAWLOWSKI, that he was not in a position to ask attorneys in his firm for political contributions for defendant PAWLOWSKI when they were getting little work for the City of Allentown. He said “. . . but the well is completely dry right now and so I'm just talking our dialect of English that, you know, we've been

unbelievably supportive in the past and now, you know, the work's going everywhere but, but to our shop . . . This is a short term fixable issue.”

118. On or about December 12, 2014, defendant SCOTT ALLINSON discussed with S.R. that the new solicitor for the Allentown Parking Authority would be R.S. from Law Firm #2 and that defendant ALLINSON would get the credit with Law Firm #2.

119. On or about December 12, 2014, defendant SCOTT ALLINSON agreed to be a \$2,500 sponsor for defendant EDWIN PAWLOWSKI's holiday party.

120. On or about January 23, 2015, S.R. and defendant SCOTT ALLINSON discussed that defendant EDWIN PAWLOWSKI said that he would continue to give lots of work to defendant ALLINSON but that he needed defendant ALLINSON to be a fundraiser for him.

121. On or about January 28, 2015, defendant SCOTT ALLINSON told Michael Fleck and S.R., consultants for defendant EDWIN PAWLOWSKI, that the request for \$12,500 for defendant PAWLOWSKI “is a heavy stretch unless that is the mayor's way of finding a good spot for us.”

122. On or about January 30, 2015, upon hearing of defendant SCOTT ALLINSON's concerns that his campaign contributions had not resulted in sufficient legal work for Law Firm #2, defendant EDWIN PAWLOWSKI called Francis Dougherty to find out how much money the City of Allentown paid to Law Firm #2 since 2006.

123. On or about January 30, 2015, Michael Fleck told defendant PAWLOWSKI that, in relation to political contributions, he was going to “beat the shit” out of defendant SCOTT ALLINSON, meaning that he was going to put pressure on defendant ALLINSON to make a contribution.

124. On or about February 3, 2015, defendant SCOTT ALLINSON asked for all City of Allentown work to be funneled through him for Law Firm #2. Defendant ALLINSON told Michael Fleck and S.R. that “If I get a hundred percent of the kind of credit that turns into money, that goes out of my checkbook where you want it to go. So if it comes to me and I get billing credit, then I get the full stack of cash on the one side to do with it what I need to do, annually. Do you know what I’m saying to you? If it goes to anybody other than me, it will get fucked up.”

125. On or about February 13, 2015, defendant SCOTT ALLINSON brought a check to the Mardi Gras fundraiser and asked S.R. to make sure that defendant EDWIN PAWLOWSKI knew that he had brought a check.

126. On or about February 13, 2015, defendant SCOTT ALLINSON contributed \$250 to the Friends of Ed Pawlowski.

127. On or about March 25, 2015, defendant SCOTT ALLINSON told Michael Fleck that he would tell another partner at Law Firm #2 that defendant EDWIN PAWLOWSKI referred work to many law firms and that if Law Firm #2 was going to handle work they needed to “cobble some money together” for defendant PAWLOWSKI’s consultants because it “isn’t like we are being hired because we are good guys. It’s not the way this shit works.”

128. On or about April 1, 2015, when S.R. told defendant EDWIN PAWLOWSKI that it was important that defendant SCOTT ALLINSON got the call about work from the City of Allentown so that he could get the credit and so that when we call defendant ALLINSON there is money in “the little fund,” defendant PAWLOWSKI said, “I got you.”

129. On or about May 20, 2015, defendant EDWIN PAWLOWSKI met with defendant SCOTT ALLINSON and another member of Law Firm #2 and solicited a contribution of \$25,000, and said that the City of Allentown might have more legal contract trust work for Law Firm #2.

130. On or about May 22, 2015, defendant SCOTT ALLINSON told S.R. that defendant PAWLOWSKI asked for a lot of money when they were getting “absolutely zero back from the City.”

131. In or about the week before June 15, 2015, defendant EDWIN PAWLOWSKI told the Allentown City Solicitor to give legal contract trust work to Law Firm #2.

132. Between on or about June 18, 2015 and June 26, 2015, defendant EDWIN PAWLOWSKI and defendant SCOTT ALLINSON caused Law Firm #2 to contribute \$20,000 to Pawlowski 2016.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

(Federal Program Bribery-Soliciting)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, 32 and 33 and Overt Acts 22 to 52 of Count One of this indictment are incorporated here.

2. On or about December 10, 2013, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWIN PAWLOWSKI,

aided and abetted by others known and unknown to the grand jury, while Mayor of Allentown, being an agent of the City of Allentown, which received benefits in excess of \$10,000 in the one-year period from January 1, 2013 to December 31, 2013, from federal programs involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, corruptly solicited, demanded, accepted, and agreed to accept something of value, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of the City of Allentown involving something of value of \$5,000 or more, namely, PAWLOWSKI solicited campaign contributions from M.P and Law Firm #5 intending to be influenced and rewarded in connection with the awarding of the delinquent tax collection contract for the City of Allentown.

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

COUNT THREE

(Extortion under Color of Official Right)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 22 to 52 of Count One of this indictment are incorporated here.

2. On or about December 10, 2013, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWIN PAWLOWSKI,

aided and abetted by others known and unknown to the grand jury, knowingly attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by extortion, as those terms are defined in Title 18, United States Code, Section 1951; that is, defendant PAWLOWSKI, while Mayor of the City of Allentown, engaged in a course of conduct whereby PAWLOWSKI solicited M.P. and Law Firm #5, under color of official right, to consent to provide an unspecified amount of campaign contributions for the benefit of PAWLOWSKI, which money was not due to PAWLOWSKI.

In violation of Title 18, United States Code, Sections 1951 and 2.

COUNT FOUR

(Federal Program Bribery-Soliciting)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 22 to 52 of Count One of this indictment are incorporated here.

2. On or about December 18, 2013, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWIN PAWLOWSKI,

aided and abetted by others known and unknown to the grand jury, while Mayor of Allentown, being an agent of the City of Allentown, which received benefits in excess of \$10,000 in the one-year period from January 1, 2013 to December 31, 2013, from federal programs involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, corruptly solicited, demanded, accepted, and agreed to accept something of value, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of the City of Allentown involving something of value of \$5,000 or more, namely, PAWLOWSKI solicited campaign contributions from S.K. and Law Firm #1 intending to be influenced and rewarded in connection with the awarding of the delinquent tax collection contract for the City of Allentown.

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

COUNT FIVE

(Federal Program Bribery-Soliciting)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 22 to 52 of Count One of this indictment are incorporated here.

2. On or about January 4, 2014, in Allentown and Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWIN PAWLOWSKI,

aided and abetted by others known and unknown to the grand jury, while Mayor of Allentown, being an agent of the City of Allentown, which received benefits in excess of \$10,000 in the one-year period from January 1, 2014 to December 31, 2014, from federal programs involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, corruptly solicited, demanded, accepted, and agreed to accept something of value, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of the City of Allentown involving something of value of \$5,000 or more, namely, PAWLOWSKI solicited tickets to a Philadelphia Eagles playoff game and dinner at a Philadelphia restaurant from S.K. and Law Firm #1 intending to be influenced and rewarded in connection with the awarding of the delinquent tax collection contract for the City of Allentown.

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

COUNT SIX

(Federal Program Bribery-Soliciting)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 1 to 21 of Count One of this indictment are incorporated here.

2. In or about December 2014, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWIN PAWLOWSKI,

aided and abetted by others known and unknown to the grand jury, while Mayor of Allentown, being an agent of the City of Allentown, which received benefits in excess of \$10,000 in the one-year period from January 1, 2014 to December 31, 2014, from federal programs involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, corruptly solicited, demanded, accepted, and agreed to accept something of value, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of the City of Allentown involving something of value of \$5,000 or more, namely, PAWLOWSKI solicited a \$2,500 campaign contribution from Ramzi Haddad intending to be influenced and rewarded in connection with expediting zoning approval for a property Haddad owned in Allentown.

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

COUNT SEVEN

(Federal Program Bribery-Soliciting)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30 and 32 and 33 of Count One of this indictment are incorporated here.
2. Between 2011 and 2015, Law Firm #3 received over \$1,000,000 in legal fees from the City of Allentown.
3. On or about June 15, 2015, in Allentown, in the Eastern District of Pennsylvania and elsewhere, defendant

EDWIN PAWLOWSKI,

aided and abetted by others known and unknown to the grand jury, while Mayor of Allentown, being an agent of the City of Allentown, which received benefits in excess of \$10,000 in the one-year period from January 1, 2015 to December 31, 2015, from federal programs involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, corruptly solicited, demanded, accepted, and agreed to accept something of value, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of the City of Allentown involving something of value of \$5,000 or more, namely, PAWLOWSKI solicited a \$20,000 campaign contribution from M.F. and Law Firm #3 intending to be influenced and rewarded in connection with awarding legal services contracts to Law Firm #3 with the City of Allentown.

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

COUNT EIGHT

(Federal Program Bribery-Soliciting)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 105-112 of Count One of this indictment are incorporated here.

2. On or about June 24, 2015, in Allentown, in the Eastern District of Pennsylvania and elsewhere, defendant

EDWIN PAWLOWSKI,

aided and abetted by others known and unknown to the grand jury, while Mayor of Allentown, being an agent of the City of Allentown, which received benefits in excess of \$10,000 in the one-year period from January 1, 2015 to December 31, 2015, from federal programs involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, corruptly solicited, demanded, accepted, and agreed to accept something of value, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of the City of Allentown involving something of value of \$5,000 or more, namely, PAWLOWSKI solicited a \$2,700 campaign contribution from J.B. and Company #8 intending to be influenced and rewarded in connection with awarding a contract for consulting and engineering and design services for the renovation of Allentown's public pools.

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

COUNT NINE

(Federal Program Bribery-Soliciting)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 92 to 104 of Count One of this indictment are incorporated here.

2. In or about October 2013, in Allentown, in the Eastern District of Pennsylvania and elsewhere, defendant

EDWIN PAWLOWSKI,

aided and abetted by others known and unknown to the grand jury, while Mayor of Allentown, being an agent of the City of Allentown, which received benefits in excess of \$10,000 in the one-year period from January 1, 2013 to December 31, 2013, from federal programs involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, corruptly solicited, demanded, accepted, and agreed to accept something of value, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of the City of Allentown involving something of value of \$5,000 or more, namely, PAWLOWSKI solicited a campaign contribution from Mathew McTish intending to be influenced and rewarded in connection with awarding the Basin Street construction contract with the City of Allentown.

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

COUNT TEN

(Federal Program Bribery-Soliciting)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 92 to 104 of Count One of this indictment are incorporated here.

2. On or about April 27, 2015, in Allentown, in the Eastern District of Pennsylvania and elsewhere, defendant

EDWIN PAWLOWSKI,

aided and abetted by others known and unknown to the grand jury, while Mayor of Allentown, being an agent of the City of Allentown, which received benefits in excess of \$10,000 in the one-year period from January 1, 2015 to December 31, 2015, from federal programs involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, corruptly solicited, demanded, accepted, and agreed to accept something of value, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of the City of Allentown involving something of value of \$5,000 or more, namely, PAWLOWSKI solicited a campaign contribution from Mathew McTish intending to be influenced and rewarded in connection with awarding future contracts to McTish with the City of Allentown.

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

COUNT ELEVEN

(Federal Program Bribery-Soliciting)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, and 32 and 33 of Count One of this indictment are incorporated here.
2. Between 2006 and 2013, Law Firm #4 received over \$1,600,000 in legal fees from the City of Allentown.
 - a. On or about February 19, 2012, D.W., an attorney at Law Firm #4 contributed \$500 to the Friends of Ed Pawlowski.
 - b. On or about February 22, 2012, Law Firm #4's PAC contributed \$1,000 to the Friends of Ed Pawlowski.
 - c. On or about December 17, 2012, D.W. contributed \$100 to the Friends of Ed Pawlowski.
 - d. On or about December 16, 2013, D.W. contributed \$100 to Pawlowski for Governor.
 - e. On or about March 12, 2015, defendant EDWIN PAWLOWSKI complained to J.S., a representative of Law Firm #4, that although he had given Law Firm #4 millions of dollars of work, they had reciprocated with an insufficient amount of political contributions.
 - f. On or about March 12, 2015, defendant PAWLOWSKI told J.S. that it was still possible for Law Firm #4 to obtain City of Allentown work in the future.

g. On or about March 27, 2015, defendant PAWLOWSKI caused S.R. to telephone J.S. to complain about D.W. and Law Firm #4 making only a small donation to a defendant PAWLOWSKI fundraiser for council candidates.

h. On or about June 8, 2015, defendant PAWLOWSKI called D.W. on the telephone and solicited a political contribution of \$1,000.

3. From on or about March 12, 2015 to on or about March 27, 2015, in Allentown and Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWIN PAWLOWSKI,

aided and abetted by others known and unknown to the grand jury, while Mayor of Allentown, being an agent of the City of Allentown, which received benefits in excess of \$10,000 in the one-year period from January 1, 2015 to December 31, 2015, from federal programs involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, corruptly solicited, demanded, accepted, and agreed to accept something of value, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of the City of Allentown involving something of value of \$5,000 or more, namely, PAWLOWSKI solicited campaign contributions from J.S., a representative of Law Firm # 4, intending to be influenced and rewarded in connection with the awarding of legal services contracts for the City of Allentown.

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

COUNT TWELVE

(Extortion under Color of Official Right)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Eleven of this indictment are incorporated here.
2. From on or about March 12, 2015 through on or about March 27, 2015, in Philadelphia and Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWIN PAWLOWSKI,

aided and abetted by others known and unknown to the grand jury, knowingly attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by extortion, as those terms are defined in Title 18, United States Code, Section 1951; that is, PAWLOWSKI, while Mayor of the City of Allentown, engaged in a course of conduct whereby PAWLOWSKI solicited J.S., who was acting on behalf of Law Firm #4, under color of official right, to consent to provide an unspecified amount of campaign contributions for the benefit of PAWLOWSKI, which money was not due to PAWLOWSKI.

In violation of Title 18, United States Code, Sections 1951 and 2.

COUNT THIRTEEN

(Federal Program Bribery-Soliciting)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Eleven of this indictment are incorporated here.

2. On or about June 8, 2015, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWIN PAWLOWSKI,

aided and abetted by others known and unknown to the grand jury, while Mayor of Allentown, being an agent of the City of Allentown, which received benefits in excess of \$10,000 in the one-year period from January 1, 2015 to December 31, 2015, from federal programs involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, corruptly solicited, demanded, accepted, and agreed to accept something of value, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of the City of Allentown involving something of value of \$5,000 or more, namely, PAWLOWSKI solicited a \$1,000 campaign contribution from D.W. and Law Firm #4 intending to be influenced and rewarded in connection with the awarding of legal services contracts for the City of Allentown.

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

COUNT FOURTEEN

(Extortion under Color of Official Right)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Eleven of this indictment are incorporated here.

2. On or about June 8, 2015, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWIN PAWLOWSKI,

aided and abetted by others known and unknown to the grand jury, knowingly attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by extortion, as those terms are defined in Title 18, United States Code, Section 1951; that is, PAWLOWSKI, while Mayor of the City of Allentown, engaged in a course of conduct whereby PAWLOWSKI solicited D.W. and Law Firm #4, under color of official right, to consent to provide a \$1,000 campaign contribution for the benefit of PAWLOWSKI, which money was not due to PAWLOWSKI.

In violation of Title 18, United States Code, Sections 1951 and 2.

COUNT FIFTEEN

(Federal Program Bribery-Soliciting)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 53 to 78 of Count One of this indictment are incorporated here.

2. On or about March 10, 2015, in Allentown, in the Eastern District of Pennsylvania and elsewhere, defendant

EDWIN PAWLOWSKI,

aided and abetted by others known and unknown to the grand jury, while Mayor of Allentown, being an agent of the City of Allentown, which received benefits in excess of \$10,000 in the one-year period from January 1, 2015 to December 31, 2015, from federal programs involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, corruptly solicited, demanded, accepted, and agreed to accept something of value, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of the City of Allentown involving something of value of \$5,000 or more, namely, PAWLOWSKI solicited a contribution from Patrick Regan to sponsor the Pennsylvania Municipal League meeting in Allentown intending to be influenced and rewarded in connection with the awarding of the Street Lights contract with the City of Allentown.

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

COUNT SIXTEEN

(Federal Program Bribery-Soliciting)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 53 to 78 of Count One of this indictment are incorporated here.

2. From on or about May 5, 2015 through on or about June 29, 2015, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWIN PAWLOWSKI,

aided and abetted by others known and unknown to the grand jury, while Mayor of Allentown, being an agent of the City of Allentown, which received benefits in excess of \$10,000 in the one-year period from January 1, 2015 to December 31, 2015, from federal programs involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, corruptly solicited, demanded, accepted, and agreed to accept something of value, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of the City of Allentown involving something of value of \$5,000 or more, namely, PAWLOWSKI solicited campaign contributions from James Hickey, and his family and his clients, intending to be influenced and rewarded in connection with the awarding of the Street Lights contract with the City of Allentown.

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

COUNT SEVENTEEN

(Federal Program Bribery-Soliciting)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 113-132 of Count One of this indictment are incorporated here.

2. Between 2006 and 2014, Law Firm #2 received over \$1,000,000 in legal fees from the City of Allentown.

3. From in or about January 2015 through on or about June 30, 2015, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWIN PAWLOWSKI,

aided and abetted by others known and unknown to the grand jury, while Mayor of Allentown, being an agent of the City of Allentown, which received benefits in excess of \$10,000 in the one-year period from January 1, 2015 to December 31, 2015, from federal programs involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, corruptly solicited, demanded, accepted, and agreed to accept something of value, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of the City of Allentown involving something of value of \$5,000 or more, namely, PAWLOWSKI solicited campaign contributions from Scott Allinson and Law Firm #2, intending to be influenced and rewarded in connection with the awarding of legal services contracts to Law Firm #2 with the City of Allentown.

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

COUNT EIGHTEEN

(Federal Program Bribery-Soliciting)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 79 to 91 of Count One of this indictment are incorporated here.

2. In or about January 2015 through on or about June 30, 2015, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWIN PAWLOWSKI,

aided and abetted by others known and unknown to the grand jury, while Mayor of Allentown, being an agent of the City of Allentown, which received benefits in excess of \$10,000 in the one-year period from January 1, 2015 to December 31, 2015, from federal programs involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, corruptly solicited, demanded, accepted, and agreed to accept something of value, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of the City of Allentown involving something of value of \$5,000 or more, namely, PAWLOWSKI solicited campaign contributions from J.R. intending to be influenced and rewarded in connection with the award of a contract to Company #7.

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

COUNT NINETEEN

(Federal Program Bribery-Offering)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 113 to 132 of Count One of this indictment are incorporated here.

2. From on or about February 2015 through on or about June 30, 2015, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

SCOTT ALLINSON

corruptly gave, offered to give, agreed to give, caused, and attempted to cause others to give, something of value, that is, campaign contributions, to defendant EDWIN PAWLOWSKI and his political action committees, while PAWLOWSKI was the Mayor of Allentown and an agent of the City of Allentown, which received benefits in excess of \$10,000 in the one-year period from January 1, 2015 to December 31, 2015, from federal programs involving a grant, contract, subsidy, loan, guarantee, insurance and other form of federal assistance, with intent to influence and reward defendant PAWLOWSKI in connection with the business, transaction, and series of transactions of the City of Allentown involving something of value of \$5,000 or more, namely, legal services contracts awarded to Law Firm #2.

All in violation of Title 18, United States Code, Section 666(a)(2).

COUNTS TWENTY through TWENTY-EIGHT
(Mail Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 22-78 and 92-112 of Count One of this indictment are incorporated here.

2. Defendant EDWIN PAWLOWSKI and defendant JAMES HICKEY defrauded and attempted to defraud Law Firm #5 and Companies #5, #6, #9, #10, and #12 by rigging the contract award system to benefit other law firms and companies providing political contributions to defendant PAWLOWSKI.

3. On or about the below dates, in the Eastern District of Pennsylvania and elsewhere, defendants

**EDWIN PAWLOWSKI and
JAMES HICKEY,**

having devised and intended to devise a scheme or artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and for the purposes of executing the scheme to defraud, knowingly caused to be deposited any matter and thing whatever to be sent and delivered by the Postal Service and any private and commercial interstate carrier:

COUNT	DEFENDANT	DATE	DESCRIPTION
20	EDWIN PAWLOWSKI	01/30/14	City of Allentown mailed contract rejection letter to Law Firm #5
21	EDWIN PAWLOWSKI	01/30/14	City of Allentown mailed contract rejection letter to Company #5

22	EDWIN PAWLOWSKI	01/30/14	City of Allentown mailed contract award letter to Company #4
23	EDWIN PAWLOWSKI	04/02/14	City of Allentown mailed contract rejection letter to Company #9
24	EDWIN PAWLOWSKI	04/02/14	City of Allentown mailed contract rejection letter to Company #10
25	EDWIN PAWLOWSKI	04/02/14	City of Allentown mailed contract award letter to Company #3
26	EDWIN PAWLOWSKI	04/09/15	City of Allentown mailed contract award letter to Company #8
27	EDWIN PAWLOWSKI and JAMES HICKEY	04/22/15	City of Allentown mailed letter notifying Company #6 that they were on short list of bidders
28	EDWIN PAWLOWSKI and JAMES HICKEY	06/19/15	City of Allentown mailed contract award letter to Company #1

All in violation of Title 18, United States Code, Section 1341.

COUNTS TWENTY-NINE through THIRTY-SEVEN
(Wire Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 22-78 and 105-112 of Count One of this indictment are incorporated here.

2. Defendant EDWIN PAWLOWSKI and defendant JAMES HICKEY defrauded and attempted to defraud Law Firm #5 and Companies #5, #6, #12, and #13 by rigging the contract award system to benefit law firms and companies providing political contributions to defendant PAWLOWSKI.

3. On or about the below dates, in the Eastern District of Pennsylvania and elsewhere, defendants

**EDWIN PAWLOWSKI and,
JAMES HICKEY,**

having devised and intending to devise a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, for the purposes of executing the scheme to defraud, knowingly caused to be transmitted, and aided and abetted the transmission of, by means of wire communication in interstate commerce, signals and sounds, that is, the below:

COUNT	DEFENDANT	DATE	DESCRIPTION
29	EDWIN PAWLOWSKI	12/06/13	email of RFP Addendum #1 from City of Allentown to Law Firm #5
30	EDWIN PAWLOWSKI	12/06/13	email of RFP Addendum #1 from City of Allentown to Company #5
31	EDWIN PAWLOWSKI	12/19/14	email of RFP from City of Allentown to Company #13

32	EDWIN PAWLOWSKI	01/14/15	email of invitation to tour pools from City of Allentown to Company #13
33	EDWIN PAWLOWSKI	01/14/15	email of invitation to tour pools from City of Allentown to Company #12
34	EDWIN PAWLOWSKI and JAMES HICKEY	03/09/15	email of RFQ from City of Allentown to Company #6
35	EDWIN PAWLOWSKI and JAMES HICKEY	04/13/15	email from City of Allentown inviting Company #6 to interview on RFQ
36	EDWIN PAWLOWSKI and JAMES HICKEY	05/01/15	email from City of Allentown sending RFP to Company #6
37	EDWIN PAWLOWSKI and JAMES HICKEY	05/27/15	email from City of Allentown sending Addendum #1 to RFQ to Company #6

All in violation of Title 18, United States Code, Section 1343.

COUNTS THIRTY-EIGHT and THITY-NINE

(Honest Services Wire Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 1 to 21 of Count One of this indictment are incorporated here.

2. Between December 2014 and May 2015, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

EDWIN PAWLOWSKI,

knowingly devised and participated in a scheme and artifice to defraud and deprive the citizens of the City of Allentown of their right to the honest services of the Mayor of Allentown, through bribery, that is, defendant PAWLOWSKI took actions to expedite zoning rulings and inspections for Ramzi Haddad in return for campaign contributions.

3. For the purpose of executing and attempting to execute the scheme and artifice to defraud and deprive the citizens of Allentown of the honest services of the Mayor of Allentown, on or about the dates below in the Eastern District of Pennsylvania and elsewhere, defendant EDWIN PAWLOWSKI and others, knowingly caused to be transmitted, and aided and abetted the transmission of, by means of wire communication in interstate commerce, signals and sounds, that is, the below electronic mail messages:

COUNT	DATE	DESCRIPTION
38	12/19/14	email between Zoning Supervisor and Francis Dougherty re the approval of zoning use for Ramzi Haddad's property at 1324 North Sherman Street, Allentown

39	05/21/15	email to defendant EDWIN PAWLOWSKI and Francis Dougherty from Director of Building Standards concerning the inspection of Ramzi Haddad's property at 1324 North Sherman Street, Allentown, PA
----	----------	---

In violation of Title 18, United States Code, Sections 1343 and 1346 and 2.

COUNTS FORTY through FORTY-THREE**(Honest Services Wire Fraud)****THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 53 to 78 of Count One of this indictment are incorporated here.

2. Between November 20, 2013 and June 8, 2015 in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendants

**EDWIN PAWLOWSKI, and
JAMES HICKEY**

knowingly devised and participated in a scheme and artifice to defraud and deprive the citizens of the City of Allentown of their right to the honest services of the Mayor of Allentown, through bribery, that is, defendant HICKEY gave and defendant PAWLOWSKI accepted campaign contributions to steer the Street Lights Contract to Company #1.

3. For the purpose of executing and attempting to execute the scheme and artifice to defraud and deprive the citizens of Allentown of the honest services of the Mayor of Allentown, on or about the dates below in the Eastern District of Pennsylvania and elsewhere, defendant EDWIN PAWLOWSKI and others, knowingly caused to be transmitted, and aided and abetted the transmission of, by means of wire communication in interstate commerce, signals and sounds, that is, the below electronic mail messages:

COUNT	DATE	DESCRIPTION
40	03/09/15	email of RFQ from City of Allentown to Company #6
41	04/13/15	email from City of Allentown inviting Company #6 to interview on RFQ
42	05/01/15	email from City of Allentown sending RFP to Company #6

43	05/27/15	email from City of Allentown sending Addendum #1 to RFQ to Company #6
----	----------	---

All in violation of Title 18, United States Code, Sections 1343 and 1346 and 2.

COUNTS FORTY-FOUR and FORTY-FIVE

(Honest Services Mail Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 53 to 78 of Count One of this indictment are incorporated here.

2. Between November 20, 2013 and June 8, 2015, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendantS

**EDWIN PAWLOWSKI, and
JAMES HICKEY**

knowingly devised and participated in a scheme and artifice to defraud and deprive the citizens of the City of Allentown of their right to the honest services of the Mayor of Allentown, through bribery, that is, defendant HICKEY gave and defendant PAWLOWSKI accepted campaign contributions to steer the Street Lights Contract to Company #1.

3. For the purpose of executing and attempting to execute the scheme and artifice to defraud and deprive the citizens of Allentown of the honest services of the Mayor of Allentown, on or about the dates below in the Eastern District of Pennsylvania and elsewhere, defendant EDWIN PAWLOWSKI and others, knowingly caused to be deposited any matter and thing whatever to be sent and delivered by the Postal Service and any private and commercial interstate carrier.

COUNT	DATE	DESCRIPTION
44	04/22/15	City of Allentown mailed letter notifying Company #6 that they were on the short list of bidders

45	06/19/15	City of Allentown mailed contract award letter to Company #1
----	----------	--

All in violation of Title 18, United States Code, Sections 1341 and 1346 and 2.

COUNTS FORTY-SIX through FORTY-EIGHT**(Travel Act Bribery)****THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 to 30, 32 and 33, and Overt Acts 1-21 and 79-91 of Count One of this indictment are incorporated here.

2. On or about the below dates, in Allentown, in the Eastern District of Pennsylvania and elsewhere, defendant

EDWIN PAWLOWSKI

traveled in interstate and foreign commerce with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on, of an unlawful activity, that is, Bribery in Official and Political Matters in violation of Title 18, Pa. Cons. Stat. Ann. § 4701, and to thereafter perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of the unlawful activity:

COUNT	DATE	DESCRIPTION
46	02/06/15	traveled to New York City from Allentown to solicit a bribe for his state political action committee from J.R.
47	05/18/15	traveled to New York City from Allentown to solicit a bribe for his U.S. Senate campaign from J.R.

48	05/18/15	traveled to New York City from Allentown to solicit a bribe for his U.S. Senate campaign from Ramzi Haddad
----	----------	--

All in violation of Title 18, United States Code, Section 1952(a)(3).

COUNTS FORTY-NINE THROUGH FIFTY-FIVE**(Material False Statements to the FBI)****THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 2, 2015, in Allentown, in the Eastern District of Pennsylvania,
defendant

EDWIN PAWLOWSKI,

in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations, in that defendant EDWIN PAWLOWSKI:

COUNT	DESCRIPTION
49	Stated that he stayed out of the contract bidding process in the City of Allentown, when he knew that he did not stay out of the contract bidding process;
50	Stated that he did not try to influence the awarding of contracts from the City of Allentown to particular vendors, when he knew that he did try to influence the awarding of city contracts to particular vendors;
51	Stated that he did not tell the City of Allentown City Solicitor to whom to award City of Allentown contracts, when he knew that he did tell the city solicitor to award contracts to certain law firms and to deny contracts to certain law firms;
52	Stated that he has never used a list of vendors and the amount of money they have received in contracts from the City of Allentown to determine how much money those vendors should contribute to his political campaign, when he knew that he did use such a list for that very purpose;
53	Stated that he has never taken anything of value from anyone bidding on a City of Allentown contract, when he knew that he did take a free meal and tickets to a Philadelphia Eagles playoff game from a company bidding on a city contract;
54	Stated that he has never taken any official action to benefit Ramzi Haddad, when he knew that he did take official action to help expedite the resolution of Haddad's zoning and inspection problems;
55	Stated that he had no role in selecting or not selecting the law firm Stevens and Lee for contracts with the City of Allentown, when he knew that he did.

All in violation of Title 18, United States Code, Section 1001.

A TRUE BILL:

GRAND JURY FOREPERSON

LOUIS D. LAPPEN
ACTING UNITED STATES ATTORNEY