REPORT TO CONGRESS

ON THE ACTIVITIES AND OPERATIONS

OF THE

PUBLIC INTEGRITY SECTION

FOR 2022



Public Integrity Section
Criminal Division
United States Department of Justice

Submitted Pursuant to Section 603 of the Ethics in Government Act of 1978

INTRODUCTION

This Report to Congress is submitted pursuant to the Ethics in Government Act of 1978, which requires the Attorney General to report annually to Congress on the operations and activities of the Justice Department's Public Integrity Section. The Report describes the activities of the Public Integrity Section during 2022. It also provides statistics on the nationwide federal effort against public corruption during 2022 and over the previous two decades. Both the activities of the Public Integrity Section and the nationwide statistics for 2022 reflect the impact of the COVID-19 pandemic on court, law enforcement, and Departmental operations.

The Public Integrity Section was created in 1976 in order to consolidate in one unit of the Criminal Division the Department's oversight responsibilities for the prosecution of criminal abuses of the public trust by government officials. Section attorneys prosecute selected cases involving federal, state, or local officials, and also provide advice and assistance to prosecutors and agents in the field regarding the handling of public corruption cases. In addition, the Section serves as the Justice Department's center for handling various issues that arise regarding public corruption statutes and cases.

An Election Crimes Branch was created within the Section in 1980 to supervise the Department's nationwide response to election crimes, such as voter fraud and campaign-financing offenses. The Director of Election Crimes reviews all major election crime investigations throughout the country and all proposed criminal charges relating to election crime.

During the year, the Section maintained a staff of approximately thirty attorneys, including experts in extortion, bribery, election crimes, and criminal conflicts of interest. The Section management included: Corey Amundson, Chief; John D. Keller, Principal Deputy Chief; Todd Gee, Deputy Chief; Jennifer Clark, Deputy Chief, and Robert Heberle, Deputy Chief and Director, Election Crimes Branch.

Part I of the Report discusses the operations of the Public Integrity Section and highlights its major activities in 2022. Part II describes significant cases prosecuted by the Section in 2022. Part III presents nationwide data regarding the national federal effort to combat public corruption over the last two decades.

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PART I

OPERATIONAL RESPONSIBILITIES OF THE PUBLIC INTEGRITY SECTION

A. RESPONSIBILITY FOR LITIGATION

The work of the Public Integrity Section focuses on public corruption, which is crimes involving abuses of the public trust by government officials. Most of the Section's resources are devoted to investigations involving alleged corruption by government officials and to prosecutions resulting from these investigations. Decisions to undertake particular matters are made on a case-by-case basis, given Section resources, the type and seriousness of the allegation, the sufficiency of factual predication reflecting criminal conduct, and the availability of federal prosecutive theories to reach the conduct.

Cases handled by the Section generally fall into one of the following categories: sensitive cases and multi-district cases, referrals from federal agencies, recusals by United States Attorneys' Offices, and shared cases. These categories are discussed below.

1. Sensitive and Multi-District Cases

At the request of the Attorney General, Deputy Attorney General, or the Assistant Attorney General for the Criminal Division, the Section handles cases that are highly sensitive or multi-jurisdictional. Highly sensitive matters include those implicating especially challenging legal and factual issues requiring the resources, rigor, and subject-matter expertise of the Section.

In addition to sensitive cases, this category encompasses multi-district cases, involving allegations that cross judicial district lines and fall under the jurisdiction of two or more United States Attorneys' Offices. In these cases, the Section occasionally is asked to coordinate the investigation among the various United States Attorneys' Offices, to handle a case jointly with one or more United States Attorney's Office, or, when appropriate, to assume operational responsibility for the entire case.

2. Federal Agency Referrals

In another area of major responsibility, the Section handles matters referred directly by federal agencies concerning possible federal crimes by agency employees. The Section reviews these allegations to determine whether an investigation of the matter is warranted and, ultimately, whether the matter should be prosecuted. If so, the Section will handle the matter solely or in partnership with a local United States Attorney's Office.

Agency referrals of possible employee wrongdoing are an important part of the Section's mission. The Section works closely with the Federal Bureau of Investigation (FBI), Offices of Inspector General (OIGs) of the executive branch agencies, as well as with other agency investigative components, such as the Offices of Internal Affairs and the Criminal Investigative Divisions. In addition, the Section invests substantial time in training agency investigators in the statutes involved in corruption cases and the investigative approaches that work best in these cases. These referrals from the various agencies require close consultation with the referring agency's investigative component and prompt prosecutive evaluation.

3. Recusals by United States Attorneys' Offices

Many federal corruption prosecutions are handled by the local United States Attorney's Office for the geographic district where the crime occurred, a fact demonstrated by the statistical charts in Part III of this Report. At times, however, a local United States Attorney's Office may confront conflicts of interest or other prudential factors weighing against handling a particular corruption case.

Public corruption cases tend to raise unique problems of public perception that are generally absent in more routine criminal cases. An investigation of alleged corruption by a government official, whether at the federal, state, or local level, or someone associated with such an official, always has the potential of becoming a high-profile case simply because its focus is on the conduct of a public official. In addition, these cases are often politically sensitive because their ultimate targets tend to be politicians or government officials appointed by politicians.

A successful public corruption prosecution requires both the appearance and the reality of fairness and impartiality. This means that a successful corruption case involves not just a conviction but public perception that the conviction was warranted, not the result of improper motivation by the prosecutor, and is free of conflicts of interest. In a case in which the local conflict of interest is substantial, the local office is removed from the case by a procedure called recusal. Recusal occurs when the local office either asks to step aside, or is asked to step aside by Department headquarters, as primary prosecutor. Federal cases involving corruption allegations in which the conflict is substantial are usually referred to the Public Integrity Section either for prosecution or direct operational supervision.

Allegations involving possible crimes by federal judges almost always require recusals of the local offices for significant policy, as well as practical reasons. Having the case handled outside the local offices eliminates the possible appearance of bias, as well as the practical difficulties and awkwardness that would arise if an office investigating a judge were to appear before the judge on other matters. Thus, as a matter of established Department practice, federal judicial corruption cases generally are handled by the Public Integrity Section.

Similar concerns regarding the appearance of bias also arise when the target of an investigation is a federal prosecutor, a federal investigator, or other employee assigned to work in or closely with a particular United States Attorney's Office. Thus, cases involving United States Attorneys, Assistant United States Attorneys (AUSAs), or federal investigators or employees working with AUSAs in the field generally result in a recusal of the local office. These cases are typically referred to the Public Integrity Section.

4. Requests for Assistance/Shared Cases

The final category of cases in which the Section becomes involved is cases that are handled jointly by the Section and a United States Attorney's Office or other component of the Department. At times, the available prosecutorial resources in a United States Attorney's Office may be insufficient to undertake sole responsibility for a significant corruption case. In this situation the local office may request the assistance of an experienced Section prosecutor to share responsibility for prosecuting the case. On occasion, the Section may also be asked to provide operational assistance or to assume supervisory responsibility for a case due to a partial recusal of the local office. Finally, the Public Integrity Section may be assigned to supervise or assist with a case initially assigned to another Department component.

B. SPECIAL SECTION PRIORITIES

In addition to the general responsibilities discussed above, in 2022 the Public Integrity Section continued its involvement in a number of priority areas of criminal law enforcement.

1. Election Crimes

One of the Section's law enforcement priorities is its supervision of the Justice Department's nationwide response to election crimes. The prosecution of all forms of election crime is a high Departmental priority, and headquarters' oversight in this area is designed to ensure that the Department's nationwide response to election crime matters is uniform, impartial, and effective. In 1980, the Election Crimes Branch was created within the Section to handle this supervisory responsibility.

The Election Crimes Branch oversees the Department's handling of all election crime allegations other than those involving federal voting rights, which are handled by the Civil Rights Division. Specifically, the Branch provides advice and guidance on three types of election crime cases: (1) vote frauds, such as vote buying and absentee ballot fraud; (2) campaign-financing crimes, most notably under the Federal Election Campaign Act (FECA); and (3) patronage crimes, such as political shakedowns and misuse of federal programs for political purposes. Vote frauds and campaign-financing offenses are the most significant, and most common types of election crimes.

The additional election-related work of the Section and its Election Crimes Branch falls into the following categories:

a. <u>Consultation and Field Support</u>. Under long-established Department procedures, the Section's Election Crimes Branch reviews all major election crime investigations, including all proposed grand jury investigations and FBI full-field investigations, and all election crime charges proposed by the various United States Attorneys' Offices for legal and factual sufficiency. (Justice Manual 9-85.210.) The Branch is also often consulted before a United States Attorney's Office opens a preliminary investigation into a vote fraud allegation, although this is not required.

In the area of campaign-financing crimes, Department procedures require consultation with headquarters before any investigation, including a preliminary investigation, is commenced by a United States Attorney's Office. (Justice Manual 9-85.210.) The increased coordination with the Section at the initial stage of a

criminal investigation of a FECA matter enables the Department to coordinate, when necessary, with another federal agency, the Federal Election Commission, which has civil enforcement authority over FECA violations.

The Section's consultation responsibility for election matters includes providing advice to prosecutors and investigators regarding the application of federal criminal laws to vote fraud, patronage crimes, and campaign-financing crimes, and the most effective investigative techniques for particular types of election offenses. In addition, the Election Crimes Branch helps draft election crime charges and other pleadings when requested.

The majority of the Branch's consultations are in the following two categories: vote fraud, also known as election fraud or ballot fraud and campaign financing crimes arising under the FECA. During 2022, the Branch assisted in evaluating allegations, helping to structure investigations, and drafting charges for United States Attorneys' Offices around the country in these areas of law enforcement.

- b. <u>Litigation</u>. Section attorneys investigate and prosecute selected election crimes, either by assuming total operational responsibility for the case or by handling the case jointly with a United States Attorney's Office or other Department component.
- c. <u>District Election Officer Program</u>. The Branch also assists in implementing the Department's long-standing District Election Officer (DEO) Program. This Program is designed to ensure that each of the Department's 94 United States Attorneys' Offices has a trained prosecutor available to oversee the handling of election crime matters within the district and to coordinate district responses with Department headquarters regarding these matters.

The DEO Program involves appointing an Assistant United States Attorney in each federal district to serve a two-year term as a DEO and providing periodic training for the DEOs in the handling of election crime and voting rights matters.

The DEO Program is also a crucial feature of the Department's nationwide Election Day Program, which takes place during the federal general elections held in November of even-numbered years. The Election Day Program ensures that federal prosecutors and investigators are available both at Department headquarters in Washington, DC, and in each district to receive complaints of election irregularities while the polls are open. As part of the Program, press releases are

issued in Washington, DC, and in each district before the November federal elections that advise the public of the Department's enforcement interests in deterring and prosecuting election crimes and protecting voting rights. The press releases also provide contact information for the DEOs, local FBI officials, and Department officials in the Criminal and Civil Rights Divisions at headquarters, who may be contacted on Election Day by members of the public who have complaints of possible vote fraud or voting rights violations.

- d. <u>Inter-Agency Liaison with the Federal Election Commission</u>. The Election Crimes Branch is the formal liaison between the Justice Department and the Federal Election Commission (FEC), an independent federal agency that shares enforcement jurisdiction with the Department over willful violations of the Federal Election Campaign Act (FECA). The FEC has exclusive civil jurisdiction over all FECA violations, while the Department has exclusive criminal jurisdiction over FECA crimes.
- e. <u>Inter-Agency Liaison with the Office of Special Counsel</u>. The Branch also serves as the Department's point of contact with the United States Office of Special Counsel (OSC). The OSC has jurisdiction over noncriminal violations of the Hatch Act, 5 U.S.C. §§ 1501-1509, 7321-7326, which may also involve criminal patronage crimes that are within the Department's jurisdiction.

2. Threats to the Election Community

In June 2021, the Section was selected to lead the Department's Election Threats Task Force to address the sharp increase in reports of hostility and threats of violence to the election community during and following the 2020 election cycle. Because of the Section's experience handling sensitive issues that arise in investigating and prosecuting crimes targeting elections, PIN's oversight and guidance ensures consistency in investigations and prosecutions, adherence to election-related policies, and appropriate engagement with the election community.

At the Task Force's inception, the Section handled the assessment, investigation, and prosecution of all reports of threats to the election community. Through nationwide training of federal, state, and local law enforcement partners, including United States Attorney's offices, the Section has effectively transitioned to supervising and supporting such investigations and prosecutions in the field, in addition to continuing to handle individual cases when warranted.

The Section leads the Department's engagement with the election community through trainings, presentations, meetings, and preparedness briefings. The Section

works with other Department components and partners in the interagency to ensure fulsome information sharing where possible. For example, in August 2022, the Section worked closely with the FBI to produce and present a Liaison Information Report to the election community statistically analyzing the reports of hostile contacts by volume of reports, mode of transmission, class of election worker targeted, and the locations of identified subjects.

As referenced below, in 2022, the Section successfully concluded the first election threats case charged by the Task Force, resulting in an eighteen-month sentence of imprisonment for the defendant. The Section continues to investigate and prosecute dozens of cases across the country.

3. Conflicts of Interest Crimes

"Conflicts of interest" is a wide-ranging and complex area of law, with many layers of administrative and oversight responsibility. Moreover, the federal criminal conflicts of interest laws overlap to some extent with the sometimes broader ethics restrictions imposed by civil statutes, agency standards of conduct, Presidential orders, and, in the case of attorneys, bar association codes of conduct.

The Public Integrity Section's work in the conflicts area falls into the following categories:

a. <u>Criminal Referrals from Federal Agencies and Recusals</u>.

The Section's criminal enforcement role comes into play with respect to a narrow group of conflicts of interest matters, namely, those that involve possible misconduct proscribed by one of the federal conflicts of interest statutes, 18 U.S.C. §§ 203-209. These crimes are prosecuted either by a United States Attorney's Office or by the Public Integrity Section. Conflicts of interest matters are often referred to the Section by the various federal agencies. If investigation of a referral is warranted, the Section coordinates the investigation with the Inspector General for the agency concerned, the FBI, or both. If prosecution is warranted, the Section prosecutes the case. If a civil remedy may be appropriate in lieu of criminal prosecution, the Section or the Inspector General may refer the case to the Civil Division of the Department of Justice for its review.

b. <u>Coordination</u>. The Public Integrity Section works with the United States Office of Government Ethics (OGE) to coordinate conflicts of interest issues with OGE and other executive branch agencies and offices. The purpose of this coordination is to ensure that the overall legislative and enforcement efforts in this

area are both complementary and consistent. OGE has broad jurisdiction over noncriminal conduct by executive branch personnel, as well as the authority to provide guidance concerning the coverage of the federal criminal conflicts of interest statutes. The Section's coordination with OGE ensures that consistent guidance is provided with respect to the overlapping criminal, civil, and administrative interests implicated by the statutory and regulatory restrictions on federal personnel.

C. LEGAL AND TECHNICAL ASSISTANCE

1. Training and Advice

The Public Integrity Section is staffed with specialists who have considerable experience investigating and prosecuting corruption cases. Section attorneys participate in a wide range of formal training events for federal prosecutors and investigators. They are also available to provide informal advice on investigative methods, charging decisions, and trial strategy in specific cases.

The Section also conducts a public corruption seminar, held annually either virtually or on site, at the National Advocacy Center. Speakers at this seminar typically include both the Section's senior prosecutors and Assistant United States Attorneys from the field who have handled significant corruption cases. The seminar provides training for federal prosecutors regarding the statutes most commonly used in corruption cases, guidance in the use of the complex and difficult investigative techniques necessary to investigate government corruption, and advice from experienced prosecutors on conducting corruption trials.

2. <u>Legal Advisor to the Integrity Committee of the Council of Inspectors General on Integrity and Efficiency</u>

Pursuant to the Inspector General Reform Act of 2008, Pub. L. No. 110-409, 122 Stat. 4302 (Oct. 14, 2008), the designee of the Chief of the Public Integrity Section serves as Legal Advisor to the Integrity Committee of the Council of Inspectors General on Integrity and Efficiency (CIGIE). The CIGIE is a body composed of the Inspectors General of the various agencies of the executive branch of the federal government. The Integrity Committee of the CIGIE is charged with handling allegations against Inspectors General and senior members of their staff.

In addition, the Integrity Committee is charged with establishing policies and procedures to ensure consistency in conducting administrative investigations. The Committee's procedures, drafted with the assistance of the Public Integrity Section,

provide a framework for the investigative function of the Committee. Allegations of wrongdoing by Inspectors General and their senior staff are initially reviewed by an Integrity Committee working group, with assistance from the Public Integrity Section, for potential criminal prosecution. In noncriminal matters, the procedures guide the Committee's process for reviewing or investigating alleged misconduct and for reporting on its findings. The Public Integrity Section also advises the Integrity Committee on matters of law and policy relating to its investigations.

3. Legislative Activities

An important responsibility of the Public Integrity Section is the review of proposed legislation that may affect, directly or indirectly, the investigation and prosecution of public officials and those who seek to corrupt these officials. The Section is often called upon to comment on legislation proposed by Congress, by the Administration, or by other departments of the executive branch; to draft or review testimony for congressional hearings; and to respond to congressional inquiries concerning legislative proposals. On occasion, the Section drafts legislative proposals relating to various corruption matters.

4. Case Supervision and General Assistance

Public corruption cases are often controversial, complex, and highly visible. These factors may warrant Departmental supervision and review of a particular case. On occasion Section attorneys are called upon to conduct a careful review of a sensitive public corruption case, evaluating the quality of the investigative work and the adequacy of any proposed indictments. Based on its experience in this area, the Section can often identify tactical or evidentiary problems early on and either provide needed assistance or, if necessary, assume operational responsibility for the prosecution.

The Section also has considerable expertise in the supervision of the use of undercover operations in serious corruption cases. The Section serves on the FBI's Criminal Undercover Operations Review Committee. A number of the Section's senior prosecutors have experience in the practical and legal problems involved in such operations and have the expertise to employ this sensitive investigative technique effectively and to advise law enforcement personnel on its use.

5. International Advisory Responsibilities

The Public Integrity Section actively participates in the area of international law enforcement. The Section regularly provides briefings and training on United States public corruption issues to visiting foreign delegations and continues the efforts of the United States to assist foreign countries in their quest to combat public corruption and election crime in their respective countries. This assistance includes participation in international proceedings and coordination with other components of the Justice Department and the State Department on the Administration's positions in this area.

Section experts continue to address visiting foreign officials in investigations and prosecutions of public corruption. These presentations are generally conducted under the auspices of the State Department's Foreign Visitor Program and the Justice Department's Office of Overseas Prosecutorial Development, Assistance, and Training.

PART II

PUBLIC INTEGRITY SECTION INDICTMENTS AND PROSECUTIONS IN 2022

INTRODUCTION

As described in Part I, the Public Integrity Section's role in the prosecution of public corruption cases ranges from sole operational responsibility for the entire case to approving an indictment or to providing advice on the drafting of charges. Part II of the Report provides examples of noteworthy public corruption cases for which the Section had either sole or shared operational responsibility during 2022.

In 2022, the Section's case work resulted in 50 guilty pleas, as well as trial convictions in the Northern District of Georgia, the Southern District of Texas, and the District of Columbia. The Section tried six cases in 2022 resulting in the convictions of seven defendants.

The descriptions of the Section's significant cases for calendar year 2022 are separated into categories, based on the branch or level of government affected by the corruption. Election crime cases are grouped separately. Unrelated cases in each category are separated by triple lines. When a conviction but not a sentencing took place in 2022, the case may be reported in this report or in a later year's report.

FEDERAL JUDICIAL BRANCH

The Public Integrity Section has sole responsibility for the investigation and prosecution of federal judges due to the potential appearance issues that might arise if a local United States Attorney's Office were to investigate an allegation of wrongdoing by a judge before whom that United States Attorney's Office appears on a regular basis. The investigation of allegations of criminal wrongdoing in the federal judicial branch is a very sensitive matter. These investigations may involve intrusions into pending federal cases, cooperation from parties or witnesses who are appearing before the court, or potential disruption of the normal judicial process. In addition, the Section must coordinate closely with supervisory judges and the Administrative Office of United States Courts to facilitate the assignment of magistrates and judges from outside of the judicial district to handle requests during the investigation, such as grand jury supervision, or applications for warrants or electronic surveillance. The Public Integrity Section has developed substantial experience and expertise in these matters over the years. During 2022, the Section brought no cases involving the federal judicial branch.

FEDERAL LEGISLATIVE BRANCH

The Public Integrity Section plays a central role in the effort to combat corruption in the federal legislative branch. These cases raise unique issues of interbranch comity, and they are always sensitive given the high-profile stature of elected officials. The Section has developed substantial expertise regarding the unique protections provided to Members of Congress and their staff by the Speech or Debate Clause set forth in Article I of the Constitution and has worked closely and effectively with House and Senate counsel and the Ethics Committees in both houses. Department procedures require consultation with the Section in all investigations involving a Member of Congress or a congressional staff member. (Justice Manual 9-85.110) and approval by the Section of any plea agreements involving a Member of Congress (Justice Manual 9-16.110). In addition to handling its own cases, the Section routinely provides advice and guidance to prosecutors across the country regarding these sensitive investigations. During 2022, the Section brought no cases involving the federal legislative branch.

FEDERAL EXECUTIVE BRANCH

The Public Integrity Section frequently receives allegations of corruption in the executive branch from federal law enforcement agencies, including the FBI, the Inspectors General for the various departments and agencies, and United States military investigators. These matters involve a careful balancing of the requirements of a criminal investigation and the operational needs of the executive offices involved. During 2022, the Section handled a number of cases involving executive branch corruption, several of which are described below.

US v. Edwards et al, District of Columbia

On April 11, 2022, Murali Y. Venkata, a former Acting Branch Chief of the Information Technology Division of the U.S. Department of Homeland Security (DHS-OIG) was convicted at trial of conspiracy to defraud the U.S. government, theft of government property, wire fraud, aggravated identity theft, and obstruction.

Venkata, along with co-conspirators Charles K. Edwards, who previously served as the Acting Inspector General of DHS-OIG, and Sonal Patel, another official at DHS-OIG, executed a scheme to steal confidential and proprietary software from the government along with the personally identifying information (PII) of hundreds of thousands of federal employees.

Edwards pled guilty in January 2022 and Patel pled guilty in April 2019 to stealing property from the U.S. government for the purpose of developing a commercial version of a case management system to be offered for sale to government agencies. Venkata was convicted for his role in the conspiracy, which included exfiltrating proprietary source code and sensitive databases from DHS-OIG facilities, as well as assisting Edwards in setting up three computer servers in Edwards's residence so that software developers in India could access the servers remotely and develop the commercial version of the case management system.

US v. Eghbal Saffarinia, District of Columbia

On September 20, 2022, Eghbal Saffarinia, a former Assistant Inspector General for the Department of Housing and Urban Development (HUD), was convicted at trial of one count of concealing material facts, three counts of making false statements, and three counts of falsifying a record or document.

According to court documents and evidence presented at trial, Saffarinia engaged in a scheme to conceal material facts, including the nature and extent of his financial relationship with a personal friend who was the owner and chief executive officer of an information technology company. During a period in which Saffarinia received payments and loans from his friend totaling \$80,000, Saffarinia disclosed confidential internal government information to his friend and undertook efforts to steer government contracts and provide competitive advantages and preferential treatment to his friend's company. Saffarinia also failed to disclose this financial relationship and another large promissory note on his public financial disclosure forms.

US v. Diane Sturgis and William Snow, Eastern District of Virginia

On February 1, 2022, Diane D. Sturgis, a former contracting officer with the Broadcasting Board of Governors ("BBG") pled guilty to a second criminal information charging her with conspiracy to commit bribery and honest services mail fraud in connection with the scheme involving Star-Hawk. According to court documents, Sturgis engaged in a scheme involving a Virginia government contracting firm, Star-Hawk Solutions, LLC, and its owner and chief executive officer, Rita Starliper, and a Star-Hawk executive, William ("Bill") Snow.

Between late 2014 and late 2016, Starliper, Sturgis, and Snow agreed to and did hire and pay Sturgis's relative for a job involving minimal work and that resulted in payments to the relative of more than \$68,000. In exchange, Sturgis, in her capacity as a BBG contracting officer, took official actions that benefitted Starliper, Star-Hawk, and Snow, including the awarding of a professional staffing contract worth millions of dollars. Sturgis also took steps to steer the procurement process and provide preferential treatment to Star-Hawk.

On November 10, 2022, William Snow pled guilty to conspiracy to defraud the United States.

On April 22, 2022, Sturgis was sentenced to 30 months imprisonment and two years of supervised release. The sentence runs concurrently with a previous sentence in which Sturgis was sentenced to 24 months imprisonment.

US v. Keim et al, Eastern District of Virginia

On November 28, 2022, Susan Keim, a former government contractor, her husband, Russell Keim, and Rodney Wilson, a business-owner, pled guilty to conspiracy to commit bribery.

According to court documents, Susan Keim and her husband Russell Keim accepted bribes from co-conspirator Rodney Wilson in return for Susan Keim's award of purchase orders to Wilson's company to sell parts and materials to U.S. Army Garrison Fort Lee (Fort Lee). Susan Keim worked for Skookum Educational Services (Skookum), a company that contracted with the federal government to provide maintenance and supply services at Fort Lee. Wilson was the owner of C&L Supply, a company formed for the sole purpose of selling supplies to Skookum for use at Fort Lee. From 2013 to 2018, in return for the award of the subcontracts worth over \$900,000, Wilson provided checks and cash payments to Susan and Russell Keim disguised as compensation.

STATE AND LOCAL CORRUPTION

The Public Integrity Section plays a major role in combating corruption at all levels of government, including corruption relating to state or local public officials. During 2022, the Section handled a number of cases involving state and local corruption, several of which are described below.

US v. Tom and Bontinea Goss, Western District of Missouri

On September 29, 2022, Bontiea and Tommy Goss pled guilty for their roles in a multimillion-dollar public corruption scheme that involved embezzlement and bribes paid to multiple elected public officials in the state of Arkansas.

According to court documents, Bontiea Goss, and her husband, Tommy Goss, were high-level executives at Preferred Family Healthcare Inc., a charity that provided a variety of services to individuals in Missouri, Arkansas, Kansas, Oklahoma, and Illinois, including mental and behavioral health treatment and counseling, substance abuse treatment and counseling, employment assistance, aid to individuals with developmental disabilities, and medical services. In exchange for the bribes and kickbacks offered and paid by the Gosses, elected state officials in Arkansas provided favorable legislative and official action for the charity, including, but not limited to, directing funds from the state's General Improvement Fund (GIF).

Bontiea Goss pled guilty to conspiracy to pay bribes and kickbacks to elected public officials in Arkansas. Tom Goss pled guilty to participating in the conspiracy by embezzling funds from the charity, as well as by paying bribes and kickbacks to elected public officials in Arkansas. Tom Goss also pled guilty to one count of aiding and assisting in the preparation and presentation of a false tax return.

US v. Kelsey et al, Middle District of Tennessee

On November 22, 2022, Tennessee State Senator Brian Kelsey pled guilty to violating campaign finance laws and conspiring to defraud the Federal Election Commission (FEC) as part of a scheme to benefit his 2016 campaign for U.S. Congress.

Kelsey and his co-conspirators illegally orchestrated the concealed movement of \$91,000 to a national political organization for the purpose of funding advertisements that urged voters to support Kelsey in the August 2016 primary election. Kelsey and his co-conspirators also caused the political organization to make \$80,000 worth of contributions to Kelsey's federal campaign committee in the form of illegal coordinated expenditures.

Joshua Smith, a co-conspirator, pled guilty on October 19, 2022, to aiding and abetting the solicitation, receipt, direction, transfer, and spending of soft money in connection with a federal election.

US v. Jo Ann Macrina, Northern District of Georgia

On October 14, 2022, Jo Ann Macrina, former City of Atlanta Commissioner of Watershed Management, was convicted at trial of accepting bribes from an Atlanta contractor in exchange for steering city business worth millions of dollars to the contractor's company.

According to information presented in court, Jo Ann Macrina served as the Commissioner of Atlanta's Department of Watershed Management from 2011 through May 2016. During Macrina's tenure, the City of Atlanta awarded contracts worth millions of dollars to PRAD Group Inc. (PRAD Group), an architectural, design, and construction management and services firm based in Atlanta. To ensure that PRAD Group received city business worth millions of dollars, Macrina replaced two evaluators who previously represented the Department of Watershed Management with herself and another individual and engaged in other efforts to alter scores that had previously been assigned to potential contractors.

Macrina also discussed potential employment with and accepted things of value from Lohrasb "Jeff" Jafari, who was the executive vice president of PRAD Group. In exchange, Macrina provided Jafari with access to confidential information and preferential treatment with respect to City of Atlanta projects.

Macrina accepted \$10,000 in cash, jewelry, a room at a luxury hotel in Dubai, and landscaping work at her home from Jafari either directly or through another employee of PRAD Group. Shortly after Macrina's employment with the City of Atlanta ended she began working for Jafari and PRAD Group. Between June 2016

and September 2016, Jafari and/or PRAD Group paid Macrina \$30,000 in four separate payments.

Jafari subsequently pled guilty to conspiracy to commit bribery, bribery, and tax evasion.

US v. Quintanilla et al, Southern District of Texas

On October 21, 2022, a federal jury convicted Richard Quintanilla and former Hidalgo Count Commissioner Arturo C. Cuellar Jr., at trial for conspiring to pay bribes to two city commissioners in Weslaco, Texas, in connection with millions of dollars in city contracts.

According to court documents and evidence presented at trial, Quintanilla, and Cuellar, agreed with others to bribe two Weslaco City Commissioners, John Cuellar and Gerardo Tafolla, in exchange for official actions favorable to engineering companies seeking large contracts with the city.

From approximately March 2008 through December 2015, one of the participants in the scheme received approximately \$4.1 million from two engineering companies and shared nearly \$1.4 million with Arturo Cuellar. Arturo Cuellar also used a company he controlled to facilitate the payment of approximately \$405,000 in bribes to his cousin, John Cuellar, which were disguised as legitimate legal expenses. In exchange for these payments, John Cuellar took several official actions to benefit the companies, including helping to award a \$38.5 million contract to rehabilitate Weslaco's water treatment plant. Quintanilla also facilitated the payment of other bribes to Tafolla.

Cuellar was convicted of conspiracy to commit honest services wire fraud, four counts of honest services wire fraud, federal program bribery, conspiracy to commit money laundering, 26 counts of money laundering, and 26 counts of using a facility in interstate commerce to facilitate unlawful activity. Quintanilla was convicted of conspiracy to commit honest services wire fraud, four counts of honest services wire fraud, federal program bribery, conspiracy to commit money laundering, and seven counts of money laundering.

John Cuellar pled guilty in August 2019 to conspiracy to commit honest services fraud. Tafolla pled guilty in April 2019 to federal program bribery.

US v. Trabona et al, Eastern District of Louisiana

On July 21, 2022, Jerry Trabona, former police chief in Amite City and Kristian Hart, current Amite City councilmember pled guilty to criminally violating federal election laws as part of a conspiracy to pay, or offer to pay, voters for voting in a federal election.

According to court documents, Trabona and Hart, pled guilty to conspiring to pay and offering to pay voters residing in Tangipahoa Parish, Louisiana, for voting in the 2016 open primary election and the 2016 open general election. Trabona and Hart admitted that they agreed with each other and others to pay or offer to pay voters during contests in which the defendants were candidates, and in which federal candidates appeared on the same ballot.

In addition to the conspiracy with Trabona, Hart pled guilty to three counts of paying and offering to pay voters during both the 2016 and 2020 elections. In both elections, Hart was running for the seat he currently holds on the Amite City Council.

US v. Barnes Sutton, Northern District of Georgia

On November 2, 2022, a federal jury convicted Sharon Barnes Sutton, a former commissioner of the DeKalb County Board of Commissioners, for extorting a DeKalb County subcontractor in connection with a \$1.8 million contract.

According to court documents and evidence presented at trial, from about May 2014 to August 2014, Barnes Sutton, demanded monthly payments of \$500 from a subcontractor, later increasing her demand to \$1,000 per month. The subcontractor made the first \$500 payment in June 2014 at a restaurant in Decatur and the second \$500 cash payment in July 2014 at Barnes Sutton's residence. The FBI disrupted Barnes Sutton's continued demands in August 2014. Separately, Barnes Sutton also accepted a \$5,000 cash bribe from an FBI confidential source who had business before the DeKalb County Board of Commissioners.

FEDERAL ELECTION CRIMES

As described in Part I, during 2022, the Public Integrity Section continued its nationwide oversight of the handling of election crime investigations and prosecutions. Set forth below are examples of the Section's 2022 casework in this area.

US v. Kao et al, District of Columbia

On September 27, 2022, Martin Kao, pled guilty to conspiring to make unlawful campaign contributions to a candidate for Congress and a political action committee (PAC), making unlawful campaign contributions, and causing the submission of false information to the Federal Election Commission.

According to court documents, Kao was a defense contractor prohibited from making contributions in federal elections. Kao and his co-conspirators Clifford Chen and Lawrence Lum Kee created a shell company, which they used to make an illegal contribution – using government contractor funds – to a PAC supporting the election of a candidate for the U.S. Senate. Kao also used family members as conduits to make illegal contributions to the campaign committee of the same candidate, and then reimbursed them for those donations using funds obtained from Kao's company.

Chen and Lum Kee subsequently pled guilty to making illegal conduit contributions.

US v. Keeler and Waltz, Southern District of Indiana

On April 11, 2022, Darryl Waltz, a former Indiana State Senator and 2016 candidate for U.S. Congress, pled guilty to two charges: using sham donors to make illegal contributions into his campaign for U.S. Congress, and making false statements to special agents of the Federal Bureau of Investigation.

On April 18, 2022, John Keeler, former vice president and general counsel of Indiana-based casino company New Centaur LLC, pled guilty to causing the casino

company to make false statements on its federal tax return by concealing contributions to a local political party as deductible business expenses.

According to court documents, Waltz worked with Rogers to funnel \$40,500 in illegal conduit contributions to his congressional campaign. Rogers directed corporate funds from New Centaur into the "Brent Waltz for Congress" campaign through over a dozen straw donors and Waltz himself. Waltz pleaded guilty to receiving these fictitious donations. Waltz also pleaded guilty to lying to and misleading FBI agents who were investigating the illegal contributions.

Keeler, paid \$41,000 in New Centaur corporate funds to Maryland-based political consultant Kelley Rogers and directed him to funnel \$25,000 to a local political party committee in Marion County, Indiana. To further conceal the nature of the contribution, Keeler caused New Centaur's federal tax return filed with the Internal Revenue Service to falsely describe the \$41,000 payment to Rogers as a deductible business expense.

On August 17, 2022, Waltz and Keeler were sentenced to 10 and two months' imprisonment, respectively.

On January 17, 2020, Kelley Rogers was sentenced to three years in prison. He previously pled guilty to one count of wire fraud.

US v. Travis Ford, District of Nebraska

On June 16, 2022, Travis Ford, pled guilty to making multiple threatening posts on an Instagram page associated with an election official.

According to court documents, Ford, made multiple threats in August 2021 toward the election official, specifically: "Do you feel safe? You shouldn't. Do you think Soros will/can protect you?" and "Your security detail is far too thin and incompetent to protect you. This world is unpredictable these days....anything can happen to anyone."

On October 6, 2022, Ford was sentenced to 18 months' incarceration.

US v. Fuentes-Fernandez and Salvemos a Puerto Rico, District of Puerto Rico

On May 5, 2022, Joseph Fuentes-Fernandez and the Super PAC for which he served as president and treasurer, Salvemos a Puerto Rico, pleaded guilty to one count of scheming to falsify and conceal material facts.

According to the admissions made in connection with their pleas, Fuentes was the president and treasurer of Salvemos a Puerto Rico, which was organized to raise funds to support the 2020 election campaign of Public Official-1, then a candidate for office in the executive branch of the government of Puerto Rico. Soon after Salvemos a Puerto Rico was organized, Fuentes and others also formed two shell § 501(c)(4) nonprofit social welfare organizations. These two § 501(c)(4) entities were registered within seven minutes of each other, listed the same mailing address, and shared some of the same officers.

Fuentes and others solicited hundreds of thousands of dollars of donations to the two shell nonprofit entities, which rapidly sent most of those funds on to Salvemos a Puerto Rico. Fuentes and Salvemos a Puerto Rico then reported to the FEC that the nonprofit organizations were the donors of those funds, rather than reporting the true source of the funds. The purpose of routing these donor funds through the nonprofit organizations was exclusively to conceal the true identities of the donors to Salvemos a Puerto Rico.

US v. Benton et al, District of Columbia

On November 17, 2022, a federal jury convicted Jessie R. Benton, a political consultant, of conspiring to solicit and cause an illegal campaign contribution by a foreign national to the campaign of a 2016 candidate for President of the United States, effecting a conduit contribution, and causing false records to be filed with the FEC.

According to court documents and evidence presented at trial, Benton, schemed with another political advisor to funnel the political contributions from the Russian Foreign National seeking to support, meet, and take a picture with the presidential candidate. Benton arranged for the Russian foreign national – whose nationality Benton concealed from the campaign and the candidate – to attend a political fundraising event for the campaign and to take a picture with the candidate.

As such attendance and engagement required a contribution, Benton caused the Russian foreign national to wire \$100,000 to Benton's political consulting firm for purposes of making an illegal foreign contribution to the campaign. To disguise the scheme, Benton created a fake invoice, which falsely identified the funds as payment for consulting services. Benton acted as a straw donor and contributed \$25,000 of the Russian foreign national's money to the campaign, falsely identified himself as the contributor, and pocketed the remaining \$75,000. Because Benton falsely claimed to have given the contribution himself, the relevant campaign entities unwittingly filed reports with the Federal Election Commission (FEC) that inaccurately reported Benton – instead of the Russian foreign national – as the source of the funds.

PART III

NATIONWIDE FEDERAL PROSECUTIONS OF CORRUPT PUBLIC OFFICIALS

INTRODUCTION

The tables in this section of the Report reflect data that is compiled from annual nationwide surveys of the United States Attorneys' Offices and from the Public Integrity Section.

As discussed in Part I, most corruption cases are handled by the local United States Attorney's Office in the district where the crime occurred. However, on occasion, outside prosecutors are asked either to assist the local office on a corruption case, or to handle the case entirely as a result of recusal of the local office due to a possible conflict of interest. The figures in Tables I through III include all public corruption prosecutions within each district including cases handled by the United States Attorneys' Offices and the Public Integrity Section.

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TABLE I

NATIONWIDE FEDERAL PROSECUTIONS OF CORRUPT PUBLIC OFFICIALS IN 2022

Federal Offic	eials
Charged	183
Convicted	205
Awaiting Trial	128

State Officia	als
Charged	50
Convicted	68
Awaiting Trial	36

Local Officials									
Charged	122								
Convicted	149								
Awaiting Trial	107								

Others Invol	ved
Charged	111
Convicted	167
Awaiting Trial	130

Totals	
Charged	466
Convicted	589
Awaiting Trial	401

TABLE II

PROGRESS OVER THE LAST TWO DECADES: FEDERAL PROSECUTIONS BY UNITED STATES ATTORNEYS' OFFICES OF CORRUPT PUBLIC OFFICIALS

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
FEDERAL OFFICIALS										
Charged	479	424	445	463	426	518	425	422	412	381
Convicted	421	381	390	407	405	458	426	397	392	369
Awaiting Trial as of 12/31	129	98	118	112	116	117	107	103	110	108
STATE OFFICALS										
Charged	94	111	96	101	128	144	93	168	93	100
Convicted	87	81	94	116	85	123	102	108	143	78
Awaiting Trial as of 12/31	38	48	51	38	65	61	57	105	41	68
LOCAL OFFICIALS										
Charged	259	268	309	291	284	287	270	296	282	319
Convicted	119	252	232	241	275	246	257	280	276	295
Awaiting Trial as of 12/31	106	105	148	141	127	127	148	146	127	135
PRIVATE CITIZENS INV	OLVE	D IN P	UBLIC	CORR	UPTIC	ON OFF	ENSE	S		
Charged	318	410	313	295	303	355	294	298	295	278
Convicted	241	306	311	266	249	302	276	251	296	318
Awaiting Trial as of 12/31	139	168	136	148	179	184	161	200	191	144
TOTALS										
Charged	1150	1,213	1,163	1,150	1,141	1,304	1,082	1,184	1,082	1,078
Convicted	868	1,020	1,027	1,030	1,014	1,129	1,061	1,036	1,107	1,060
Awaiting Trial as of 12/31	412	419	453	439	487	489	473	554	469	455

TABLE II (continued)

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Totals
FEDERAL OFFICIALS											
Charged	337	364	458	354	383	275	300	242	246	183	7,537
Convicted	315	364	402	326	334	250	307	207	228	205	6,984
Awaiting Trial as of 12/31	113	111	153	170	169	165	131	154	153	128	\times
STATE OFFICIALS											
Charged	133	80	123	139	63	85	60	55	52	50	1,968
Convicted	119	109	97	125	68	72	63	30	43	68	1,811
Awaiting Trial as of 12/31	68	33	66	74	53	59	46	48	60	36	\times
LOCAL OFFICIALS											
Charged	334	231	259	234	223	171	213	135	167	122	4,954
Convicted	303	252	200	213	208	175	199	110	138	149	4,420
Awaiting Trial as of 12/31	149	100	135	148	150	110	111	129	150	107	\times
PRIVATE CITIZENS INV	OLVE	D IN P	UBLIC	CORR	UPTIC	ON OF	ENSE	S			
Charged	330	241	262	255	194	234	207	196	181	111	5,370
Convicted	300	264	205	222	227	198	165	122	189	167	4,875
Awaiting Trial as of 12/31	169	106	150	177	149	145	163	230	192	130	\times
TOTALS											
Charged	1134	916	1102	982	863	765	780	628	646	466	19,829
Convicted	1037	989	904	886	837	695	734	469	598	589	18,090
Awaiting Trial as of 12/31	499	350	504	569	521	479	451	561	555	401	\times

TABLE III

UNITED STATES ATTORNEYS' OFFICES FEDERAL PUBLIC CORRUPTION CONVICTIONS BY DISTRICT OVER THE PAST DECADE

U.S. Attorney's Office	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Totals
Alabama, Middle	9	8	6	2	4	3	5	2	8	4	51
Alabama, Northern	12	11	13	8	7	11	8	4	2	2	78
Alabama, Southern	2	0	1	0	0	0	1	3	6	4	17
Alaska	2	1	4	4	1	0	0	2	2	3	19
Arizona	40	29	18	8	18	29	26	12	16	23	219
Arkansas, Eastern	4	3	10	14	15	2	3	5	0	1	57
Arkansas, Western	0	2	3	0	1	4	4	1	2	0	17
California, Central	19	66	53	32	23	13	41	23	14	18	302
California, Eastern	4	10	12	14	12	8	8	3	8	11	90
California, Northern	3	9	12	8	12	4	11	4	9	9	81
California, Southern	37	10	7	10	13	7	5	5	3	6	103
Colorado	3	2	0	3	1	6	8	2	0	0	25
Connecticut	13	9	6	0	0	1	4	0	7	5	45
Delaware	5	0	1	0	2	0	2	0	0	1	11
District of Columbia	18	15	8	7	10	19	21	11	8	17	134
Florida, Middle	20	28	27	10	24	14	13	4	5	6	151
Florida, Northern	8	9	14	18	9	5	13	8	5	5	94
Florida, Southern	21	27	42	38	26	39	30	23	21	16	283
Georgia, Middle	9	10	11	2	6	1	4	0	6	0	49
Georgia, Northern	11	33	22	67	24	19	11	11	4	22	224
Georgia, Southern	7	4	1	4	5	2	0	0	6	1	30
Guam & NMI	2	3	10	1	0	2	2	2	4	1	27
Hawaii	0	4	5	0	2	2	5	4	4	9	35

TABLE III (continued)

U.S. Attorney's Office	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Totals
Idaho	4	1	3	4	1	7	2	2	2	2	28
Illinois, Central	6	10	0	1	4	0	3	1	1	0	26
Illinois, Northern	45	18	16	30	25	13	26	22	32	28	255
Illinois, Southern	18	4	3	4	5	5	3	8	4	3	57
Indiana, Northern	15	7	7	10	5	5	5	5	5	9	73
Indiana, Southern	8	10	5	10	4	4	1	4	7	8	61
Iowa, Northern	1	2	4	3	2	0	5	2	1	1	21
Iowa, Southern	2	2	2	6	2	2	0	1	0	0	17
Kansas	4	2	2	0	2	12	16	3	3	11	55
Kentucky, Eastern	12	15	10	17	15	7	14	15	5	2	112
Kentucky, Western	3	4	3	3	6	2	6	5	2	3	37
Louisiana, Eastern	20	10	12	16	14	11	10	8	51	27	179
Louisiana, Middle	5	7	9	3	9	0	0	0	0	0	33
Louisiana, Western	25	4	6	22	9	10	12	8	8	4	108
Maine	2	3	4	5	0	1	0	0	0	1	16
Maryland	47	38	31	23	80	17	11	11	2	17	277
Massachusetts	22	18	16	17	19	11	26	4	21	12	166
Michigan, Eastern	19	13	4	25	20	24	16	3	14	11	149
Michigan, Western	0	6	2	9	7	3	7	1	2	0	37
Minnesota	6	5	4	5	3	3	7	3	8	5	49
Mississippi, Northern	11	8	3	4	3	3	2	0	4	3	41
Mississippi, Southern	7	10	8	3	6	4	2	5	12	6	63
Missouri, Eastern	10	10	5	6	3	6	5	4	2	11	62
Missouri, Western	0	9	6	12	11	15	11	8	5	9	86
Montana	5	27	8	26	19	10	16	13	0	4	128

TABLE III (continued)

U.S. Attorney's Office	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Totals
Nebraska	3	4	3	6	8	14	8	9	3	7	65
Nevada	2	6	0	0	1	5	2	3	4	2	25
New Hampshire	0	0	0	1	1	0	1	1	1	0	5
New Jersey	30	33	23	28	21	31	35	15	29	22	267
New Mexico	2	10	12	4	6	1	4	5	0	2	46
New York, Eastern	5	9	28	8	12	16	17	11	8	14	128
New York, Northern	1	0	4	2	1	2	3	1	6	3	23
New York, Southern	13	13	19	20	15	33	1	8	18	7	147
New York, Western	7	19	17	18	18	2	1	2	9	1	94
North Carolina, Eastern	10	6	13	15	5	16	4	2	5	6	82
North Carolina, Middle	2	0	0	0	0	1	0	0	0	2	5
North Carolina, Western	7	2	4	2	4	3	4	6	0	1	33
North Dakota	0	0	1	0	2	3	3	0	2	2	13
Ohio, Northern	8	11	18	13	12	8	7	11	16	4	108
Ohio, Southern	11	9	12	1	0	2	5	8	10	6	64
Oklahoma, Eastern	14	11	10	4	12	4	11	2	0	1	69
Oklahoma, Northern	3	4	4	5	0	5	0	2	0	1	24
Oklahoma, Western	5	7	6	4	9	4	7	2	3	2	49
Oregon	3	4	3	0	1	5	0	0	0	1	17
Pennsylvania, Eastern	29	36	27	26	26	29	21	9	13	7	223
Pennsylvania, Middle	0	1	14	3	14	7	6	5	8	7	65
Pennsylvania, Western	10	6	8	3	8	4	2	2	2	7	52
Puerto Rico	19	47	13	41	13	28	25	7	27	36	256
Rhode Island	8	4	3	0	1	0	1	0	0	0	17

TABLE III (continued)

U.S. Attorney's Office	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Totals
South Carolina	5	7	3	6	0	7	10	0	5	0	43
South Dakota	3	1	6	1	15	6	13	6	3	6	60
Tennessee, Eastern	8	11	8	4	2	5	3	2	1	2	46
Tennessee, Middle	4	0	5	7	5	5	0	0	0	3	29
Tennessee, Western	18	8	21	9	10	13	0	2	4	3	88
Texas, Eastern	3	6	3	4	4	0	1	2	4	4	31
Texas, Northern	27	39	48	49	18	8	16	13	2	15	235
Texas, Southern	83	29	11	3	12	6	17	2	30	15	208
Texas, Western	53	28	29	30	33	8	11	13	4	14	223
Utah	3	2	0	2	1	0	0	3	1	2	14
Vermont	1	1	1	0	0	0	1	0	0	0	4
Virgin Islands	5	2	1	0	0	4	4	2	1	0	19
Virginia, Eastern	53	34	40	32	32	16	26	26	27	16	302
Virginia, Western	3	5	8	4	3	0	3	1	2	1	30
Washington, Eastern	0	0	0	7	1	0	3	0	2	0	13
Washington, Western	5	7	5	9	7	7	7	5	5	7	64
West Virginia, Northern	7	18	3	3	3	2	2	4	2	5	49
West Virginia, Southern	4	4	2	1	4	11	10	5	6	6	53
Wisconsin, Eastern	6	4	5	3	2	8	7	6	3	4	48
Wisconsin, Western	7	5	2	4	6	0	1	1	1	4	31
Wyoming	3	0	0	0	0	0	0	0	0	0	3