

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on May 15, 2009

UNITED STATES OF AMERICA

CRIMINAL NO.

CR - 09 - 254

v.

YITBAREK SYUME, BERHANE  
LEGHESE, and AMANUEL  
GHIRMAZION,

UNDER SEAL

FILED IN OPEN COURT

OCT - 1 2009

Defendants.

VIOLATION:  
18 U.S.C. § 371

CLERK, U.S. DISTRICT COURT  
DISTRICT OF COLUMBIA

**FRIEDMAN, J. PLF**

(Conspiracy to Commit Bribery);  
18 U.S.C. § 2  
(Aiding and Abetting, Causing an  
Act to be Done)

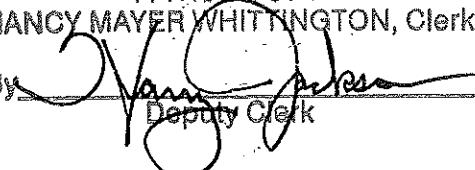
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INDICTMENT

The Grand Jury charges that:

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

COUNT ONE

By   
Deputy Clerk

Introduction

1. The District of Columbia Taxicab Commission ("DCTC") regulates the operation of taxicabs in Washington, D.C. The DCTC, among other things, establishes criteria, standards, and requirements for taxicab licensing, including the licensing of owners, operators, companies, associations, and fleets. It also sets licensing fees. The DCTC comprises seven commissioners and a chairperson.

2. Public Official Number One became chairperson of the DCTC on or about July 7,

Case Related To CR 09-226 (PLF)

2007. As part of his official duties, Public Official Number One (the "Chairperson") performed the following acts among others:

- (a) the Chairperson had authority and influence over the issuance of licenses to operate multi-vehicle taxicab companies in the District of Columbia;
- (b) the Chairperson had authority and influence over the issuance of individual District of Columbia taxicab operator licenses which, when issued, authorized individuals to operate taxicabs in the District of Columbia;
- (c) the Chairperson could recommend to the Council of the District of Columbia and others legislation affecting the taxicab industry in Washington, D.C.; and
- (d) the Chairperson could present positions to the Council of the District of Columbia and others in opposition to proposed legislation affecting the taxicab industry in Washington, D.C.

3. Historically, taxicab fares in the District of Columbia had been determined by a zone system, but, pursuant to legislation, on or about October 17, 2007, the District of Columbia adopted a meter system. It was widely anticipated in the taxicab industry, based on the adoption of meter systems in other cities, that the adoption of a meter system would lead to a more regulated taxicab industry, including stringent limitations on the total number of taxicabs licensed to do business in the District of Columbia.

4. On or about July 15, 2008, the Council of the District of Columbia enacted a moratorium on the issuance of multi-vehicle taxicab company licenses. Given this moratorium, the DCTC may not issue any new taxicab company licenses, rendering multi-vehicle taxicab company licenses a valuable commodity.

### **The Conspiracy**

5. From between in or about September 2007, until in or about September 2009, the exact dates being unknown to the grand jury, in the District of Columbia and elsewhere, defendants **YITBAREK SYUME (“SYUME”)**, **BERHANE LEGHESE (“LEGHESE”)**, and **AMANUEL GHIRMAZION (“GHIRMAZION”)**, knowingly and willfully conspired and agreed together and with each other, and with other persons both known and unknown to the grand jury, to commit the following offenses against the United States: that is to directly and indirectly, corruptly give, offer, and promise things of value to the Chairperson, with intent to influence official acts, that is, **SYUME, LEGHESE, and GHIRMAZION** agreed to give approximately \$220,000 in cash to the Chairperson in return for the Chairperson’s agreement to issue numerous multi-vehicle taxicab company licenses, in violation of Title 18, United States Code, Section 201(b) (Bribery of a Public Official).

### **A Goal of the Conspiracy**

6. It was a goal of the conspiracy to obtain corruptly licenses for multi-vehicle taxicab companies from the Chairperson in exchange for cash and other things of value.

### **Manner and Means of the Conspiracy**

7. **SYUME, LEGHESE, GHIRMAZION** (the “**DEFENDANTS**”), and other unindicted co-conspirators, both known and unknown to the Grand Jury, used the following manner and means to accomplish a goal of the conspiracy:

- (a) It was part of the conspiracy that the **DEFENDANTS** would and did play different roles in the conspiracy, and took upon themselves different tasks and participated in the conduct of the organization

through various criminal acts. The **DEFENDANTS** made themselves and their services available at various times throughout the life of the conspiracy and participated in activities required to obtain corruptly licenses for multi-vehicle taxicab companies. Some of the roles assumed and carried out by the **DEFENDANTS** and other unindicted co-conspirators both known and unknown to the Grand Jury included, ~~included~~<sup>END</sup> among others, collecting large sums of cash to be used for bribe payments to the Chairperson. They agreed to pay the Chairperson approximately \$10,000 per license for multi-vehicle taxicab companies. The principal role of **GHIRMAZION** was to raise money for the scheme; the principal role of **LEGHESE** was to prepare documents associated with the corruptly obtained multi-vehicle taxicab company licenses; and the principal role of **SYUME** was to arrange for and make a series of bribe payments to the Chairperson.

- (b) It was further part of the conspiracy that attempts were made to obtain corruptly large numbers of licenses for multi-vehicle taxicab companies from the Chairperson.
- (c) It was further part of the conspiracy that the **DEFENDANTS** intended to sell some of the licenses for multi-vehicle taxicab companies that they had corruptly obtained to finance their scheme,

and to hold the balance of the licenses in anticipation of the licenses becoming more valuable.

- (d) It was further part of the conspiracy that the **DEFENDANTS** and unindicted co-conspirators used telephones to facilitate their bribery scheme; that is, to communicate with each other and with the Chairperson.

#### Overt Acts

8. In furtherance of the conspiracy and in order to achieve the goals thereof, **SYUME**, **LEGHESE**, **GHIRMAZION**, and other unindicted co-conspirators, both known and unknown to the Grand Jury, within the District of Columbia, and elsewhere, committed overt acts, including, but not limited to the following:

- (1) On or about September 5, 2007, **SYUME** gave to the Chairperson a list of seven multi-vehicle taxicab companies for which he requested licensing without proper authorization.
- (2) On or about September 5, 2007, **SYUME** also gave to the Chairperson an envelope containing approximately \$14,000 in cash in exchange for the requested licenses.
- (3) On or about September 6, 2007, **SYUME** gave two envelopes containing a total of approximately \$8,000 in cash to the Chairperson in exchange for multi-vehicle taxicab company licenses.
- (4) On or about September 25, 2007, **SYUME** received from the Chairperson multi-vehicle taxicab company licenses for which **SYUME** had previously paid.

- (5) On or about October 1, 2007, **SYUME** gave the Chairperson approximately \$2,000 in cash as partial payment for the multi-vehicle taxicab licenses that he had received to date.
- (6) On or about October 2, 2007, **SYUME** gave the Chairperson an envelope that contained approximately \$2,000 in cash as partial payment for multi-vehicle taxicab company licenses.
- (7) On or about October 3, 2007, **SYUME** put a folded newspaper containing approximately \$3,000 in cash into the Chairperson's automobile as partial payment for multi-vehicle taxicab company licenses.
- (8) On or about October 17, 2007, **SYUME** again put a folded newspaper containing approximately \$3,000 in cash into the Chairperson's automobile as partial payment for multi-vehicle taxicab company licenses.
- (9) On or about November 3, 2007, **SYUME** and **GHIRMAZION** spoke by telephone, at which time **GHIRMAZION** provided information for use on a document that **SYUME** was preparing in relation to the multi-vehicle taxicab company licenses that they were attempting to obtain from the Chairperson.
- (10) On or about November 8, 2007, **SYUME** and **LEGHESE** spoke by telephone, at which time they discussed selling for \$150,000 apiece the multi-vehicle taxicab company licenses that they were attempting to obtain from the Chairperson.
- (11) On or about November 14, 2007, **SYUME** gave a shopping bag containing approximately \$59,880 in cash to the Chairperson in partial payment for ten multi-vehicle taxicab company licenses.

- (12) On or about November 18, 2007, **SYUME** and **LEGHESE** spoke by telephone, at which time they agreed to meet so that **LEGHESE** could give to **SYUME** fraudulent paperwork related to the multi-vehicle taxicab company licenses which they were attempting to obtain from the Chairperson.
- (13) On or about December 14, 2007, **SYUME** and **LEGHESE** spoke by telephone, at which time they prepared for an upcoming meeting with the Chairperson.
- (14) On or about January 10, 2008, **SYUME** gave the Chairperson approximately \$99,950 in cash as partial payment for multi-vehicle taxicab company licenses.
- (15) On or about January 12, 2008, **SYUME** and **GHIRMAZION** spoke by telephone, at which time they discussed plans to sell multi-vehicle taxicab company licenses that they had obtained from the Chairperson.
- (16) On or about March 5, 2008, **SYUME** and **LEGHESE** spoke by telephone, at which time they discussed the status of the licenses for multi-vehicle taxicab companies that they had obtained from the Chairperson.
- (17) On or about March 6, 2008, **SYUME** gave the Chairperson approximately \$6,900 in cash as partial payment for multi-vehicle taxicab company licenses.
- (18) On or about March 12, 2008, **SYUME** gave the Chairperson approximately \$2,000 in cash as partial payment for multi-vehicle taxicab company licenses.
- (19) On or about March 14, 2008, **SYUME** gave the chairperson approximately \$1,100 in cash as partial payment for multi-vehicle taxicab company licenses.

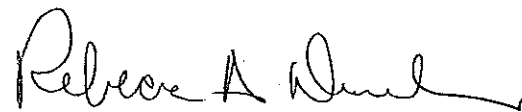
- (20) On or about April 2, 2008, **SYUME** and **GHIRMAZION** spoke by telephone, at which time they discussed the status of their efforts to obtain a moratorium on the issuance of multi-vehicle taxicab company licenses.
- (21) On or about April 24, 2008, **SYUME** gave the Chairperson approximately \$3,800 in cash as partial payment for multi-vehicle taxicab company licenses.
- (22) On or about April 29, 2008, **SYUME** gave the Chairperson approximately \$2,340 in cash as partial payment for multi-vehicle taxicab company licenses.
- (23) On or about May 5, 2008, **SYUME** gave the Chairperson approximately \$4,980 in cash as partial payment for multi-vehicle taxicab company licenses.
- (24) On or about May 5, 2008, **SYUME** and **LEGHESE** spoke by telephone, at which time they discussed their bribery of the Chairperson; **SYUME** stated: "I don't regret a penny I spend on [the Chairperson]."
- (25) On or about May 6, 2008, **SYUME** gave the Chairperson \$962 in cash as partial payment for multi-vehicle taxicab company licenses.
- (26) On or about May 15, 2008, an unindicted co-conspirator gave the Chairperson approximately \$5,000 in cash as partial payment for multi-vehicle taxicab company licenses.
- (27) On or about June 2, 2008, **SYUME** gave the Chairperson approximately \$3,950 in cash as partial payment for multi-vehicle taxicab company licenses.
- (28) On or about July 5, 2008, **SYUME** and **LEGHESE** spoke by telephone, at which time they discussed their concerns about the Chairperson; **LEGHESE** stated: "We

have to be careful that [the Chairperson] will not play any games, do you understand?"

- (29) On or about July 7, 2008, SYUME and GHIRMAZION spoke by telephone, at which time SYUME asked GHIRMAZION to approve the entry of another into their conspiracy: "Listen, listen. So you will sign on [co-conspirator's] investor. If you give the approval he will join."
- (30) On or about July 22, 2008, SYUME and GHIRMAZION spoke by telephone, at which time they discussed financing for their scheme to obtain corruptly licenses for multi-vehicle taxicab companies.

**(Conspiracy to Commit Bribery, Aiding and Abetting, Causing an Act to Be Done, in violation of Title 18, United States Code, Sections 371 and 2)**

A TRUE BILL:



FOREPERSON

*Channing D. Phillips / STD*  
Acting United States Attorney of the United States  
in and for the District of Columbia