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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY: _____

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2012 Grand Jury

CR 14-0103

UNITED STATES OF AMERICA,

CR No. 14-

Plaintiff,

I N D I C T M E N T

v.

[18 U.S.C. § 1341: Mail Fraud; 18 U.S.C. § 1343: Wire Fraud; 18 U.S.C. § 1346: Honest Services Fraud; 18 U.S.C. § 666: Bribery Concerning Programs Receiving Federal Funds; 18 U.S.C. § 1956(h): Conspiracy to Commit Money Laundering; 18 U.S.C. § 1956(a)(1)(B)(i): Money Laundering; 26 U.S.C. § 7206(2): Aiding in the Filing of False Tax Return]

RONALD S. CALDERON and
THOMAS M. CALDERON,

Defendants.

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

A. RELEVANT PERSONS AND ENTITIES

1. Defendant RONALD S. CALDERON was an elected California State Senator who owed a fiduciary duty and a duty of honest services to the citizens of California, including his

DMM:dmm
MEJ:mej

1 constituents in the 30th Senate District, which included, among
2 others, the cities of Bell, Bell Gardens, Commerce, Cudahy,
3 Montebello, Norwalk, Pico Rivera, Santa Fe Springs, and
4 Whittier.

5 2. Defendant THOMAS M. CALDERON was defendant RONALD S.
6 CALDERON's brother and a former California State Assemblymen for
7 the 58th Assembly District, which included, among others, the
8 cities of Montebello, Norwalk, and Whittier.

9 3. The Calderon Group Incorporated ("the Calderon Group")
10 was a privately-owned consulting company founded by defendant
11 THOMAS M. CALDERON after he left the California State Assembly
12 in 2002.

13 4. Californians for Diversity was a tax-exempt public
14 benefit corporation under Title 26, United States Code, Section
15 501(c)(4), for which defendant THOMAS M. CALDERON served as
16 Chief Executive Officer and President.

17 5. Michael D. Drobot ("Drobot") owned and/or operated
18 Pacific Hospital of Long Beach ("Pacific Hospital") from in or
19 around 1997 to in or around October 2013. Pacific Hospital was
20 a hospital located in Long Beach, California, specializing in
21 surgeries, particularly spinal and orthopedic surgeries.

22 6. UC-1 was an undercover agent for the Federal Bureau of
23 Investigation ("FBI") who held himself out to defendant RONALD
24 S. CALDERON, defendant THOMAS M. CALDERON, and others as the
25 owner of an independent film studio in Los Angeles, California.

26 7. UC-2 was an undercover agent for the FBI who held
27 herself out to defendant RONALD S. CALDERON, defendant THOMAS M.
28 CALDERON, and others as UC-1's girlfriend.

1 8. UC-3 was an undercover agent for the FBI who held
2 himself out to defendant RONALD S. CALDERON, defendant THOMAS M.
3 CALDERON, and others as the owner of an entertainment company in
4 Florida and an investor in UC-1's independent film studio.

5 B. THE CALIFORNIA LEGISLATURE

6 9. The California State Senate (the "Senate") was one of
7 two legislative bodies in the California State Legislature. The
8 Senate was comprised of approximately 40 elected representatives
9 ("Senators").

10 10. Senators were agents of California, a government that
11 received more than \$10,000 per fiscal year in funds from the
12 United States in the form of grants, contracts, subsidies,
13 loans, guarantees, insurance, and other forms of federal
14 assistance.

15 11. Senators, in their official capacity, would
16 customarily: (1) draft and vote on legislation; (2) meet with
17 other public officials and their staff to discuss legislation;
18 (3) issue press releases, letters of support, and other public
19 statements indicating their position on legislation; and (4)
20 hire staff members whose salaries were paid for by the State of
21 California to assist them in their responsibilities as Senators.

22 C. RELEVANT LEGISLATION

23 12. Pursuant to California law, California's Workers'
24 Compensation System ("CWCS") required California employers to
25 provide workers' compensation benefits to employees who were
26 injured in the course of their employment.

27 13. Before January 2013, California law, in a provision
28 referred to herein as the "spinal pass-through," allowed a

1 hospital to bill the cost of medical hardware separately from
2 the other costs of a surgery, such as the hospital's and
3 surgeon's services, the reimbursement rates of which were set by
4 a fee schedule. The hardware was considered a pass-through cost
5 and billing was limited to \$250 over what the hospital paid for
6 the hardware.

7 14. Between January 2010 and August 2012, the California
8 Senate and the Division of Workers' Compensation, an agency
9 within the CWCS system, took several steps designed to modify or
10 eliminate the spinal pass-through. This was due, in part, to
11 studies that showed eliminating the spinal pass-through could
12 result in savings of as much as \$60 million to California
13 taxpayers.

14 15. By January 2013, California law was changed to
15 eliminate the spinal pass-through; subsequently, reimbursement
16 for all costs of a surgery was limited to a fee schedule.

17 16. Pursuant to California law, in a provision referred to
18 herein as the "film tax credit," producers of certain
19 independent films and qualified motion pictures in California
20 were entitled to receive a state tax credit for certain
21 expenditures. The film tax credit defined independent films as
22 motion pictures with a minimum budget of \$1,000,000 and a
23 maximum budget of \$10,000,000 that were produced by certain
24 individuals and companies.

25 17. Pursuant to California law, Senators were required to
26 file Statements of Economic Interests and similar forms with the
27 California Fair Political Practices Commission, wherein they
28 disclosed, among other things, certain income, gifts, loans, and

1 travel they had received, as well as certain payments they had
2 requested, solicited, or suggested be made to third parties.

3 18. These Introductory Allegations are hereby incorporated
4 by reference into each count of this Indictment as though set
5 forth fully therein.

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COUNTS ONE THROUGH TEN

[18 U.S.C. §§ 1341, 1343, 1346]

A. THE SCHEME TO DEFRAUD

Beginning on a date unknown to the Grand Jury and continuing through on or about May 4, 2013, in Los Angeles County, within the Central District of California, and elsewhere, defendant RONALD S. CALDERON, together with others known and unknown to the Grand Jury, knowingly and with intent to defraud, devised, participated in, and executed a scheme to defraud the citizens of the State of California of their right to the honest services of their elected officials through bribery and kickbacks, and the concealment of material information, which scheme is described further below.

B. MEANS AND METHODS OF THE SCHEME TO DEFRAUD

Defendant RONALD S. CALDERON, together with others known and unknown to the Grand Jury, defrauded the citizens of the State of California by the following means and methods:

1. Defendant RONALD S. CALDERON would seek and accept bribes and kickbacks in the form of financial benefits and payments to himself, his children, and to Californians for Diversity and the Calderon Group.

2. Defendant RONALD S. CALDERON would perform official acts favorable to the individuals paying him bribes and kickbacks, including introducing and supporting legislation on their behalf, and seeking the support of other public officials and their staff for such legislation.

3. Defendant RONALD S. CALDERON would disclose some of the official acts he had performed on behalf of co-schemers

1 paying him bribes to induce others to continue paying him
2 bribes.

3 4. Defendant RONALD S. CALDERON would take steps to
4 disguise, conceal, and cover up the bribe payments he was
5 receiving and, in several instances, the official acts he had
6 performed in exchange for the bribe payments.

7 Bribes Involving the Spinal Pass-Through

8 5. Defendant RONALD S. CALDERON would solicit and accept
9 benefits, such as employment for his son, trips on privately-
10 chartered airplanes, golf at exclusive, high-end golf resorts,
11 and meals at expensive restaurants, from Drobot with the
12 understanding that such benefits were to influence, and in
13 exchange for, defendant RONALD S. CALDERON's official acts in
14 connection with the spinal pass-through and worker's
15 compensation legislation and regulation.

16 6. Defendant RONALD S. CALDERON would solicit Drobot
17 to hire defendant RONALD S. CALDERON's son at one or more of
18 Drobot's companies during the summers of 2010, 2011, and 2012,
19 and to pay defendant RONALD S. CALDERON's son approximately
20 \$10,000 per summer.

21 7. Drobot would agree to hire defendant RONALD S.
22 CALDERON's son to perform clerical duties at one or more of
23 Drobot's companies during the summers of 2010, 2011, and 2012,
24 and cause defendant RONALD S. CALDERON's son to be paid
25 approximately \$10,000 per summer, or approximately \$30,000
26 total, for approximately 15 days of work per summer, which
27 payments were disbursed on or about the following dates:
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DATE	AMOUNT
7/13/2010	\$10,000
7/11/2011	\$5,000
8/16/2011	\$5,000
7/13/2012	\$1,490.95
7/27/2012	\$1,490.95
8/02/2012	\$7,018.10

8. Defendant RONALD S. CALDERON would perform official acts favorable to Drobot in connection with the spinal pass-through and worker's compensation legislation and regulation.

9. Defendant RONALD S. CALDERON would communicate with other public officials and their staff and attempt to convince them to take action favorable to Drobot in connection with the spinal pass-through and worker's compensation legislation and regulation. For example:

a. In or about February 2010, defendant RONALD S. CALDERON met with Drobot in or around Sacramento, California and solicited Drobot to hire defendant RONALD S. CALDERON's son for the next several summers and to pay him \$10,000 per summer, so that defendant RONALD S. CALDERON's son would have enough money to pay his college tuition.

b. In or about April 2010, defendant RONALD S. CALDERON met with a Director at the Division of Workers' Compensation and discussed the negative impact that proposed regulations would have on Pacific Hospital and other hospitals.

c. On or about February 18, 2011, defendant RONALD S. CALDERON met with Senator A and requested that Senator A

1 introduce legislation in the Senate favorable to Drobot and
2 Pacific Hospital ("Bill #1").

3 d. On or about March 5, 2011, defendant RONALD S.
4 CALDERON wrote an email to Senator B, discussing the importance
5 of the spinal pass-through and worker's compensation legislation
6 and regulation.

7 e. On or about June 12, 2012, defendant RONALD S.
8 CALDERON and Drobot met with Senator C and discussed the
9 negative impact Senator C's proposed legislation would have on
10 Pacific Hospital and other hospitals ("Bill #2").

11 Bribes Involving the Film Tax Credit

12 10. Defendant RONALD S. CALDERON would solicit and accept
13 financial benefits, such as trips to Las Vegas, meals, and
14 employment for his daughter, from UC-1 and UC-3 with the
15 understanding that such benefits were to influence, and in
16 exchange for, defendant RONALD S. CALDERON's official acts in
17 connection with the film tax credit.

18 11. Defendant RONALD S. CALDERON would negotiate the terms
19 of his daughter's employment with UC-1 and UC-3, including that
20 they were under no obligation to continue paying his daughter if
21 defendant RONALD S. CALDERON did not "deliver" on his support
22 for the film tax credit.

23 12. Defendant RONALD S. CALDERON would cause UC-1 and UC-3
24 to pay his daughter multiple payments of \$3,000 or more under
25 what purported to be a "Studio Services Agreement," even though
26 defendant RONALD S. CALDERON knew his daughter was not expected
27 to perform any work under the purported agreement and that the
28 payments of \$3,000 or more were to influence, and in exchange

1 for, defendant RONALD S. CALDERON's official acts in connection
2 with the film tax credit.

3 13. Defendant RONALD S. CALDERON would cause UC-1 and UC-3
4 to make the payments of \$3,000 or more, which totaled
5 approximately \$39,000, on or about the following dates, in the
6 following approximate disbursements:

DATE	AMOUNT
7/19/2012	\$3,000
8/01/2012	\$3,000
9/08/2012	\$3,000
9/28/2012	\$3,000
11/01/2012	\$3,000
12/01/2012	\$3,000
1/01/2013	\$3,000
2/02/2013	\$3,000
3/02/2013	\$3,000
3/27/2013	\$3,000
4/18/2013	\$9,000

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17 14. Defendant RONALD S. CALDERON would inform UC-1 of the
18 official acts he had performed on behalf of Drobot in connection
19 with the spinal pass-through and worker's compensation
20 legislation and regulation to induce UC-1 to continue making
21 bribe payments in connection with the film tax credit.

22 15. Defendant RONALD S. CALDERON would perform
23 official acts favorable to UC-1 and UC-3 in connection with the
24 film tax credit. For example:

25 a. On or about September 12, 2012, defendant RONALD
26 S. CALDERON signed a letter in his capacity as a Senator
27 expressing his support for amending the film tax credit to lower
28 the threshold for independent films from \$1 million to \$750,000.

1 b. On or about October 25, 2012, defendant RONALD S.
2 CALDERON met with Senator B to discuss the benefits of lowering
3 the film tax credit threshold for independent films below \$1
4 million.

5 c. On or about February 19, 2013, defendant RONALD
6 S. CALDERON caused legislation to be introduced in the Senate,
7 which he intended to use as a vehicle to create a separate tax
8 credit for independent filmmakers with budgets below \$1 million.

9 d. On or about April 24, 2013, defendant RONALD S.
10 CALDERON met with Senator C to discuss legislation that would
11 create a separate tax credit for independent filmmakers and
12 producers of commercials with budgets below \$1 million.

13 Bribes Involving the Hiring of UC-2

14 16. Defendant RONALD S. CALDERON would solicit and accept
15 benefits, including money towards his son's college tuition and
16 a large financial contribution to Californians for Diversity,
17 from UC-1 with the understanding that such benefits were to
18 influence, and in exchange for, defendant RONALD S. CALDERON's
19 official acts in connection with hiring UC-2 to defendant RONALD
20 S. CALDERON's Senate staff.

21 17. Defendant RONALD S. CALDERON would solicit and accept
22 a \$5,000 payment towards his son's college tuition from UC-1.

23 18. Defendant RONALD S. CALDERON would direct UC-1 to make
24 a \$25,000 payment to Californians for Diversity after explaining
25 to UC-1 that defendant RONALD S. CALDERON and Thomas M. Calderon
26 intended to use that money to pay themselves.

27 19. Defendant RONALD S. CALDERON would perform official
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1 acts favorable to UC-1 and UC-2 in connection with the hiring of
2 UC-2 to defendant RONALD S. CALDERON's Senate staff. For
3 example:

4 a. On or about January 11, 2013, defendant RONALD S.
5 CALDERON sought Senator A's approval to hire UC-2 as a member of
6 defendant RONALD S. CALDERON's Senate staff.

7 b. On or about January 16, 2013, defendant RONALD S.
8 CALDERON requested the Secretary of the Senate to hire UC-2 as a
9 member of defendant RONALD S. CALDERON's Senate staff.

10 The Concealment of Material Information

11 20. Defendant RONALD S. CALDERON would take steps to
12 conceal and disguise the bribe payments he received and, in
13 several instances, the official acts he performed in exchange
14 for the bribe payments. For example:

15 a. In or about February 2011, defendant RONALD S.
16 CALDERON had Senator A introduce Bill #1 in the Senate to
17 conceal from the citizens of California that defendant RONALD S.
18 CALDERON was a main proponent of legislation favorable to
19 Drobot.

20 b. On or about September 12, 2012, defendant RONALD
21 S. CALDERON signed an official letter indicating his support for
22 lowering the threshold for independent films from \$1 million to
23 \$750,000, knowing the letter was addressed to a fictitious
24 organization, to conceal from the citizens of California that
25 the letter was written at the request, and for the benefit, of
26 UC-1.

27 c. On or about January 16, 2013, defendant RONALD S.
28 CALDERON falsely claimed that he was hiring UC-2 to service the

1 new communities in his Senate district to conceal from the
2 citizens of California that UC-2 was actually being hired at the
3 request, and for the benefit, of UC-1.

4 d. On or about February 14, 2013, defendant RONALD
5 S. CALDERON failed to disclose to the California Fair Political
6 Practices Commission that he had directed UC-1 to make a \$25,000
7 contribution to Californians for Diversity to conceal from the
8 citizens of California the fact that the payment was made at his
9 behest.

10 e. On or about March 1, 2013, defendant RONALD S.
11 CALDERON caused a false Statement of Economic Interest,
12 California Form 700, to be submitted to the California Fair
13 Political Practices Commission, which failed to disclose certain
14 gifts, travel, and money defendant RONALD S. CALDERON had
15 received from Drobot and UC-1 during 2012.

16 C. THE USE OF WIRES

17 On or about the dates set forth below, within the Central
18 District of California and elsewhere, defendant RONALD S.
19 CALDERON, for the purpose of executing the above-described
20 scheme to defraud, caused the transmission of the following
21 items by means of wire and radio communication in interstate and
22 foreign commerce:

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COUNT	DATE	ITEM WIRED
ONE	6/18/2012	An email from defendant RONALD S. CALDERON's America Online email account to Drobot's email account at Pacific Hospital regarding when and how much money defendant RONALD S. CALDERON's son should be paid by Drobot
TWO	6/28/2012	An email from defendant RONALD S. CALDERON's America Online email account to Drobot's email account at Pacific Hospital regarding when and how much money defendant RONALD S. CALDERON's son should be paid by Drobot

D. THE USE OF THE MAIL

On or about the dates set forth below, within the Central District of California and elsewhere, defendant RONALD S. CALDERON, for the purpose of executing the above-described scheme to defraud, caused the following items to be placed in an authorized depository for mail matter to be sent and delivered by the United States Postal Service according to the directions thereon:

COUNT	DATE	ITEM MAILED
THREE	7/20/2012	Envelope addressed to what was represented to be UC-1's independent film studio in Los Angeles, California, containing a "Studio Services Agreement" signed by defendant RONALD S. CALDERON's daughter and UC-1
FOUR	8/12/2012	Envelope addressed to defendant RONALD S. CALDERON at his home address containing a \$3,000 check payable to defendant RONALD S. CALDERON's daughter
FIVE	9/28/2012	Envelope addressed to defendant RONALD S. CALDERON at his home address containing a \$3,000 check payable to defendant RONALD S. CALDERON's daughter

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COUNT	DATE	ITEM MAILED
SIX	1/03/2013	Envelope addressed to defendant RONALD S. CALDERON at his home address containing a \$3,000 check payable to defendant RONALD S. CALDERON's daughter
SEVEN	1/15/2013	Envelope addressed to Californians for Diversity in Covina, California, containing a \$25,000 check payable to Californians for Diversity
EIGHT	2/05/2013	Envelope addressed to defendant RONALD S. CALDERON at his home address containing a \$3,000 check payable to defendant RONALD S. CALDERON's daughter
NINE	2/27/2013	Envelope addressed to UC-2's mailing address in Los Angeles, California, containing a Senate Benefits Package
TEN	3/01/2013	Envelope addressed to defendant RONALD S. CALDERON at his home address containing a \$3,000 check payable to defendant RONALD S. CALDERON's daughter

COUNT ELEVEN

[18 U.S.C. § 666(a)(1)(B)]

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3 On or about July 13, 2010, in Los Angeles County, within
4 the Central District of California, and elsewhere, defendant
5 RONALD S. CALDERON, an agent of the State of California, a state
6 government that received in any one-year period benefits in
7 excess of \$10,000 under a Federal program, corruptly solicited
8 and demanded for the benefit of a person, and accepted and
9 agreed to accept, something of value from a person, intending to
10 be influenced and rewarded in connection with a business,
11 transaction, and series of transactions of the State of
12 California having a value of \$5,000 or more. Specifically,
13 defendant RONALD S. CALDERON solicited, demanded, accepted, and
14 agreed to accept from Michael D. Drobot employment for defendant
15 RONALD S. CALDERON's son, intending to be influenced and
16 rewarded in connection with supporting the spinal pass-through
17 and worker's compensation legislation and regulation.
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COUNT TWELVE

[18 U.S.C. § 666(a)(1)(B)]

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3 Between on or about July 20, 2011 and on or about August
4 16, 2011, in Los Angeles County, within the Central District of
5 California, and elsewhere, defendant RONALD S. CALDERON, an
6 agent of the State of California, a state government that
7 received in any one-year period benefits in excess of \$10,000
8 under a Federal program, corruptly solicited and demanded for
9 the benefit of a person, and accepted and agreed to accept,
10 something of value from a person, intending to be influenced and
11 rewarded in connection with a business, transaction, and series
12 of transactions of the State of California having a value of
13 \$5,000 or more. Specifically, defendant RONALD S. CALDERON
14 solicited, demanded, accepted, and agreed to accept from Michael
15 D. Drobot employment for defendant RONALD S. CALDERON's son,
16 intending to be influenced and rewarded in connection with
17 supporting the spinal pass-through and worker's compensation
18 legislation and regulation.

COUNT THIRTEEN

[18 U.S.C. § 666(a)(1)(B)]

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3 Between on or about June 18, 2012 and on or about August
4 14, 2012, in Los Angeles County, within the Central District of
5 California, and elsewhere, defendant RONALD S. CALDERON, an
6 agent of the State of California, a state government that
7 received in any one-year period benefits in excess of \$10,000
8 under a Federal program, corruptly solicited and demanded for
9 the benefit of a person, and accepted and agreed to accept,
10 something of value from a person, intending to be influenced and
11 rewarded in connection with a business, transaction, and series
12 of transactions of the State of California having a value of
13 \$5,000 or more. Specifically, defendant RONALD S. CALDERON
14 solicited, demanded, accepted, and agreed to accept from Michael
15 D. Drobot employment for defendant RONALD S. CALDERON's son,
16 intending to be influenced and rewarded in connection with
17 supporting the spinal pass-through and worker's compensation
18 legislation and regulation.

COUNT FOURTEEN

[18 U.S.C. § 666(a)(1)(B)]

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3 Between on or about February 24, 2012 and on or about May
4 4, 2013, in Los Angeles County, within the Central District of
5 California, and elsewhere, defendant RONALD S. CALDERON, an
6 agent of the State of California, a state government that
7 received in any one-year period benefits in excess of \$10,000
8 under a Federal program, corruptly solicited and demanded for
9 the benefit of a person, and accepted and agreed to accept,
10 something of value from a person, intending to be influenced and
11 rewarded in connection with a business, transaction, and series
12 of transactions of the State of California having a value of
13 \$5,000 or more. Specifically, defendant RONALD S. CALDERON
14 solicited, demanded, accepted, and agreed to accept from UC-1
15 and UC-3, money, employment for defendant RONALD S. CALDERON's
16 daughter, and other financial benefits, intending to be
17 influenced and rewarded in connection with the Film tax credit
18 legislation and the hiring of UC-2 to a Senate staff position.
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COUNT FIFTEEN

[18 U.S.C. § 1956(h)]

A. THE OBJECT OF THE CONSPIRACY

Between in or about January 2013 and on or about May 4, 2013, in Los Angeles County, within the Central District of California, and elsewhere, defendants RONALD S. CALDERON, THOMAS M. CALDERON, unindicted coconspirator #1, and others known and unknown to the Grand Jury, knowingly conspired and agreed with each other to conduct financial transactions affecting interstate commerce involving the proceeds of specified unlawful activity, namely, bribery, knowing that the property involved in the transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed, in whole and in part, to conceal and disguise the nature, the location, the source, the ownership, and the control of said proceeds, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

B. THE MANNER AND MEANS OF THE CONSPIRACY

The object of the conspiracy was carried out, and to be carried out, in substance, as follows:

1. Defendant RONALD S. CALDERON would solicit and accept bribes and kickbacks from UC-1 and UC-3.

2. Defendant RONALD S. CALDERON would direct UC-1 and UC-3 to make bribe payments to Californians for Diversity and the Calderon Group, two entities over which defendant THOMAS M. CALDERON had financial control.

3. Defendant THOMAS M. CALDERON would use the bribe payments made by UC-1 and UC-3 to engage in monetary

1 transactions at financial institutions, including California
2 Bank and Trust and Camino Federal Credit Union, designed to
3 conceal and disguise the nature, location, source, ownership,
4 and control of the bribe payments.

5 C. OVERT ACTS

6 In furtherance of the conspiracy, and to accomplish its
7 object, defendants RONALD S. CALDERON, THOMAS M. CALDERON,
8 unindicted coconspirator #1, and others known and unknown to the
9 Grand Jury, committed and willfully caused others to commit the
10 following overt acts, among others, in the Central District of
11 California and elsewhere:

12 Overt Act No. 1: On or about January 11, 2013, defendant
13 RONALD S. CALDERON directed UC-1 to make a contribution of
14 approximately \$25,000 to Californians for Diversity, an entity
15 over which defendant THOMAS M. CALDERON had financial control.

16 Overt Act No. 2: On or about January 22, 2013, defendant
17 THOMAS M. CALDERON caused Californians for Diversity to issue a
18 payment of \$6,500 to the Calderon Group.

19 Overt Act No. 3: On or about January 23, 2013, defendant
20 THOMAS M. CALDERON caused a \$6,500 check from Californians for
21 Diversity to be deposited into the Calderon Group credit union
22 account at Camino Federal Credit Union (XXX53-9).

23 Overt Act No. 4: On or about February 28, 2013, defendant
24 THOMAS M. CALDERON caused a \$6,500 check from Californians for
25 Diversity to be deposited into the Calderon Group credit union
26 account at Camino Federal Credit Union (XXX53-9).

27 Overt Act No. 5: On or about March 14, 2013, defendant
28 THOMAS M. CALDERON caused a transfer of approximately \$700 from

1 his personal credit union account to defendant RONALD S.
2 CALDERON's credit union account at Camino Federal Credit Union
3 (XXX56-9).

4 Overt Act No. 6: On or about March 29, 2013, defendant
5 RONALD S. CALDERON spoke with defendant THOMAS M. CALDERON over
6 the telephone and asked defendant THOMAS M. CALDERON how much
7 more money defendant THOMAS M. CALDERON could draw from
8 Californians for Diversity "without drawing too much attention."

9 Overt Act No. 7: On or about April 4, 2013, defendant
10 RONALD S. CALDERON spoke with unindicted coconspirator #1 over
11 the telephone and discussed ways of getting money from UC-3 to
12 defendant RONALD S. CALDERON, including using defendant THOMAS
13 M. CALDERON to "funnel" the money.

14 Overt Act No. 8: On or about April 11, 2013, defendant
15 THOMAS M. CALDERON caused a \$6,500 check from Californians for
16 Diversity to be deposited into the Calderon Group credit union
17 account at Camino Federal Credit Union (XXX53-9).

18 Overt Act No. 9: On or about April 12, 2013, defendant
19 THOMAS M. CALDERON caused a transfer of approximately \$7,000
20 from the Calderon Group credit union account at Camino Federal
21 Credit Union (XXX53-9) to defendant THOMAS M. CALDERON's
22 personal credit union account at Camino Federal Credit Union
23 (XXX91-9).

24 Overt Act No. 10: On or about April 12, 2013, defendant
25 THOMAS M. CALDERON caused a withdrawal of approximately \$9,900
26 in cash from his personal credit union account at Camino Federal
27 Credit Union (XXX91-9).

1 Overt Act No. 11: On or about April 12, 2013, defendant
2 RONALD S. CALDERON spoke with defendant THOMAS M. CALDERON over
3 the telephone and told defendant THOMAS M. CALDERON that he had
4 "closed the deal" with UC-3 and that UC-3 had agreed to send
5 future bribe payments through defendant THOMAS M. CALDERON's
6 company, the Calderon Group.

7 Overt Act No. 12: On or about April 12, 2013, defendant
8 RONALD S. CALDERON spoke with defendant THOMAS M. CALDERON over
9 the telephone and discussed meeting later that day so defendant
10 THOMAS M. CALDERON could give defendant RONALD S. CALDERON
11 "half" of the money defendant RONALD S. CALDERON was to receive
12 from defendant THOMAS M. CALDERON.

13 Overt Act No. 13: On or about April 16, 2013, defendant
14 THOMAS M. CALDERON instructed UC-3 to send a check for \$30,000
15 to the Calderon Group via United States mail, which defendant
16 THOMAS M. CALDERON knew included \$9,000 in bribe payments to
17 defendant RONALD S. CALDERON's daughter.

18 Overt Act No. 14: On or about April 29, 2013, defendant
19 THOMAS M. CALDERON caused the \$30,000 check from UC-3 to be
20 deposited into the Calderon Group's credit union account at
21 Camino Federal Credit Union (XXX53-9).

22 Overt Act No. 15: On or about April 29, 2013, defendant
23 THOMAS M. CALDERON caused a \$9,000 check from the Calderon Group
24 credit union account at Camino Federal Credit Union (XXX53-9) to
25 be issued to defendant RONALD S. CALDERON's daughter.

COUNTS SIXTEEN THROUGH TWENTY-TWO

[18 U.S.C. § 1956(a)(1)(B)(i)]

On or about the following dates, in Los Angeles County, within the Central District of California, and elsewhere, defendants RONALD S. CALDERON, THOMAS M. CALDERON, and others known and unknown to the Grand Jury, knowing that the property involved in each of the financial transactions described below represented the proceeds of some form of unlawful activity, knowingly conducted and attempted to conduct, the following financial transactions affecting interstate commerce, which transactions, in fact, involved the proceeds of specified unlawful activity, namely, bribery, knowing that each of the transactions was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of such specified unlawful activity:

COUNT	DATE	FINANCIAL TRANSACTION
SIXTEEN	1/23/2013	The deposit of a check issued from Californians for Diversity's bank account for approximately \$6,500 into the Calderon Group credit union account at Camino Federal Credit Union (XXX53-9)
SEVENTEEN	2/28/2013	The deposit of a check issued from Californians for Diversity's bank at California Bank and Trust for approximately \$6,500 into the Calderon Group credit union account at Camino Federal Credit Union (XXX53-9)
EIGHTEEN	3/14/2013	The transfer of approximately \$700 from defendant THOMAS M. CALDERON's personal credit union account at Camino Federal Credit Union (XXX91-9) to defendant RONALD S. CALDERON's personal credit union account at Camino Federal Credit Union (XXX56-9)

COUNT	DATE	FINANCIAL TRANSACTION
NINETEEN	4/11/2013	The deposit of a check issued from Californians for Diversity's bank account at California Bank and Trust for approximately \$6,500 into the Calderon Group credit union account at Camino Federal Credit Union (XXX53-9)
TWENTY	4/12/2013	The transfer of approximately \$7,000 from the Calderon Group bank account at Camino Federal Credit Union (XXX53-9) to defendant THOMAS M. CALDERON's personal credit union account at Camino Federal Credit Union (XXX91-9)
TWENTY-ONE	4/12/2013	The withdrawal of approximately \$9,900 in cash from defendant THOMAS M. CALDERON's personal credit union account at Camino Federal Credit Union (XXX91-9).
TWENTY-TWO	4/29/2013	The issuance of a check for approximately \$9,000 from the Calderon Group bank account at Camino Federal Credit Union (XXX53-9) made payable to defendant RONALD S. CALDERON's daughter.

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COUNT TWENTY-THREE

[26 U.S.C. § 7206(2)]

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3 On or about March 28, 2011, in Los Angeles County, within
4 the Central District of California, and elsewhere, defendant
5 RONALD S. CALDERON willfully aided and assisted in, and
6 procured, counseled, and advised the preparation and
7 presentation of a United States Individual Income Tax Return,
8 Form 1040, to the Internal Revenue Service, for defendant RONALD
9 S. CALDERON's son as to the 2010 tax year, which was false and
10 fraudulent as to material matters, in that it falsely claimed
11 approximately \$6,826 in business expense deductions from the
12 \$10,000 defendant RONALD S. CALDERON's son received through his
13 summer employment with International Implants Incorporated, one
14 of Michael D. Drobot's companies, when, in fact, as defendant
15 RONALD S. CALDERON well knew, his son had not incurred said
16 amount of business expenses.

COUNT TWENTY-FOUR

[26 U.S.C. § 7206(2)]

On or about April 4, 2012, in Los Angeles County, within the Central District of California, and elsewhere, defendant RONALD S. CALDERON willfully aided and assisted in, and procured, counseled, and advised the preparation and presentation of a United States Individual Income Tax Return, Form 1040, to the Internal Revenue Service, for defendant RONALD S. CALDERON's son as to the 2011 tax year, which was false and fraudulent as to material matters, in that it falsely claimed approximately \$6,805 in business expense deductions from the \$10,000 defendant RONALD S. CALDERON's son received through his

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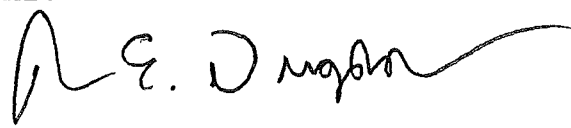
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1 summer employment with International Implants Incorporated, on
2 of Michael D. Drobot's companies, when, in fact, as defendant
3 RONALD S. CALDERON well knew, his son had not incurred said
4 amount of business expenses.

5
6 A TRUE BILL

7
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9 Foreperson

10 ANDRÉ BIROTTE JR.
11 United States Attorney

12 

13 ROBERT E. DUGDALE
14 Assistant United States Attorney
15 Chief, Criminal Division

16 LAWRENCE S. MIDDLETON
17 Assistant United States Attorney
18 Chief, Public Corruption & Civil Rights
19 Section

20 DOUGLAS M. MILLER
21 MACK E. JENKINS
22 Assistant United States Attorneys
23 Public Corruption & Civil Rights Section
24
25
26
27
28