IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	Case No:
	:	
v.	:	**18 U.S.C. § 201(b)(2)(C)**
	:	**(Bribery)**
VINCENT FORREST	:	
Defendant.	:	**18 U.S.C. § 1001(a)(2)**
	:	**(False Statement)**
	:	
	:	<u>**UNDER SEAL**</u>

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT
<u>AND ARREST WARRANT</u>

I, Matthew James Gano, being first duly sworn, hereby depose and state as follows:

1.   I am a Special Agent with the Federal Bureau of Investigation (FBI). As such, I am an investigative or law enforcement officer of the United States within the meaning of Section 2510 of the Title 18, United States Code.

2.   I have been a Special Agent with the FBI since 2017. During that time, I have investigated corruption of local and federal officials, fraud against the government, bribery, threat to life cases, and violations of Color of Law and Civil Rights, as a part of the FBI Washington Field Office Public Corruption and Civil Rights program. I have prepared and assisted in the preparation of court orders and search warrant applications. Additionally, during the course of these and other investigations, I have conducted or participated in physical and electronic surveillance, assisted in the execution of search and arrest warrants, debriefed informants, interviewed witnesses and suspects, and reviewed other pertinent records. Through my training, education, and experience, I have become familiar with the efforts of persons involved in criminal activity to avoid detection by law enforcement.

3.   The information set forth in this affidavit comes from my personal involvement in this investigation, as well as from information provided to me by other law enforcement officers and people with knowledge of the case.   This affidavit does not represent every fact law enforcement knows about this investigation but is submitted for the limited purpose of establishing probable cause for the issuance of a criminal complaint against VINCENT FORREST, for violations of the laws of the United States, that is, bribery, in violation of Title 18, United States Code, Section 201(b)(2)(C) and False Statement, in violation of Title 18, United States Code, Section 1001(a)(2).

BACKGROUND

4.   Defendant VINCENT FORREST, a resident of the District of Columbia, was employed by the District of Columbia Metropolitan Police Department ("MPD").   FORREST served as a Patrol Officer with the MPD's Seventh District Police Station.

5.   As a public official, FORREST had a lawful duty to, among other things, perform his responsibilities consistent with the established policies, practices, directives and orders of the MPD; maintain the confidentiality of law enforcement sensitive MPD systems and databases; and uphold and enforce the laws of the District of Columbia and the United States.

6.   Person 1, a resident of Prince George's County, Maryland, was the owner of Company A, a corporation that, among other things, provided contact information for traffic accident victims to attorneys in exchange for a referral fee.

Protected Traffic Accident Information

7.   MPD officers created Traffic Crash Reports in connection with traffic accidents that occurred within the District of Columbia.   These Traffic Crash Reports contained, among other things, contact information for accident victims.

8.   Various MPD orders and systems, as well as District of Columbia law, controlled and limited access to traffic accident information, in part to prevent harassment of accident victims by attorneys seeking to represent them. These included:

a. MPD General Order No. 401.03, Traffic Crash Reports, which states, in relevant part, that the only persons permitted to view and/or obtain free copies of a Traffic Crash Report are: (1) A person involved in a crash; their spouse; or if a juvenile, their parent or guardian; the owner of the vehicle; or his or her duly authorized agent; and (2) Investigators, attorneys, and/or their staff representing a party involved in a crash.

b. COBALT, an online electronic record management system used to manage all MPD incident reports, which is restricted to MPD and other law enforcement agencies, and which contains information about individuals involved in traffic crashes in the District of Columbia, including their names, addresses, telephone numbers, and other identifying information.

c. District law, specifically, 22 D.C. Code Section 3225.14, makes it "unlawful for a practitioner [that is, a person, licensed to practice a profession or trade in the District, such as an attorney], whether directly or through a paid intermediary, to solicit for financial gain a client . . . within 21 days of a motor vehicle accident with the intent to seek benefits under a contract of insurance or to assert a claim against an insured, a governmental entity, or an insurer on behalf of any person arising out of the accident."

The Bribery Scheme

9.   Walter Lee was a MPD officer between July 2012 and February 2019. On August 15, 2019, Lee pleaded guilty to participating in a bribery scheme with Person 1. *See* Criminal Case No. 19-CR-198 (EGS). According to his sworn statement of offense, ECF No. 8, between February 1, 2018, and February 28, 2019, Lee accepted from Person 1 more than $15,000 in payments in exchange for providing Person 1 confidential victim information from Traffic Crash Reports. Lee typically provided the confidential information to Person 1 through the cell phone application "What's App." To accept payment, Lee would drive to Person 1's home in Beltsville, Maryland, which he would coordinate by communicating with Person 1 over "What's App." Person 1 would either personally pay Lee in cash or leave the cash underneath the mat located at Person 1's front door. (Through separate investigation, your Affiant is aware that Lee also accepted some payments through an electronic application called the "Cash App.") Through separate investigation, your Affiant is aware that there are statues of a lion outside of Person 1's home, flanking Person 1's front door. Lee and Person 1's bribery scheme stopped in February 2019, after Lee was confronted by law enforcement. (During that initial confrontation, Lee denied participating in the bribery scheme.)

10.   A little over a month after the Lee-Person 1 bribery scheme was interrupted, beginning at least as early as April 2019, and continuing through August 2019, in the District of Columbia and elsewhere, FORREST and Person 1 engaged in a virtually identical scheme to trade confidential traffic accident victim information from MPD Traffic Crash Reports for payment. Person 1 offered FORREST, a public official, payment to get confidential accident victim information. FORREST, in violation of his official duties, used his official access to MPD's law enforcement sensitive COBALT database to review and record victim contact information from Traffic Crash Reports. FORREST sent Person 1 the victim contact information using WhatsApp

Messenger, an encrypted communications application. FORREST then met up with Person 1 at various locations in the District of Columbia and Maryland, including Person 1's residence, to accept payment. Person 1 then provided victim contact information from the Traffic Crash Reports to local attorneys in exchange for a referral fee, causing accident victims to be contacted by attorneys within days of their traffic accidents in violation of 22 D.C. Code Section 3225.14. FORREST and Person 1 concealed their bribery scheme by, among other methods, communicating by encrypted application and meeting in person to exchange things of value. In addition, when interviewed by federal law enforcement, FORREST provided false, fictitious, and fraudulent statements and representations regarding his conduct and the scheme.

STATEMENT OF FACTS IN SUPPORT OF PROBABLE CAUSE

April 2019

11.   On April 14, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 16 victims derived from MPD Traffic Crash Reports.

12.   The following day, on April 15, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for an additional 19 accident victims.

13.   On April 16, 2019, Person 1 sent FORREST a WhatsApp message asking FORREST to send her accident victim information earlier in the day, and FORREST commented on victim contact information he was in the midst of reviewing for Person 1:

Person 1:   Can you send earlier if possible so my girl can get on them

FORREST: 1st 10 who was in a metro bus? Yes I have a few now about 6. Still looking through what's here.

Person 1:   That's what my girl sad but she be exaggerating!!!! Metro bus passengers.

FORREST: Lol yeah that's a bit exaggerated there's no way because it was all different report numbers. If its something like that I'll try and list if

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it was driver passenger to let you know if was the same vehicle.

14.   On April 25, 2019, Person 1 and FORREST exchanged WhatsApp messages to arrange an in-person meeting to exchange a bribe payment:

Person 1:   Heyyyyy

MISSED CALL FROM Person *1 TO FORREST*

FORREST: On a shooting. I didn't forget.

FORREST: I'll send it before I leave.

Person 1:   Ok

Person 1:   Cool

Person 1:   Be safe

FORREST: Yes ma'am

Person 1:   Lol ok I'll see u tomorrow lets do it at 1-1:30

FORREST: Okay cool are you picking the spot

Person 1:   I thought u was

Person 1:   U know the area better or we can play it by ear

FORREST: Okay I will my old spot

15.   Less than four hours later, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 21 victims derived from MPD Traffic Crash Reports.

16.   Within hours of FORREST sending Person 1 the contact information for the 21 victims, FORREST and Person 1 exchanged additional WhatsApp messages to arrange an in-person meeting to exchange a bribe payment:

Person 1:   What's the word

FORREST: Yeah we can still meet in Laurel. I'm about to leave in 10 minutes.

FORREST: Then I'll shoot the address and see if that works for you

Person 1:   Cool beans

FORREST: [FORREST's home address]

17.   In total in April 2019, FORREST viewed approximately 656 MPD Traffic Crash Reports.

May 2019

18.   On May 1, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 13 victims derived from MPD Traffic Crash Reports.

19.   On May 2, 2019, FORREST and Person 1 exchanged WhatsApp messages to arrange an in-person meeting to exchange a bribe payment:

Person 1:   Heyyyyyy

Person 1:   McDonald's in calverton

FORREST: Okay.

FORREST: I don't have the best signal here.

Person 1:   It's cool

Person 1:   Text me when ur 10 minutes away

FORREST: Okay I'm leaving now.

20.   On May 6, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 23 victims derived from MPD Traffic Crash Reports.

21.   Later that day, FORREST and Person 1 exchanged WhatsApp messages to arrange an in-person meeting to exchange a bribe payment:

Person 1:   How far

FORREST: I'm about 20 minutes away. Should be there around 7:12pm.

Person 1:   Ok

22.   On May 10, 2019, FORREST sent Person 1 WhatsApp messages containing contact information for approximately 24 victims derived from MPD Traffic Crash Reports.

23.   On May 10, 2019, Person 1 and FORREST exchanged WhatsApp messages in which Person 1 asked FORREST to begin searching for victim contact information for all of MPD's seven police districts—in addition to FORREST's assigned Seventh District—and FORREST agreed:

FORREST: I know this week just seem really slow. Hopefully come Saturday when I'm back in early I'll kick these list off earlier in the day to boost your chances.

Person 1:   Please that will be nice

Person 1:   I'm thinking we should do all 7 districts

FORREST: Doesn't matter to me, I'll give you whatever is there.

24.   On May 11, 2019, FORREST sent Person 1 a Whats App message containing contact information for approximately 37 victims derived from MPD Traffic Crash Reports.

25.   Just seven minutes later, Person 1 and FORREST exchanged WhatsApp messages to arrange an in-person meeting to exchange a bribe payment:

Person 1:   Text me when u get off and on your way.

FORREST: Okay where we meeting?

Person 1:   Same spot

26.   On May 18, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 42 victims derived from MPD Traffic Crash Reports.

27.   Approximately two hours later, FORREST and Person 1 exchanged WhatsApp messages to arrange an in-person meeting to exchange a bribe payment:

FORREST: Are you able to meet me a lil closer today?

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Person 1:   Sure where.

FORREST: Are you familiar with Iverson mall?

Person 1:   Yes

Person 1:   What time

FORREST: I should be off at 4:30pm so just let me know if around that time is
                suitable.

28.   On May 20, 2019, FORREST sent Person 1 a WhatsApp message containing contact

information for approximately 19 victims derived from MPD Traffic Crash Reports.

29.   Approximately one hour later, FORREST and Person 1 exchanged WhatsApp

messages to arrange an in-person meeting to exchange a bribe payment:

FORREST: You think we can meet this week on Wednesday or Thursday for the
                work of next week.

FORREST: I'm going to be tied up most the weekend headed into next week

Person 1:   That's fine

Person 1:   Just let me know

FORREST: Okay I can meet you wherever on Wednesday just let me know what
                time best suit you

Person 1:   What time do you get off work

FORREST: Tomorrow around 4:30pm

Person 1:   And Wednesday

FORREST: I'm off

Person 1:   I go to dc on Wednesday's

Person 1:   So I can meet you closer once I go to the bank

FORREST: Bet

Person 1:   Cool

30.   On May 21, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 22 victims derived from MPD Traffic Crash Reports.

31.   Approximately two hour later, FORREST and Person 1 exchanged WhatsApp messages to arrange an in-person meeting to exchange a bribe payment:

> Person 1:   Are u on ur way
>
> FORREST: Yeah my bad. I can be headed that way now
>
> FORREST: Where am I coming to
>
> Person 1:   Same spot

32.   In total in May 2019, FORREST viewed approximately 1,067 MPD Traffic Crash Reports.

June 2019

33.   On June 3, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 20 victims derived from MPD Traffic Crash Reports.

34.   Approximately five minutes later, FORREST and Person 1 exchanged WhatsApp messages to arrange an in-person meeting to exchange a bribe payment:

> Person 1:   I'm 10 minutes away
>
> FORREST: On my way.

35.   On June 7, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 22 victims derived from MPD Traffic Crash Reports.

36.   On June 8, 2019, FORREST and Person 1 exchanged WhatsApp messages to arrange an in-person meeting to exchange a bribe payment:

> Person 1:   Any work
>
> Person 1:   I don't know what's up with these leads
>
> FORREST: Yeah I got work coming to you. What's up with the leads

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Person 1:   I don't know but I'm headed to u in a few can u come out

FORREST: I'm in the city on the south side. You'll have to meet me somewhere over here

37.   Less than an hour later, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 20 victims derived from MPD Traffic Crash Reports.

38.   On June 20, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 22 victims derived from MPD Traffic Crash Reports.

39.   On June 21, 2019, FORREST and Person 1 exchanged a phone call via WhatsApp, and then exchanged WhatsApp messages to arrange for FORREST to collect a bribe payment hidden by Person 1 underneath a lion statute[1] at her home:

Person 1:   [Person 1's home address]

Person 1:   It's underneath my lion

FORREST: Bet

40.   On June 22, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 33 victims derived from MPD Traffic Crash Reports.

41.   On June 27, 2019, FORREST sent Person 1 WhatsApp messages containing contact information for approximately 29 victims derived from MPD Traffic Crash Reports.

42.   Less than three hours later, FORREST and Person 1 exchanged WhatsApp messages to arrange an in-person meeting to exchange a bribe payment:

FORREST: Do you think I can meet up with you tomorrow?

Person 1:   We can it would have ben at night or I come early in the sa

Person 1:   Saturday

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[1] I have visited the residence of Person 1 and observed the lion statues referenced in the WhatsApp text message to Forrest and as described by Walter Lee.

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FORREST: If Friday about what time at night?

Person 1:   8-830

FORREST: Okay I may be able to swing that

43.   In total in June 2019, FORREST viewed approximately 1,123 MPD Traffic Crash

Reports.

July 2019

44.   On July 5, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 51 victims derived from MPD Traffic Crash Reports.

45.   On July 12, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 26 victims derived from MPD Traffic Crash Reports.

46.   Approximately three hours later, FORREST and Person 1 exchanged WhatsApp messages to arrange an in-person meeting to exchange a bribe payment:

FORREST: On my way should be there at 7pm

Person 1:   Ok

Person 1:   I'm here

47.   On July 14, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 46 victims derived from MPD Traffic Crash Reports.

48.   On July 15, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 24 victims derived from MPD Traffic Crash Reports.

49.   On July 16, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 27 victims derived from MPD Traffic Crash Reports.

50.   Approximately 21 minutes later, FORREST and Person 1 exchanged WhatsApp

messages to arrange an in-person meeting to exchange a bribe payment:

Person 1:   Thank you

FORREST: You welcome babe. Hey next week can we meet up sooner?

Person 1:   This week

FORREST: Nah I don't expect double pay. I'm saying next week Saturday the
27th can we meet up before then.

Person 1:   Of course

Person 1:   Can you please send the leads tomorrow, Thursday, Friday and
Saturday my lawyer is on my back like a tick.

51.   On July 24, 2019, FORREST sent Person 1 a WhatsApp message containing contact

information for approximately 26 victims derived from MPD Traffic Crash Reports.

52.   Less than nine minutes later, FORREST and Person 1 exchanged WhatsApp

messages to arrange an in-person meeting to exchange a bribe payment:

Person 1:   Thanx babe

FORREST: Welcome babe. Are we still good to meet tomorrow or early Friday?

Person 1:   Friday for sure or tomorrow night

FORREST: Okay tomorrow night would be great if you can pull it off. Just let
me know.

Person 1:   Yeah more like around 5:30

FORREST: Sounds good.

53.   In total in July 2019, FORREST viewed approximately 1,068 MPD Traffic Crash

Reports.

August 2019

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54.   On August 1, 2019, FORREST and Person 1 exchanged WhatsApp messages to arrange an in-person meeting to exchange a bribe payment:

> FORREST: Hey babe I missed your call
>
> Person 1:   We can only meet Saturday this week is that ok
>
> Person 1:   And can plse send tomorrow and Friday
>
> Person 1:   Don't worry about today
>
> FORREST: Yeah that's fine. Your sure?
>
> FORREST: Or when I go in tomorrow you want me to include today with tomorrow?
>
> Person 1:   You can

55.   Approximately five hours later, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 32 victims derived from MPD Traffic Crash Reports.

56.   On August 2, 2019, FORREST and Person 1 exchanged WhatsApp messages to arrange an in-person meeting to exchange a bribe payment:

> Person 1:   Let me know what time we are meeting
>
> FORREST: Okay I will I'm running behind
>
> Person 1:   Cool
>
> FORREST: Is it cool if I meet you first? I'm already in MD about to be leaving traing. I'm coming from Fort Meade.
>
> Person 1:   Sure how far

57.   On August 3, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 52 victims derived from MPD Traffic Crash Reports.

58.   On August 15, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 30 victims derived from MPD Traffic Crash Reports.

59.   On August 16, 2019, FORREST went to his MPD duty station on a leave day to

obtain MPD Traffic Crash Reports to give Person 1, and explained to her why he did not provide

them at the expected time::

    Person 1:   What happened

    FORREST: I'm still here the watch commander walking around talking to us so
                 I ain't trying to be hot with it.

    Person 1:   Oh shit.

    FORREST: And you know he was like do you have a home ain't you on day off.
                 I told him I had to catch up on some other paperwork lol.

60.   Later that same day, August 16, 2019, FORREST sent Person 1 a WhatsApp

message containing contact information for approximately 22 victims derived from MPD Traffic

Crash Reports.

61.   Approximately three and a half hours later he sent the reports, FORREST sent

Person 1 a WhatsApp message to arrange in-person meeting to collect a bribe payment:

    FORREST: Is it okay if we meet tomorrow at some time babe?

    Person 1:   Sure

    Person 1:   What time

    FORREST: I work tomorrow so if need be I can meet you when I get off.

    Person 1:   Ok

62.   On August 17, 2019, FORREST sent Person 1 WhatsApp messages containing

contact information for approximately 25 victims derived from MPD Traffic Crash Reports.

63.   Less than two hours later, FORREST and Person 1 exchanged WhatsApp messages

to arrange an in-person meeting to exchange a bribe payment:

    Person 1:   Let me know when u on ur way

    FORREST: Okay I will

FORREST: Should be there around 5:40pm

Person 1:   Ok

64.   On August 19, 2019, FORREST sent Person 1 a WhatsApp message containing contact information for approximately 17 victims derived from MPD Traffic Crash Reports.

65.   In total in August 2019, FORREST viewed at least 146 MPD Traffic Crash Reports.

False Statement

66.   Also on August 19, 2020, FORREST was interviewed by agents of the FBI investigating the bribery scheme described above. During that interview, FORREST stated that he had not provided victim contact information from Traffic Crash Reports to a third party, when, in truth and in fact, FORREST had provided victim contact information from Traffic Crash Reports to Person 1 on many occasions, as set forth above. Whether FORREST had in fact disclosed the victim contact information from Traffic Crash Reports was important to the FBI's investigation of the bribery scheme.

CONCLUSION

67.   Based on the above facts, I respectfully submit there is probable cause to believe that FORREST committed bribery—that is, FORREST accepted payments from Person 1 in exchange for violating his official duty to keep Traffic Accident Reports confidential—in violation of Title 18, United States Code, Section 201(b)(2)(C), and False Statements—that is, FORREST falsely represented to the FBI that he had not disclosed confidential Traffic Accident Reports to any third party, which was material to the FBI's investigation of the bribery scheme--in violation of Title 18, United States Code, Section 1001(a)(2).

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SPECIAL AGENT MATTHEW J. GANO
FEDERAL BUREAU OF INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 4th day of June, 2021.

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HON. ROBIN M. MERIWEATHER
U.S. MAGISTRATE JUDGE