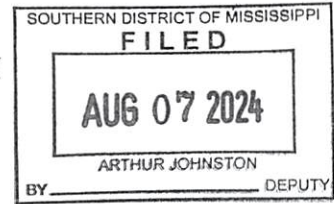


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. **3:24-cr-72-DPJ-LGI**

ANGELIQUE LEE

18 U.S.C. § 371

The United States charges:

Introduction

At all times material to this Information unless otherwise indicated:

1. Defendant **ANGELIQUE LEE** (“**LEE**”) was the Vice President of the City Council of Jackson, Mississippi and the Representative of Ward 2, which is included within Hinds County, Mississippi. **LEE** was first elected to Jackson’s City Council in December 2020.

2. Unindicted Co-conspirator A is a resident of Hinds County, Mississippi and a person known to **LEE**.

3. Individual 1 is a confidential human source employed by the Federal Bureau of Investigation (“**FBI**”). Individual 1 purported to be a real estate developer from Nashville, Tennessee seeking to invest in and develop a property in downtown Jackson, Mississippi.

4. Individual 2 is a confidential human source employed by the **FBI**. Individual 2 purported to be a real estate developer from Nashville, Tennessee seeking to invest in and develop a property in downtown Jackson, Mississippi.

5. In 2024, the City of Jackson, Mississippi received over \$10,000 in benefits from the United States government under federal programs involving grants, subsidies, loans, guarantees, insurance, and other forms of assistance.

Conspiracy to Commit Federal Program Bribery
(Violation of 18 U.S.C. § 371)

6. The preceding paragraphs of this Information are hereby re-alleged and incorporated by reference as though fully set forth herein.

The Conspiracy

7. In the calendar year 2024, in the Northern Division of the Southern District of Mississippi and elsewhere, LEE, a government official and agent of the City of Jackson, did knowingly and willfully conspire and agree with Unindicted Co-conspirator A and others known and unknown to the Grand Jury, to commit offenses against the United States, including Federal Program Bribery, that is, to corruptly solicit, demand, accept, and agree to accept for her own benefit, things of value from Individual 1 and Individual 2, through Co-conspirator A, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of the City of Jackson valued at \$5,000 or more in violation of 18 U.S.C. § 666(a)(1)(B).

Object of the Conspiracy

8. It was an object of the conspiracy for LEE to benefit and enrich herself by corruptly soliciting, accepting, and agreeing to accept things of value, including cash payments, from Individual 1 and Individual 2 directly and indirectly via Unindicted Co-conspirator A, in exchange for LEE's vote in favor of the real estate development project being proposed by Individual 1 and Individual 2, LEE's support for closure of a road in furtherance of that same project, and LEE's official approvals and support for future development projects of Individual 1 and Individual 2 as opportunities arose.

9. It was further an object of the conspiracy to hide, conceal, and cover up the nature and scope of the things of value that LEE received, including the true source and nature of the cash payments.

Manner and Means of the Conspiracy

10. The manner and means by which LEE carried out the conspiracy included, but were not limited to, the following:

11. LEE accepted cash, deposits, and other gifts from Individual 1 and Individual 2 in exchange for LEE's future vote or votes in favor of Individual 1 and Individual 2's proposed real estate development project in the City of Jackson.

12. LEE and her co-conspirators funneled payments to LEE through a bank account owned or controlled by Unindicted Co-conspirator A and allowed LEE to use the credit card of Individual 2 to receive things of value, in part to conceal that Individual 1 and Individual 2 were the true source of those payments.

Overt Acts in Furtherance of the Conspiracy

13. In furtherance of the conspiracy, and to affect the object of the conspiracy, the following overt acts, among others, were committed in the Northern Division of the Southern District of Mississippi:

14. In February and March 2024, LEE accepted the following payments, understanding they were intended as bribes, in exchange for LEE's future vote or votes in favor of Individual 1 and Individual 2's proposed real estate development project in the City of Jackson:

- a. \$10,000 via electronic transfer from Individual 1 and Individual 2 through Unindicted Co-conspirator A to pay off a portion of LEE's campaign debt on or about February 15, 2024;

- b. \$3,000 in cash from Individual 2 for LEE’s personal use on or about March 27, 2024; and
- c. Approximately \$6,000 spent on Individual 2’s credit card by LEE at a luxury retail store in the City of Jackson with Individual 2’s authorization on or about March 28, 2024.

All in violation of 18 U.S.C. § 371.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

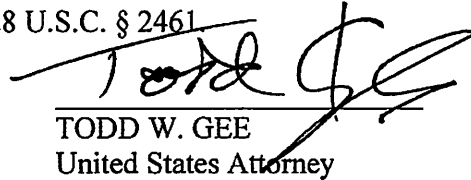
15. As a result of the offense specified above, the defendant **ANGELIQUE LEE**, shall forfeit to the United States any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violations and any and all of the property of the said defendant used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations.

16. **ANGELIQUE LEE** shall forfeit to the United States the following property that is subject to forfeiture as a result of the offense specified above:


ASSET ID	ASSET DESCRIPTION
TBD	\$13,654.00 in United States Currency
TBD	One (1) pair Valentino brand wedge sandals, pink in color, size 7
TBD	One (1) Christian Louboutin brand Cabata small tote bag in Paris Blooming Patent Leather
TBD	One (1) pair MEGHA TES-LP Earrings
TBD	One (1) Tanya Taylor brand Abigail dress; Peony in color, size 8
TBD	One (1) Golden Goose Brand Mid Star Sneaker, white and blue fog in color, size 6
TBD	One (1) pair Christian Louboutin Nicol is Back 85mm silk sandals multi-colored shoes
TBD	One (1) pair Aviator Nation sweatpants, orange in color, bearing the logo “RIDE” with multi-colored stripes, size small
TBD	One (1) Aviator Nation brand boyfriend t-shirt, white in color, size small

17. Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 28 U.S.C. § 2461



TODD W. GEE
United States Attorney



COREY AMUNDSON
Chief, Public Integrity Section
U.S. Department of Justice