

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	Criminal No.
	:	
v.	:	
	:	
THOMAS W. GORE,	:	Violations:
	:	
Defendant.	:	D.C. Law 11-144;
	:	D.C. Official Code §§ 1-1131.01(e),
	:	22-1805
	:	(Making a Contribution in the Name
	:	of Another Person, Aiding and Abetting)
	:	
	:	18 U.S.C. § 1519
	:	(Destruction of Records in
	:	Federal Investigation)

INFORMATION

The United States Attorney charges that:

Introduction

At all times relevant to this Information:

1. Beginning in the spring of 2010 and continuing through the 2010 general election, Candidate A was a candidate for Mayor of the District of Columbia.
2. Beginning in the spring of 2010 and continuing through the 2010 general election, defendant **THOMAS W. GORE (“GORE”)** worked on the Candidate A for Mayor campaign (hereinafter, “Campaign A”). He held the position of assistant treasurer for the campaign, handled the day-to-day finances of the campaign, and was a member of the campaign’s treasury team. He previously had served as treasurer of Candidate A’s 2004 campaign for Ward 7 Council Member and 2006 campaign for Chairman of the Council of the District of Columbia (“D.C. Council”).

3. Beginning in the spring of 2010 and continuing through the 2010 general election, Person A, whose identity is known to the Grand Jury, worked on Campaign A and was a member of the campaign's finance and treasury teams.

4. Beginning in or about May 2009 and continuing through the 2010 primary election, Candidate B was a candidate for Mayor of the District of Columbia.

5. At all times relevant to this Information, the Federal Bureau of Investigation ("FBI") was an agency within the executive branch of the federal government, headquartered in Washington, D.C. Among the FBI's top investigative priorities was public corruption, including election crimes and local corruption.

COUNT ONE

(Making a Contribution in the Name of Another Person)

6. Paragraphs 1-5 of this Information are re-alleged and incorporated by reference as if set out in full.

7. Between on or about June 15, 2010, and on or about July 2, 2010, in the District of Columbia and elsewhere, defendant **GORE**, using funds from Campaign A, made a contribution and aided and abetted the making of a contribution in the name of another person to Candidate B's campaign (hereinafter, "Campaign B"), to wit, a \$100 money order (serial number ending in 3612).

**(Making a Contribution in the Name of Another Person, Aiding and Abetting,
in Violation of Section 3(a)(3) of the District of Columbia Contribution Limitation
Initiative Amendment Act of 1995, effective June 13, 1996 (D.C. Law 11-144; D.C. Official
Code § 1-1131.01(e)), D.C. Official Code § 22-1805)**

COUNT TWO

(Making a Contribution in the Name of Another Person)

8. Paragraphs 1-5 of this Information are re-alleged and incorporated by reference as if set out in full.

9. Between on or about June 24, 2010, and on or about July 2, 2010, in the District of Columbia and elsewhere, defendant **GORE**, using funds from Campaign A, made a contribution and aided and abetted the making of a contribution in the name of another person to Campaign B, to wit, a \$335 money order (serial number ending in 4090).

(Making a Contribution in the Name of Another Person, Aiding and Abetting, in Violation of Section 3(a)(3) of the District of Columbia Contribution Limitation Initiative Amendment Act of 1995, effective June 13, 1996 (D.C. Law 11-144; D.C. Official Code § 1-1131.01(e)), D.C. Official Code § 22-1805)

COUNT THREE

(Making a Contribution in the Name of Another Person)

10. Paragraphs 1-5 of this Information are re-alleged and incorporated by reference as if set out in full.

11. Between on or about June 28, 2010, and on or about July 2, 2010, in the District of Columbia and elsewhere, defendant **GORE**, using funds from Campaign A, made a contribution and aided and abetted the making of a contribution in the name of another person to Campaign B, to wit, a \$100 money order (serial number ending in 6254).

(Making a Contribution in the Name of Another Person, Aiding and Abetting, in Violation of Section 3(a)(3) of the District of Columbia Contribution Limitation Initiative Amendment Act of 1995, effective June 13, 1996 (D.C. Law 11-144; D.C. Official Code § 1-1131.01(e)), D.C. Official Code § 22-1805)

COUNT FOUR


(Obstruction of Justice - Destruction of Records in Federal Investigation)

12. Paragraphs 1-5 of this Information are re-alleged and incorporated by reference as if set out in full.

13. On or about March 6, 2011, in the District of Columbia, defendant **GORE** did knowingly destroy a record, document, and tangible object, that is, a spiral notebook containing a record of payments to Candidate B by Campaign A, with the intent to impede, obstruct, and influence the investigation of a matter within the jurisdiction of the FBI, an agency of the United States, and in relation to and contemplation of such a matter.

(Obstruction of Justice - Destruction of Records in Federal Investigation, in Violation of Title 18, United States Code, Section 1519)

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