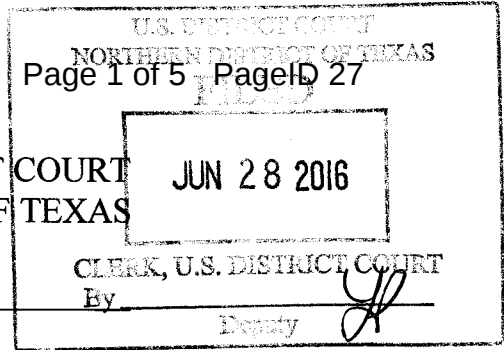


ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION



UNITED STATES OF AMERICA

NO. 3:16-CR-261-K

v.

ANTHONY L. ROBINSON (1)

FACTUAL RESUME

INDICTMENT:

Count One: Conspiracy to Bribe or Reward an Agent of an Organization  
Receiving Federal Funds in violation of 18 U.S.C. § 18 U.S.C. § 371

PLEA:

Count One: Conspiracy to Bribe or Reward an Agent of an Organization  
Receiving Federal Funds in violation of 18 U.S.C. § 18 U.S.C. § 371

PENALTIES:

The penalties the Court can impose include:

- a. imprisonment for a period not more than 5 years;
- b. a fine not to exceed \$250,000;
- c. a term of supervised release of not more than three years, which may be mandatory under the law and will follow any term of imprisonment. If the Defendant violates the conditions of supervised release, he could be imprisoned for the entire term of supervised release;
- d. a mandatory special assessment of \$100;
- e. restitution to victims or to the community, which may be mandatory under the law; and

- f. costs of incarceration and supervision.

ESSENTIAL ELEMENTS OF THE OFFENSE:

To establish the offense alleged in Count One of the indictment, the government must prove the following elements beyond a reasonable doubt:

- First:* That the defendant and at least one other person made an agreement to commit an offense against the United States, that is, to corruptly solicit, demand, accept and agree to accept a thing of value from a person, intending to be influenced and rewarded in connection with business of an organization receiving federal funds, as charged in the Indictment;
- Second:* That the defendant knew the unlawful purpose of the agreement and joined in it willfully, that is, with the intent to further the unlawful purpose; and
- Third:* That one of the conspirators during the existence of the conspiracy knowingly committed at least one of the overt acts described in the Indictment, in order to accomplish some object or purpose of the conspiracy.

The substantive crime of receipt of a bribe by an agent of an organization receiving federal funds in violation of 18 U.S.C. § 666(a)(1)(B) occurs when the government can prove that:

- First:* That the defendant was an agent of the Dallas County District Attorney's Office;
- Second:* That the Dallas County District Attorney's Office was an agency of a State government or local government that received in any one-year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, or other form of Federal assistance;
- Third:* That the defendant corruptly solicited, accepted, or agreed to accept anything of value from any person with the intent to be influenced or rewarded in connection with any business, transaction, or series of transactions of the Dallas County District Attorney's Office; and

*Fourth:* That the business, transaction, or series of transactions involved anything of value of \$5,000 or more.

STIPULATED FACTS:

The Defendant stipulates that the following facts are true and correct:

1. The Dallas County District Attorney's Office was an agency of the State of Texas that received federal benefits in excess of \$10,000 during the one-year period from September 1, 2012 to August 31, 2013.
2. The defendant, **Anthony L. Robinson**, was employed as the Chief Investigator at the Dallas County District Attorney's Office and, as such, was its agent.
3. Between on or about September 13, 2012 and May 24, 2013, in the Northern District of Texas and elsewhere, defendant **Anthony L. Robinson** did corruptly solicit, demand, accept and agree to accept a thing of value from a person, intending to be influenced and rewarded in connection with business, a transaction and a series of transactions of the Dallas County District Attorney's Office involving anything of value of \$5,000 or more, that is, defendant **Robinson** solicited, demanded, and accepted a bribe disguised as an investment in a cattle business from W.S., intending to be influenced and rewarded for the use of his position to assist in the dismissal of criminal charges that had been filed by the Dallas County District Attorney's Office against W.S.
4. On or about September 13, 2012, **Robinson** traveled to Las Vegas at Dallas County expense to take custody of W.S. and return him to Dallas County to face a

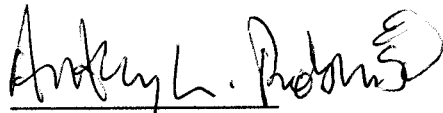
criminal charge. On the return trip, **Robinson** told W.S. that he wanted to enter the cattle business. W.S. told **Robinson** that he was wealthy and would be willing enter into business with **Robinson** if **Robinson** would assist in getting his criminal charges dismissed. **Robinson** agreed.

5. On or about February 28, 2013, **Robinson** drafted a proposed business partnership specifying that W.S. would supply the initial funding for the partnership, while **Robinson** would handle all day-to-day activities.

6. On March 26, 2013, W.S. deposited \$200,000 into a joint checking account. On March 27, 2013, **Robinson** signed paperwork adding himself as a co-owner of the joint checking account. The next day, **Robinson** wrote a check from the joint checking account to his wife in the amount of \$5,000. **Robinson** also made additional withdrawals from the account which he used for personal expenses. He also withdrew some money that he sent back to W.S. In all, **Robinson** withdrew approximately \$51,708 from the account.

7. On or about May 24, 2013, Robinson used his position as Chief Investigator at the Dallas County District Attorney's Office to persuade an Assistant District Attorney to dismiss the criminal charge pending against W.S.

SIGNED on this 21 day of June, 2016.



ANTHONY L. ROBINSON  
Defendant



KIRK F. LECHTENBERGER  
Attorney for Defendant