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## riminal Complaint Against Dean Skelos and Adam Skelos

n G. Skelos, the leader of the New York State Senate, and his son, Adam B. Skelos, were charged with fraud, extortion and solicitation of bribes gratuities. MAY 4, 2015



ORIGINAL

Approved:

JASON A. MASIMORE/RAHUL MUKHI/TATIANA R.

Assistant United States Attorneys

Before:

THE HONORABLE MICHAEL H. DOLINGER United States Magistrate Judge Southern District of New York

1492

UNITED STATES OF AMERICA

- v. -DEAN SKELOS, and ADAM SKELOS.

Defendants.

SEALED COMPLAINT

Violations of 18 U.S.C. §§ 666, 1343, 1346, 1349, 1951, and 2

COUNTY OF OFFENSE: NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

PAUL M. TAKLA, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

## COUNT ONE

(Conspiracy to Commit Extortion Under Color of Official Right)

- From at least in or about 2010, up to and including in or about April 2015, in the Southern District of New York and elsewhere, DEAN SKELOS and ADAM SKELOS, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1951.
- It was a part and an object of the conspiracy that DEAN SKELOS and ADAM SKELOS, the defendants, and others known and unknown, willfully and knowingly, would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by extortion as that term is defined in Title 18, United States Code, Section 1951, to wit, DEAN SKELOS, ADAM SKELOS, and others known and unknown, would and did arrange for DEAN SKELOS to cause entities with business before New York State to direct payments to ADAM SKELOS with

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