

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CRIMINAL NO. 09-20295

HON. MARIANNE O. BATTANI

vs.

D-2 SAMUEL L. RIDDLE, JR. and

D-3 MARY WATERS,

Defendants.

VIOLATIONS:

18 U.S.C. § 371 (conspiracy)

18 U.S.C. § 666 (bribery)

18 U.S.C. § 2 (aiding & abetting)

FIRST SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE  
(18 U.S.C. §§ 666(a)(2) & 371  
Conspiracy to Commit Bribery)

D-2 SAMUEL L. RIDDLE, JR.

D-3 MARY WATERS

INTRODUCTION

1. The City of Southfield was a local government that received federal assistance in excess of \$10,000 during the one year period beginning July 1, 2007 and ending June 30, 2008.

2. At all times material to this indictment, William Lattimore was an agent of the City of Southfield, Michigan, in that Lattimore served on the Council for the City of Southfield.

THE CONSPIRACY

3. From approximately April 2007 until May 2008, in the Eastern District of Michigan, Southern Division, and elsewhere, SAMUEL L. RIDDLE, JR. and MARY WATERS did unlawfully, willfully, and knowingly combine, conspire, confederate and

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agree with each other to corruptly give, offer, and agree to give approximately \$12,500 to William Lattimore with intent to influence and reward Lattimore in connection with a business, transaction, or series of transactions of the City of Southfield involving \$5,000 or more, in violation of Title 18, United States Code, Section 666(a)(2).

**MANNER AND MEANS BY WHICH THE  
CONSPIRACY WAS CARRIED OUT**

4. It was part of the conspiracy that RIDDLE agreed to assist the owner of a jewelry store and pawn shop in obtaining approval from the City of Southfield for the relocation of his store in Southfield.

5. For his assistance, RIDDLE was paid approximately \$45,000 and was assisted by WATERS. RIDDLE also received a Breitling watch, worth approximately \$5,500, and WATERS received a Rolex watch, worth approximately \$6,000.

6. RIDDLE and WATERS gave approximately \$12,500 in cash to Lattimore who agreed to assist in the approval by the Southfield City Council of the relocation of the jewelry store in Southfield.

**OVERT ACTS**

In furtherance of the unlawful conspiracy, and to effect its objectives, the co-conspirators committed the following overt acts, among others:

7. On or about April 27, 2007, RIDDLE received a \$10,000 check from the owner of the jewelry store.

8. In approximately April 2007, the owner of the jewelry store gave RIDDLE a Breitling watch, worth approximately \$5,500.

9. On July 27, 2007, RIDDLE and Lattimore had a telephone conversation in which Riddle told Lattimore that they were ready to do something regarding the relocation and that they would need a "letter of support or something."

10. In approximately August 2007, RIDDLE and WATERS met Lattimore at a Starbucks in Southfield, Michigan, where RIDDLE gave \$7,500 in cash to Lattimore.

11. RIDDLE and WATERS caused Lattimore to write a letter on City of Southfield letterhead, dated August 9, 2007, which stated in part, "I will continue to pledge my full support towards the opening of a new store in this proposed venue, and will also encourage my colleagues to embrace it as well."

12. On August 10, 2007, RIDDLE had a telephone conversation with the owner of the jewelry store in which RIDDLE said that he had seen the letter and that Lattimore will "encourage his other colleagues to support it [the relocation] also."

13. On October 4, 2007, RIDDLE had a telephone conversation with WATERS in which Riddle instructed Waters to set up a meeting with the owner of the jewelry store and Lattimore. That conversation included the following dialogue:

Riddle: Set up a meeting like as soon as possible. . . . So he can go over the renderings. What's that guy? The councilman's name out there?

Waters: Lattimore.

Riddle: Is it Bill Lattimore?

Waters: Yeah.

Riddle: Because he ain't done nothing for the money yet except do one letter. That ain't enough for 7,500. Anyway.

14. On or about October 11, 2007, RIDDLE received a \$20,000 check from the owner of the jewelry store, payable to Meridian Management, RIDDLE's consulting business.

15. On October 12, 2007, RIDDLE cashed the \$20,000 check at the jewelry store in Southfield and received \$20,000 in cash.

16. On or about October 12, 2007, WATERS called Lattimore. During the call,

WATERS told Lattimore to expect another payment of money, but that the amount of money would be less than the last payment.

17. On October 12, 2007, RIDDLE called Lattimore to set up a meeting to pay him. That conversation included the following dialogue:

Lattimore: OK. But we still on, right?

Riddle: Oh yeah. I'll be there for you. You OK. You'll be, you'll be OK. It won't be quite, quite what I said before. But it will be, you'll see. You'll be OK.

Lattimore: Well, Mary told me, so I mean --

Riddle: Oh, oh, OK. I had mentioned that to her and asked if she got a chance. I didn't know if she had called you or not.

Lattimore: Yeah, yeah, she --

Riddle: Oh, OK. You'll still, you'll still be cool, I mean, I'll talk to you. It's also, it's one of the most unusual ways -- I'm glad you had that relationship with Mary cause otherwise it would be like a hard core attitude on my part.

18. On October 12, 2007, RIDDLE met Lattimore at a Starbucks in Birmingham, Michigan and gave him \$5,000 in cash.

19. RIDDLE and WATERS caused Lattimore to write a letter on City of Southfield letterhead, dated October 22, 2007, which stated, in part, "Pursuant to our last conversation, I have reviewed your rendering and site plan along with the city planner, . . ., and it has been determined that your project is in compliance with City of Southfield requirements."

20. On December 14, 2007, RIDDLE and WATERS had a telephone conversation in which they discussed the money that they paid Lattimore:

Riddle: Did you talk to that guy? Lattimore?

Waters: Yeah. I talked to him. Yep.

Riddle: He wants to try to get some money and I can't do anything till [the jewelry store owner is] through with his thing.

Waters: That's what I told him.

\* \* \*

Riddle: What it is is, we gave him too much money too soon for doing nothing and now he wants more money.

Waters: [Laughs]

Riddle: [unintelligible] 10 grand, I think, he just . . . yeah.

Waters: It is the holidays, he wanna try to get his kids something.

Riddle: Yeah, yeah, well he shouldn't been a big shot and spent all his little money.

Waters: Yeah.

21. On or about February 2, 2008, RIDDLE received a \$15,000 check from the owner of the jewelry store.

22. In approximately February 2008, the owner of the jewelry store gave WATERS a Rolex watch, worth approximately \$6,000.

23. At the May 5, 2008 meeting of the Southfield City Council, Lattimore advocated and voted for the approval of the site plan for the relocation of the jewelry store in Southfield.

In violation of Title 18, United States Code, Sections 371 and 666(a)(2).

**COUNT TWO**  
**(18 U.S.C. §§ 666(a)(2) & 2 - Bribery)**

**D-2 SAMUEL L. RIDDLE, JR.**

**D-3 MARY WATERS**

1. The allegations in paragraphs one and two of Count One are realleged in this Count and are incorporated by reference as if fully set forth herein.

2. On or about August 1, 2007, in the Eastern District of Michigan, SAMUEL L. RIDDLE, JR., aided and abetted by MARY WATERS, did knowingly and corruptly give \$7,500 to William Lattimore, a member of the Southfield City Council, with intent to influence or reward Lattimore in connection with a business, transaction, or series of transactions of the City of Southfield, involving \$5,000 or more.

In violation of Title 18, United States Code, Sections 666(a)(2) and 2.

**COUNT THREE**  
**(18 U.S.C. §§ 666(a)(2) & 2 - Bribery)**

**D-2 SAMUEL L. RIDDLE, JR.**

**D-3 MARY WATERS**

1. The allegations in paragraphs one and two of Count One are realleged in this Count and are incorporated by reference as if fully set forth herein.

2. On or about October 12, 2007, in the Eastern District of Michigan, SAMUEL L. RIDDLE, JR., aided and abetted by MARY WATERS, did knowingly and corruptly give \$5,000 to William Lattimore, a member of the Southfield City Council, with intent to influence or reward Lattimore in connection with a business, transaction, or series of transactions of the City of Southfield, involving \$5,000 or more.

In violation of Title 18, United States Code, Sections 666(a)(2) and 2.

**CRIMINAL FORFEITURE ALLEGATIONS**  
**(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461)**

1. Upon conviction of conspiracy to commit bribery in violation of Title 18, United States Code, Sections 371 and 666, as alleged in Count One of this Indictment, and/or upon conviction of one or more counts of bribery in violation of Title 18, United States Code, Section 666, as alleged in Counts Two and/or Three of this Indictment, Defendants SAMUEL L. RIDDLE, JR. and MARY WATERS shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, their right, title and interest in any property, real or personal, which constitutes or is derived from proceeds traceable to bribery in violation of Title 18, United States Code, Section 666.

2. Property subject to criminal forfeiture to the United States includes, but is not limited to, the following:

- a. United States Currency in the amount of forty-five thousand dollars (\$45,000.00); and
- b. Jewelry, including:
  - i. One Men's Breitling Watch, valued at approximately five thousand five hundred dollars (\$5,500.00), received by Defendant RIDDLE; and
  - ii. One Ladies' Rolex Watch, valued at approximately six thousand dollars (\$6,000.00), received by Defendant WATERS.

3. Substitute Assets: Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), Defendants RIDDLE and WATERS shall forfeit substitute property, up to the value of the properties described in paragraph 2 above, if, by any act or omission of one or both of the defendants, the property described in paragraph 2 cannot be located upon the exercise of due diligence;