

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

<b>UNITED STATES OF AMERICA</b>	:	<b>Criminal No.</b>
	:	
	:	
<b>v.</b>	:	<b>Violations:</b>
	:	
<b>EL-HADJ DRAME,</b>	:	<b>18 U.S.C. §§ 201(b)(2)(A) and (C)</b>
	:	<b>(Receipt of a Bribe by a Public Official)</b>
<b>Defendant.</b>	:	

**INFORMATION**

The United States Attorney informs the Court that:

**COUNT ONE**  
**(Receipt of a Bribe by a Public Official)**

1. At all times material to this Information, defendant **EL-HADJ DRAME** was employed as a Tax Auditor with the District of Columbia Office of Tax and Revenue (hereinafter referred to as "OTR"). His duties included conducting office and combined field audits of a wide range of different tax returns filed by individuals, partnerships, fiduciaries, unincorporated business, and corporations to determine correct tax liability.

3. From on or about November 4, 2007, to on or about November 14, 2007, in a continuing course of conduct, defendant **EL-HADJ DRAME**, being a public official, did directly and indirectly, corruptly demand, seek, receive, accept, and agree to receive and accept, something of value, to wit, United States currency, in return for his (a) being influenced in the performance of defendant **EL-HADJ DRAME**'s official acts and (b) being induced to do and omit to do acts in violation of defendant **EL-HADJ DRAME**'s official duties, to wit, defendant **EL-HADJ DRAME** solicited and received \$6,000 in United States currency for his personal use directly from an individual business owner whose business he was auditing for sales and use tax

in return for defendant **EL-HADJ DRAME** lowering the business's sales and use tax liability.

**All in Violation of Title 18, United States Code, Sections 201(b)(2)(A) and (C)  
(Receipt of a Bribe by a Public Official)**

JEFFREY A. TAYLOR  
United States Attorney for  
the District of Columbia

By: \_\_\_\_\_

ELLEN CHUBIN EPSTEIN  
Assistant United States Attorneys