

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**D. Cooperation**

In March, before finalizing the plea agreement in this case, counsel met for the purpose of discussing whether Mr. Fabian could assist the government in the investigation and prosecution of other individuals. Mr. Fabian, through counsel, provided specific and detailed information about improper campaign expenditures and activities by former Lieutenant Governor Michael Steele after the 2006 election:

- \$37,000 that Steele caused to be paid to Brown Sugar Unlimited, LLC, a defunct limited liability company operated by his pediatrician sister for “catering and web services” that Brown Sugar never performed.
- Funds that Steele caused to be paid to two companies, Formmasters and GOP Shoppe, which provided legitimate services to Steele’s federal campaign. The charges were later reversed and billed to the Michael Steele for Maryland Committee, the state campaign, despite the fact that Steele was not running for any state office in 2006.
- \$75,000 paid from the state campaign to the law firm of Baker & Hostetler that was reported as an “in-kind contribution to the Maryland Republican Party” even though Baker & Hostetler provided no services to the state party.

- Steele or his Chief-of-Staff transferred \$600,000 of state campaign funds out of an account at Bay National Bank without authorization from party officials and despite having no signatory authority over the account.

The information provided by Mr. Fabian was derived from his personal knowledge in his former capacity as Finance Committee Chairman for Steele's federal campaign, as well as from his communications with a professional fundraiser with whom he worked closely during the campaign. Counsel provided the government with documentation supporting Mr. Fabian's allegations.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Although the government is not prepared at this time to move for a downward departure under U.S.S.G. § 5K1.1 (presumably because its investigation is ongoing), this Court can and should consider Mr. Fabian's willingness to assist the government and, if necessary, to testify against a prominent Maryland Republican and rising star on the national political stage as evidence of his good character and efforts to redeem himself. Doing so will destroy his ability to participate in Republican party political activities for the rest of his life and will further diminish his reputation in the community.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]