STATE OF CONNECTICUT ss: New Haven, Connecticut

COUNTY OF NEW HAVEN Date: October ___, 2021

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Christopher Cieplik, having been duly sworn, depose and state the following:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI). I have been employed by the FBI for over twenty-two years. Prior to becoming a Special Agent with the FBI, I was a commissioned officer in the United States Coast Guard for approximately six years. I graduated from the FBI Academy in Quantico, Virginia, and have attended numerous other law enforcement training programs. Since June 2008, I have been assigned to the FBI New Haven Field Office. My primary duties have been to identify, investigate and assist in the prosecution of individuals who violate federal laws involving public corruption and financial fraud. I have attended numerous specialized training courses and seminars, where I have received additional training on how to investigate various types of criminal violations, including fraud, money laundering, and public corruption. During my employment with FBI, I have initiated and/or participated in numerous criminal investigations, initiated and/or participated in the arrest of numerous defendants, initiated and/or participated in numerous search warrants, and initiated and/or participated in the interview of numerous of witnesses, defendants, and subjects involved in various criminal violations.

2. I submit this affidavit in support of an application for a criminal complaint and arrest warrant for MICHAEL DIMASSA for a violation of Title 18, United States Code, Section 1343 (Wire Fraud). Based upon the facts set forth below, there is probable cause to believe, and I

do believe, that MICHAEL DIMASSA has violated the above-referenced criminal statute.

3. The information provided herein is based upon my own knowledge and experience, as well as information provided to me by other law enforcement officers, including members of the United States Department of Housing and Urban Development-Office of Inspector General for Investigations. Because this affidavit is submitted for the limited purpose of establishing probable cause for the requested criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth herein only those facts that I believe are necessary to establish probable cause to support the requested criminal complaint and arrest warrant.

Background

4. MICHAEL DIMASSA is listed in the City of West Haven Employee Directory as the Administrative Assistant to the City Council. He is also currently a Connecticut State Representative elected to represent West Haven and New Haven.

5. According to the City of West Haven, MICHAEL DIMASSA has been employed by the City of West Haven for approximately twelve years in various positions, including legislative aide to the West Haven City Council, Council's Clerk, assistant to the Mayor and administrative aide to the West Haven Registrar of Voters.

6. According to records at the State of Connecticut-Office of the Secretary of State, the business COMPASS INVESTMENT GROUP, LLC was formed January 27, 2021. The business has two principals, MICHAEL DIMASSA and Person 1. The listed business address appears to be the home address of Person 1.

7. On February 5, 2021 a bank account for COMPASS INVESTMENT GROUP, LLC was established at Webster Bank. The listed address appears to be the residence of Person 1. Both

MICHAEL DIMASSA and Person 1 are listed as authorized signatories

8. A review of the bank account was conducted for the period of February 5, 2021 through April 30, 2021. This review revealed that from February 12, 2021 through April 30, 2021, seven checks were made payable to COMPASS INVESTMENT GROUP, LLC from the City of West Haven and were deposited to the business account. The checks ranged in value from $11,847.50 to $87,650.0. These funds were then used for twenty-one cash withdrawals that were conducted by MICHAEL DIMASSA, ranging from $8,000 to $10,000, for a total of $178,150. Nine of the withdrawals were in the form of checks made out to himself and twelve were via withdrawal slips.

Examples of Fraudulent Claims for Payment in May, 2021

9. On May 5, 2021, a City of West Haven Payment Voucher No. 602081 was submitted for payment by the "COVID-19 Grant Department." Attached to this voucher was an invoice listing alleged services provided to the West Haven Health Department. The voucher described the services as "COVID-19 Legal + Lobbying + Site work for COVID-19 Clinic." The invoice listed charges that included 305 hours of Consulting Service-Legislative Review Executive Orders – COVID-19, 483 hours of Consulting Service-Support Staff Services, 305 hours of Monitors/Security Site (April 2021-May 2021), and 102 hours of Consulting Service Lobbying Service – COVID-19 Federal. The amount billed to the City of West Haven was $85,595.00

10. On May 6, 2021, Check Number xxxxx9061 was issued by the City of West Haven Accounts Payable bank account in the amount of $85,595.00. The check was issued to COMPASS INVESTMENT GROUP LLC. On May 7, 2021, the check was deposited into the Webster Bank account of Compass Investment Group. Such deposit caused the transmission of an interstate wire.

11. On May 7, 2021, a cash withdrawal of $8,200 was taken from the account by

MICHAEL DIMASSA. On the following dates, subsequent cash withdrawals were made by MICHAEL DIMASSA:

May 10 - $8,500 May 11 - $9,125

May 13 - $9,250 May 17 - $9,100

May 18 - $9,350

12. On May 7, 2021 Mohegan Sun Patron Gaming records reflect MICHAEL DIMASSA executed a cash "Buy-In" of chips for $9,800. On the following dates subsequent cash buy-ins were executed by MICHAEL DIMASSA:

May 10 - $5,700 May 12 - $5,000

May 13 - $3,000 May 15 - $5,000

May 17 - $4,600

13. On May 19, 2021 West Haven Payment Voucher No. 602082 was submitted for payment by the "COVID-19 Grant Department." Attached to this voucher was an invoice listing alleged services provided to the West Haven Health Department. The voucher described the services as "COVID-19 Legal + Site work". The invoice listed items which included 150 hours of Consulting Service-Legislative Review Opening Guidelines, 100 hours of Consulting Service-Support Staff Services, 242 hours of Consulting Service Lobbying Service-COVID-19 Federal, and Economic Consulting-Economic Site Plan Assessment/Review. The amount billed to the City of West Haven was $84,650.00

14. On May 20, 2021 Check Number xxxxx9461 was issued by the City of West Haven Accounts Payable bank account in the amount of $84,650.00. The check was issued to COMPASS INVESTMENT GROUP LLC.

15. On May 21, 2021, the check was deposited into Compass's Webster Bank account. Such deposit caused the transmission of an interstate wire.

16. On May 21, 2021, $9,200 was withdrawn from the account by MICHAEL DIMASSA. On the following dates subsequent cash withdrawals were made by MICHAEL DIMASSA:

May 24 - $9,000

June 1 - $9,800

June 7 - $9,800

May 24 - $9,000

June 1 - $9,800

17. On May 21, 2021 Mohegan Sun Patron Gaming records reflect MICHAEL DIMASSA executed a cash buy-in of $4,000. On the following dates, subsequent cash buy ins were executed by MICHAEL DIMASSA:

May 23 - $6,200

May 28 - $4,000

May 29 - $10,400

Compass Investment Group Never Provided Any Services to the West Haven Public Health Department

18. The invoices requesting payment to Compass Investment Group refer to services provided to "City of West Haven, Health Department." According to the West Haven Corporation Counsel, the West Haven Health Director never used, selected, approved, or otherwise engaged Compass Investment Group for any work or services concerning the West Haven Public Health Department.

19. From in or about February, 2021 through September, 2021, a total of $636,783.70 was paid to the Compass Investment Group by the City of West Haven.

Conclusion

20. For the reasons set forth herein, I submit that there is probable cause to believe, and I do believe, that MICHAEL DIMASSA committed a violation of Title 18, United States Code, Sections 1343 (Wire Fraud). I respectfully request the issuance of the requested criminal complaint and arrest warrant.

21. I also request that this affidavit, the requested criminal complaint and the requested warranted be placed under seal by the Court until the time of the initial appearance because the defendant has not yet been arrested.

Respectfully submitted,

Christopher Cieplik
FBI Special Agent

Subscribed and sworn to before me this 19th day of October, 2021

Sarah A. L. Merriam, U.S.D.J.
Digitally signed by Sarah A. L. Merriam, U.S.D.J.
Date: 2021.10.19 15:02:26 -04'00'

THE HON. SARAH A. L. MERRIAM
UNITED STATES DISTRICT JUDGE