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Snyder and the Evolving Jurisprudence Surrounding Public Corruption Statutes

On June 26, 2024, the U.S. Supreme Court issued a landmark decision in *Snyder v. United States*, holding that 18 U.S.C. § 666 does *not* criminalize the acceptance of gratuities by state and local officials for past official acts.[1] The ruling sharply limits the federal government's reach in prosecuting public corruption cases under § 666, confining its application to classic *quid pro quo* bribery.

In the wake of *Snyder*, lower courts — both trial and appellate — have begun navigating the decision's implications, distinguishing between lawful gratuities and criminal bribes, and reassessing the contours of federal anti-corruption enforcement. For defense attorneys, the decision marks a pivotal shift in public integrity prosecutions and offers new avenues for challenging § 666 charges based on timing and intent.

This article analyzes how courts are interpreting *Snyder*, surveys recent post-*Snyder* decisions, and discusses the evolving jurisprudence surrounding public corruption statutes. It also offers practical insights for attorneys representing clients in government or those engaging with public officials in the uncertain legal terrain that follows *Snyder*.

Snyder v. United States — Factual Background

James Snyder is a former mayor of Portage, Indiana.[2] In 2013, while Snyder was mayor, Portage awarded two contracts to Great Lakes Peterbilt to purchase garbage trucks valued at around $1.1 million.[3] The next year, Snyder accepted a $13,000 check from the same company.[4] Snyder was charged with violating the anti-corruption statute. At trial, the government contended that the payment was an illegal gratuity under 18 U.S.C. § 666(a)(1)(B), which prohibits state and local officials from accepting anything of value in connection with their official acts.[5] The government argued that the payment was a reward for Snyder's past actions in awarding the contracts, even though the payment occurred after the contracts were granted.[6] Snyder claimed that the payment was for consulting services.[7] Siding with the government, the jury convicted Snyder of accepting an illegal "gratuity" in violation of 18 U.S.C. § 666(a)(1)(B).[8]

On appeal, Snyder maintained that § 666 only criminalizes bribery — requiring a *quid pro quo* — not gratuities given as a reward after the fact.[9] The Seventh Circuit rejected this argument, affirming the conviction, emphasizing that the statute's language prohibits payments made to "influence or reward" public officials and does not distinguish between bribes and gratuities.[10] Based on the plain text of the statute, the Seventh Circuit concluded that § 666 encompasses gratuities and does not require evidence of a prior *quid pro quo* agreement.[11]

In a monumental 6-3 decision, the Supreme Court disagreed. The Court said that while the law prohibits corrupt payments meant to influence officials, it does not clearly include rewards given after the fact with-

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out a prior agreement.[12] Writing for the majority, Justice Brett Kavanaugh said that expanding the law to include all after-the-fact gratuities would risk criminalizing common, harmless behavior — like giving a small gift to a teacher or a thank-you lunch for a public servant.[13] The Court emphasized that Congress must speak clearly if it wants to make that kind of conduct a federal crime.

The Court relied on six reasons to conclude that § 666 is a bribery statute and not a gratuities statute.[14]

1. *Statutory Text*: The statutory text strongly suggests that § 666 is a bribery statute, like § 201(b), and not a gratuities statute. The use of the word "corruptly" and the phrase "intending to be influenced or rewarded" signals a *quid pro quo* requirement.[15]

2. *Statutory History*: When Congress enacted § 666, it borrowed language from § 201(c), the statute for federal officials.[16] Two years later, Congress amended § 666 to base it on § 201(b), the bribery statute, instead.[17]

3. *Statutory Structure*: The statutory structure reinforces that § 666 is a bribery statute, not a two-for-one bribery and gratuities statute.[18] Section 201 also does not include gratuities because bribery and gratuities are "two separate crimes" with "two different sets of elements."[19]

4. *Statutory Punishments*: Congress separated bribery and gratuities into two distinct provisions of § 201, and the crimes received different punishments that "reflect their relative seriousness."[20] For example, accepting a bribe as a federal official is punishable up to 15 years in prison, while accepting a gratuity as a federal official is punishable up to two years. But, under § 666, a gratuities violation carried a potential sentence of 10 years.[21]

5. *Federalism Concerns*: The Court expressed federalism concerns that the application of § 666 to all gratuities would significantly infringe on states' rights, as § 666 "covers virtually all state and local officials — about 19 million nationwide."[22] The majority highlighted the risk that an overbroad application of § 666 could lead to unintended results.

6. *Fair Notice*: The *Snyder* Court expressed concern that allowing § 666 to encompass gratuities would "create traps for unwary state and local officials."[23]

The result is a sharply circumscribed reading of § 666, requiring prosecutors to prove a pre-act, corrupt agreement to sustain a conviction.

Bribery Law Under *Snyder* and Its Progeny

Snyder: Recent Applications Under § 666

One of the earliest applications of *Snyder* appeared in *United States v. Macrina*.[24] There, the Eleventh Circuit upheld the conviction of Jo Ann Macrina, former commissioner of the city of Atlanta's Department of Watershed Management, for federal program bribery and conspiracy under 18 U.S.C. § 666.[25]

While serving as commissioner, Macrina oversaw the evaluation of proposals for a significant architecture and engineering contract.[26] Initially, a company owned by Lohrasb "Jeff" Jafari was not selected.[27] Subsequently, Macrina initiated a reevaluation process, replaced two evaluation committee members, and personally scored Jafari's company higher than any other evaluator.[28] Following this, Jafari's company secured the contract. Shortly after being dismissed from her city position, Macrina joined Jafari's firm.[29]

In upholding the conviction, the Eleventh Circuit found that the evidence showed the payments and benefits Macrina received — including cash, gifts, and promises of employment — were tied to an ongoing corrupt arrangement that preceded and was meant to include her official decisions while she was still in office.[30] Macrina repeatedly argued that the benefits she received were gratuities, not bribes.[31] However, the court rejected this argument, finding ample evidence of a *quid pro quo* — namely that Macrina altered a contract evaluation process to benefit the bribe-payer and expected (and later received) personal gain in return.[32]

Consistent with *Snyder*, the court emphasized that § 666 is violated when a public official accepts or agrees to accept something of value in exchange for influencing official actions, regardless of whether the benefit is received before or after the act, as long as a corrupt agreement exists.[33]

The Fifth Circuit also applied *Snyder* in upholding the convictions in *United States v. Quintanilla*.[34] That case involved a bribery conspiracy in Weslaco, Texas, where defendants Ricardo Quintanilla and Arturo Cuellar were convicted of offering payments to city officials in exchange for favorable treatment on municipal contracts.[35] The Fifth Circuit upheld their convictions for conspiracy to commit honest-services wire fraud and federal program bribery, emphasizing that the defendants' conduct constituted classic bribes — pre-arranged *quid pro quo* payments — rather than mere gratuities.[36] In doing so, the court directly aligned its reasoning with *Snyder*.

Similarly, in *United States v. O'Donovan*, the First Circuit applied *Snyder* in reviewing the conviction of Sean O'Donovan, a Massachusetts attorney and former Somerville city councilor.[37] O'Donovan was charged with bribery and honest-services wire fraud for allegedly offering to secure a job for a city official's relative in exchange for favorable treatment of a cannabis business application.[38] While the court vacated O'Donovan's honest-services wire fraud convictions due to insufficient evidence of a bribery or kickback scheme under *Skilling v. United States*,[39] it affirmed his conviction under § 666.[40] Applying *Snyder*, the panel concluded that O'Donovan's employment offer preceded any official action and was made with corrupt intent — therefore qualifying as a bribe, not a gratuity.[41] The decision reaffirmed that, even as *Snyder* narrows the statute's reach, § 666 continues to be a powerful tool against pre-act public corruption.

Public Corruption and Political Campaigns Leave More Questions Than Answers

On the other hand, *United States v. Sittenfeld* appears primed for Supreme Court review in *Snyder's* wake.[42] In a divided decision issued in February 2025 — featuring a majority opinion, a concurrence, and a dissent — the Sixth Circuit upheld the conviction of former Cincinnati City Councilman Alexander "P.G." Sittenfeld[43] for attempted Hobbs Act extortion and federal-program bribery.[44] What makes *Sittenfeld* particularly notable is that all three judges on the Sixth Circuit panel expressed doubts about the legitimacy of Sittenfeld's conviction.

The case arose from an FBI sting operation in which undercover agents posed as real estate investors and gave Sittenfeld $40,000 in campaign contributions.[45] In exchange, the government argued that Sittenfeld promised to help secure city approval for their development project. But the case's broader implications go beyond the facts of the sting.[46] At its core is a pressing legal question: When does a politician's solicitation of campaign contributions cross the line from protected First Amendment activity into criminal bribery?

On appeal, Sittenfeld contended that the indictment failed to allege an explicit exchange of contributions for specific official acts, as required under the Hobbs Act post-*McDonnell v. United States*.[47] He argued that the indictment's general language lacked the specificity necessary to support a bribery theory under federal law.[48] The majority rejected this argument, holding that the allegations — read in context — adequately conveyed the elements of a *quid pro quo* arrangement and gave sufficient notice to the defendant.

Sittenfeld also advanced a broader constitutional argument: The application of the Hobbs Act to campaign contributions risks chilling core political speech and opens the door to selective enforcement. The court acknowledged this tension but held that when an explicit *quid pro quo* can be shown — regardless of the form of the payment — a campaign contribution can serve as the basis for an extortion or bribery conviction.

Sittenfeld encapsulates a deep jurisprudential tension left unresolved by recent Supreme Court precedent: how to preserve the government's interest in preventing corruption without unduly burdening protected political expression. Given the doctrinal uncertainty post-*McDonnell* and *Snyder*, the case may present an opportune vehicle for the High Court to clarify the boundary between protected political conduct and prosecutable corruption.

Most recently, in *United States v. Householder*, the Sixth Circuit Court of Appeals upheld the conviction of former Ohio House Speaker Larry Householder for orchestrating a massive public corruption scheme involving nearly $61 million in bribes from FirstEnergy Corp.[49] From 2017 to 2020, Householder led a criminal enterprise that accepted substantial bribes from FirstEnergy in exchange for passing House Bill 6 (H.B. 6), a $1 billion taxpayer-funded bailout for the company's failing nuclear plants.[50] The scheme funneled money through a dark money nonprofit, Generation Now, which Householder controlled.[51] These funds were used to support Householder's political ambitions, including his bid to become Speaker, and to finance campaigns of candidates who would back H.B. 6.[52] Additionally, Householder used over $500,000 for personal expenses, such as paying off credit card debt and renovating his Florida home.[53] In March 2023, a federal jury found Householder guilty of participating in a racketeering conspiracy.[54] Co-defendant Matthew Borges, former Ohio Republican Party chair, was also convicted for his role, which included attempting to bribe an FBI informant.[55]

On appeal, Householder argued that the payments he received were lawful political contributions protected by the First Amendment, citing cases like *Citizens United v. FEC*.[56] The Sixth Circuit rejected this argument, distinguishing between legitimate campaign contributions and corrupt *quid pro quo* arrangements.[57] The court emphasized that bribery laws target explicit exchanges of money for official acts, which are not shielded by free speech protections.[58]

Post-*Snyder* — Where Are We Now?

While *Snyder* did not directly affect the *Householder* case, it has broader implications for future federal corruption prosecutions. Prosecutors may now face challenges in cases involving post-act payments, as the Court's ruling requires evidence of a prior agreement to influence official actions. This shift could impact how similar cases are approached and prosecuted moving forward.

In addition to circuit court cases, the impact of *Snyder* has been apparent in the trial courts across the country, both in prosecuting and defending bribery. These cases have helped to define the scope of public corruption post-*Snyder*.

In *United States v. Bongiovanni*, the trial court granted the defendant's Rule 29 motion and vacated his bribery conviction.[59] Joseph Bongiovanni was a former DEA agent who was charged with a range of illegal conduct, including shielding a drug dealer's childhood friends from investigations by tipping them off to investigations and falsifying DEA documents.[60] The government alleged Bongiovanni accepted at least $250,000 in cash bribes from his friends on a reoccurring basis.[61] Specifically, his ex-wife testified that in 2015 on two occasions Bongiovanni received an envelope with cash, but she did not know what the cash was for.[62] She also testified that for his 50th birthday party, Bongiovanni received a card with $5,000 cash.[63] However, the government alleged that the official acts began in 2009 — prior to the cash being exchanged.[64]

Thus, in line with *Snyder*, the court stated that the payments connected to the alleged official acts were "gratuities," or "payments made to an official after an official act as a token of appreciation" — not 'bribes."[65] Therefore, in determining whether grounds existed for acquittal on the bribery charge, the court found that "[a]lthough this is a close case that tests the boundary … between the drawing of a permissible inference and impermissible speculation, only surmise and guesswork could lead a jury to determine that" the money constituted a bribe rather than (1) a gratuity for past actions or in the hope of future action, or (2) a reimbursement or genuine gift to a longtime friend."[66] In explanation, the court stated that no witnesses testified regarding the purpose of the cash, and that there was no evidence "that the payments were bribes, as opposed to being gratuities or benign exchanges between friends."[67] Importantly, the court stated that while a temporal connection between the payment and acts was not necessary, it would have assisted the government's case in showing circumstantial evidence of the payments as bribes.[68]

Similarly, in *United States v. Starks*, the defendant moved to dismiss his bribery charge, insisting that the indictment could not survive the ruling in *Snyder*.[69] Angela Starks was charged with soliciting and receiving $18,500 in bribes in exchange for arranging certain contractors to receive "no-bid" contracts from the New York City Housing Authority (NYCHA).[70] The contracts from NYCHA were worth at least $130,245.[71] The government alleged that two contractors paid Starks approximately $1,000 for the contracts and that the contractors understood that if they did not pay

Starks, that they would not be paid for work completed or would not receive future work.[72]

Starks claimed that because the contracts were awarded before the $1,000 payments, the cash was a gratuity, not a bribe.[73] The court quickly corrected Starks, stating *Snyder*'s holding was not dependent on the timing of the payment but whether the official had a "corrupt state of mind and accept[ed] (or agree[d] to accept) the payment intending to be influenced by an official act."[74] Thus, instead of determining the payment timing, the correct inquiry is agreement timing. Notably, the court clarified that in *Snyder*, a reward after the act was still a bribe if it was pursuant to an agreement beforehand.[75]

In *United States v. Cui*, the court addressed an important issue: the potential impact of *Snyder* on jury instructions.[76] The defendant was convicted of five counts of corruptly offering or agreement to give things of value, among other related charges.[77] Charles Cui was a successful businessman and lawyer who desperately needed a pole sign project and tax financing funds from the city of Chicago for his commercial real estate development project.[78] The government alleged that Cui offered Ed Burke, the chairman of the 14th Ward Alderman and chair of the Committee on Finance for the City Council, legal business in exchange for his help.[79]

After the jury convicted him, Cui moved for a new trial under Rule 33 by attacking the court's jury instructions.[80] Particularly, Cui argued that post-*Snyder* the court "should have explicitly instructed the jury that a *quid pro quo* was required" "to ensure the jury did not convict upon an impermissible gratuity theory."[81] The court stated that "[w]hile *Snyder*'s implications on jury instructions are yet to be determined, the ruling does not mandate the Court give a separate instruction to find a *quid pro quo* to convict on § 666(a)(2), the corresponding provision criminalizing the offer of the bribe."[82] The court found that a while the jury instructions did not explicitly state "*quid pro quo*," it still required such a finding and no further instruction was necessary.[83]

The court in *United States v. Menendez* analyzed what constituted a *quid pro quo* agreement.[84] The grand jury indicted Sen. Robert Menendez, his wife, and other co-conspirators for participating in a bribery scheme in which Menendez accepted gold bars, jewelry, and a Mercedes-Benz convertible in exchange for official acts such as signing off on a foreign military sale to Egypt.[85] Specifically, the government alleged that the *quid pro quo* was Menendez's promise to perform official acts to benefit Egypt in exchange for things of value, including a $23,568.54 payment toward his wife's mortgage and three $10,000 company checks to his wife for performing no work for the company.[86]

Menendez filed motions for acquittal and a new trial, arguing these could not be bribes because they were received after the official acts, and thus, were gratuities.[87] The court shot down this argument, citing *Snyder*, and stating that bribes are payments "made or agreed to before an official act in order to influence the official with respect to a future act."[88] The court concluded that there were a series of events showing that long before Menendez informed the other co-conspirator of his official act, or any payment was received, he agreed to do so in exchange for things of value.[89] Thus, it was reasonable for the jury to conclude that Menendez agreed to take official action in exchange for items of value for his wife, before he took or attempted to take any official action.[90]

The court in *United States v. Adams* analyzed the bounds of political contributions.[91] The city mayor was charged with accepting illegal campaign contributions and bribes consisting of luxury travel while he was a mayoral candidate and Brooklyn borough president. Adams moved to dismiss the bribery charge, alleging the government failed to meet the legal standard for *quid pro quo* bribery under § 666(a)(1)(B), specifically that *Snyder* signaled that such liability requires an "official act."[92]

The court stated that while *Snyder* used the term "official act" repeatedly in referencing § 666, it did not do so intending to import the term as defined in Section 201.[93] Further, the court stated *Snyder*'s use of the words "official act" could "reasonably be read according to their ordinary meaning — as a shorthand for an action or course of conduct taken by a public official, without necessarily intending a technical legal meaning."[94] Thus, the court concluded that the government was not required to satisfy the "official act" requirement to succeed on the § 666 bribery charge.[95] This case was dismissed by the government on unrelated grounds.

In *United States v. Bock*, the trial court determined the sufficiency of a bribery indictment.[96] The government alleged that Aimee Bock, the founder of nonprofit Feeding Our Future, Salim Said, and others were leading a massive fraud scheme involving the Federal Child Nutrition Program (FCNP). FCNP was a federally funded program meant to feed children, but allegedly the defendants used the federal funds to fund their lavish lifestyles instead. Bock's company allegedly recruited individuals to open FCNP food distribution sites throughout the state, then faked attendance rosters to submit false claims. In exchange for sponsoring sites, and their fraudulent participation in FCNP, Bock created shell companies to enroll in FCNP as food program sites and used the sites to launder money. Bock received bribes and kickbacks from the sites in exchange for her sponsorship of the sites' fraudulent participation in the program.

Before trial, Bock moved to dismiss the bribery charges based on the *Snyder* case, stating that *Snyder* required the *quid pro quo* agreement had to occur before the official act.[97] The defendants contended this element was missing in the indictment against them.[98] In analyzing the motion to dismiss, the court stated for a bribery charge post-*Snyder*, "the bribe-giver and the bribe-taker must have come to their *quid pro quo* agreement before the official act."[99] Bock submitted the indictment suggested a "'non-criminal' gratuity, not a bribe."[100] To become a food distribution site, the defendants relied on sponsorship from Bock and her company. In exchange for sponsorship, defendants allegedly paid Bock's company various bribes ranging from $1,500 to $310,000.[101] Thus, the court held it was reasonable to construe from the indictment that the defendants entered into an agreement before the official act of sponsorship, then they paid the alleged bribes afterwards.[102] The court held the indictment survived the motion to dismiss, even post-*Snyder*.[103]

In March 2025, an Illinois federal trial court judge ordered a retrial on four bribery charges against ex-Commonwealth Edison executives and lobbyists convicted of conspiring to bribe former Illinois House Speaker Michael Madigan.[104] In doing so, the court found the jury was improperly instructed post-*Snyder*. The jury instructions received in *McClain* were

"substantially similar" to the instructions in the *Snyder* case, which allowed the jury to convict on a gratuity theory as opposed to a bribery theory.[105] While there was sufficient evidence of a *quid pro quo* bribery — namely, that ComEd hired Madigan allies as subcontractors and gave business to the law firm of one of his fundraisers during the time the legislation ComEd wanted was going through the legislature — the judge was unsure whether jurors would still conclude there was a corrupt intended exchange if they had received instructions in line with *Snyder*. Thus, the judge ordered a retrial due to the faulty jury instructions.

Another high-profile federal public corruption case ended in a mistrial in April 2025, after a jury could not reach a unanimous decision after three days of deliberation. In *United States v. Emil Jones III*, Illinois State Sen. Emil Jones III was charged with three counts of bribery and lying to the FBI.[106] The government alleged he agreed to take $5,000 and to get his intern a "do-nothing job" from former SafeSpeed LLC founder Omar Maani in exchange for limiting a proposed statewide study to Chicago only, where SafeSpeed LLC did not operate.

Of note, as relevant to post-*Snyder*, the jurors asked questions during deliberations, such as whether it is bribery when a defendant changes his mind after an initial agreement, and later whether they needed to find Jones illegally agreed to accept both benefits at issue or if just one benefit sufficed. Such questions were a signal that the jury was attempting to determine just how much, or how little, it would take to convict Jones. After polling the jury, the judge made the decision that no deliberation progress could be made and that the prosecutors failed to meet their burden.

Takeaways for Practitioners

Filing Motions to Dismiss: In light of the evolving state of the law, new opportunities to challenge the government's theory may exist at the pretrial stage. Since a campaign contribution can serve as the basis for an extortion or bribery conviction when an explicit *quid pro quo* is shown, in situations where an explicit *quid pro quo* is not readily apparent, a motion to dismiss may have some merit.

Moving for a Bill of Particulars: While difficult to obtain, the holdings in *Snyder* and *Sittenfeld* may support the grant of a bill of particulars. Forcing the government to identify the criminal acts supporting its indictment can lead to greater clarity as to the alleged criminal conduct.

Jury Instructions: Jury instructions remain vitally important, and counsel should begin work on them immediately. *Snyder* does not mandate the instructions explicitly state "*quid pro quo*" but such a finding is nonetheless required. Crafting jury instructions that focus on the key components of *Snyder* and *Sittenfeld* provide greater ammunition in closing argument and direct the jury to weaknesses in the government's case.

Conclusion

In the last several months, a number of high-profile public corruption cases have ended in mistrial, as the landmark *Snyder* case continues to affect the legal landscape and as the government continues to pursue cases in which the legitimacy of campaign contributions is at issue. Courts continue interpreting the bounds of bribery charges under § 666. Practitioners should continue analyzing corruption charges to determine if they qualify as bribes or gratuities, and particularly they should be cognizant that *Snyder* and *Sittenfeld* may have further implications on defining constitutionally protected political activity.

Notes

1. Snyder v. United States, 603 U.S. 1 (2024).
2. *Id.* at 9.
3. *Id.*
4. *Id.*
5. *Id.* at 10.
6. *Id.* at 9-10.
7. *Id.* at 9.
8. *Id.*
9. *Id.* at 10.
10. *Id.*
11. *Id.*
12. *Id.*
13. *Id.* at 6.
14. *Id.* at 10.
15. *Id.* at 10-11.
16. *Id.* at 12.
17. *Id.*
18. *Id.* at 12-13.
19. *Id.* at 13
20. *Id.*
21. *Id.*
22. *Id.* at 14.
23. *Id.* at 15.
24. United States v. Macrina, 109 F.4th

1341 (11th Cir. 2024).
25. *Id.* at 1352.
26. *Id.* at 1344.
27. *Id.* at 1345.
28. *Id.*
29. *Id.*
30. *Id.* at 1346.
31. *Id.*
32. *Id.* at 1347.
33. *Id.* at 1352.
34. United States v. Quintanilla, 114 F.4th 453 (5th Cir. 2024).
35. *Id.* at 460.
36. *Id.* at 478.
37. United States v. O'Donovan, 126 F.4th 17 (1st Cir. 2025).
38. *Id.* at 23.
39. Skilling v. United States, 561 U.S. 358 (2010).
40. *O'Donovan,* at 46.
41. *Id.* at 40.
42. United States v. Sittenfeld, 128 F.4th 752 (6th Cir. 2025).
43. Sittenfeld was pardoned by President Trump on May 29, 2025. He is still appealing his conviction. *See* https://paw.princeton.edu/article/pardoned-pg-sittenfeld-07-still-wants-supreme-court-take-his-case.
44. *Sittenfeld,* at 786.
45. *Id.* at 762.
46. *Id.* at 762-6.
47. *Id.* at 774; McDonnell v. United States, 579 U.S. 550 (2016).
48. *Id.* at 775.
49. United States v. Householder, 2025 WL 1300540 (6th Cir. May 6, 2025).
50. *Id.*
51. *Id.*
52. *Id.*
53. *Id.* at 13.
54. *Id.* at 7.
55. *Id.*
56. *See, e.g.,* Citizens United v. Fed. Election Comm'n, 558 U.S. 310 (2010).
57. *Id.* at 8.
58. *Id.*
59. United States v. Bongiovanni, No. 19 CR 227, 2024 WL 3487914 (W.D.N.Y. July 19, 2024).
60. *Id.*
61. *Id.*
62. *Id.* at 3.
63. *Id.*
64. *Id.* at 4.
65. *Id.*, citing *Snyder*, 603 U.S. 1, 5 (2024).
66. *Id.* at 5.
67. *Id.*
68. *Id.*
69. United States v. Starks, No. 1:24-cr-00126, 2024 WL 4528169 (S.D.N.Y. Oct. 18, 2024).
70. *Id.*
71. *Id.*
72. *Id.*
73. *Id.* at 3.
74. *Id.*
75. *Id.* at 5; *see, e.g.*, *Snyder*, 603 U.S. at 18 (a "reward given after the act pursuant to an agreement beforehand" is a bribe).
76. United States v. Cui, No. 19 CR 322-3, 2024 WL 3848513 (N.D. Ill. Aug. 16, 2024).
77. *Id.*
78. *Id.* at 2.
79. *Id.* at 2-4.
80. *Id.* at 12.
81. *Id.* at 13.
82. *Id.*
83. *Id.* at 14.
84. United States v. Menendez, 759 F. Supp. 3d 460 (S.D.N.Y. 2024).
85. *Id.* at 474.
86. *Id.* at 481-2.
87. *Id.* at 474.
88. *See* Snyder v. United States, 603 U.S. 1, 5 (2024) (emphasis added); *see also* 18 U.S.C. § 201(b)(2) (criminalizing public officials for, inter alia, "agree[ing] to receive or accept anything of value … in return for being influenced in the performance of any official act").
89. *Id.* at 482.
90. *Id.* at 490.
91. United States v. Adams, 760 F. Supp. 3d 6 (S.D.N.Y. 2024).
92. *Id.* at 13.
93. *Id.* at 15.
94. *Id.*
95. *Id.* at 21.
96. United States v. Bock, No. 22-CR-223, 2025 WL 18629 (D. Minn. Jan 2. 2025).
97. *Id.* at 6.
98. *Id.*
99. *Id.*; citing *Snyder*, 603 U.S. at 6.
100. *Id.* at 9.
101. *Id.* at 8.
102. *Id.*
103. *Id.* at 9.
104. *See* United States v. Michael McClain, et al., No. 20 CR 812 (N.D. Ill. Mar. 3, 2025).
105. *Id.*
106. United States v. Emil Jones III, No. 22 CR 460 (N.D. Ill. Apr. 24, 2025). ■

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