

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**INDICTMENT FOR CONSPIRACY TO RECEIVE ILLEGAL PAYOFFS BY AN  
AGENT OF A PROGRAM RECEIVING FEDERAL FUNDS, RECEIPT OF  
ILLEGAL PAYOFFS BY AN AGENT OF A PROGRAM RECEIVING  
FEDERAL FUNDS, MAKING FALSE STATEMENTS TO  
FEDERAL AGENTS, AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

\* CRIMINAL NO.

v.

\* SECTION:

HENRY M. MOUTON

\* VIOLATION: 18 U.S.C. § 371  
18 U.S.C. § 666(a)(1)(B)  
\* 18 U.S.C. § 1001

\* \* \*

The Grand Jury charges that:

**COUNT 1**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. The Louisiana Department of Wildlife and Fisheries (LDWF) is a state agency responsible for the management of Louisiana's renewable natural resources including wildlife and aquatic life.

2. According to the Louisiana Constitution, the Louisiana Wildlife and Fisheries Commission is part of the executive branch and consists of seven members appointed by the governor.

3. In about January 2003, defendant, **HENRY M. MOUTON**, was appointed to serve as a Commissioner on the Louisiana Wildlife and Fisheries Commission and held the position until December 2008.

4. The LDWF is an agency of the State of Louisiana that received federal assistance in excess of the \$10,000.00 during each of the one year periods beginning on January 1st and ending on December 31st for the years 2003, 2004, 2005, 2006, 2007, 2008, and 2009.

5. The Federal Bureau of Investigation (FBI), New Orleans Division, located in the Eastern District of Louisiana, was the lead federal investigative agency responsible for the investigation into the defendant, **HENRY M. MOUTON**, co-conspirator "A", and other co-conspirators known and unknown to the grand jury.

6. Co-conspirator "A" and other co-conspirators known and unknown to the grand jury operate businesses W.C.S., Inc.; W. Inc.; D & A; A. P., LLC; and landfill companies located in the Eastern District of Louisiana.

7. Co-conspirator "A" and other co-conspirators known to the grand jury paid defendant **HENRY M. MOUTON** approximately \$463,000.00 in the form of checks that were written in the Eastern District of Louisiana and drawn on bank accounts also located in the Eastern District of Louisiana.

8. The Old Gentilly Landfill is located in the Eastern District of Louisiana.

**B. THE CONSPIRACY**

Beginning at a time unknown, but prior to on or about April 14, 2003, and continuing until on or about April 16, 2010, in the Eastern District of Louisiana and elsewhere, the defendant, **HENRY M. MOUTON**, and others known and unknown to the Grand Jury, did knowingly and willfully combine, conspire and agree with each other to knowingly and corruptly solicit, demand, accept and agree to accept something of value from companies owned by and/or operated by co-conspirator "A" and other co-conspirators known and unknown to the grand jury, including, but not limited to W.C.S., Inc.; W. Inc.; D&A; and A.P., LLC., with the intent to be influenced and rewarded in connection with any business, transaction, or series of transactions of the Louisiana Department of Wildlife and Fisheries, a government agency of the State of Louisiana, involving something of value of \$5,000 or more; all in violation of Title 18, United States Code, Section 666(a)(1)(B).

**C. OVERT ACTS**

On or about the following dates, in furtherance of the conspiracy and to accomplish its purposes, the defendant, **HENRY M. MOUTON**, and others known and unknown to the Grand Jury committed the following overt acts, among others, in the Eastern District of Louisiana and elsewhere:

1. On or about April 14, 2003, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 139790, from W. Inc. to influence and reward him for his official action.

2. On or about May 7, 2003, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 140263, from W. Inc. to influence and reward him for his official action.
3. On or about June 10, 2003, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 140803, from W. Inc. to influence and reward him for his official action.
4. On or about June 30, 2003, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 141313, from W. Inc. to influence and reward him for his official action.
5. On or about August 18, 2003, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 141930, from W. Inc. to influence and reward him for his official action.
6. On or about September 2, 2003, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 142519, from W. Inc. to influence and reward him for his official action.
7. On or about September 29, 2003, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$3,500.00, check number 143184, from W. Inc. to influence and reward him for his official action.
8. On or about September 30, 2003, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 143104, from W. Inc. to influence and reward him for his official action.

9. On or about October 27, 2003, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$12,000.00, check number 3509, from co-conspirator "A" to influence and reward him for his official action.
10. On or about November 7, 2003, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 143791, from W. Inc. to influence and reward him for his official action.
11. On or about December 8, 2003, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 144345, from W. Inc. to influence and reward him for his official action.
12. On or about December 24, 2003, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$12,000.00, check number 144928, from W. Inc. to influence and reward him for his official action.
13. On or about January 9, 2004, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 144968, from W. Inc. to influence and reward him for his official action.
14. On or about February 3, 2004, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 145492, from W. Inc. to influence and reward him for his official action.
15. On or about April 1, 2004, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 146289, from W. Inc. to influence and reward him for his official action.

16. On or about April 14, 2004, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 146615, from W. Inc. to influence and reward him for his official action.

17. On or about May 10, 2004, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 147427, from W. Inc. to influence and reward him for his official action.

18. On or about June 1, 2004, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 147987, from W. Inc. to influence and reward him for his official action.

19. On or about July 8, 2004, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 148690, from W. Inc. to influence and reward him for his official action.

20. On or about July 30, 2004, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$18,000.00, check number 149346, from W. Inc. to influence and reward him for his official action.

21. On or about August 5, 2004, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 149263, from W. Inc. to influence and reward him for his official action.

22. On or about September 1, 2004, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 149801, from W. Inc. to influence and reward him for his official action.

23. On or about October 5, 2004, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 150460, from W. Inc. to influence and reward him for his official action.

24. On or about November 10, 2004, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 150985, from W. Inc. to influence and reward him for his official action.

25. On or about December 3, 2004, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 151462, from W. Inc. to influence and reward him for his official action.

26. On or about January 4, 2005, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 152090, from W. Inc. to influence and reward him for his official action.

27. On or about February 4, 2005, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 152571, from W. Inc. to influence and reward him for his official action.

28. On or about February 10, 2005, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$18,000.00, check number 3876, from co-conspirator "A" to influence and reward him for his official action.

29. On or about March 2, 2005, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 153075, from W. Inc. to influence and reward him for his official action.

30. On or about April 6, 2005, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 153694, from W. Inc. to influence and reward him for his official action.

31. On or about May 4, 2005, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 154252, from W. Inc. to influence and reward him for his official action.

32. On or about June 1, 2005, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 154763, from W. Inc. to influence and reward him for his official action.

33. On or about July 14, 2005, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 155389, from W. Inc. to influence and reward him for his official action.

34. On or about July 29, 2005, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 155838, from W. Inc. to influence and reward him for his official action.

35. On or about September 9, 2005, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 156337, from W. Inc. to influence and reward him for his official action.

36. On or about October 17, 2005, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 156626, from W. Inc. to influence and reward him for his official action.

37. On or about November 1, 2005, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote to the United States Attorney for the Western District of Louisiana while concealing the financial motives of himself and others and attempted to gain the assistance of the U.S. Attorney in his effort to keep closed the Old Gentilly Landfill located in New Orleans. **MOUTON** wrote that the "Gentilly Landfill is charging \$3.50 per CY Ton while River Birch is charging \$2.50, which was the Pre Katrina price so this is costing the Taxpayers MORE money."

38. On or about November 4, 2005, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote letters to approximately 17 United States Senators and represented himself as a Commissioner on the State of Louisiana Department of Wildlife and Fisheries Commission and attempted to gain the assistance of these U.S. Senators in an effort to keep closed the Old Gentilly Landfill located in New Orleans.

39. On or about November 4, 2005, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 156876, from W. Inc. to influence and reward him for his official action.

40. On or about November 10, 2005, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote to an official with the Environmental Protection Agency in Dallas and represented himself as a Commissioner on the State of Louisiana Department of Wildlife and Fisheries Commission and attempted to affect the EPA official's actions in an effort to keep closed the Old Gentilly Landfill located in New Orleans.

41. On or about November 14, 2005, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, went to the offices of the FBI, represented himself as a Commissioner on the State of Louisiana Department of Wildlife and Fisheries Commission, and reported to the FBI that he had rented a helicopter on November 7, 2005, and flew over the Old Gentilly Landfill and filmed what he had observed to demonstrate the "illegal nature of the landfill."

42. On or about November 14, 2005, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote to a FBI Special Agent and attempted to direct FBI resources to investigate the Old Gentilly Landfill located in New Orleans with the goal of keeping that landfill closed and while concealing his and others' financial motives and making it appear he was merely concerned because of his role in preserving Louisiana's natural resources.

43. On or about November 17, 2005, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote to a FBI Special Agent and attempted to direct FBI resources to investigate the Old Gentilly Landfill located in New Orleans with the goal of keeping that landfill closed and while concealing his and others' financial motives and making it appear he was merely concerned because of his role in preserving Louisiana's natural resources.

44. On or about November 28, 2005, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote to a FBI Special Agent and attempted to direct FBI resources to investigate the Old Gentilly Landfill located in New Orleans with the goal of keeping that landfill closed and while

concealing his and others' financial motives and making it appear he was merely concerned because of his role in preserving Louisiana's natural resources..

45. On or about November 30, 2005, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote to a FBI Special Agent and attempted to direct FBI resources to investigate the Old Gentilly Landfill located in New Orleans with the goal of keeping that landfill closed and while concealing his and others' financial motives and making it appear he was merely concerned because of his role in preserving Louisiana's natural resources.

46. On or about November 30, 2005, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote to the United States Attorney for the Western District of Louisiana while concealing the financial motives of himself and others and attempted to gain the assistance of the U.S. Attorney in his effort to keep closed the Old Gentilly Landfill located in New Orleans.

47. On or about December 7, 2005, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 157361, from W. Inc. to influence and reward him for his official action.

48. On or about December 8, 2005, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 157362, from W. Inc. to influence and reward him for his official action.

49. On or about December 16, 2005, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$18,000.00, check number 157491, from W. Inc. to influence and reward him for his official action.

50. On or about January 3, 2006, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote to the United States Attorney for the Western District of Louisiana while concealing the financial motives of himself and others and attempted to gain the assistance of the U.S. Attorney in his effort to keep closed the Old Gentilly Landfill located in New Orleans.

51. On or about January 3, 2006, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote to an official with the Environmental Protection Agency (EPA) in Washington, D.C. while concealing the financial motives of himself and others and represented himself as a Commissioner on the State of Louisiana Department of Wildlife and Fisheries Commission and attempted to gain the assistance of the EPA official in his effort to keep closed the Old Gentilly Landfill located in New Orleans.

52. On or about January 3, 2006, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote to a Colonel with the U.S. Army Corp of Engineers while concealing the financial motives of himself and others and represented himself as a Commissioner on the State of Louisiana Department of Wildlife and Fisheries Commission and attempted to gain the assistance of the official in his effort to keep closed the Old Gentilly Landfill located in New Orleans.

53. On or about January 3, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$17,000.00, check number 157741, from W. Inc. to influence and reward him for his official action.

54. On or about January 9, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 157704, from W. Inc. to influence and reward him for his official action.

55. On or about January 9, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 157703, from W. Inc. to influence and reward him for his official action.

56. On or about January 10, 2006, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote to the United States Attorney for the Western District of Louisiana while concealing the financial motives of himself and others and attempted to gain the assistance of the U.S. Attorney in his effort to keep closed the Old Gentilly Landfill located in New Orleans.

57. On or about January 27, 2006, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote to the United States Attorney for the Western District of Louisiana while concealing the financial motives of himself and others and attempted to gain the assistance of the U.S. Attorney in his effort to keep closed the Old Gentilly Landfill located in New Orleans.

58. On or about January 31, 2006, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote to the United States Attorney for the Western District of Louisiana while concealing the financial motives of himself and others and attempted to gain the assistance of the U.S. Attorney in his effort to keep closed the Old Gentilly Landfill located in New Orleans.

59. On or about January 31, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,958.00, check number 158129, from W. Inc. to influence and reward him for his official action.

60. On or about February 3, 2006, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote to the United States Attorney for the Western District of Louisiana while concealing the financial motives of himself and others and attempted to gain the assistance of the U.S. Attorney in his effort to keep closed the Old Gentilly Landfill located in New Orleans.

61. On or about February 8, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 158087, from W. Inc. to influence and reward him for his official action.

62. On or about February 8, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 158086, from W. Inc. to influence and reward him for his official action.

63. On or about February 17, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,400.00, check number 158362, from W. Inc. to influence and reward him for his official action.

64. On or about March 1, 2006, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote to a FBI Special Agent and attempted to direct FBI resources to investigate the Old Gentilly Landfill located in New Orleans with the goal of keeping that landfill closed and while concealing his and others' financial motives and making it appear he was merely concerned

because of his role preserving Louisiana's natural resources. In his letter **MOUTON** wrote that "other landfills, Hiway (sic) C and D, Inc, River Birch, Inc, KV Landfill have enough Capacity to take at least 10 times the amount of Waste/Debris that DEQ is estimating and maybe 20 times, all three of these landfill (sic) are properly permitted and properly constructed and are NOT a threat to the environment."

65. On or about March 6, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 158467, from W. Inc. to influence and reward him for his official action.

66. On or about March 14, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$3,329.00, check number 158694, from W. Inc. to influence and reward him for his official action.

67. On or about April 6, 2006, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote to an official with the Environmental Protection Agency in Washington D.C. and other officials while concealing the financial motives of himself and others and represented himself as a Commissioner on the State of Louisiana Department of Wildlife and Fisheries Commission and provided the EPA official with "Notice of Intention to File Citizen's Suit, Violations at 16600 Chef Menteur Highway, New Orleans, Louisiana."

68. On or about April 6, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$5,000.00, check number 159159, from W. Inc. to influence and reward him for his official action.

69. On or about April 6, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 159103, from W. Inc. to influence and reward him for his official action.

70. On or about April 6, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 159102, from W. Inc. to influence and reward him for his official action.

71. On or about April 7, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$7,500.00, check number 159158, from W. Inc. to influence and reward him for his official action.

72. On or about April 15, 2006, defendant, **HENRY M. MOUTON**, concealed his involvement in this payoff conspiracy by failing to report approximately \$35,000.00 in illegal payoffs received from co-conspirator "A" and other co-conspirators known and unknown to the grand jury on his 2005 federal income tax return.

73. On or about April 24, 2006, defendant, **HENRY M. MOUTON**, to further his and others' goal of influencing decision makers for financial reasons, approached an individual known to the grand jury and asked him to make straw campaign contributions to a federal congressional campaign on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury.

74. On or about April 24, 2006, defendant, **HENRY M. MOUTON**, faxed to a co-conspirator, known to the grand jury, and wrote that he had spoken to co-conspirator "A" and that defendant **HENRY M. MOUTON** was to obtain checks from the co-conspirator "so we can disguise a contribution."

75. On or about April 24, 2006, defendant, **HENRY M. MOUTON**, to further his and others' goal of influencing decisions makers for financial reasons, delivered check number 159429, in the amount of \$2,200.00, from W. Inc., to a straw campaign contributor.

76. On or about April 25, 2006, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, to further his and others' goal of influencing decisions makers for financial reasons, collected check number 1966, in the amount of \$2,200.00 made payable to a federal congressional candidate from a straw campaign contributor.

77. On or about April 25, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$4,400.00, check number 159430, from W. Inc. to influence and reward him for his official action.

78. On or about April 27, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$4,400.00, check number 159431, from W. Inc. to influence and reward him for his official action.

79. On or about May 4, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 159487, from W. Inc. to influence and reward him for his official action.

80. On or about May 4, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 159488, from W. Inc. to influence and reward him for his official action.

81. On or about May 12, 2006, defendant, **HENRY M. MOUTON**, acting on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury, wrote to

a FBI Special Agent while concealing the financial motives of himself and others and attempted to gain the assistance of the FBI in an effort to keep closed the Old Gentilly Landfill located in New Orleans.

82. On or about May 18, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$3,882.14, check number 159720, from W. Inc. to influence and reward him for his official action.

83. On or about June 6, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 159975, from W. Inc. to influence and reward him for his official action.

84. On or about June 6, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 159974, from W. Inc. to influence and reward him for his official action.

85. On or about June 28, 2006, defendant, **HENRY M. MOUTON**, faxed an invoice to co-conspirator "A." The invoice requested \$5,148.78 in reimbursements for "Expenses Related to Waste Issues."

86. On or about June 30, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$5,148.78, check number 160291, from W. Inc. to influence and reward him for his official action.

87. On or about July 5, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 160366, from W. Inc. to influence and reward him for his official action.

88. On or about July 5, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 160367, from W. Inc. to influence and reward him for his official action.

89. On or about July 19, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,500.93, check number 126, from W.C.S., Inc. to influence and reward him for his official action.

90. On or about August 2, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$18,250.00, check number 130, from W.C.S., Inc. to influence and reward him for his official action.

91. On or about August 3, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 160692, from W. Inc. to influence and reward him for his official action.

92. On or about August 3, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 160693, from W. Inc. to influence and reward him for his official action.

93. On or about August 16, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$30,000.00, check number 195, from W.C.S., Inc. to influence and reward him for his official action.

94. On or about August 29, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 201, from W.C.S., Inc. to influence and reward him for his official action.

95. On or about September 1, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$4,994.12, check number 207, from W.C.S., Inc. to influence and reward him for his official action.
96. On or about September 7, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 161179, from W. Inc. to influence and reward him for his official action.
97. On or about September 7, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 161180, from W. Inc. to influence and reward him for his official action.
98. On or about September 13, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$17,040.10, check number 211, from W.C.S., Inc. to influence and reward him for his official action.
99. On or about September 13, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$12,320.00, check number 212, from W.C.S., Inc. to influence and reward him for his official action.
100. On or about October 4, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 161535, from W. Inc. to influence and reward him for his official action.
101. On or about October 4, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 161536, from W. Inc. to influence and reward him for his official action.

102. On or about October 6, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$16,500.00, check number 218, from W.C.S., Inc. to influence and reward him for his official action.

103. On or about October 12, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$4,000.00, check number 135, from W.C.S., Inc. to influence and reward him for his official action.

104. On or about November 6, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 161904, from W. Inc. to influence and reward him for his official action.

105. On or about November 6, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 161905, from W. Inc. to influence and reward him for his official action.

106. On or about December 13, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 162385, from W. Inc. to influence and reward him for his official action.

107. On or about December 13, 2006, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 162386, from W. Inc. to influence and reward him for his official action.

108. On or about January 5, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 162784, from W. Inc. to influence and reward him for his official action.

109. On or about January 5, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 162785, from W. Inc. to influence and reward him for his official action.

110. On or about February 2, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 163144, from W. Inc. to influence and reward him for his official action.

111. On or about February 2, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 163145, from W. Inc. to influence and reward him for his official action.

112. On or about March 12, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 163601, from W. Inc. to influence and reward him for his official action.

113. On or about March 12, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 163602, from W. Inc. to influence and reward him for his official action.

114. On or about April 5, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 164000, from W. Inc. to influence and reward him for his official action.

115. On or about April 5, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 164001, from W. Inc. to influence and reward him for his official action.

116. On or about April 15, 2007, defendant, **HENRY M. MOUTON**, concealing his involvement in this payoff conspiracy by failing to report approximately \$161,093.92 in illegal payoffs received from co-conspirator "A" and other co-conspirators known and unknown to the grand jury on his 2006 federal income tax return.

117. On or about May 10, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 164526, from W. Inc. to influence and reward him for his official action.

118. On or about May 10, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 164527, from W. Inc. to influence and reward him for his official action.

119. On or about June 7, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 164861, from W. Inc. to influence and reward him for his official action.

120. On or about June 7, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 164862, from W. Inc. to influence and reward him for his official action.

121. On or about July 12, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 165229, from W. Inc. to influence and reward him for his official action.

122. On or about July 12, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 165230, from W. Inc. to influence and reward him for his official action.

123. On or about August 2, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 165602, from W. Inc. to influence and reward him for his official action.

124. On or about August 2, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 165603, from W. Inc. to influence and reward him for his official action.

125. On or about September 12, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 166061, from W. Inc. to influence and reward him for his official action.

126. On or about September 12, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 166062, from W. Inc. to influence and reward him for his official action.

127. On or about September 14, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$21,000.00, check number 166185, from W. Inc. to influence and reward him for his official action.

128. On or about September 14, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$4,000.00, check number 166186, from W. Inc. to influence and reward him for his official action.

129. On or about October 4, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 166421, from W. Inc. to influence and reward him for his official action.

130. On or about October 4, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 166422, from W. Inc. to influence and reward him for his official action.

131. On or about November 9, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 166837, from W. Inc. to influence and reward him for his official action.

132. On or about November 9, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 166838, from W. Inc. to influence and reward him for his official action.

133. On or about December 7, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 167133, from W. Inc. to influence and reward him for his official action.

134. On or about December 7, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 167134, from W. Inc. to influence and reward him for his official action.

135. On or about December 24, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$4,000.00, check number 1042, from D & A to influence and reward him for his official action.

136. On or about December 26, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,500.00, check number 1043, from D & A to influence and reward him for his official action.

137. On or about December 26, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,500.00, check number 1044, from D & A to influence and reward him for his official action.

138. On or about December 26, 2007, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$500.00, check number 1045, from D & A to influence and reward him for his official action.

139. On or about January 10, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 167449, from W. Inc. to influence and reward him for his official action.

140. On or about January 10, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 167450, from W. Inc. to influence and reward him for his official action.

141. On or about February 11, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 167691, from W. Inc. to influence and reward him for his official action.

142. On or about February 11, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 167692, from W. Inc. to influence and reward him for his official action.

143. On or about March 6, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 167919, from W. Inc. to influence and reward him for his official action.

144. On or about March 6, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 167920, from W. Inc. to influence and reward him for his official action.

145. On or about April 7, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 168151, from W. Inc. to influence and reward him for his official action.

146. On or about April 7, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 168152, from W. Inc. to influence and reward him for his official action.

147. On or about April 15, 2008, defendant, **HENRY M. MOUTON**, concealing his involvement in this payoff conspiracy by failing to report approximately \$25,383.00 in illegal payoffs received from co-conspirator "A" and other co-conspirators known and unknown to the grand jury on his 2007 federal income tax return.

148. On or about April 28, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 168395, from W. Inc. to influence and reward him for his official action.

149. On or about April 28, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 168398, from W. Inc. to influence and reward him for his official action.

150. On or about April 28, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 168399, from W. Inc. to influence and reward him for his official action.

151. On or about April 28, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 168400, from W. Inc. to influence and reward him for his official action.

152. On or about April 28, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 168401, from W. Inc. to influence and reward him for his official action.

153. On or about April 28, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,000.00, check number 168402, from W. Inc. to influence and reward him for his official action.

154. On or about May 1, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 168396, from W. Inc. to influence and reward him for his official action.

155. On or about May 1, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$2,000.00, check number 168397, from W. Inc. to influence and reward him for his official action.

156. On or about May 15, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 168372, from W. Inc. to influence and reward him for his official action.

157. On or about May 15, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 168373, from W. Inc. to influence and reward him for his official action.

158. On or about June 11, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 168663, from W. Inc. to influence and reward him for his official action.

159. On or about June 11, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 168664, from W. Inc. to influence and reward him for his official action.

160. On or about July 3, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 168920, from W. Inc. to influence and reward him for his official action.

161. On or about July 3, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 168921, from W. Inc. to influence and reward him for his official action.

162. On or about August 6, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 169200, from W. Inc. to influence and reward him for his official action.

163. On or about August 6, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 169201, from W. Inc. to influence and reward him for his official action.

164. On or about September 10, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 169408, from W. Inc. to influence and reward him for his official action.

165. On or about September 10, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 169409, from W. Inc. to influence and reward him for his official action.

166. On or about September 22, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$860.88, check number 1050, from A. P., LLC to influence and reward him for his official action.

167. On or about October 6, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 169561, from W. Inc. to influence and reward him for his official action.

168. On or about October 8, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 169577, from W. Inc. to influence and reward him for his official action.

169. On or about November 5, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 169775, from W. Inc. to influence and reward him for his official action.

170. On or about November 5, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 169776, from W. Inc. to influence and reward him for his official action.

171. On or about December 2, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 169932, from W. Inc. to influence and reward him for his official action.

172. On or about December 2, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 169933, from W. Inc. to influence and reward him for his official action.

173. On or about December 31, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 170061, from W. Inc. to influence and reward him for his official action.

174. On or about December 31, 2008, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 170062, from W. Inc. to influence and reward him for his official action.

175. On or about February 3, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 170205, from W. Inc. to influence and reward him for his official action.

176. On or about February 4, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 170206, from W. Inc. to influence and reward him for his official action.

177. On or about March 10, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 170327, from W. Inc. to influence and reward him for his official action.

178. On or about March 11, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 170328, from W. Inc. to influence and reward him for his official action.

179. On or about April 7, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 170433, from W. Inc. to influence and reward him for his official action.

180. On or about April 8, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 170434, from W. Inc. to influence and reward him for his official action.

181. On or about April 15, 2009, defendant, **HENRY M. MOUTON**, concealing his involvement in this payoff conspiracy by failing to report approximately \$65,837.00 in illegal payoffs received from co-conspirator "A" and other co-conspirators known and unknown to the grand jury on his 2008 federal income tax return.

182. On or about May 8, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 170550, from W. Inc. to influence and reward him for his official action.

183. On or about May 11, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 170551, from W. Inc. to influence and reward him for his official action.

184. On or about June 10, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 170752, from W. Inc. to influence and reward him for his official action.

185. On or about June 11, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 170753, from W. Inc. to influence and reward him for his official action.

186. On or about July 8, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 170876, from W. Inc. to influence and reward him for his official action.

187. On or about July 15, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 170875, from W. Inc. to influence and reward him for his official action.

188. On or about August 10, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 171078, from W. Inc. to influence and reward him for his official action.

189. On or about August 13, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 171077, from W. Inc. to influence and reward him for his official action.

190. On or about September 3, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 171196, from W. Inc. to influence and reward him for his official action.

191. On or about September 11, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 171197, from W. Inc. to influence and reward him for his official action.

192. On or about October 13, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 171393, from W. Inc. to influence and reward him for his official action.

193. On or about October 15, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 171392, from W. Inc. to influence and reward him for his official action.

194. On or about November 9, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 171547, from W. Inc. to influence and reward him for his official action.

195. On or about November 9, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 171548, from W. Inc. to influence and reward him for his official action.

196. On or about December 15, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 171642, from W. Inc. to influence and reward him for his official action.

197. On or about December 15, 2009, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 171643, from W. Inc. to influence and reward him for his official action.

198. On or about January 8, 2010, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 171783, from W. Inc. to influence and reward him for his official action.

199. On or about January 13, 2010, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 171782, from W. Inc. to influence and reward him for his official action.

200. On or about February 8, 2010, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 171899, from W. Inc. to influence and reward him for his official action.

201. On or about February 8, 2010, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 171900, from W. Inc. to influence and reward him for his official action.

202. On or about February 12, 2010, defendant, **HENRY M. MOUTON**, to conceal his relationship with co-conspirator "A" lied to FBI Special Agents when he said a wealthy friend from Mobile, Alabama provided a helicopter and a pilot for **MOUTON** to fly over the Old Gentilly Landfill and obtain aerial video and photographs, when in truth and fact, co-conspirator "A" or other co-conspirators known and unknown to the grand jury actually paid for the helicopter rental.

203. On or about February 12, 2010, defendant, **HENRY M. MOUTON**, lied to FBI Special Agents when he claimed not to have any business relationship with any landfill and claimed that he had not received any compensation from any landfill, when in truth and fact, **HENRY M. MOUTON** actually had a relationship with a landfill company owned by co-conspirator "A" and other co-conspirators known and unknown to the grand jury and he received approximately \$463,970.00 from companies closely related to a landfill company owned by co-conspirator "A" and co-conspirators known and unknown to the grand jury.

204. On or about February 12, 2010, defendant, **HENRY M. MOUTON**, lied to FBI Special Agents when he said he was not reimbursed by anyone for his involvement with his attempts to close the Old Gentilly Landfill in New Orleans, when in truth and fact, **HENRY M.**

**MOUTON** actually received approximately \$463,970.00 for his efforts to close the Old Gentilly Landfill on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury.

205. On or about February 18, 2010, defendant, **HENRY M. MOUTON**, lied to FBI Special Agents when he said he received \$2,000.00 a month from co-conspirator "A" for building and air conditioning consulting work, when in truth and fact, he was paid \$2,000.00 a month by co-conspirator "A" and other co-conspirators known and unknown to the grand jury to influence and reward him for his efforts as a Commissioner with the Louisiana Department of Wildlife and Fisheries to close the Old Gentilly Landfill in New Orleans on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury.

206. On or about March 18, 2010, defendant, **HENRY M. MOUTON**, received an illegal payment in the amount of \$1,487.00, check number 172012, from W. Inc. to influence and reward him for his official action.

207. On or about March 18, 2010, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 172013, from W. Inc. to influence and reward him for his official action.

208. On or about April 12, 2010, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$1,487.00, check number 172141, from W. Inc. to influence and reward him for his official action.

209. On or about April 16, 2010, defendant, **HENRY M. MOUTON**, received an illegal payoff in the amount of \$513.00, check number 172142, from W. Inc. to influence and reward him for his official action.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

**RECEIPT OF ILLEGAL PAYOFFS BY AN  
AGENT OF A PROGRAM RECEIVING FEDERAL FUNDS**

A. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. Beginning on or about January 1, 2006, through December 31, 2006, in the Eastern District of Louisiana and elsewhere, defendant **HENRY M. MOUTON** did corruptly accept a thing of value, to wit: approximately \$186,110.00 from co-conspirator "A" and other co-conspirators known and unknown to the grand jury, intending to be influenced and rewarded in connection with a transaction and series of transactions of the Louisiana Department of Wildlife and Fisheries, a government agency of the State of Louisiana, involving something of value of \$5,000.00 or more.

All in violation of Title 18, United States Code, Section 666(a)(1)(B).

COUNT 3

**RECEIPT OF ILLEGAL PAYOFFS BY AN  
AGENT OF A PROGRAM RECEIVING FEDERAL FUNDS**

A. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. Beginning on or about January 1, 2007, through December 31, 2007, in the Eastern District of Louisiana and elsewhere, defendant **HENRY M. MOUTON** did corruptly accept a thing of value, to wit: approximately \$58,500.00 from co-conspirator "A" and other co-conspirators known and unknown to the grand jury, intending to be influenced and rewarded in connection with a transaction and series of transactions of the Louisiana Department of Wildlife

and Fisheries, a government agency of the State of Louisiana, involving something of value of \$5,000.00 or more.

All in violation of Title 18, United States Code, Section 666(a)(1)(B).

**COUNT 4**

**RECEIPT OF ILLEGAL PAYOFFS BY AN  
AGENT OF A PROGRAM RECEIVING FEDERAL FUNDS**

A. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. Beginning on or about January 1, 2008, through December 31, 2008, in the Eastern District of Louisiana and elsewhere, defendant **HENRY M. MOUTON** did corruptly accept a thing of value, to wit: approximately \$41,860.00 from co-conspirator "A" and other co-conspirators known and unknown to the grand jury, intending to be influenced and rewarded in connection with a transaction and series of transactions of the Louisiana Department of Wildlife and Fisheries, a government agency of the State of Louisiana, involving something of value of \$5,000.00 or more.

All in violation of Title 18, United States Code, Section 666(a)(1)(B).

**COUNT 5**

**MAKING FALSE STATEMENTS TO FEDERAL AGENTS**

A. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. On or about February 12, 2010, in the Eastern District of Louisiana and elsewhere, in a matter within the jurisdiction of the Federal Bureau of Investigation (FBI), an agency of the

United States, the defendant, **HENRY M. MOUTON**, did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation; that is the defendant, lied to Special Agents with the FBI, New Orleans Division, when **MOUTON** said a wealthy friend from Mobile, Alabama provided a helicopter and a pilot for **MOUTON** to fly over the Old Gentilly Landfill in New Orleans and obtain aerial video and photographs, when in truth and fact, co-conspirator "A" and other co-conspirators known and unknown to the grand jury actually paid for the helicopter rental;

All in violation of Title 18, United States Code, Section 1001.

#### COUNT 6

#### MAKING FALSE STATEMENTS TO FEDERAL AGENTS

- A. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.
- B. On or about February 12, 2010, in the Eastern District of Louisiana and elsewhere, in a matter within the jurisdiction of the Federal Bureau of Investigation (FBI), an agency of the United States, the defendant, **HENRY M. MOUTON**, did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation; that is the defendant, lied to Special Agents with the FBI, New Orleans Division, when he claimed not to have any business relationship with any landfill and claimed that he had not received any compensation from any landfill, when in truth and fact, **HENRY M. MOUTON** actually had a relationship with a landfill company located in the Eastern District of Louisiana and received approximately

\$463,970.00 from companies closely related to a landfill company owned by co-conspirator "A" and other co-conspirators known and unknown to the grand jury;

All in violation of Title 18, United States Code, Section 1001.

COUNT 7

MAKING FALSE STATEMENTS TO FEDERAL AGENTS

A. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. On or about February 12, 2010, in the Eastern District of Louisiana and elsewhere, in a matter within the jurisdiction of the Federal Bureau of Investigation (FBI), an agency of the United States, the defendant, **HENRY M. MOUTON**, did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation; that is the defendant, lied to Special Agents with the FBI, New Orleans Division, when the defendant said he was not reimbursed by anyone for his involvement with his attempts to close the Old Gentilly Landfill in New Orleans, when in truth and fact, **HENRY M. MOUTON** actually received approximately \$463,970.00 for his efforts to close the Old Gentilly Landfill on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury;

All in violation of Title 18, United States Code, Section 1001.

COUNT 8

MAKING FALSE STATEMENTS TO FEDERAL AGENTS

A. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. On or about February 18, 2010, in the Eastern District of Louisiana and elsewhere, in a matter within the jurisdiction of the Federal Bureau of Investigation (FBI), an agency of the United States, the defendant, **HENRY M. MOUTON**, did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation; that is the defendant, lied to Special Agents with the FBI, New Orleans Division, when the defendant said he received \$2,000.00 a month from co-conspirator "A" and other co-conspirators known and unknown to the grand jury for building and air conditioning consulting work, when in truth and fact, he was paid \$2,000.00 a month by co-conspirator "A" and other co-conspirators known and unknown to the grand jury for his efforts as a Commissioner with the Louisiana Department of Wildlife and Fisheries to close the Old Gentilly Landfill in New Orleans on behalf of co-conspirator "A" and other co-conspirators known and unknown to the grand jury;

All in violation of Title 18, United States Code, Section 1001.

#### NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 4 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 371, 666 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 1 through 4, defendant, **HENRY M. MOUTON**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all

property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Sections 371 and 666, including but not limited to:

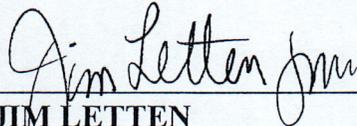
- a. \$463,970.00 in United States Currency and all interest and proceeds traceable thereto.
  - b. The government specifically provides notice of its intent to seek a personal money judgment against the defendant in the amount of the fraudulently-obtained proceeds.
3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:
- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third person;
  - c. has been placed beyond the jurisdiction of the Court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

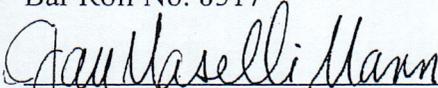
All in violation of Title 18, United States Code, Sections 371, 666 and 981(a)(1)(C),  
made applicable through Title 28, United States Code, Section 2461(c).

A TRUE BILL:

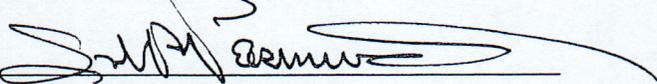
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FOREPERSON



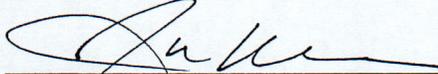
\_\_\_\_\_  
**JIM LETTEN**  
UNITED STATES ATTORNEY  
Bar Roll No. 8517



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**JAN MASELLI MANN**  
First Assistant United States Attorney  
Bar Roll No. 9020



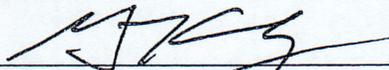
\_\_\_\_\_  
**SALVADOR PERRICONE**  
Assistant United States Attorney  
Bar Roll No. 10515



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**JAMES R. MANN**  
Assistant United States Attorney  
Bar Roll No. 20513



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**BRIAN M. KLEBBA**  
Assistant United States Attorney  
New York Bar Roll No. 2938728



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**GREGORY KENNEDY**  
Assistant United States Attorney  
Bar Roll No. 20896



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**WILLIAM J. QUINLAN, JR.**  
Assistant United States Attorney  
Bar Roll No. 22600

New Orleans, Louisiana  
February 25, 2011