

FELONY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

BILL OF INFORMATION FOR CONSPIRACY TO COMMIT
COMPUTER FRAUD AND WIRE FRAUD

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
WILLIE J. IRONS, JR.	*	VIOLATIONS: 18 U.S.C. §371
	*	*
	*	*

The United States Attorney charges that:

COUNT 1
CONSPIRACY

A. AT ALL TIMES MATERIAL HEREIN:

1. The State of Louisiana—Department of Insurance had the power and authority to issue and revoke licenses that enabled qualified individuals to function as bail bondsmen in the State of Louisiana.

2. In or around 2003, the State of Louisiana—Department of Insurance revoked the criminal bail bonding license of the defendant, **WILLIE J. IRONS, JR.** At no point after in or

around the year 2003 did **WILLIE J. IRONS, JR.** regain his license to function as a bail bondsman in the State of Louisiana or anywhere else.

3. Personal recognizance bonds are normally reserved for individual criminal defendants who have been determined by a judge of the Orleans Parish Criminal District Court to not pose a danger to the community and to stand a strong likelihood to re-appear in court as ordered.

4. Authorization to release a criminal defendant on personal recognizance, sometimes referred to as “released on recognizance,” or “ROR,” lay solely with legally empowered members of the judiciary, including but not limited to judges of the Orleans Parish Criminal District Court and the Orleans Parish Municipal Court.

5. A personal recognizance bond means that a criminal defendant is not required to post money or property in order to secure his or her release.

6. From in and around 2006 through in and around 2010, Gilishia Garrison worked for the Orleans Parish Criminal Sheriff, as a part-time employee in Orleans Parish Prison.

7. From a time prior to in and around 2006 through in and around 2010, Gilishia Garrison was also a full-time employee of the Orleans Parish Criminal District Court Clerk’s Office.

8. The Orleans Parish Prison (hereinafter “O.P.P.”) was a governmental entity of Orleans Parish, tasked with housing criminal defendants who had been ordered held on bail pending trial in the Orleans Parish Criminal District Court.

9. O.P.P. utilized "CINTAP," a computerized system within which criminal defendants' and inmates' bail status and records of incarceration were retained. Among the information retained, controlled, and entered into this computerized system were a criminal defendant's bail amount and orders of release.

10. In order to effect a change in a criminal defendant's bail status from being held on bond to being released on personal recognizance, a formal Order of Release was to be authorized and signed by a judge; however, in common practice, employees of O.P.P. would personally sign an Order of Release per a judge's instructions.

11. A change in a defendant's bail status entered through the use of this computerized system caused a corresponding change to the official and publicly accessible internet site of the Orleans Parish Criminal Sheriff, an internet site that was fully integrated with and accessible through common and ordinary means of internet access. This computerized system affected interstate commerce and was therefore a protected computer, as defined by Title 18, United States Code, Section 1030.

12. It was a part of Gilishia Garrison's official duties as an employee at O.P.P. to receive bail orders from judges of the Orleans Parish Criminal District Court during non-official hours. Included among these bail orders were reductions in bond amounts and alterations of criminal defendants' bail from being held pending bond to being released on recognizance.

13. Gilishia Garrison accessed this computerized system in the course of her employment at O.P.P. with limited authorization of the Criminal Sheriff for Orleans Parish, for the legitimate and proper purpose of receiving the orders, including orders to release on recognizance, of judges of the Orleans Parish Criminal District Court.

14. The Metropolitan Orleans Total Information Online Network (“MOTION”) is a computerized record-keeping system used and maintained by the New Orleans Police Department (“NOPD”) for the purpose of informing law enforcement, certain authorized employees of the Orleans Parish Criminal Clerk’s Office, the Orleans Parish Criminal District Court’s Parole Officers, and others of a criminal defendant’s arrest and criminal history. MOTION-NAME (“MONA”) was a sub-folder within the MOTION system that enabled authorized users to search MOTION by name. The information contained on MOTION and MONA was not publicly available.

15. Gilishia Garrison accessed the MONA system in the course of her employment at O.P.P. with limited authorization of the Criminal Sheriff for Orleans Parish, for the legitimate and proper purpose of verifying criminal histories and arrest records of criminal defendants. She also accessed the MONA system in the course of her employment at the Orleans Parish Criminal Clerk’s Office for the limited, authorized purpose of performing background checks on prospective employees for legally authorized companies and businesses.

16. Western Union is a company that transmits funds through an electronic wire from one person to another.

B. THE CONSPIRACY

1. From on or about February 8, 2009 through on or about April 13, 2009, in the Eastern District of Louisiana and elsewhere, the defendant, **WILLIE J. IRONS, JR.**, along with Gilishia Garrison and others known and unknown to the United States Attorney, did knowingly and willfully conspire, confederate and agree with each other and with other persons known and unknown to the United States Attorney to:

- a. access a protected computer, for an illegitimate and improper purpose, thereby exceeding any authorized and legitimate access, in violation of 18 U.S.C. §§ 1030(a)(4) and (c)(3)(A).
- b. transmit and cause to be transmitted in interstate commerce certain signs, signals, and sounds by means of a wire communication, that is a Western Union wire, in furtherance of a scheme and artifice to defraud and to obtain money and property, in violation of Title 18, United States Code, Section 1343.

C. OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

On or about the dates below, in furtherance of the conspiracy and to effect the unlawful objects thereof, the defendant, **WILLIE J. IRONS, JR.**, and Gilishia Garrison, and others known and unknown to the United States Attorney, committed and caused to be committed the following Overt Acts, among others, in the Eastern District of Louisiana and elsewhere:

Orleans Parish Criminal Defendant A

- 1. On or about February 8, 2009, at or around 7:09 a.m. and again at or around 1:17

p.m., Orleans Parish Criminal Defendant A contacted the defendant, **WILLIE J. IRONS, JR.**, by phone from O.P.P. , where Criminal Defendant A was being held in the custody of the Orleans Parish Criminal Sheriff on a bond of \$15,000.00.

2. That same day, on or about February 8, 2009, the defendant **WILLIE J. IRONS, JR.** and Gilishia Garrison, communicated no fewer than seven (7) times by cell phone, including text messages and calls, beginning at or around 1:22 p.m. and concluding at or around 4:40 p.m..

3. The following day, on or about February 9, 2009, the defendant, **WILLIE J. IRONS, JR.** and Gilishia Garrison, communicated no fewer than twelve (12) times, including text messages and calls, beginning at or around 3:25 p.m. and concluding at or around 8:22 p.m.. These communications included a series of five (5) calls and a text message within a twenty-seven (27) minute period between 7:02 p.m. and 7:29 p.m..

4. On or about February 9, 2009 at or around 7:49 p.m., at the request of **WILLIE J. IRONS, JR.**, and with a corrupt intent, Gilishia Garrison accessed Criminal Defendant A's electronic file in the MONA system for the purpose of effecting Criminal Defendant A's release from O.P.P. .

5. On or about the night of February 9, 2009, while working at the CINTAP office of the Orleans Parish Criminal Sheriff's Office, Gilishia Garrison forged and fabricated a personal recognizance bond for Criminal Defendant A that purported to indicate that Orleans Parish Criminal District Court Judge 1 ("Judge 1") had authorized and ordered the release of Criminal Defendant A from the custody of O.P.P. , knowing that Judge 1 had not authorized and ordered the release of Criminal Defendant A.

6. On or about the night of February 9, 2009, Gilishia Garrison, having agreed to be paid by the defendant, **WILLIE J. IRONS, JR.**, in exchange for her effecting the release of Criminal Defendant A, accessed and manipulated CINTAP's computer system, causing the electronic file for Criminal Defendant A to indicate to all other users that Criminal Defendant A had been ordered released on a personal recognizance bond.

7. At or around 8:22 p.m. on or about February 9, 2009, the defendant, **WILLIE J. IRONS, JR.** and Gilishia Garrison exchanged text messages, confirming that Criminal Defendant A would soon be released from custody.

8. At or around 11:15 p.m. on or about February 9, 2009, Criminal Defendant A was released from custody due to the actions and agreement between the defendant, **WILLIE J. IRONS, JR.** and Gilishia Garrison.

9. On or about February 10, 2009, the defendant, **WILLIE J. IRONS, JR.** and Gilishia Garrison coordinated a time and place to meet so that the defendant could pay Garrison.

10. On or about February 10, 2009, the defendant, **WILLIE J. IRONS, JR.** met Gilishia Garrison and paid her a sum of money.

11. On or about February 11, 2009, Gilishia Garrison deposited via an Automated Teller Machine ("ATM") \$300.00 into her bank account, the money the defendant, **WILLIE J. IRONS, JR.**, had paid her in exchange for her misuse and corruption of her authority as an employee of the Orleans Parish Criminal Sheriff's Office.

Orleans Parish Criminal Defendant B

12. On or about March 13, 2009, the defendant **WILLIE J. IRONS, JR.** and Gilishia Garrison, communicated no fewer than five (5) times by cell phone, including text messages and calls, beginning at or around 12:02 p.m. and continuing through at or around 3:48 p.m.. During the course of these conversations, the defendant, **WILLIE J. IRONS, JR.**, was informed that Garrison would be working at CINTAP that evening.

13. On or about March 13, 2009, at or around 6:01 p.m., Orleans Parish Criminal Defendant B ("Criminal Defendant B") contacted the defendant, **WILLIE J. IRONS, JR.**, by phone from O.P.P., where Criminal Defendant B was being held in the custody of the Orleans Parish Criminal Sheriff on a bond of \$4,000.00

14. At or around 7:23 p.m. on or about March 13, 2009 and again at or around 7:30 p.m. on or about March 13, 2009, the defendant, **WILLIE J. IRONS, JR.** and Gilishia Garrison communicated by cell phone while Garrison was working at CINTAP. During these phone calls, the defendant, **WILLIE J. IRONS, JR.**, informed Gilishia Garrison that he was seeking her cooperation in effecting the release of Criminal Defendant B, in a manner similar to that described above.

15. At or around 9:05 p.m., at the request of **WILLIE J. IRONS, JR.**, and with a corrupt intent, Gilishia Garrison accessed Criminal Defendant B's electronic file in the MONA system for the purpose of effecting Criminal Defendant B's release from O.P.P.

16. On or about the night of March 13, 2009, while working at the CINTAP office of the Orleans Parish Criminal Sheriff's Office, Gilishia Garrison forged and fabricated a personal recognizance bond for Criminal Defendant B that purported to indicate that Judge 1 had authorized and ordered the release of Criminal Defendant B from the custody of O.P.P. , knowing that Judge 1 had not authorized and ordered the release of Criminal Defendant B.

17. On or about the night of March 13, 2009, Gilishia Garrison, having agreed to be paid by the defendant, **WILLIE J. IRONS, JR.**, in exchange for her effecting the release of Criminal Defendant B, accessed and manipulated CINTAP'S computer system, causing the electronic file for Criminal Defendant B to indicate to all other users that Criminal Defendant B had been ordered released on a personal recognizance bond.

18. At or around 10:17 p.m. on or about March 13, 2009 and again at or around 10:29 p.m. on or about March 13, 2009, the defendant, **WILLIE J. IRONS, JR.** and Gilishia Garrison communicated by cell phone, confirming that Criminal Defendant B would soon be released from custody.

19. At or around 1:16 a.m. on or about March 14, 2009, Criminal Defendant B was released from custody due to the actions and agreement between the defendant, **WILLIE J. IRONS, JR.** and Gilishia Garrison.

20. On or about March 14, 2009, the defendant, **WILLIE J. IRONS, JR.** and Gilishia Garrison coordinated a time and place to meet so that the defendant could pay Garrison.

21. On or about March 14, 2009, the defendant, **WILLIE J. IRONS, JR.** met Gilishia Garrison and paid her a sum of money.

22. On or about March 17, 2009, Gilishia Garrison deposited via an Automated Teller Machine ("ATM") \$50.00 into her bank account, the remainder of the money the defendant, **WILLIE J. IRONS, JR.**, had paid her in exchange for her misuse and corruption of her authority as an employee of the Orleans Parish Criminal Sheriff's Office.

Orleans Parish Criminal Defendants C and D

23. On or about April 8, 2009, at or around 8:37 p.m. and again at or around 9:10 p.m., Orleans Parish Criminal Defendant C ("Criminal Defendant C") contacted the defendant, **WILLIE J. IRONS, JR.**, by phone from O.P.P., where Criminal Defendant C was being held in the custody of the Orleans Parish Criminal Sheriff on a bond of \$2,500.00.

24. Likewise, on or about April 8, 2009, at or around 9:01 p.m., Orleans Parish Criminal Defendant D ("Criminal Defendant D") contacted the defendant, **WILLIE J. IRONS, JR.**, by phone from O.P.P., where Criminal Defendant D was being held in the custody of the Orleans Parish Criminal Sheriff on a bond of \$2,500.00.

25. As a result of the conversations between Criminal Defendants C and D and the defendant, **WILLIE J. IRONS, JR.**, Criminal Defendants C and D arranged for \$800.00 (\$400.00 for each) to be wired through Western Union to the defendant, **WILLIE J. IRONS, JR.**. This wire transfer of \$800.00, which originated in Tampa, Florida, a location outside of the State of Louisiana and the Eastern District of Louisiana, took place at or around 11:14 p.m. on or about April 8, 2009.

26. The next day, on or about April 9, 2009, the defendant **WILLIE J. IRONS, JR.** and Gilishia Garrison, communicated no fewer than three (3) times by cell phone, including text messages and calls, beginning at or around 8:11 a.m. and continuing through at or around 9:27 a.m. During the course of these conversations, the defendant, **WILLIE J. IRONS, JR.**, was informed that Garrison would be working at CINTAP that evening.

27. At or around 11:49 a.m. on or about April 9, 2009, the defendant, **WILLIE J. IRONS, JR.**, retrieved the \$800.00 that had been wired from Tampa, Florida on behalf of Criminal Defendants C and D.

28. At or around 7:50 p.m. on or about April 9, 2009, again at or around 8:08 p.m. on or about April 9, 2009, and again at or around 8:20 p.m. on or about April 9, 2009 the defendant, **WILLIE J. IRONS, JR.** and Gilishia Garrison communicated by cell phone while Garrison was working at CINTAP. During these phone calls, the defendant, **WILLIE J. IRONS, JR.**, informed Gilishia Garrison that he was seeking her cooperation in effecting the release of Criminal Defendant B, in a manner similar to that described above.

29. At or around 8:32 p.m., at the request of **WILLIE J. IRONS, JR.**, and with a corrupt intent, Gilishia Garrison accessed Criminal Defendant C's electronic file in the MONA system for the purpose of effecting Criminal Defendant C's release from O.P.P.

30. At or around 8:33 p.m., at the request of **WILLIE J. IRONS, JR.**, and with a corrupt intent, Gilishia Garrison accessed Criminal Defendant D's electronic file in the MONA system for the purpose of effecting Criminal Defendant D's release from O.P.P.

31. On or about the night of April 9, 2009, while working at the CINTAP office of the Orleans Parish Criminal Sheriff's Office, Gilishia Garrison forged and fabricated a personal recognizance bond for Criminal Defendants C and D that purported to indicate that Judge 1 had authorized and ordered the release of Criminal Defendants C and D from the custody of O.P.P. , knowing that Judge 1 had not authorized and ordered the release of Criminal Defendants C and D.

32. On or about the night of March 13, 2009, Gilishia Garrison, having agreed to be paid by the defendant, **WILLIE J. IRONS, JR.**, in exchange for her effecting the release of Criminal Defendants C and D, accessed and manipulated CINTAP'S computer system, causing the electronic file for Criminal Defendants C and D to indicate to all other users that Criminal Defendants C and D had been ordered released on a personal recognizance bond.

33. At or around 12:00 a.m. on or about April 10, 2009, Criminal Defendant D was released from custody due to the actions and agreement between the defendant, **WILLIE J. IRONS, JR.** and Gilishia Garrison.

34. At or around 12:02 a.m. on or about April 10, 2009, Criminal Defendant C was released from custody due to the actions and agreement between the defendant, **WILLIE J. IRONS, JR.** and Gilishia Garrison.

35. On or about April 10, 2009, the defendant, **WILLIE J. IRONS, JR.** and Gilishia Garrison coordinated a time and place to meet so that the defendant could pay Garrison.


36. On or about April 10, 2009, the defendant, **WILLIE J. IRONS, JR.** met Gilishia Garrison and paid her a sum of money.

37. On or about April 13, 2009, Gilishia Garrison deposited via an Automated Teller Machine ("ATM") \$240.00 and \$50.00 into her bank accounts, the money the defendant, **WILLIE J. IRONS, JR.**, had paid her in exchange for her misuse and corruption of her authority as an employee of the Orleans Parish Criminal Sheriff's Office.


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



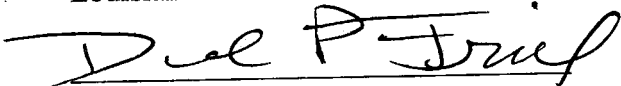
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