

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**UNITED STATES OF AMERICA**

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**CRIMINAL NO. 12-294**

**v.**

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**SECTION: "E" (2)**

**RODNEY WILLIAMS**

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**FACTUAL BASIS**

If this case were to proceed to trial, the United States would prove, beyond a reasonable doubt, through credible testimony and reliable evidence, the following factual summary:

***The City of New Orleans Receives Federal Assistance in Excess of \$10,000 Annually***

The City of New Orleans is a local political subdivision within the State of Louisiana and received federal financial assistance and benefits in excess of \$10,000 annually from January 1, 2007, through January 1, 2012.

The City of New Orleans is also empowered to award and execute large contracts with local consulting firms. That power and authority rests with the City of New Orleans' chief executive officer, the Mayor.

***2007 - 2008: City of New Orleans Releases Requests for Services - Payoffs Begin***

In November and December of 2007, the City of New Orleans announced a need to hire contractors to provide architectural, engineering and management services to the city's Department of Public Works and the Capital Projects Division. The defendant, RODNEY WILLIAMS, President of Three Fold Consultants, LLC ("Three Fold") responded to the City of New Orleans' requests for services.

Shortly after the request for proposals and qualifications were released to the public, and before the contractor approval process was completed, as part of a conspiracy to defraud the citizens of New Orleans and to engage in bribery, RODNEY WILLIAMS agreed to provide a \$60,000 payoff to Public Official A, an agent and employee of the City of New Orleans. The payoff was provided to influence, reward and guarantee "favorable treatment" from Public Official A during the contractor and contract approval process.

The payoff was provided to Public Official A in the form of three (3) separate \$20,000 checks. The checks were dated January 31, 2008, and made payable to a granite installation company funded and operated by Public Official A.

***The "Payoffs" Paid Off***

Shortly after receiving the January 31, 2008 \$60,000 payoff, Public Official A approved RODNEY WILLIAMS and his company, Three Fold, to receive architectural, engineering and management services work from the City of New Orleans (as advertised by the City of New Orleans

in the November and December of 2007 requests for proposals). Following Public Official A's approval of RODNEY WILLIAMS as a vendor for the Public Works Department and the Capital Projects Division in February and April of 2008, RODNEY WILLIAMS (through Three Fold) received a large number of city contracts during the remainder of Public Official A's tenure at City Hall.

Several additional payoffs were funneled to Public Official A following the original \$60,000 payoff. On or about June 13, 2008, RODNEY WILLIAMS funneled a \$2,250 payoff to Public Official A via a personal check made payable to Public Official A's granite installation company.

In July, 2009, following the approval and the award of a large contract to Three Fold, RODNEY WILLIAMS provided a \$10,000 cash payoff. The cash payoff was delivered to close family members of Public Official A on or about July 21, 2009.

### ***The Cover-Up***

To conceal and disguise the illegality of the payoffs, Public Official A provided RODNEY WILLIAMS with ownership documents in his granite installation company. The ownership documents evidenced the sale of a partial interest in Public Official A's granite installation company to a newly created company partially owned by RODNEY WILLIAMS. However, according to documents filed with the Louisiana Secretary of State, this newly created company was not formed until after the January 31, 2008 \$60,000 payoff to Public Official A.

This scheme and artifice to defraud the public of their right to receive the honest services of their public officials, described above, also involved the use of wire communications to complete the bribery scheme. These wire communications traveled outside the state of Louisiana and across state lines.

In summary, all of the evidence introduced at trial would establish the elements of the offense and prove the defendant's guilt beyond a reasonable doubt.

**READ AND APPROVED:**

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RODNEY WILLIAMS  
Defendant

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MATTHEW M. COMAN  
Assistant U.S. Attorney

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RALPH CAPITELLI  
Counsel for Defendant

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RICHARD R. PICKENS, II  
Assistant U.S. Attorney