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U.S. DISTRICT COURT  
EASTERN DISTRICT OF LA.

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

BILL OF INFORMATION FOR  
CONSPIRACY TO COMMIT WIRE FRAUD

**FELONY**

UNITED STATES OF AMERICA

\*

CRIMINAL NO.

**16-112**

v.

\*

SECTION:

**SECT. L MAG. 5**

GERALD URSIN, JR.

\*

VIOLATION: 18 U.S.C. § 371

\* \* \*

The United States Attorney charges that:

**COUNT 1**

*(Conspiracy to Commit Wire Fraud)*

**A. AT ALL TIMES MATERIAL HEREIN**

1. The defendant, **GERALD URSIN, JR.**, was an Orleans Parish Sheriff's Office ("OPSO") Deputy, who was promoted to the position of Chief Deputy in or around November 2011.

2. Roy Austin was an OPSO Colonel who owned and operated a private company named Austin Sales and Service. Austin utilized Austin Sales and Service to arrange security details for local entities and events that required security beyond what would otherwise be provided by police patrols. Austin staffed those events with off-duty OPSO deputies, New Orleans Police Department officers, and others.

**B. THE CONSPIRACY**

3. Beginning on or about 2009 and continuing through January 2014, in the Eastern District of Louisiana, and elsewhere, the defendant, **GERALD URSIN, JR.**, and others known and unknown to the United States Attorney, did knowingly and willfully combine, conspire and agree with each other to devise a scheme and artifice to defraud local entities and events and to obtain money by means of false and fraudulent representations by fraudulently inflating invoices sent to those local entities and events by means of wire and radio communication, from outside the State of Louisiana and into the Eastern District of Louisiana, all involving the use of interstate wire transmissions, in violation of Title 18, United States Code, Sections 1343.

**C. MANNER AND MEANS OF THE CONSPIRACY**

4. During the course of the conspiracy, Roy Austin, with others known and unknown, submitted fraudulently inflated invoices to local entities and events via electronic mail and fax transmissions, which traveled in interstate commerce by means of wire and radio communication, from outside the State of Louisiana and into the Eastern District of Louisiana. Austin inflated by including in the billing documents with names of individuals who did not in fact provide any security services ("Ghost Employees"). For example, in early 2012, Mardi Gras Krewe A hired Austin Sales and Service to provide security details for its preview party, bus parking, and extravaganza. On or about February 27, 2012, Austin caused an email to be sent to Mardi Gras Krewe A that contained an invoice for the security details. The invoice fraudulently included charges for Ghost Employees who did not in fact work. Mardi Gras Krewe A paid Austin the entire invoice.

5. Austin kept a portion of the overbilled amount in the Austin Sales and Service corporate bank account for his own personal use. In some instances, Austin drafted Austin Sales and Service corporate checks made payable to the Ghost Employees who did not work and then fraudulently endorsed those checks and deposited them into his personal bank account for his own personal use.

6. As part of the scheme, Austin regularly directed funds from that overbilled surplus for his own personal use by drafting checks to members of his family under the fraudulent guise of payments for detail work that in fact did not take place.

7. At the time of those fraudulent payments, Austin often also drafted checks made payable to **URSIN**'s family members under the fraudulent guise of payments for detail work that in fact did not take place and delivered those checks to **URSIN**.

8. **URSIN** then had their respective family members endorse the checks for subsequent deposit.

**C. OVERT ACTS**

On or about the following dates, in furtherance of and to conceal the conspiracy and accomplish its purposes, the defendant, **GERALD URSIN, JR.**, and others, committed the following overt acts, among others, in the Eastern District of Louisiana and elsewhere:

9. On or about March 18, 2010, Austin provided **URSIN** a check in the amount of \$250 made payable to a **URSIN** family member that **URSIN** selected.

10. On or about March 18, 2010, Austin provided **URSIN** a check in the amount of \$325 made payable to a **URSIN** family member that **URSIN** selected.

11. On or about December 1, 2010, Austin provided **URSIN** a check in the amount of \$500 made payable to a **URSIN** family member that **URSIN** selected.



12. On or about March 26, 2011, Austin provided **URSIN** a check in the amount of \$220 made payable to a **URSIN** family member that **URSIN** selected.

13. On or about March 6, 2012, Austin provided **URSIN** a check in the amount of \$300 made payable to a **URSIN** family member that **URSIN** selected.

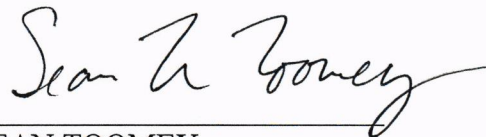
14. On or about April 12, 2012, Austin provided **URSIN** a check in the amount of \$180 made payable to a **URSIN** family member that **URSIN** selected.

15. On or about November 22, 2012, Austin provided **URSIN** a check in the amount of \$500 made payable to a **URSIN** family member that **URSIN** selected.

16. On or about March 5, 2013, Austin provided **URSIN** a check in the amount of \$500 made payable to a **URSIN** family member that **URSIN** selected.

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

KENNETH ALLEN POLITE, JR.  
UNITED STATES ATTORNEY



SEAN TOOMEY  
Assistant United States Attorney  
La. Bar Roll No. 36055

New Orleans, Louisiana  
June 21, 2016

