

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

**UNITED STATES OF AMERICA**

\*

**CRIMINAL NO.: 14-193**

**v.**

\*

**SECTION: "N"**

\*

**STEVEN BOURG**

\* \* \*

**FACTUAL BASIS**

Should this matter have gone to trial, the government would have proved beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible exhibits, the following to support the allegations charged by the government in the one-count Bill of Information now pending against the defendant **STEVEN BOURG** ("**BOURG**").

A witness from the Coast Guard would testify that on or about October 10, 2012, he received information from Daigle Towing in Belle Chase, Louisiana, that **BOURG**, had been hired by Daigle Towing to captain the uninspected towing vessel (*UTV*) *Mason Ray* but that **BOURG** had been found asleep while on watch. The Coast Guard checked the Marine Information for Safety and Law Enforcement database and found that **BOURG** had not possessed a merchant mariner license as issued by the Coast Guard and as required to captain a towing vessel since 2007 when he had voluntarily surrendered the license, identified as license number 1015916. **BOURG's** license which had been issued in 2004 would have expired in 2009.

At trial, documents and testimony from Daigle Towing would be presented to show that **BOURG** submitted an altered merchant mariner license with his application to Daigle Towing. The license was in the name of **BOURG**, but listed the issuance date as January 2009 and the

expiration date as January 2014. The Coast Guard witness would testify that **BOURG** had not been issued a license nor had his license renewed in January 2009. As a result of **BOURG's** submission of the altered license which appeared to be valid and in good standing, he had been employed by Daigle Towing from September 19, 2012 until September 25, 2012. Prior to being employed by Daigle Towing in the Eastern District of Louisiana, **BOURG** had used the altered license to apply and get employment with Triple C Towing, LLC, out of Houma, Louisiana. **BOURG** applied to Triple C Towing on or about July 19, 2011 and ended his employment on or about February 1, 2012. **BOURG** earned \$36,000.00 as a captain with Triple C Towing.

**READ AND APPROVED:**

\_\_\_\_\_  
STEVEN BOURG  
Defendant

\_\_\_\_\_  
Date

\_\_\_\_\_  
VALERIE JUSSELIN ( )  
Attorney for defendant

\_\_\_\_\_  
Date

\_\_\_\_\_  
EMILY K. GREENFIELD (LA 28587)  
Assistant United States Attorney

\_\_\_\_\_  
Date