

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR
EMBEZZLEMENT OF UNION FUNDS**

UNITED STATES OF AMERICA * CRIMINAL NO.

v. * SECTION:

WAYNE P. BOUDOIN * VIOLATION: 29 U.S.C. 501(c)

 * * *

The United States Attorney charges that:

COUNT 1

From on or about April 24, 2008, and continuing through on or about January 19, 2011, in the Eastern District of Louisiana, **WAYNE P. BOUDOIN**, while holding the positions of President of the Security, Police, and Fire Professionals of America Local 709, a labor organization engaged in an industry affecting interstate commerce, did embezzle, steal, and unlawfully and willingly abstract and convert to his own use the moneys, funds, securities, property, and other assets of said labor organization in the approximate amount of \$16,367.96, in violation of Title 29, United States Code, Section 501(c).

NOTICE OF FORFEITURE

1. The allegations of Count 1 of this Bill of Information 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 29, United States Code, Section 501(c) and Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offense alleged in Count 1, defendant, **WAYNE P. BOUDOIN**, 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 a violation of Title 29, United States Code, Section 501(c).

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

- 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 defendants up to the value of the above forfeitable property.

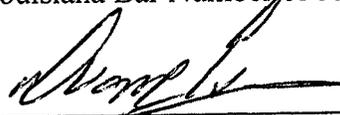
All in violation of Title 29, United States Code, Section 501(c) and Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).



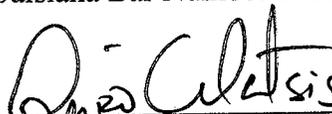
DANA J. BOENTE
United States Attorney



FRED P. HARPER, JR.
First Assistant United States Attorney
Louisiana Bar Number 6568



DUANE A. EVANS
Chief of Criminal Division
Louisiana Bar Number 24086



SPIRO G. LATSIS
Assistant United States Attorney
Louisiana Bar Number 24517

New Orleans, Louisiana
April 22, 2013