

RECEIVED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

2015 MAR -6 PM 1:31

WILLIAM W. BLEVINS
CLERK

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

FELONY

**BILL OF INFORMATION FOR CONSPIRACY TO
COMMIT BRIBERY AND HONEST SERVICES WIRE FRAUD**

UNITED STATES OF AMERICA *

v. *

IRA THOMAS *

* * *

CRIMINAL NO. 15-50

SECTION: SECT. E MAG. 5

VIOLATION: 18 U.S.C. § 371

The United States Attorney charges that:

COUNT 1

**CONSPIRACY TO COMMIT BRIBERY
AND HONEST SERVICES WIRE FRAUD**

A. AT ALL TIMES MATERIAL HEREIN:

1. The Orleans Parish School Board (“OPSB”) consists of seven (7) board members. Each member serves a four (4) year term.

2. The defendant, **IRA THOMAS** (“**THOMAS**”), served as a member of the OPSB. As an OPSB member, **IRA THOMAS** shared responsibility for awarding OPSB contracts to private entities, including local businesses.

3. The OPSB was a local government entity within the State of Louisiana that received federal assistance in excess of \$10,000 annually from 2013 through 2015.

4. OPSB Employee "A" was an employee of the OPSB.
5. Private citizen "B" was associated with **THOMAS** as a consultant.

B. THE CONSPIRACY:

Beginning on or about September 2013, and continuing through January 2015, in the Eastern District of Louisiana, and elsewhere, the defendant, **IRA THOMAS**, and others known and unknown to the United States Attorney, did knowingly and willfully combine, conspire and agree with each other:

1. To corruptly accept and agree to accept anything of value from any person, intending to be influenced and rewarded as an agent of an organization, government, or agency in connection with any business, transaction, and series of transactions involving anything of value of \$5,000 or more of an organization, government, or agency that receives more than \$10,000 under a federal program during a one-year period, in violation of Title 18, United States Code, Section 666(a)(1)(B); and
2. To devise and intend to devise a scheme and artifice to defraud the Parish of Orleans, and its citizens of their intangible right to receive the honest services of **THOMAS** and OPSB Employee "A," through bribes and payoffs, involving the use of interstate wire transmissions, in violation of Title 18, United States Code, Sections 1343 and 1346.

C. OVERT ACTS:

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

- 1) Beginning in or near September 2013, a cooperating witness ("CW") was approached by OPSB Employee "A," who offered CW a janitorial services contract that would soon be up for bid by the OPSB in exchange for a monetary payoff.

- 2) During the fall of 2013, the CW, **THOMAS**, OPSB Employee "A," and at times Private citizen "B," met to discuss this contract. These conversations were recorded by the CW.
- 3) Ultimately, it was decided that the CW would pay \$5,000 to **THOMAS** in the form of a "campaign contribution" in exchange for **THOMAS'** and OPSB Employee "A's" assistance regarding the janitorial services contract.
- 4) In December 2013, the CW delivered \$5,000 in cash to Private Citizen "B," which was video recorded. Private Citizen "B" then delivered that cash payment to **THOMAS**. **THOMAS** and Private Citizen "B" agreed that Private Citizen "B" would deposit the money in Private Citizen "B's" bank account and withdraw from that account a portion of the \$5,000 to be returned in cash to **THOMAS**, which Private Citizen "B" did in fact do.
- 5) During the fall of 2014, **THOMAS** and OPSB Employee "A" discussed over recorded telephone conversations how to alter the bid process so that the CW would be given an improper advantage in bidding for the janitorial services contract, which was valued over \$5,000.
- 6) In completing this payoff and during recorded conversations between **THOMAS** and OPSB Employee "A," **THOMAS** caused electronic wire transmissions to travel outside of the State of Louisiana, Eastern District of Louisiana, and across state lines for the purpose of executing the scheme and artifice to defraud.
- 7) From in or near September 2013, and continuing through in or near January 2015, **THOMAS** and OPSB Employee "A" used their public offices and official capacities to obtain a corrupt illicit payment from the CW benefiting **THOMAS** and OPSB Employee "A" in exchange for their help in the bid-process.

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

NOTICE OF FORFEITURE

1. The allegation of Count 1 of this Bill of Information is 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 provision of Title 18, United States Code, Sections 371, 666(a)(1), and 1343, made applicable through Title 28, United States Code, Section 2461(c).
2. As a result of the offense alleged in Count 1, defendant, **IRA THOMAS**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 371, 666(a)(1), and

1343, 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 violations of Title 18, United States Code, Sections 371, 666(a)(1), and 1343.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:
 - 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 defendant up to the value of the above forfeitable property.

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

KENNETH ALLEN POLITE JR.
UNITED STATES ATTORNEY



SEAN TOOMEY
Assistant United States Attorney

New Orleans, Louisiana
March 6, 2015