

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

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
IRA THOMAS	*	
	* * *	

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 facts:

The Orleans Parish School Board (“OPSB”) is a local political subdivision within the State of Louisiana and received federal financial assistance and benefits in excess of \$10,000 annually from 2013 through 2015. The OPSB is empowered to award and execute large contracts with local businesses. The OPSB consists of seven (7) board members. Each board member serves a four (4) year term. As an OPSB member, **IRA THOMAS** (“**THOMAS**”) had shared responsibility for awarding OPSB contracts to private entities, including local businesses.

In September 2013, OPSB Employee “A” approached a cooperating witness (“CW”), and offered to secure for the CW a janitorial services contract from the OPSB in exchange for illicit payments.

During the fall of 2013, the CW, **THOMAS**, OPSB Employee “A,” and at times Private Citizen “B,” met to discuss this scheme. These conversations were recorded by the CW.

Ultimately, it was decided that the CW would make a \$5,000 payment to **THOMAS** in the form of a “campaign contribution” in exchange for **THOMAS** and OPSB Employee “A’s” assistance in being awarded the janitorial services contract.

In December 2013, the CW delivered \$5,000 in cash to Private Citizen “B,” which was video recorded by the Federal Bureau of Investigation. 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 a portion of the \$5,000 to be returned in cash to **THOMAS**, which Private Citizen “B” did in fact do.

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.

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 payoff scheme. These wire communications traveled outside the State of Louisiana, Eastern District 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. Moreover, the above described statement is not intended to constitute a complete statement of all facts and evidence of the defendant's guilt in this case, but rather is a minimum statement of facts necessary to establish a factual predicate for the guilty plea.

READ AND APPROVED:

IRA THOMAS (date)
Defendant

JOHN REED (date)
Counsel for Defendant

SEAN TOOMEY (date)
Assistant U.S. Attorney