

RECEIVED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
2013 MAY 23 PM 1:46
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR
MAKING FALSE STATEMENTS TO THE
FEDERAL ELECTION COMMISSION**

UNITED STATES OF AMERICA

*

CRIMINAL NO.

13-116

v.

*

SECTION:

SECT. J MAG. 5

ARLEN B. CENAC, JR

*

VIOLATION: 18 U.S.C. §1001
18 U.S.C. §2

* * *

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN

The defendant, **ARLEN B. CENAC, JR.**, was the president and sole owner of Cenac Towing and numerous other related companies headquartered in or near Houma, Louisiana, a location within the Eastern District of Louisiana.

The Federal Election Campaign Act of 1971, as amended, Title 2, United States Code, Sections 431, et. Seq. ("Election Act"), limited financial influence in the election of candidates for federal office, including the offices of Senator and President, and provided for public disclosure of the financing of federal election campaigns:

- a. The Election Act limited the amount and source of money that may be contributed to a federal candidate or that candidate's authorized campaign committee ("contributions").
- b. The Election Act prohibited any person, including any corporation or partnership, from making contributions in the name of another.
- c. The Election Act prohibited any contributions of corporate general treasury funds.
- d. In 2008, the Election Act limited both primary and general election campaign contributions to \$2,300, for a total of \$4,600, from any individual to any one candidate.
- e. The Election Act required candidates for United States Senate to report to the Federal Election Commission data detailing the amounts and sources of donations made to their campaign accounts or their authorized campaign committees.
- f. The Federal Election Commission was an agency and department of the United States with jurisdiction to enforce the limits and prohibitions of the Election Act, and to compile and publicly report accurate information about the source and amounts of contributions.

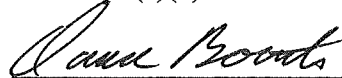
B. THE OFFENSE

On or about February 16, 2008 and on or about May 24, 2008, the defendant, **ARLEN B. CENAC, JR.**, submitted to the campaigns of United States Senators A and B, cashier's checks that he purchased in the names of individuals other than himself, the source of the funds used to purchase these cashier's checks being his personal and corporate funds over which he exerted authority and control. In submitting these contributions to the campaigns of Senators A and B, the defendant, **ARLEN B. CENAC, JR.**, neither obtained nor sought the knowledge, permission or authority of the individuals he listed as remitters on the cashier's checks.

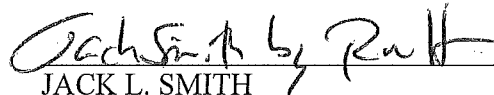
On or about February 16, 2008 and on or about May 24, 2008, in the Eastern District of Louisiana, in a matter within the jurisdiction of the executive branch of the Government of the

United States, the defendant, **ARLEN B. CENAC, JR.**, knowingly and willfully caused the submission of a materially false, fictitious, and fraudulent statement and representation, that is the submission by unwitting authorized campaign committees of candidates for the United States Senate to the Federal Election Commission of a report that was materially false in reporting the source and amount of contributions to the campaigns.

All in violation of Title 18, United States Code, Sections 1001(a)(2) and 2.



DANA J. BOENTE
United States Attorney



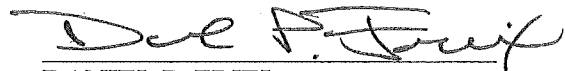
JACK L. SMITH
Chief, Public Integrity Section
U.S. Department of Justice



FRED P. HARPER JR.
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Assistant United States Attorney
MA Bar Number 660583



TRACEE J. PLOWELL
Trial Attorney
Public Integrity Section

New Orleans, Louisiana
May 23, 2013