

RECEIVED
U.S. DISTRICT COURT
EAST DISTRICT OF LA

2008 JAN 22 AM 9:01

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FELONY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

BILL OF INFORMATION FOR STRUCTURING

UNITED STATES OF AMERICA

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CRIMINAL NO.

**08-017
SECT. L MAG 5**

v.

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SECTION:

BURNELL MOLIÈRE

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VIOLATION: 31 U.S.C. § 5324

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The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN.

1. On or about January 7, 2005, Local Businessman ("Mr. A") paid Ellenese Brooks-Simms a "kickback" in connection with her promotion and approval of the Orleans Parish School Board's expansion of the "I Can Learn®" program within the Orleans Parish school system. The "kickback" was in the form of a \$40,000 corporate check made payable to a nominee payee. The check was signed by Mr. A and dated January 7, 2005.

2. Ellenese Brooks-Simms accepted the "kickback" check from Mr. A and then delivered the \$40,000 check to BURNELL MOLIERE for cashing.

3. On or about, January 7, 2005, BURNELL MOLIERE accepted the check from Ellenese Brooks-Simms, deposited the check in his First American Bank checking account and then conducted a series of financial transactions designed to evade federal currency reporting requirements and to conceal the flow of monies between Mr. A and Ellenese Brooks-Simms.

4. Title 31, United States Code, Section 5313 and Title 31, Code of Federal Regulations, Section 103.22 require that all currency transactions in excess of \$10,000 conducted at or through a "domestic financial institution" be reported by said financial institution to the United States Department of Treasury, Internal Revenue Service in a "Currency Transaction Report."

5. Title 31, Code of Federal Regulations, Section 103.11(gg) provides that a person structures a transaction if that person conducts one or more transactions in currency, in any amount, at one or more financial institutions, on one or more days, in any manner, for the purpose of evading the reporting requirements under Title 31, United States Code, Section 5313 and Title 31, Code of Federal Regulations, Section 103.22.

6. First American Bank was a "domestic financial institution" within the meaning of Title 31, United States Code, Sections 5313 and 5324, and as such, was subject to the currency transaction reporting requirements of Title 31, United States Code, Section 5313.

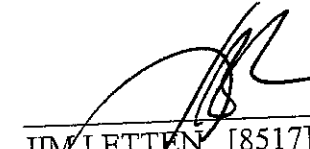
B. THE STRUCTURING:


In or around January, 2005, in the Eastern District of Louisiana, defendant, BURNELL MOLIERE, and others known to the United States Attorney, knowingly and for the purpose of

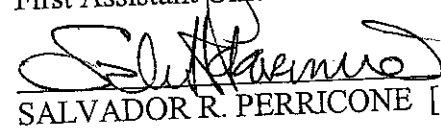
evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, did structure the following transactions with a domestic financial institution (First American Bank - Account No: 0289280):

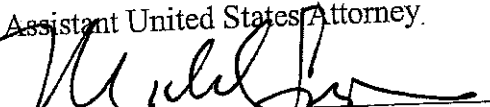
Payee	Financial Institution	Check #	Date of Exchange	Amount
Cash	First American Bank	1414	1/7/05	\$5000
Straw-Payee "A"	First American Bank	1316	1/12/05	\$7500
Straw-Payee "B"	First American Bank	1317	1/14/05	\$7500
Cash	First American Bank	1412	1/14/05	\$5000
Straw-Payee "C"	First American Bank	1322	1/21/05	\$7000
Straw-Payee "D"	First American Bank	1323	1/24/05	\$4000
Cash	First American Bank	1418	1/28/05	\$4000

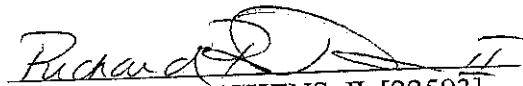
All in violation of Title 31, United States Code, Section 5324(a)(3) and Title 18, United States Code, Section 2.


 JIM LETTEN [8517]
 UNITED STATES ATTORNEY


 JAN MASELLI MANN [9020]
 First Assistant United States Attorney


 SALVADOR R. PERRICONE [10515]
 Assistant United States Attorney.


 MICHAEL M. SIMPSON [12299]
 Assistant United States Attorney


 RICHARD R. PICKENS, II [22593]
 Assistant United States Attorney

New Orleans, Louisiana
 January 22, 2008