

U. S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

UNITED STATES OF AMERICA	*	CRIMINAL NO. 6:13-CR-00008
	*	18 U.S.C. § 371
VERSUS	*	
	*	JUDGE FOOTE
BARNA D. HAYNES	*	MAGISTRATE JUDGE HANNA

BILL OF INFORMATION

THE UNITED STATES CHARGES:

COUNT 1

**CONSPIRACY
18 U.S.C. § 371**

AT ALL TIMES MATERIAL HEREIN:

1. The defendant, BARNA D. HAYNES, was employed by the District Attorney's Office for the 15th Judicial District for the State of Louisiana, (hereafter, District Attorney's Office) located in Lafayette, Louisiana, acting as the office administrator and the secretary to the District Attorney.

2. The District Attorney's Office was an agency of the State of Louisiana and received federal assistance in excess of \$10,000 during a one year period during the existence of the conspiracy.

THE CONSPIRACY

3. Beginning on an unknown date but reasonably near to the 1st day of March, 2008, and continuing until on or about the 27th day of February, 2012, in the Western District of Louisiana, the defendant, BARNA D. HAYNES, did conspire, confederate, and agree with others both known and unknown to the United States, to commit the crime of bribery of an agent of a government agency receiving federal funds, in violation of Title 18 United States Code, Section 666(a)(1)(B).

MANNER AND MEANS OF THE CONSPIRACY

4. It was part of the conspiracy that an uncharged co-conspirator (hereafter co-conspirator #1) would solicit hundreds of thousands of dollars from individuals with criminal charges pending in the 15th Judicial District by promising favorable resolutions of their pending felony and misdemeanor cases, the majority of which were operating a vehicle while intoxicated (hereafter, OWI) cases.

5. It was further part of the conspiracy that in his effort to deliver on his promises to his "clients" of favorable case resolutions, co-conspirator #1 would pay bribes in the form of cash and other things of value to personnel within the District Attorney's Office and to employees with entities associated with the OWI program in the 15th Judicial District Court.

6. It was further part of the conspiracy that in exchange for her assistance in obtaining favorable resolutions to cases, the defendant, BARNA D. HAYNES, would use her position with the District Attorney's Office to enrich herself by corruptly

accepting bribes from co-conspirator #1 in the form of cash and other things of value, intending to be influenced and rewarded in connection with a series of transactions of the District Attorney's Office involving \$5,000 or more.

OVERT ACTS

7. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Western District of Louisiana:

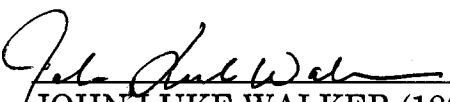
A. On or about the 16th day of December, 2011, the defendant, BARNA D. HAYNES, did corruptly accept and agree to accept a cash payment from co-conspirator #1;

B. On or about the 2nd day of February, 2012, the defendant, BARNA D. HAYNES, did corruptly accept and agree to accept a cash payment from co-conspirator #1; and,

C. On or about the 27th day of February, 2012, the defendant, BARNA D. HAYNES, did corruptly accept and agree to accept a cash payment from co-conspirator #1.

All in violation of Title 18, United States Code, Section 371. [18 U.S.C. § 371].

STEPHANIE A. FINLEY
United States Attorney

BY:  01/10/2013
JOHN LUKE WALKER (18077)
Assistant United States Attorney
800 Lafayette Street, Suite 2200
Lafayette LA 70501-6832
Telephone: (337) 262-6618