

# FELONY

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**BILL OF INFORMATION FOR ILLEGALLY ACCEPTING KICKBACKS  
RELATING TO A PRIME CONTRACT WITH THE UNITED STATES**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
HULON EUGENE PARSONS a/k/a GENE PARSONS	*	VIOLATION: 41 U.S.C. § 53
	*	*
	*	*

The United States Attorney charges that:

**COUNT 1**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. Company A was a construction company headquartered in New Orleans, Louisiana, which furnished supplies, materials, equipment and services under a subcontract relating to a prime contract with the United States and was a subcontractor within the meaning of Title 41, United States Code, Section 52. Specifically, Company A entered into a subcontract for

asphalt work on the Naval Air Station Joint Reserve Base Belle Chasse, located in Belle Chasse, Louisiana, within the Eastern District of Louisiana (“NAS Belle Chasse subcontract”).

2. The NAS Belle Chasse subcontract related to a prime contract awarded by Naval Facilities Engineering Command Southeast, an agency of the Department of the Navy to a prime contractor (“prime contract”). The prime contractor awarded a subcontract to another company, which in turn subcontracted with Company A for the NAS Belle Chasse subcontract.

3. Defendant **HULON EUGENE PARSONS** (“**PARSONS**”) was a subcontractor employee within the meaning of Title 41, United States Code, Section 52, in that he was employed by Company A as a dispatcher in the asphalt department. His job duties included, along with his supervisor, deciding which trucking companies would be awarded trucking business in connection with various public works projects, specifically asphalt road projects, on which Company A held contracts and subcontracts.

4. Individual B operates a trucking business which from time to time has been awarded trucking business by Company A. For approximately ten years, **PARSONS** accepted cash payments from Individual B in order to ensure that the trucking business operated by Individual B would continue to be awarded work of Company A.

5. In December 2008 and January 2009, Individual B ceased making cash payments to **PARSONS**. Thereafter, Individual B continued to seek trucking business from Company A through **PARSONS**, but the frequency and amount of work awarded to Individual B by Company A through **PARSONS** was greatly diminished.

6. Individual B reported to law enforcement the fact that **PARSONS** had required him to make cash payments in return for awarding him trucking business of Company A. Using

money furnished to him by law enforcement for that purpose, Individual B then offered cash payments to **PARSONS** to obtain and reward favorable treatment in connection with a subcontract relating to the prime contract between Naval Facilities Engineering Command Southeast, an agency of the Department of the Navy of the United States and the prime contractor; namely, the award of trucking business in connection with the subcontract for asphalt work on the Naval Air Station Joint Reserve Base Belle Chasse.

7. On or about the dates set forth below, Defendant **HULON EUGENE PARSONS**, a subcontractor employee, knowingly and willfully accepted the following cash payments constituting kickbacks provided by Individual B which were provided for the purpose of improperly obtaining and rewarding favorable treatment in connection with a subcontract held by his employer, relating to a prime contract with the United States, namely, the award of trucking business to Individual B's company in connection with a subcontract with Company A for asphalt work on the Naval Air Station Joint Reserve Base Belle Chasse:

DATE	AMOUNT
September 14, 2009	\$300
October 30, 2009	\$300
November 6, 2009	\$300

All in violation of Title 41, United States Code, Section 53.




---

JIM LETTEN (8517)  
UNITED STATES ATTORNEY



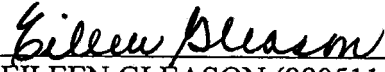
---

JAN MASELLI MANN (9020)  
First Assistant United States Attorney



---

JAMES R. MANN (20513)  
Assistant United States Attorney  
Chief, Financial Crimes Unit



---

EILEEN GLEASON (980511 D.C.)  
Assistant United States Attorney

New Orleans, Louisiana  
June \_\_, 2010