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U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

BILL OF INFORMATION FOR WIRE FRAUD AND
INTERSTATE TRANSPORTATION OF STOLEN FUNDS AND FORFEITURE

UNITED STATES OF AMERICA

v.

WAYNE READ

* CRIMINAL NO. **10-078**
* SECTION: **SECT. F MAG. 3**
* VIOLATION: 18 U.S.C. § 1343
18 U.S.C. § 2314
* * *

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. WAYNE READ, defendant herein (hereinafter referred to as READ) represented himself as the President/Manager of Louisiana Film Studios, LLC., located primarily in Jefferson Parish, Louisiana, within the Eastern District of Louisiana.
2. In 2002, the State of Louisiana established a program of tax incentives to promote the motion picture industry in Louisiana. As part of the incentive program, film production companies, like READ's, if approved and certified could receive a tax credit calculated

according to the amount of funds actually invested and expended in a production. Once tax credits were certified by the State of Louisiana and issued to a qualifying motion picture production, they could be negotiated and sold by the qualifying film producer to other third parties seeking to obtain Louisiana Tax Credits for the purpose of reducing their Louisiana State income tax liability in a particular tax filing year.

3. Current and former members, coaches and staff of the New Orleans Saints Football Organization, (hereinafter referred to as Saints victims) purchased Louisiana Film Tax Credits for the 2008 Louisiana Tax filing year from READ. Saints victim members included current players, former players, coaches and other administrative staff. The Saints victims purchased approximately 1.9 million dollars of fraudulent 2008 Louisiana Film Tax Credits from READ. At no time did READ provide or issue any tax credits to any of the Saints victims.

B. SCHEME TO DEFRAUD THE SAINTS VICTIMS:

1. Beginning at a time unknown, but as early as January 2008 and continuing to the present date, the defendant, READ, did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, to wit: by selling false and fictitious 2008 Louisiana Film Tax Credits to Saints victims in order to obtain approximately 1.9 million dollars.

It was further a part of the scheme and artifice to defraud that READ was not issued any genuine and actual 2008 Louisiana Film Tax Credits from the State of Louisiana.

It was further a part of the scheme and artifice to defraud that although READ never obtained actual Louisiana Film Tax Credits from the State of Louisiana, READ nevertheless sold 2008 Louisiana Film Tax Credits to unwary Saints victims in 2008 and 2009 for which READ collected approximately 1.9 million dollars.

It was further a part of the scheme and artifice to defraud that after selling fraudulent Louisiana Film Tax Credits to the Saints victims, READ used the stolen proceeds of the sale to pay off his personal debts in another state, to include the prevention of a Sheriff's sale on his personal residence and as satisfaction of a legal judgment.

C. THE WIRE FRAUD EXECUTION:

On or about December 30, 2008 through on or about January 2, 2009, in the Eastern District of Louisiana and elsewhere, the defendant, READ, for the purpose of executing the scheme and attempting to execute the scheme and artifice to defraud, did knowingly and willingly cause to be transmitted in interstate commerce certain writings, signs, signals and sounds by means of wire communication when READ caused bank wire transfers from some Saints victims located in North Carolina to be transmitted in interstate commerce in the amount of \$510,000 thereby causing a signal, sign,

writing, and sound to be transmitted to the defendant's bank account located in the Eastern District of Louisiana by means of wire communication;

All in violation of Title 18, United States Code, Section 1343.

COUNT 2

INTERSTATE TRANSPORTATION OF STOLEN PROPERTY

1. The allegations contained in part A and B of Count 1 are hereby re-alleged and incorporated by reference.

2. Beginning at a time unknown but on or about November 2008 through on or about June 2009, in the Eastern District of Louisiana and elsewhere, the defendant, **READ**, willfully and knowingly transported and caused to be transported in interstate commerce, between the State of Louisiana and other states, monies and securities with a value of \$5,000.00 or more, that is, including but not limited to bank wire transfers in amounts totaling approximately 1.9 million dollars, drawn on bank accounts only controlled by the defendant, that the defendant well knew to be stolen and taken by fraud from the Saints victims;

All in violation of Title 18, United States Code, Section 2314.

NOTICE OF WIRE FRAUD FORFEITURE

1. The allegations contained in Count 1 of this Bill of Information are hereby re-alleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 1343.

2. As a result of the offenses alleged in Count 1, the defendant, **READ**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 1343 any and all property, real or personal which constitutes or is derived from proceeds obtained directly or indirectly, as a result of a violation of Title 18, United States Code, Section 1343 (wire fraud.)

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this notice of forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or sold or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which can not be subdivided without difficulty.

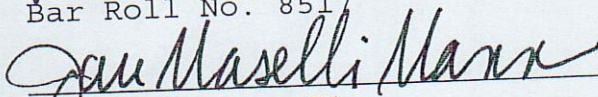
It is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other

property of said defendant up to the value of the above forfeitable property;

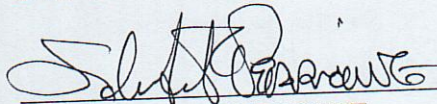
All in violation of Title 18, United States Code, Sections 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853.



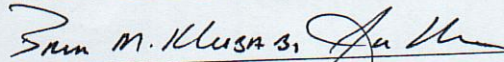
JIM LETTEN
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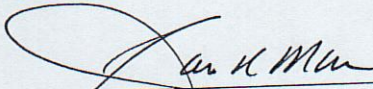
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New Orleans, Louisiana
March 22, 2010