

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR CONSPIRACY
TO COMMIT MAIL FRAUD AND
BRIBERY CONCERNING PROGRAMS RECEIVING FEDERAL FUNDS**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
IRVIN F. HINGLE a/k/a JIFF HINGLE	*	VIOLATION: 18 U.S.C. § 371
	*	*
	*	*

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. The defendant, **IRVIN F. HINGLE a/k/a JIFF HINGLE** (“**HINGLE**”) served as the elected Sheriff of Plaquemines Parish, Louisiana, and was an employee, agent, and chief law enforcement officer of Plaquemines Parish, Louisiana, from in or about 1992 until 2011. In his role as the duly-elected Sheriff, **HINGLE** was an agent of the Plaquemines Parish Sheriff’s Office.

2. **HINGLE** was employed by the Plaquemines Parish Sheriff’s Office (the “**PPSO**”), a local government entity located within the Eastern District of Louisiana. **HINGLE** resided in, and had his office located in, Plaquemines Parish, Louisiana.

3. Pursuant to Louisiana law, **HINGLE** was required to and did file annual reports with the Louisiana Board of Ethics in Baton Rouge, Louisiana, in which he was required to certify the dates, amounts and source of campaign contributions he had received and campaign-related expenditures he had made during the reporting period.

4. During calendar year 2008, **HINGLE** solicited and accepted campaign contributions for purposes authorized by Louisiana law, namely, uses related to a political campaign or the holding of a public office or party position, and not for personal use.

5. **HINGLE**'s 2008 annual campaign finance report was sent to and filed with the Louisiana Board of Ethics by mail on or about February 15, 2009.

6. The PPSO is a local government entity of the State of Louisiana, which received federal financial assistance and benefits in excess of \$10,000 annually from January 1, 2008 through the date of this Bill of Information.

7. On or about October 1, 2007, the PPSO entered into a contract (the "contract") with Benetech, LLC, calling for Benetech, LLC, to provide services relating to recovery from damages due to previous and future disasters.

8. W. Aaron Bennett ("Bennett") was an owner, operator, officer, manager, and member of Benetech, LLC.

9. In connection with the contract between the PPSO and Benetech, LLC, **HINGLE** engaged in official acts including, among other things, authorizing an attorney to prepare a request for proposal (RFP) for specific services relating to recovery from damages due to previous and future disasters; authorizing the publication of the RFP in a newspaper; authorizing the execution of the contract on behalf of the PPSO with Benetech, LLC; reviewing and approving invoices submitted

by Benetech, LLC; and signing checks payable to Benetech, LLC in payment of invoices submitted on the contract.

10. Company A, a multi-media company, was a legitimate provider of services to the PPSO but did not provide services to **HINGLE**'s campaign.

B. THE CONSPIRACY:

Beginning at a time unknown but not later than in or about March 2008 and continuing through in or about May 2011, in the Eastern District of Louisiana and elsewhere, the defendant, **IRVIN F. HINGLE a/k/a JIFF HINGLE**, together with others known and unknown to the United States Attorney, did willfully and knowingly combine, conspire, confederate and agree together and with each other to commit the following offenses against the United States and to conceal their commission:

(1) To devise and intend to devise a scheme and artifice to defraud his constituents and to obtain money and property by means of false and fraudulent pretenses, representations and promises, and for the purposes of executing and attempting to execute such scheme and artifice to defraud, placing and causing to be placed in an authorized depository for mail matter certain mail to be sent and delivered by the Postal Service, in violation of Title 18, United States Code, Section 1341; and

(2) To corruptly solicit, demand, accept and agree to accept anything of value from any person, intending to be influenced and rewarded in connection with business, transactions and a series of transactions of the Plaquemines Parish Sheriff's Office, involving something of value, that is, \$20,000, in violation of Title 18, United States Code, Section 666(a)(1)(B).

C. OVERT ACTS:

On or about the following dates, in furtherance of and to conceal the conspiracy and accomplish its purposes, the defendant **IRVIN F. HINGLE a/k/a JIFF HINGLE** and others committed the following overt acts, among others, in the Eastern District of Louisiana and elsewhere:

1. In order to conceal his use of campaign contributions for personal expenditures, in or about February 2009, **HINGLE** listed or caused to be listed expenditures totaling over \$100,000 to Company A on his annual campaign finance report for 2008 as campaign-related expenses paid out of his campaign bank account knowing Company A provided no services to his campaign.

2. On or about February 15, 2009, **HINGLE** filed and caused to be filed his 2008 annual campaign finance report, which contained material misrepresentations and omitted material information which was required to be reported by **HINGLE**, with the Louisiana Board of Ethics in Baton Rouge, Louisiana by mailing it from New Orleans, Louisiana, to the Louisiana Board of Ethics in Baton Rouge, Louisiana.

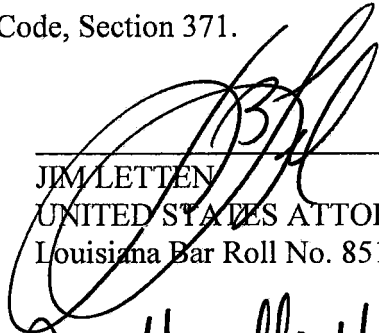
3. On or about March 14, 2008, **HINGLE** approved for payment invoices submitted by Benetech, LLC to the PPSO in the approximate amount of \$333,247.83 and signed a check drawn on the account of the PPSO payable to Benetech, LLC in the amount of \$333,247.83.

4. In or about late March 2008, **HINGLE** accepted a \$10,000 cash payment from Bennett intending to be influenced and rewarded in connection with the contract between the PPSO and Benetech, LLC, his approval of invoices submitted by Benetech, LLC to the PPSO, and his signing of official PPSO checks made payable to Benetech, LLC relating to those invoices.


5. On or about April 15 and 16, 2008, **HINGLE** approved multiple invoices submitted by Benetech, LLC to the PPSO, and signed two checks drawn on the account of the PPSO to Benetech, LLC in the approximate amount of \$207,289.22 and \$238,922.41, respectively.

6. In or about late April 2008, **HINGLE** accepted a \$10,000 cash payment from Bennett intending to be influenced and rewarded in connection with the contract between the PPSO and Benetech, LLC, his approval of invoices submitted by Benetech, LLC to the PPSO, and his signing of official PPSO checks made payable to Benetech, LLC relating to those invoices.


All in violation of Title 18, United States Code, Section 371.



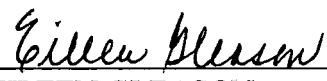
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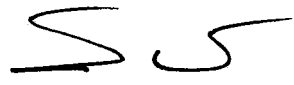
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New Orleans, Louisiana
October ____, 2011