

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

BILL OF INFORMATION FOR MAIL FRAUD

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
MICHAEL SIDNEY WOOTON	*	VIOLATION: 18 U.S.C. § 1341
		18 U.S.C. § 2
*	*	*

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

The defendant, **MICHAEL SIDNEY WOOTON**, a resident of Metairie, Louisiana, was a stock broker for Western International Securities (W.I.S.), who maintained an office in New Orleans, Louisiana.

B. THE SCHEME TO DEFRAUD

Beginning at a time unknown, but sometime during 2006 and continuing through on or about January 2010 in the Eastern District of Louisiana and elsewhere, defendant **MICHAEL SIDNEY WOOTON**, while a stock broker for W.I.S., did knowingly and willfully devise a scheme and artifice to defraud to obtain money and property from his clients by means of false and fraudulent pretenses, representations and promises, by which **WOOTON** made false representations to his clients that he would invest their money in bonds returning between fifteen and twenty percent per annum, thus increasing the value of their account, when in truth and fact **WOOTON** did not invest into high yielding bonds and directed his clients' investment proceeds to accounts controlled by him for **WOOTON's** personal benefit.

It was further a part of the scheme and artifice to defraud that the defendant **MICHAEL SIDNEY WOOTON**, in order to hide his thefts of monies, devised and created fraudulent W.I.S. statements making his clients believe the client was making profits on their investment and their investment was safe and sound, when in truth and in fact defendant **MICHAEL SIDNEY WOOTON** was stealing these investments and causing a loss of approximately \$913,773.00 to his clients.

C. THE MAILING

On or about August 6, 2008, in the Eastern District of Louisiana and elsewhere, defendant **MICHAEL SIDNEY WOOTON**, having devised the above described scheme and artifice to defraud, for purposes of executing the aforesaid scheme and artifice to defraud

his clients, and attempting to do so, knowingly and willfully caused to be delivered by the United States Postal Service, according to the direction thereon, in the Eastern District of Louisiana, mail matter in the form of a false and fraudulent W.I.S. statement to clients.

All in violation of Title 18, United States Code, Sections 1341 and 2.

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New Orleans, Louisiana
January 28, 2011