

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

UNITED STATES OF AMERICA

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CRIMINAL NO. 12-189

v.

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SECTION: "L"

JAMES E. SINGLETON

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FACTUAL BASIS

Should this matter have proceeded to trial, the Government would have proven, through the introduction of competent testimony and admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the Bill of Information now pending against the defendant:

In approximately 2008, **SINGLETON** was hired as a court employee for Orleans Parish Traffic Court, Section D. **SINGLETON** was later promoted to the position of Deputy Clerk for Traffic Court. As Deputy Clerk, **SINGLETON** was responsible for managing and/or supervising approximately thirty (30) subordinate Traffic Court employees. The FBI learned during the course of this investigation that during the years 2009 - 2010, **SINGLETON** took thousands of dollars in cash from individuals who appeared at Traffic Court in an effort to resolve their outstanding traffic tickets. Specifically, in the year 2010, the Federal Bureau of Investigation ("FBI") discovered that

SINGLETON took at least \$9,000.00 in cash from six different victims. In each instance, the victim had outstanding traffic tickets and they went to Traffic Court to resolve their tickets.

The Government would call the following witnesses, including others, to testify that they paid **SINGLETON** according to the following schedule to resolve their outstanding Traffic Court tickets, warrants, and fines:

INDIVIDUAL	DATE	AMOUNT OF CASH PAYMENT TO SINGLETON
E.R.	February 2010	\$ 3,200.00
J.A.	March 2010	\$ 850.00
M.P.	June 2010	\$ 100.00
L.W.	September 2010	\$ 110.00
G.P.	September 2010	\$ 3,200.00
A.K.	September 2010	\$ 2,300.00

In each instance, **SINGLETON** took cash from these victims and gave them a Reinstatement Letter. A Reinstatement Letter is an official Traffic Court document that is provided to individuals who have had their driver's license privileges suspended or revoked. The Reinstatement Letter is to notify the State of Louisiana, Department of Public Safety, Driver's License Division ("DMV"), that an individual has resolved their outstanding traffic citations, fines, and any warrants. A Reinstatement Letter is only to be issued by Traffic Court personnel when all of an individual's outstanding traffic citations and fines have been resolved.

SINGLETON was not authorized to receive cash from individuals attempting to resolve Traffic tickets. According to current Traffic Court personnel, only a Traffic Court cashier can handle

money. It was improper for **SINGLETON** to handle money and it was improper for him to issue Reinstatement Letters to individuals who still had pending tickets and/or fines.

In the case of **SINGLETON**'s victims, **SINGLETON** would not clear all of their outstanding tickets and, as a result, some of those victims' driving privileges were once again suspended when Traffic Court notified the DMV that the individual had not resolved their Traffic Court obligations.

The Government would present testimony from **SINGLETON**'s victims that they believed they had resolved their obligations with Traffic Court. Several were extremely upset when they learned that **SINGLETON** had taken their money and not applied the money to resolve their obligations. As a result of **SINGLETON**'s crimes, these victims were placed in jeopardy of arrest for driving on a suspended driver's license. In addition, **SINGLETON**'s victims were required to clear-up their outstanding tickets with Traffic Court and return to the DMV in order to have their driving privileges reinstated.

The Government would call agents from the FBI to testify about an August 9, 2011 interview of **SINGLETON**. During this voluntary interview, **SINGLETON** admitted that he received money from individuals to fix traffic tickets, that he did not "put" the money toward the fines and fees, and that he kept the money for personal use.

Further, the Government would introduce evidence to establish that Traffic Court is a government agency of the City of New Orleans and defendant **SINGLETON** was an agent of Traffic Court as those terms are defined in Title 18, United States Code, Sections 666(d)(1) and (2).

Further, the Government would call witnesses from the City of New Orleans to testify that, according to the City of New Orleans 2011 Adopted Operation Budget, Traffic Court received

approximately \$940,706 from the General Fund of the City of New Orleans. During the year 2010, the City of New Orleans received approximately \$159,878,490 in the form of federal grants and assistance. Accordingly, the City of New Orleans received federal assistance in excess of \$10,000 during the one-year period beginning on January 1 and ending December 31, 2010.

Various records and testimonial evidence, including testimony from representatives of the FBI, the City of New Orleans, as well as, other witnesses would also be admitted to prove the facts set forth above.

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Date

JAMES E. SINGLETON
Defendant

Date

PATRICK FANNING
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Date