

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
2019 AUG 15 P 12:46
WILLIAM W. BLEVINS
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

INDICTMENT FOR USE OF AN INTERSTATE FACILITY
WITH INTENT TO CARRY ON UNLAWFUL ACTIVITY

UNITED STATES OF AMERICA

v.

KEVIN RICHARDSON

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CRIMINAL NO. **19-159**
SECTION: **SECT. EMAG. 1**
VIOLATIONS: 18 U.S.C. § 1952(a)(3)
18 U.S.C. § 2

The Grand Jury charges that:

COUNT 1

From on or about January 2011 through February 28, 2019, in the Eastern District of Louisiana and elsewhere, the defendant, **KEVIN RICHARDSON**, aided and abetted by others known and unknown, used a facility in interstate commerce, namely the internet, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, bribery, in violation of Louisiana Revised Statute 14:118, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity, in that **RICHARDSON**, a building inspector for the City of New Orleans Safety and Permits Department, (1) solicited and accepted bribe money from individuals seeking

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favorable inspection reports and certificates of completion for properties that did not comply with the city and state building codes and for properties that had not been inspected; and (2) paid bribe money to a City of New Orleans permit analyst for the issuance of permits without proper documentation and plan review.

In violation of Title 18, United States Code, Sections 1952(a)(3) and 2.

NOTICE OF FORFEITURE

1. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1952(a)(3) and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offense alleged in Count 1, defendant, **KEVIN RICHARDSON**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense as a result of the violations of Title 18, United States Code, Section 1952(a)(3).

3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, sold to, 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 cannot be subdivided without difficulty;

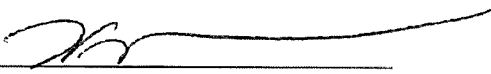
it is the intent of the United States, pursuant to Title 18, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property;

All in violation of Title 18, United States Code, Sections 1952(a)(3) and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

A TRUE BILL:



PETER G. STRASSER
UNITED STATES ATTORNEY



TRACEY N. KNIGHT
Assistant United States Attorney
Louisiana Bar Roll Number 23165

New Orleans, Louisiana
August 15, 2019