

WESTERN DISTRICT OF LOUISIANA

MONROE DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO. 10-CR-00200

VS.

ROBERT E. "RED" STEVENS &
ARTHUR GILMORE, JR.

CHIEF JUDGE JAMES
MAGISTRATE JUDGE HAYES
18 U.S.C. §§ 1951 & 1962(c)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

Racketeer Influenced and
Corrupt Organizations Act (RICO)
18 U.S.C. § 1962(c)

A. AT ALL TIMES MATERIAL HEREIN:

1. Defendant ROBERT E. "RED" STEVENS is a public official holding a high-level, decision-making position, namely an elected city councilman in the City of Monroe, Louisiana. STEVENS currently serves as Council Chairman.

2. Defendant ARTHUR GILMORE, JR. is a public official holding a high-level, decision-making position, namely an elected city councilman in the City of Monroe, Louisiana.

3. The City Council is the legislative branch of the government of the City of Monroe, Louisiana. The Council consists of five councilmen, each elected for a four year term.

4. "Cooperating witness" is a Monroe, Louisiana resident and businessman whose business ventures include manufacturing and development. He operates locally, nationally and internationally.

5. Ordinances passed by a majority of the members of the City Council have the force of law within the City of Monroe.

6. La. R.S. 14:118 provides in pertinent part:

(A)(1) Public bribery is the giving or offering to give, directly or indirectly, anything of apparent present or prospective value to any of the following persons, with the intent to influence his conduct in relation to his position, employment, or duty; . . .

(e) Any person who has been elected or appointed to public office, whether or not said person has assumed the title or duties of such office.

(2) The acceptance of, or the offer to accept, directly or indirectly, anything of apparent present or prospective value, under such circumstances, by any of the above named persons, shall also constitute public bribery. . . .

B. THE RACKETEERING ENTERPRISE

At all times material to this Indictment, the City of Monroe constituted an

which affected, interstate commerce.

C. PURPOSE OF THE DEFENDANTS

Defendants ROBERT E. "RED" STEVENS and ARTHUR GILMORE, JR. improperly used the enterprise to enrich themselves by extracting bribes in the forms of cash and other things of present or prospective value from individuals and organizations with business before the enterprise.

D. MEANS AND METHODS OF THE DEFENDANTS

1. Defendant ROBERT E. "RED" STEVENS used his office and position as an elected Monroe city councilman to enrich himself by extracting bribes in the form of cash and other things of present or prospective value from individuals and organizations with business before the enterprise.

2. Specifically, in exchange for cash and other things of present or prospective value, Defendant ROBERT E. "RED" STEVENS would take and promise to take actions favorable to individuals and organizations with business before the enterprise.

3. Defendant ARTHUR GILMORE, JR. used his office and position as an elected Monroe city councilman to enrich himself by extracting bribes in the form of cash and other things of present or prospective value from individuals and organizations with business before the enterprise.

4. Specifically, in exchange for cash and other things of present or

enterprise.

E. THE RACKETEERING VIOLATION

Beginning sometime in 2006, the exact date being unknown to the Grand Jury, and continuing until on or about the 17th day of December, 2009, in the Western District of Louisiana and elsewhere, Defendants ROBERT E. "RED" STEVENS and ARTHUR GILMORE, JR., being persons employed by and associated with the enterprise described above in paragraphs B, C and D, which was engaged in, and the activities of which affected interstate commerce, did knowingly and unlawfully conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as set forth in Paragraph F.

F. THE PATTERN OF RACKETEERING ACTIVITY

The pattern of racketeering activity as defined in Title 18, United States Code, Sections 1961(1) and (5) [18 U.S.C. §§ 1961(1) & (5)], through which Defendants conducted and participated in the conduct of the affairs of the enterprise, consisted of the following racketeering acts:

1. Racketeering Act 1 - Public Bribery - Beginning on or about the 21st day of February, 2008, and continuing until on or about the 28th day of February, 2008, in the Western District of Louisiana, Defendant ROBERT E. "RED" STEVENS, an elected councilman for the City of Monroe, Louisiana, committed public bribery by

position, employment or duties. Specifically, in exchange for \$1,000.00, Defendant ROBERT E. "RED" STEVENS agreed to assist Cooperating Witness in specific matters coming before the City of Monroe and did assist Cooperating Witness in a matter then pending before the Board of Adjustments in violation of La. R.S. 14:118.

2. Racketeering Act 2 - Public Bribery - Beginning on or about the 14th day of February, 2008, and continuing until on or about the 27th day of March 2008, in the Western District of Louisiana, Defendant ARTHUR GILMORE, JR., an elected councilman for the City of Monroe, Louisiana, committed public bribery by accepting and offering to accept \$1,000.00 and other valuable consideration from Cooperating Witness, knowing that such payment was intended to influence his conduct in relation to his position, employment or duties. Specifically, in exchange for \$1,000.00 and other valuable consideration, Defendant ARTHUR GILMORE, JR. agreed to assist Cooperating Witness in specific matters coming before the City of Monroe in violation of La. R.S. 14:118.

3. Racketeering Act 3 - Public Bribery - Beginning on or about the 2nd day of April, 2008, and continuing until on or about the 2nd day of March, 2009, in the Western District of Louisiana, Defendant ARTHUR GILMORE, JR., an elected councilman for the City of Monroe, Louisiana, committed public bribery by accepting and offering to accept valuable consideration from Cooperating Witness knowing that such payment was intended to influence his conduct in relation to his position, employment or duties. Specifically, in exchange for valuable

GILMORE, JR. agreed to assist Cooperating Witness in specific matters coming before the City of Monroe in violation of La. R.S. 14:118.

4. Racketeering Act 4 - Public Bribery - Beginning on or about the 10th day of June, 2008, and continuing until on or about the 19th day of June, 2008, in the Western District of Louisiana, Defendant ROBERT E. "RED" STEVENS, an elected councilman for the City of Monroe, Louisiana, committed public bribery by accepting and offering to accept \$500.00 from Cooperating Witness, knowing that such payment was intended to influence his conduct in relation to his position, employment or duties. Specifically, in exchange for \$500.00, Defendant ROBERT E. "RED" STEVENS agreed to assist Cooperating Witness in specific matters coming before the City of Monroe in violation of La. R.S. 14:118.

5. Racketeering Act 5 - Public Bribery - On or about the 1st day of July, 2008, in the Western District of Louisiana, Defendant ARTHUR GILMORE, JR., an elected councilman for the City of Monroe, Louisiana, committed public bribery by accepting and offering to accept \$230.00 from Cooperating Witness, knowing that such payment was intended to influence his conduct in relation to his position, employment or duties. Specifically, in exchange for \$230.00, Defendant ARTHUR GILMORE, JR. agreed to assist Cooperating Witness in specific matters coming before the City of Monroe in violation of La. R.S. 14:118.

6. Racketeering Act 6 - Public Bribery - Beginning on or about the 6th day

"RED" STEVENS, an elected councilman for the City of Monroe, Louisiana, committed public bribery by accepting and offering to accept \$800.00 from Cooperating Witness, knowing that such payment was intended to influence his conduct in relation to his position, employment or duties. Specifically, in exchange for \$800.00, Defendant ROBERT E. "RED" STEVENS agreed to assist Cooperating Witness in specific matters coming before the City of Monroe in violation of La. R.S. 14:118.

7. Racketeering Act 7 - Public Bribery - Beginning on or about the 25th day of March, 2009, and continuing until on or about the 7th day of April, 2009, in the Western District of Louisiana, Defendant ROBERT E. "RED" STEVENS, an elected councilman for the City of Monroe, Louisiana, committed public bribery by accepting and offering to accept \$3,000.00 from Cooperating Witness, knowing that such payment was intended to influence his conduct in relation to his position, employment or duties. Specifically, in exchange for \$3,000.00, Defendant ROBERT E. "RED" STEVENS agreed to assist Cooperating Witness in specific matters coming before the City of Monroe in violation of La. R.S. 14:118.

8. Racketeering Act 8 - Public Bribery - Beginning on or about the 25th day of August, 2009, and continuing until on or about the 28th day of August, 2009, in the Western District of Louisiana, Defendant ARTHUR GILMORE, JR., an elected councilman for the City of Monroe, Louisiana, committed public bribery by accepting and offering to accept \$207.00 from Cooperating Witness, knowing that

employment or duties. Specifically, in exchange for \$207.00, Defendant ARTHUR GILMORE, JR. agreed to assist Cooperating Witness in specific matters coming before the City of Monroe in violation of La. R.S. 14:118.

9. Racketeering Act 9 - Public Bribery - Beginning on or about the 11th day of December, 2009, and continuing until on or about the 17th day of December, 2009, in the Western District of Louisiana, Defendant ROBERT E. "RED" STEVENS, an elected councilman for the City of Monroe, Louisiana, committed public bribery by accepting and offering to accept \$1,000.00 from Cooperating Witness, knowing that such payment was intended to influence his conduct in relation to his position, employment or duties. Specifically, in exchange for \$1,000.00, Defendant ROBERT E. "RED" STEVENS agreed to assist Cooperating Witness in specific matters coming before the City of Monroe in violation of La. R.S. 14:118.

All in violation of Title 18, United States Code, Section 1962(c) [18 U.S.C. § 1962(c)].

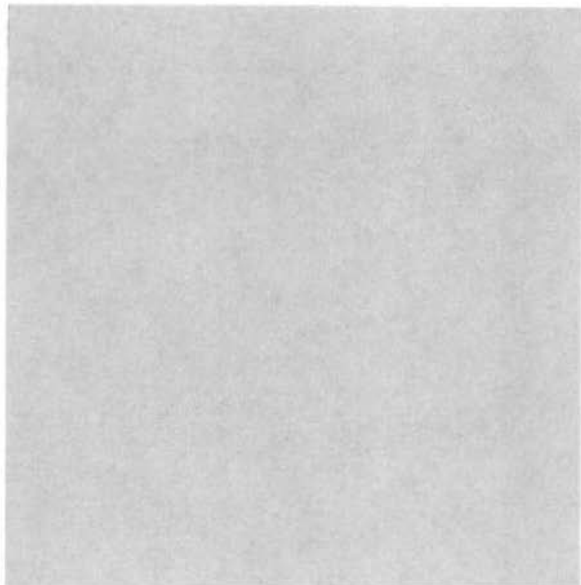
COUNT 2
Hobbs Act
18 U.S.C. § 1951

1. Paragraphs A(1) through A(3) of Count 1 are hereby realleged and incorporated as if fully set forth herein.

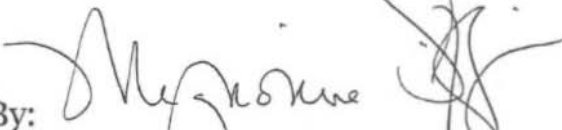
2. Beginning sometime in 2006, the exact date being unknown to the Grand Jury, and continuing until on or about the 17th day of December, 2009, in the

attempt to obstruct, delay and affect commerce and the movement of articles and commodities in commerce by extortion, as those terms are defined in Title 18, United States Code, Section 1951 [18 U.S.C. § 1951], in that Defendants ROBERT E. "RED" STEVENS and ARTHUR GILMORE, JR. unlawfully obtained property not due him or his office with consent, said consent being induced and obtained under color of official right, all in violation of Title 18, United States Code, Section 1951 [18 U.S.C. § 1951].

A TRUE BILL



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