

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

UNITED STATES OF AMERICA	*	CRIMINAL NO. 6:23-cr-00294 RRS CBW
	*	
VERSUS	*	18 U.S.C. §§ 2, 371, 981
	*	28 U.S.C. § 2461
LEONARD C. FRANQUES	*	JUDGE SUMMERHAYES
		MAGISTRATE JUDGE WHITEHURST

BILL OF INFORMATION

THE UNITED STATES CHARGES:

AT ALL TIMES MATERIAL HEREIN:

1. The defendant, LEONARD C. FRANQUES, was a resident of Lafayette Parish, within the Western District of Louisiana. FRANQUES owned several companies, to include DGL1, a registered Louisiana Limited Liability Company, that marketed a series of online courses to the Louisiana Department of Wildlife and Fisheries (“LDWF”).

2. Beginning at least on or about May 1, 2019, and continuing until at least on or about December 10, 2021, Dusty Guidry was an agent for the LDWF.

3. Beginning at least on or about January 16, 2017, and continuing until at least on or about April 14, 2023, Public Official #2 (“PO-2”) was a high-ranking employee and agent of LDWF. PO-2 had the authority to contractually bind the State of Louisiana with vendors doing business with LDWF.

4. LDWF was an agency of the State of Louisiana that received in excess of \$10,000 annually in benefits under federal programs involving grants, contracts, subsidies, loans, guarantees, insurance, and other forms of assistance.

COUNT 1
CONSPIRACY TO COMMIT AN OFFENSE

18 U.S.C. § 371

The Conspiracy

5. The introductory allegations set forth in paragraphs 1 through 4 are realleged and incorporated by reference as though fully set forth herein.

6. Beginning at least as early as December 2020, and continuing until on or about December 8, 2021, the defendant, LEONARD C. FRANQUES, did conspire, confederate, and agree with others both known and unknown to the United States, to commit the crime of paying a bribe to an agent of an organization or agency receiving federal funds, in violation of Title 18, United States Code, Section 666(a)(2).

Purpose of the Conspiracy

7. It was a purpose of the conspiracy for FRANQUES, Dusty Guidry, PO-2, and others known to the United States, to enrich themselves by paying and offering to pay money and things of value, from FRANQUES, in exchange for Guidry and PO-2 providing and agreeing to provide favorable contracting action on behalf of the LDWF for the benefit of FRANQUES in his business dealings with the LDWF.

8. It was a further part of the conspiracy to hide, conceal, and cover up the true nature and scope of FRANQUES' dealings with Guidry and PO-2, including the

true source and nature of the payments FRANQUES provided and agreed to provide to Guidry and PO-2.

Manner and Means of the Conspiracy

9. The conspiracy was carried out through the following manner and means, among others:

10. Guidry and PO-2 used their official positions at LDWF to deliver an LDWF contract for DGL1 to provide: (1) hunters' and boaters' education classes; and (2) courses to resolve LDWF violations, which would be provided as online classes by DGL1.

11. In exchange, FRANQUES agreed to give two-thirds of FRANQUES' resulting profits to Guidry and PO-2 specifically due to Guidry and PO-2's actions at the LDWF.

Overt Acts

12. In furtherance of the conspiracy and to effect the objects of the conspiracy, FRANQUES and one or more of the conspirators committed and caused to be committed at least the following acts:

a. On or about October 8, 2021, PO-2, acting on behalf of the LDWF, and FRANQUES, acting on behalf of DGL1, signed and entered into a contract, agreeing that DGL1 would provide services to LDWF related to the provision of (1) hunters' and boaters' education classes; and (2) courses to resolve LDWF violations.

b. On or about November 19, 2021, FRANQUES, Guidry and PO-2 met in person at PO-2's residence, located in the Western District of Louisiana, to discuss concealing and disguising the payment of the bribe proceeds. During this

meeting, FRANQUES, Guidry, and PO-2 agreed that FRANQUES would refrain from paying the kickbacks owed to PO-2 until after PO-2's departure from the LDWF. Further, FRANQUES, Guidry and PO-2 agreed that FRANQUES would purchase an all-terrain vehicle for PO-2.

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

FORFEITURE ALLEGATION

13. The allegations contained above and in Count 1 of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

14. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 371 and 666, as set forth in Count 1 this Information, the defendant, LEONARD C. FRANQUES, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses.

15. If any of the property described above, 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 or sold to, or deposited with, a third party;
- 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 divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).


Respectfully submitted:

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