

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

UNITED STATES OF AMERICA \* CRIMINAL NO. 13-CR-00073  
\*  
VERSUS \* JUDGE FOOTE  
\*  
ROBERT WILLIAMSON \* MAGISTRATE JUDGE HANNA

**FACTUAL BASIS FOR PLEA**

NOW INTO COURT, comes the United States, through the undersigned Assistant United States Attorney, and the defendant, ROBERT WILLIAMSON, represented by her undersigned counsel, and for the purposes of providing the Court with a factual basis for a plea agreement pursuant to Rule 11 of the Federal Rules of Criminal Procedure, the defendant, ROBERT WILLIAMSON, agrees and stipulates to the following:

1. The District Attorney's Office for the 15<sup>th</sup> Judicial District of the State of Louisiana (hereafter District Attorney's Office) was a "government agency" as defined in Title 18, United States Code, Section 666(d)(2). As the office administrator and secretary to the District Attorney for the 15<sup>th</sup> Judicial District, Barna Haynes was an "agent" of that District Attorney's Office as defined by Title 18, United States Code, Section 666(d)(1). In each calendar year throughout the time frame charged in the conspiracy, the District Attorney's Office received more than \$10,000 under a Federal program involving a grant or other form of Federal

assistance.

2. Beginning in about March of 2008 and continuing until on or about February 27, 2012, the defendant, ROBERT WILLIAMSON, conspired with Barna Haynes, Greg Williams, Denease Curry, and Sandra Degeyter to accept bribes from ROBERT WILLIAMSON in return for assisting ROBERT WILLIAMSON obtain favorable resolutions for criminal cases in which ROBERT WILLIAMSON, a non-lawyer, had a financial interest. ROBERT WILLIAMSON was soliciting and receiving payments from individuals with criminal cases pending with the District Attorney's Office. ROBERT WILLIAMSON has never been licensed to practice law.

3. The cases for which Barna Haynes received payments from ROBERT WILLIAMSON involved a variety of crimes, both felonies and misdemeanors. The majority of those cases, however, were operating a vehicle while intoxicated (hereafter, OWI) cases.

4. Sometime in late 2007, the District Attorney, with the consent of a District Judge for the 15<sup>th</sup> Judicial District, set up a process by which a select group of individuals could receive what was referred to as "immediate 894 pleas" on OWI cases.<sup>1</sup> In order to qualify for the "immediate 894 plea," the District Attorney

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<sup>1</sup>In a plea pursuant to La. Code Crim. Proc. 894 the defendant pleads guilty; however, the Court defers imposition of sentence. At the conclusion of the probationary period, if the defendant has not been charged with or convicted of another offense, the court may set aside the conviction. However, prior to setting aside any conviction and dismissing the prosecution for any charge of operating a vehicle while intoxicated, the court shall require proof in the form of a certified letter from the Department of Public Safety and Corrections, Office of Motor Vehicles, that the requirements of La. Code Crim. Proc. 894 have been complied with. Furthermore, pursuant to La. Rev. Stat. 14:98, when a person pleads guilty to operating a vehicle while

required that the charged individual complete all legal prerequisites prior to entering the plea including community service, a substance abuse program, and a driver safety program.

5. The individual cases selected for "immediate 894 pleas" were withheld from, or removed from, the normal OWI docket. Instead, special court sessions were held to handle the "immediate 894 cases" at a time and place separate from the normal OWI docket. A number of these sessions were held in the judge's chambers. The OWI defendant, at the time of the "immediate 894 plea", would appear with certifications that he/she had completed the community service, the substance abuse program, and the driver safety program. The documents would be filed into the court record at the time of the guilty plea. Then, pursuant to La. Code Crim. Proc. 894, the judge would immediately grant the 894 motion dismissing the conviction, which served as an acquittal, thereby allowing the OWI defendant(s) to have their driving privileges immediately reinstated.

6. Beginning in 2008, due to lack of oversight and safeguards built into the District Attorney's Office immediate 894 process, Barna Haynes, began receiving payments from ROBERT WILLIAMSON for placing cases in the immediate 894 sessions. ROBERT WILLIAMSON was also paying Barna Haynes for favorable outcomes on behalf of defendants who had been charged in offenses other than OWI, who in turn were paying ROBERT WILLIAMSON.

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intoxicated, first offense, he is required, at a minimum, to participate in 4 eight hour days of community service, a substance abuse program, and a driver safety program. Each of these requirements has to be completed, along with the payment of court costs, prior to a case being dismissed pursuant to La. Code Crim. Proc. 894.

7. Once hired by an individual with a pending OWI case, ROBERT WILLIAMSON would contact Barna Haynes, and give her his "client's" name. Barna Haynes, would then determine if that file was in city court or district court. The majority of ROBERT WILLIAMSON 's clients' OWI cases were assigned to city court. Barna Haynes, would have those cases transferred from city court to district court.

8. Once all of ROBERT WILLIAMSON clients' cases were assigned to district court, Barna Haynes, would coordinate the scheduling and execution of special immediate 894 sessions with the District Court Judge and the assigned Assistant District Attorney. These special sessions were never placed on a formal public docket, and always conducted separately from the normal OWI docket. These special sessions were always handled by the same Assistant District Attorney, Greg Williams. No probation officer was ever present for these special sessions. Barna Haynes, also prepared the expungement paperwork associated with ROBERT WILLIAMSON 's clients' cases. In return for coordinating these immediate 894 sessions, Barna Haynes, was paid \$500 per case by ROBERT WILLIAMSON.

9. While ROBERT WILLIAMSON paid Barna Haynes primarily to facilitate immediate 894 pleas in OWI cases, he also paid Barna Haynes to facilitate the resolution of other cases including drug cases, other felony cases, and non-OWI misdemeanor cases.

10. On October 17, 2011, ROBERT WILLIAMSON, met Barna Haynes in the area of Champagne's grocery in Lafayette, Louisiana. At that location ROBERT WILLIAMSON paid Barna Haynes money as a reward for placing his clients on an immediate 894 session.

11. In total, the defendant, ROBERT WILLIAMSON, paid Barna Haynes in excess of 55,000 dollars as a reward and to induce her to place his clients in the immediate 894 sessions.

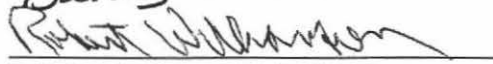
12. During the same time that the defendant, ROBERT WILLIAMSON, was paying Barna Haynes to place his client's cases in the immediate 894 sessions, he was also paying Sandra Degeyter to create false and fraudulent community service documents and Lawrence Bergeron from Safety Premiere Training to create false and fraudulent driver safety certificates.

13. He also gave gifts and money to Assistant District Attorney Greg Williamson and his secretary Denease Curry as a reward for their participation in the immediate 894 sessions.


14. During the entire time that ROBERT WILLIAMSON was obtaining money from clients in order to facilitate favorable resolutions on both OWI's and

felony cases, he was receiving social security disability payments, claiming that he was receiving no income. In total he received no less than 443,925 dollars from the clients described above.


*Some of those moneys were for fines, penalties and other expenses. The total fraudulent amount will be determined at sentencing. During this time Robert Williamson received a approximately*

  
ROBERT WILLIAMSON  
Defendant

*77,677.20 he was not entitled to. SOB Tax PW from the Social Security administration. TD PW*

  
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