

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION

UNITED STATES OF AMERICA	*	CRIM. NO.:	<u>5:14-cr-00184</u>
	*		
	*	18 U.S.C. § 2	
	*	18 U.S.C. § 371	
VERSUS	*	18 U.S.C. § 666(a)(1)(A)	
	*	31 U.S.C. § 5324	
	*	18 U.S.C. § 981(a)(1)(C)	
LARRY C. DEEN	(1)	*	
CLIFTON D. BLAKEY	(2)	*	JUDGE <u>FOOTE</u>
CLINTON E. BLAKEY	(3)	*	MAGISTRATE JUDGE HORNSBY

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

18 U.S.C. § 371

(Conspiracy to Commit Federal Program Theft)

AT ALL TIMES RELEVANT HEREIN:

I. BACKGROUND

A. The Defendant, LARRY C. DEEN, was the elected Sheriff of Bossier Parish and the head of the Bossier Parish Sheriff's Office ("BPSO") from July 1, 1988 until June 30, 2012, and as such was an agent of the BPSO.

B. The BPSO was an agency that received federal financial assistance, funding and grants from the Department of Justice, Bureau of Justice Assistance and Office of Juvenile Justice and Delinquency Programs in an amount in excess of \$10,000 during the one year period beginning on or about January 1, 2012 and

ending on or about December 31, 2012.

C. Blakey Auto Plex, LLC was established on or about March 10, 2003 and was located in Bossier Parish. Blakey Auto Plex sold new and used vehicles.

D. The Defendant, **CLIFTON D. BLAKEY**, co-owned and managed Blakey Auto Plex.

E. The Defendant, **CLINTON E. BLAKEY**, co-owned and managed Blakey Auto Plex and was a Reserve Deputy with the Bossier Parish Sheriff's Office.

F. On or about February 2, 2009, the BPSO purchased a white, four-door 2009 Chevrolet Suburban LTZ for the price of \$53,443. **LARRY C. DEEN** used the vehicle in his official capacity as the Bossier Parish Sheriff for the next three years.

G. In the spring of 2011, **LARRY C. DEEN** publicly announced that he would not seek re-election as the Sheriff of Bossier Parish when his term ended on June 30, 2012.

## II. THE CONSPIRACY

Beginning on or about January 2012, and continuing until the present, in the Western District of Louisiana and elsewhere, the Defendants, **LARRY C. DEEN**, **CLIFTON D. BLAKEY**, and **CLINTON E. BLAKEY**, did knowingly and willfully combine, conspire, confederate and agree together to commit offenses against the United States in that they embezzled, stole, obtained by fraud, without authority converted to the use of a person not the rightful owner, and intentionally misapplied property worth at least \$5,000 and owned by and under the care,

custody and control of the Bossier Parish Sheriff's Office, in violation of Title 18, United States Code, Section 666(a)(1)(A).

### III. THE OBJECT OF THE CONSPIRACY

The primary objects of the conspiracy were for **LARRY C. DEEN** to retain control and conceal his ownership of a 2009 Chevrolet Suburban LTZ and for the Defendants to unlawfully enrich themselves.

### IV. MANNER AND MEANS OF THE CONSPIRACY

To accomplish this objective, the Defendants, **LARRY C. DEEN**, **CLIFTON D. BLAKEY**, and **CLINTON E. BLAKEY**, employed several manners and means including but not limited to the Defendants transferring title to and undervaluing the 2009 Chevrolet Suburban LTZ.

### V. OVERT ACTS

In furtherance of the conspiracy and to affect the object thereof, the Defendants, **LARRY C. DEEN**, **CLIFTON D. BLAKEY**, and **CLINTON E. BLAKEY**, performed or caused to be performed the following overt acts, among others, in the Western District of Louisiana and elsewhere:

1. On or about May 21, 2012, the Defendants, **LARRY C. DEEN**, **CLIFTON D. BLAKEY**, and **CLINTON E. BLAKEY**, and others known and unknown to the grand jury met at Blakey Auto Plex to discuss a transaction involving the 2009 Chevrolet Suburban LTZ.

2. On or about May 21, 2012, **CLINTON E. BLAKEY** printed out an internet valuation from [www.nadaguides.com](http://www.nadaguides.com) for a 2009 Utility C1500 LS 2WD Chevrolet Suburban.

3. On or about May 24, 2012, five vehicles were traded-in by the Bossier Parish Sheriff's Office including the 2009 Chevrolet Suburban LTZ at the instruction of **LARRY C. DEEN**. A Blakey Auto Plex Bill of Sale Sales Agreement was created in connection with the trade-in of the 2009 Chevrolet Suburban, which was undervalued at \$21,375 by **CLIFTON D. BLAKEY** and **CLINTON E. BLAKEY**.

4. A Blakey Auto Plex Lease Agreement dated May 24, 2012, prepared by **CLIFTON D. BLAKEY** leased the 2009 Chevrolet Suburban LTZ back to the BPSO and was signed by **LARRY C. DEEN**. No payments were made to Blakey Auto Plex pursuant to this lease agreement.

5. A Blakey Auto Plex Lease Agreement dated July 2, 2012, prepared by **CLIFTON D. BLAKEY** leased the 2009 Chevrolet Suburban LTZ to B.D. at a rate of \$35.00 per day for one year and was signed by B.D.

6. By July 10, 2012, **LARRY C. DEEN** caused \$21,000 in cash to be paid to Blakey Auto Plex for the 2009 Chevrolet Suburban LTZ including:

- i. \$7,000 in cash withdrawn from B.D.'s credit union account on or about July 2, 2012;

- ii. \$6,000 in cash withdrawn from B.D.'s credit union account and \$1,000 in cash withdrawn from **LARRY C. DEEN**'s bank account on or about July 3, 2012; and
- iii. \$7,000 in cash withdrawn from B.D.'s credit union account on or about July 10, 2012.

7. On or about October 11, 2012, **CLIFTON D. BLAKEY** and **CLINTON E. BLAKEY** accepted the return of the 2009 Chevrolet Suburban LTZ at Blakey Auto Plex.

8. A few days later, on or about October 13, 2012, **CLIFTON D. BLAKEY** and **CLINTON E. BLAKEY** sold the same 2009 Chevrolet Suburban LTZ to R.A. for approximately \$31,000.

9. The allegations of Counts 2-3 are re-alleged and incorporated by reference as though fully set forth herein as separate overt acts.

All in violation of Title 18, United States Code, Section 371. [18 U.S.C. § 371].

**COUNT 2**

18 U.S.C. §§ 666(a)(1)(A), 2  
(Federal Program Theft)

1. The allegations of Count 1, paragraphs A through G, are re-alleged and incorporated by reference as though fully set forth herein.

2. From on or about May 24, 2012 through on or about October 10, 2013, in the Western District of Louisiana, the Defendant, **LARRY C. DEEN**, aided and abetted by **CLIFTON D. BLAKEY** and **CLINTON E. BLAKEY**, being an agent of the Bossier Parish Sheriff's Department, did knowingly embezzle, steal, obtain by

fraud, without authority convert to the use of a person not the rightful owner, and intentionally misapply property worth at least \$5,000 and owned by and under the care, custody and control of the Bossier Parish Sheriff's Department, that is: a white 2009 four-door Chevrolet Suburban LTZ, all in violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2. [18 U.S.C. §§ 666(a)(1)(A) and 2].

**COUNT 3**

31 U.S.C. § 5324 and 18 U.S.C. § 2  
(Failure to File Form 8300)

1. Anyone engaged in a trade or business who, in the course of such trade or business receives more than \$10,000 in coins or currency in 1 transaction or in 2 or more related transactions shall file a report with respect to such transaction or transactions with the Financial Crimes Enforcement Network (FinCEN) at such time and in such manner as the Secretary may by regulation prescribe. 31 U.S.C. § 5331(a).

2. On or about July 10, 2012, in the Western District of Louisiana, the Defendants, **CLIFTON D. BLAKEY** and **CLINTON E. BLAKEY**, knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5331 and the regulations promulgated thereunder, did cause and attempt to cause a nonfinancial trade or business to fail to file a report required under Section 5331 of Title 31, and any regulation prescribed under any such section, all in violation of Title 31, United States Code, Sections 5324(b)(1) and Title 31, Code of Federal Regulations, Part 103, recodified as Title 31, Code of Federal

Regulations, Chapter X (effective March 1, 2011) and Title 18, United States Code, Section 2. [31 U.S.C. §§ 5331, 5322 and 18 U.S.C. § 2].

FORFEITURE ALLEGATION

1. The allegations in Counts 1 - 2 of this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461.

2. Pursuant to Title 18, United States Code, Section 981(a)(1)(C), upon conviction of an offense in violation of Title 18, United States Code, Sections 371 and 666(a)(1)(A), the Defendants, **LARRY C. DEEN, CLIFTON D. BLAKEY, and CLINTON E. BLAKEY**, shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to the above alleged offenses. The property to be forfeited includes, but is not limited to, the following: \$7,000 in United States currency released by Blakey Auto Plex, LLC and seized by the Louisiana State Police on September 5, 2012.

3. The allegations in Count 3 of this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 31, United States Code, Section 5317(c)(1).

4. Pursuant to Title 31, United States Code, Section 5317, upon conviction of an offense in violation of Title 31, United States Code, Section 5324(b), the Defendants, **CLIFTON D. BLAKEY, and CLINTON E. BLAKEY**, shall forfeit to the United States of America all property, real or personal, involved in the

offense alleged in Count 3, and any property traceable thereto. The property to be forfeited includes, but is not limited to: \$21,000 in United States currency involved in the offense of Count 3.

5. If any of the property described above, as a result of any act or omission of the Defendants:

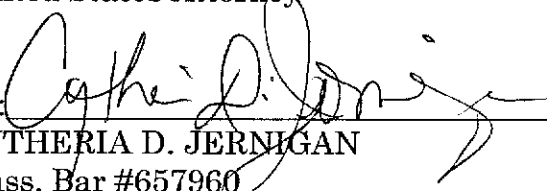
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

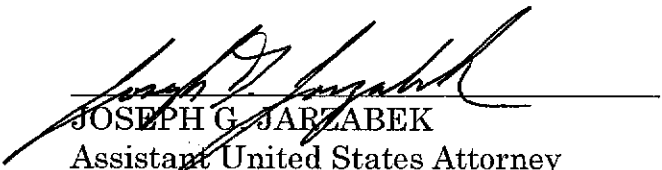
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, 981(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

  
GRAND JURY FOREPERSON

STEPHANIE A. FINLEY  
United States Attorney

By:   
CYTHERIA D. JERNIGAN  
Mass. Bar #657960  
Assistant United States Attorney

  
JOSEPH G. JARZABEK  
Assistant United States Attorney  
La. Bar Roll #07420  
300 Fannin Street, Suite 3201  
Shreveport, Louisiana 71101  
(318) 676 - 3663 - office