

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

LAFAYETTE DIVISION

UNITED STATES OF AMERICA	*	CRIMINAL NO. 12-cr-00299
VERSUS	*	JUDGE HAIK
JOHN MILLER	*	MAGISTRATE JUDGE HILL

STIPULATED FACTUAL BASIS FOR GUILTY PLEA

NOW INTO COURT, comes the United States Attorney's Office for the Western District of Louisiana, through the undersigned Assistant United States Attorney, and the defendant, JOHN MILLER, represented by his 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, stipulate as follows:

This factual basis is based upon the records of the Federal Bureau of Investigations, interviews of witnesses and the admission of Quincy Richard, Sr. and JOHN MILLER.

During the summer and fall of 2012 the St. Landry Parish School Board (SLPSB) was in the process of advertising, interviewing, and selecting a new Superintendent for the SLPSB. The Superintendent is selected by majority vote of the SLPSB, which consists of thirteen (13) members, to include the Defendants.

The Defendants, Richard and Miller, were voting board members who participated in the Superintendent screening, selection, and voting process. Acting

Superintendent Joseph Cassimere was a candidate. As such, during the summer and fall of 2012, he was subject to the Board's interview, screening, and voting/selection process. As a practical matter, the SLPSB members also vote on the salary for the Superintendent, once the position is filled.

During July, August, and September of 2012 the Defendants, Richard and Miller, had a number of private meetings with candidate and Acting Superintendent, Joseph Cassimere. During these private meetings the Defendants negotiated a price and payment from candidate Cassimere in exchange for their favorable individual votes as SLPSB members in support of Cassimere's candidacy for the SLPSB Superintendent position. At the same time, the screening selection process for Superintendent was on going by the SLPSB as a whole. By the week of September 16, the five applicants for the position of Superintendent had been publically named. Acting Superintendent Cassimere was one of the five applicants. The final vote to select the Superintendent was to be held the following Wednesday, September 26, 2012.

On September 24th 2012, the Defendants, Richard and Miller, met candidate Cassimere at the Quarters Restaurant and Casino in Opelousas. The meeting was video and audio taped by the FBI and involved the cooperation of candidate Cassimere. At this meeting, which lasted approximately ninety (90) minutes in total, Cassimere presented each of the Defendants \$5,000 in cash. This exact amount had been arrived at in discussions the week before and was below the much earlier initial proposal by Miller and Richard of \$7,500 per vote. In this meeting on September 24th Defendants, Richard and Miller, made it clear by virtue of this payment that Cassimere had

secured their votes for his candidacy for Superintendent when the SLPSB was to meet and elect the Superintendent on Wednesday, September 26, 2012, two days later. During this meeting of September 24th, the Defendants made it clear that by virtue of Cassimere's payment of \$5,000 to each of them, Cassimere had secured their services, efforts, influence, and due diligence to secure the votes of other members of the SLPSB for Cassimere's candidacy. In addition, defendant Richard made clear to Cassimere the means by which the \$5,000 per payment could also secure their favorable vote for an inflated superintendents salary once Cassimere was elected. By this means, Richard indicated how it would be possible for Cassimere to recoup his total \$10,000 payment for their vote. Miller instructed Cassimere on how to make and justify a meritorious salary request above the amount listed for the superintendent's salary as advertised.

The vote for Superintendent did not take place on September 26, 2012. As the Defendants, Richard and Miller, left the Quarters Restaurant and Casino with their vote payoff in hand, they were individually confronted by the agents of the FBI. The \$5,000 payments were recovered at that time from each. In view of these events, the election of Superintendent for the SLPSB which was scheduled for September 26, 2012 was postponed indefinitely.

The evidence shows that the State of Louisiana receives millions of dollars in federal funding. The evidence also shows that the SLPSB receives in excess of \$10,000 per year of funding derived from federal sources through the State of Louisiana.



JOHN MILLER

Defendant



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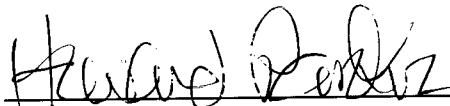
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