

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**INDICTMENT FOR CONSPIRACY, CIVIL RIGHTS VIOLATIONS
OBSTRUCTION OF JUSTICE, FALSE STATEMENTS
AND FIREARMS VIOLATIONS**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
ROLAND J. BOURGEOIS, JR.	*	VIOLATIONS: 18 U.S.C. § 245
		18 U.S.C. § 2
	*	18 U.S.C. § 371
		18 U.S.C. § 924
	*	18 U.S.C. § 1512
		18 U.S.C. § 1001
	*	*
	*	*

The Grand Jury charges that:

COUNT 1

A. At All Times Material Herein:

1. Defendant **ROLAND J. BOURGEOIS, JR.**, a white male, was residing in the Algiers Point neighborhood (hereinafter "Algiers Point") of New Orleans, in the Eastern District of Louisiana.

2. DH, MA, and CC, three African-American men, were attempting to evacuate from the City of New Orleans following Hurricane Katrina by walking through Algiers Point.

B. Interference With Rights

On or about September 1, 2005, in the Eastern District of Louisiana, defendant **ROLAND J. BOURGEOIS, JR.**, aided and abetted by others known and unknown to the grand jury, by force and threat of force willfully injured, intimidated, and interfered with DH, MA, and CC, three African-American men, because of their race and color and because they were enjoying a benefit, service, and facility administered by a State and subdivision thereof; namely, the public streets of the City of New Orleans, in and around Pelican Avenue and Vallette Street. The commission of this offense included the use of a dangerous weapon; resulted in bodily injury to DH, MA, and CC; and involved an attempt to kill.

All in violation of Title 18, United States Code, Sections 245(b)(2)(B), and 2.

COUNT 2

A. The Conspiracy:

From on or about August 28, 2005, through at least September 10, 2005, in Algiers Point, in the Eastern District of Louisiana, defendant **ROLAND J. BOURGEOIS, JR.**, willfully combined, conspired, and agreed with others known and unknown to the grand jury to commit an offense against the United States; namely, Interference with Rights, in violation of Title 18, United States Code, Section 245(b)(2)(B).

B. Plan and Purpose of the Conspiracy:

It was the plan and purpose of the conspiracy that defendant **ROLAND J. BOURGEOIS, JR.**, and others known and unknown to the grand jury would use force and

threats of force to keep African-Americans from using the public streets of Algiers Point in the aftermath of Hurricane Katrina.

C. Overt acts:

In furtherance of the conspiracy and to accomplish the object thereof, defendant **ROLAND J. BOURGEOIS, JR.**, along with other co-conspirators known and unknown to the grand jury, committed various overt acts from in or about August 28, 2005, through in or about September 10, 2005, within the Eastern District of Louisiana, including but not limited to the following:

1. Defendant **ROLAND J. BOURGEOIS, JR.**, and other individuals known to the grand jury discussed using force to defend Algiers Point from outsiders, including African-Americans who did not reside in Algiers Point.

2. Defendant **ROLAND J. BOURGEOIS, JR.**, and other individuals known and unknown to the grand jury participated in discussions using racial epithets to refer to African-Americans.

3. Defendant **ROLAND J. BOURGEOIS, JR.**, and other individuals known and unknown to the grand jury constructed barricades on the public streets of Algiers Point.

4. On or about September 1, 2005, defendant **ROLAND J. BOURGEOIS, JR.**, fired a shotgun at DH, MA, and CC while the victims were using public streets in Algiers Point.

5. After firing the shotgun at the African-American men, defendant **ROLAND J. BOURGEOIS, JR.**, bragged that he "got" one.

6. When defendant **ROLAND J. BOURGEOIS, JR.**, was advised that the man he had shot was still alive, **BOURGEOIS** referred to the injured man using a racial epithet and threatened he would kill him.

7. Defendant **ROLAND J. BOURGEOIS, JR.**, warned an African-American resident of Algiers Point known to the grand jury, “Anything coming up this street darker than a brown paper bag is getting shot.”

8. When a person known to the grand jury asked defendant **ROLAND J. BOURGEOIS, JR.**, not to shoot African-Americans that he knew from the neighborhood, **BOURGEOIS** responded that “they” all look like alike to him.

9. Following the September 1, 2005, shooting incident, defendant **ROLAND J. BOURGEOIS, JR.**, displayed to others a baseball cap, which appeared to have blood on it, which had fallen from the head of DH, an African-American man who had been shot at the intersection of Pelican Avenue and Vallette Street.

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

COUNT 3

On or about September 1, 2005, in the Eastern District of Louisiana, defendant **ROLAND J. BOURGEOIS, JR.**, aiding and abetting others known and unknown to the grand jury, knowingly used and carried a firearm during and in relation to, and possessed the firearm in furtherance of, felony crimes of violence prosecutable in a court of the United States; that is, he possessed, carried, and used a shotgun during the commission of the offenses charged in Counts

One and Two of this Indictment, and incorporated herein. Defendant **ROLAND J. BOURGEOIS, JR.**, discharged the firearm in the commission of the offense.

All in violation of Title 18, United States Code, Section 924(c).

COUNT 4

In or about August and September, 2009, in the Eastern District of Louisiana, defendant **ROLAND J. BOURGEOIS, JR.**, corruptly persuaded, and attempted to corruptly persuade, M.B., with intent to hinder, delay, and prevent the communication to a federal law enforcement officer and judge of truthful information relating to the commission and possible commission of a federal offense; that is, defendant **ROLAND J. BOURGEOIS, JR.**, directed M.B., an eyewitness to the shooting incident in or around Pelican Avenue and Vallette Street, to lie to the FBI by denying any knowledge of a shooting in Algiers Point in the days following Hurricane Katrina.

All in violation of Title 18, United States Code, Section 1512(b)(3).

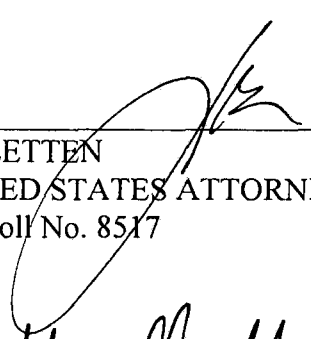
COUNT 5

On or about July 28, 2009, in New Orleans, in the Eastern District of Louisiana, defendant **ROLAND J. BOURGEOIS, JR.**, knowingly and willfully made materially false statements and representations in a matter within the jurisdiction of the FBI, an agency of the executive branch of the United States, when he told FBI agents investigating an alleged shooting in Algiers Point in the aftermath of Hurricane Katrina that he did not fire a shotgun and was not aware of a shooting incident in Algiers Point in the aftermath of Hurricane Katrina. In fact, as the defendant then well knew, he had discharged a shotgun and caused bodily injury to another person on or near a public street in Algiers Point in the aftermath of Hurricane Katrina.


All in violation of Title 18, United States Code, Section 1001.

A TRUE BILL:

FOREPERSON



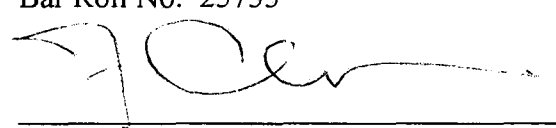
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New Orleans, Louisiana
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