

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

| | | |
|---------------------------------|---|------------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | 2:08-CR-00245-LSC-PWG |
| |) | |
| LARRY P. LANGFORD, |) | SUPERSEDING |
| WILLIAM B. BLOUNT, and |) | |
| ALBERT W. LAPIERRE |) | |

INDICTMENT

THE GRAND JURY CHARGES:

INTRODUCTION

At all times material to this Indictment:

1. Jefferson County, Alabama, was a local government that received benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee or other form of federal assistance during each fiscal year beginning with fiscal year 2001 and continuing through fiscal year 2007.
2. The Jefferson County Commission was the governing body of Jefferson County, Alabama, and was comprised of five Commissioners, each elected by the voters of his/her district. The President of the Commission presided over the Commission, signed contracts and other agreements on behalf of the Commission, and served as the head of the Finance and General Services Department.

3. Defendant **LARRY P. LANGFORD** was elected to the Jefferson County Commission in 2002 and was a member of the Commission until November 2007. Defendant **LARRY P. LANGFORD** served as President of the Commission and head of the Department of Finance and General Services from in or about November 2002 until November 2006. As head of the Department of Finance and General Services, defendant **LARRY P. LANGFORD** was responsible for the administration of the financial affairs of Jefferson County; he made recommendations to the Commission regarding proposed financial transactions of Jefferson County and firms that would participate in financial transactions.

4. Based on his position with the Jefferson County Commission, defendant **LARRY P. LANGFORD** owed a duty of loyalty to Jefferson County, Alabama, and its citizens, free from deceit, self-enrichment, concealment, and conflict between his personal interests and the interests of Jefferson County, Alabama. Specifically, as a county commissioner in Alabama, defendant **LARRY P. LANGFORD** owed Jefferson County, Alabama, and its citizens a duty to, among other things: (a) refrain from using his official position or office to obtain personal benefit for himself or a family member, pursuant to Ala. Code § 36-25-5;

(b) refrain from soliciting or receiving a thing of value for himself or a family member for the purpose of influencing official action, pursuant to Ala. Code § 36-25-7; and (c) disclose, and not conceal, personal financial interests, the nature and amount of income received, and other material financial information, pursuant to Ala. Code § 36-25-14.

5. In or about 1996, the Jefferson County Commission entered into a consent decree under which Jefferson County agreed to repair its sewer system to bring it into compliance with the Clean Water Act. To fund those improvements and other needs of Jefferson County, the Jefferson County Commission authorized and entered into several financial transactions involving billions of dollars.

6. Blount Parrish & Co., Inc., was an investment banking firm located in Montgomery, Alabama. Defendant **WILLIAM B. BLOUNT** was the Chairman and an owner of Blount Parrish & Co., Inc. and other companies. Defendant **WILLIAM B. BLOUNT** and his companies received approximately \$7.1 million in fees in connection with Jefferson County financial transactions.

7. Defendant **ALBERT W. LAPIERRE** was a lobbyist registered in the State of Alabama and was paid approximately \$219,500.00 by defendant **WILLIAM B. BLOUNT** and his companies in connection with Jefferson County financial transactions.

Count One
Bribery
Title 18, United States Code, Section 666(a)(1)(B)

On or about June 16, 2003, within Jefferson County in the Northern District of Alabama, and elsewhere, the defendant

LARRY P. LANGFORD

being an agent of Jefferson County, Alabama, which county received federal benefits in excess of \$10,000 in a one-year period, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept, anything of value from any person, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of Jefferson County involving anything of value of \$5,000 or more, that is, defendant **LARRY P. LANGFORD**, being the President of the Jefferson County Commission and the head of the Department of Finance and General Services, corruptly solicited, accepted, and agreed to accept money, cash, and checks valued at approximately \$69,000 from William B. Blount, Blount Parrish & Co., Inc., and Albert W. LaPierre, intending to be influenced and rewarded in connection with bond transactions and swap agreements involving Jefferson County.

All in violation of Title 18, United States Code, Section 666(a)(1)(B).

Count Two
Bribery
Title 18, United States Code, Sections 666(a)(2) and 2

On or about June 16, 2003, within Jefferson County in the Northern District of Alabama, and elsewhere, the defendants

WILLIAM B. BLOUNT
and
ALBERT W. LAPIERRE

aided and abetted by each other, did corruptly give, offer, and agree to give anything of value to any person, with intent to influence and reward an agent of Jefferson County, Alabama, which county received federal benefits in excess of \$10,000 in a one-year period, in connection with any business, transaction, and series of transactions of Jefferson County involving anything of value of \$5,000 or more, that is, defendants **WILLIAM B. BLOUNT** and **ALBERT W.**

LAPIERRE corruptly offered, gave, and agreed to give money, cash, and checks valued at approximately \$69,000 to Larry P. Langford, the President of the Jefferson County Commission and the head of the Department of Finance and General Services, intending to influence and reward him in connection with bond transactions and swap agreements involving Jefferson County.

All in violation of Title 18, United States Code, Sections 666(a)(2) and 2.

Count Three
Money Laundering
Title 18, United States Code, Section 1957

On or about June 14, 2003, in Jefferson County in the Northern District of Alabama, and elsewhere, the defendant

LARRY P. LANGFORD

did knowingly engage and attempt to engage in a monetary transaction by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is, withdrawal and transfer of funds in the amount of \$12,000, such property having been derived from a specified unlawful activity, that is, bribery, in violation of Title 18, United States Code, Section 666 (a)(1)(B), in that defendant **LARRY P. LANGFORD** paid Likis Audio \$12,000 for audio equipment with a check drawn on his account at Compass Bank, into which bribery proceeds had previously been deposited.

All in violation of Title 18, United States Code, Section 1957.

Count Four
Money Laundering
Title 18, United States Code, Section 1957

On or about June 14, 2003, in Jefferson County in the Northern District of Alabama, and elsewhere, the defendant

LARRY P. LANGFORD

did knowingly engage and attempt to engage in a monetary transaction by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is exchange and transfer of funds in the amount of \$12,000 by, through, and to a financial institution, such property having been derived from a specified unlawful activity, that is, bribery, in violation of Title 18, United States Code, Section 666 (a)(1)(B), in that defendant **LARRY P. LANGFORD** paid Shaia's \$12,000 for luxury clothing items with a cashiers check purchased at Compass Bank using funds paid to him as a bribe.

All in violation of Title 18, United States Code, Section 1957.

Count Five
Money Laundering
Title 18, United States Code, Section 1957

On or about June 14, 2003, in Jefferson County in the Northern District of Alabama, and elsewhere, the defendant

LARRY P. LANGFORD

did knowingly engage and attempt to engage in a monetary transaction by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is deposit of

funds in the amount of \$40,589 by, through, and to a financial institution, such property having been derived from a specified unlawful activity, that is, bribery, in violation of Title 18, United States Code, Section 666 (a)(1)(B), in that defendant **LARRY P. LANGFORD** deposited \$40,589 into his account at Compass Bank using funds paid to him as a bribe.

All in violation of Title 18, United States Code, Section 1957.

Count Six
Conspiracy
Title 18, United States Code, Section 371

THE CONSPIRACY

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 7 of the Introduction to this Indictment as though fully set out herein.

2. From in or about July 2002 and continuing until in or about May 2007, the exact dates being unknown, within Jefferson County in the Northern District of Alabama, and elsewhere, defendants

LARRY P. LANGFORD,
WILLIAM B. BLOUNT, and
ALBERT W. LAPIERRE

knowingly and willfully conspired, combined, and agreed together and with other persons, known and unknown to the Grand Jury, to commit offenses against the

United States: that is,

(A) to corruptly solicit and demand for the benefit of any person, and accept and agree to accept, anything of value from any person, intending to be influenced or rewarded in connection with any business, transaction, and series of transactions involving any thing of value of \$5,000 or more of an organization, government, or agency that receives more than \$10,000 under a federal program during any one year period, in violation of Title 18, United States Code, Section 666(a)(1)(B);

(B) to corruptly give, offer, and agree to give anything of value to any person, intending to influence or reward an agent of an organization, government, or agency that receives more than \$10,000 under a federal program during any one year period in connection with any business, transaction, and series of transactions of such organization, government, or agency involving any thing of value of \$5,000 or more, in violation of Title 18, United States Code, Section 666(a)(2);

(C) to devise and intend to devise a scheme and artifice to defraud Jefferson County, Alabama, and its citizens of their intangible right to defendant **LARRY P. LANGFORD'S** honest services and to obtain money and property belonging to others by means of false and fraudulent pretenses, representations, and promises by use of interstate carrier, in violation of Title 18, United States Code, Sections 1341 and 1346; and

(D) to devise and intend to devise a scheme and artifice to defraud Jefferson County, Alabama, and its citizens of their intangible right to defendant **LARRY P. LANGFORD'S** honest services and to obtain money and property belonging to others by means of false and fraudulent pretenses, representations, and promises by use of interstate wire transmissions, in violation of Title 18, United States Code, Sections 1343 and 1346.

MANNER AND MEANS OF THE CONSPIRACY

3. It was a part of the conspiracy that defendant **LARRY P. LANGFORD** would and did use his power and influence as President of the Jefferson County Commission and head of the Department of Finance and General Services to include defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., in Jefferson County financial transactions involving billions of dollars and thereby generate millions of dollars in fees for defendant **WILLIAM B. BLOUNT** and his companies.

4. It was a further part of the conspiracy that defendant **WILLIAM B. BLOUNT** and his companies would and did pay defendant **ALBERT W. LAPIERRE** hundreds of thousands of dollars in connection with Jefferson County financial transactions.

5. It was a further part of the conspiracy that defendants **WILLIAM B. BLOUNT** and **ALBERT W. LAPIERRE** would and did give money to and pay off loans and buy expensive clothing and jewelry for defendant **LARRY P. LANGFORD** to influence and reward him in connection with Jefferson County financial transactions.

6. It was a further part of the conspiracy that defendant **LARRY P. LANGFORD** would and did solicit, demand, accept, and agree to accept items of

value totaling approximately \$235,000.00 from defendants **WILLIAM B. BLOUNT** and **ALBERT W. LAPIERRE** intending to be influenced and rewarded in connection with Jefferson County financial transactions.

7. It was a further part of the conspiracy that defendants **LARRY P. LANGFORD, WILLIAM B. BLOUNT,** and **ALBERT W. LAPIERRE** would and did conceal the payment and receipt of items of value.

OVERT ACTS

In furtherance of the conspiracy and to achieve the objects thereof, the conspirators committed and caused to be committed the following overt acts, among others, in the Northern District of Alabama and elsewhere:

8. On or about July 19, 2002, defendant **WILLIAM B. BLOUNT** helped defendant **LARRY P. LANGFORD** obtain a \$50,000.00 unsecured loan with a six month term from Colonial Bank.

9. On or about February 14, 2003, defendant **ALBERT W. LAPIERRE** obtained a \$50,000.00 loan from Colonial Bank to pay off defendant **LARRY P. LANGFORD's** note, which was then past due.

10. On or about March 6, 2003, defendant **LARRY P. LANGFORD** and the Jefferson County Commission approved a Resolution ordering the issuance of the Series 2003-A General Obligation Capital Improvement and Refunding

Warrants in the amount of \$94 million. Defendant **LARRY P. LANGFORD** and the Jefferson County Commission selected Blount Parrish & Co., Inc., as an underwriter, for which defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received over \$200,000.00 in fees.

11. On or about March 27, 2003, defendant **LARRY P. LANGFORD** and the Jefferson County Commission approved a Resolution authorizing Jefferson County to enter into an interest rate swap transaction with JP Morgan Chase Bank in the approximate amount of \$1.1 billion.

12. On or about March 28, 2003, defendant **LARRY P. LANGFORD** received letters confirming that JP Morgan had been requested, as a condition to entering the swap transaction, to include Goldman Sachs in the transaction and confirming that Goldman Sachs intended to pay consulting fees to Blount Parrish & Co., Inc.

13. On or about April 22, 2003, defendant **LARRY P. LANGFORD** and the Jefferson County Commission approved a Resolution ordering the issuance of the Series 2003-B Warrants in an amount not exceeding \$1.17 billion. Defendant **LARRY P. LANGFORD** and the Jefferson County Commission selected Blount Parrish & Co., Inc., as a Remarketer, for which defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received substantial fees.

14. On or about May 7, 2003, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received \$500,000.00 from Chase Bank in connection with a Jefferson County financial transaction.

15. On or about May 27, 2003, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received \$300,000.00 from Goldman Sachs in connection with a Jefferson County financial transaction.

16. On or about May 28, 2003, defendant **WILLIAM B. BLOUNT** wrote a check for \$50,000.00 to defendant **ALBERT W. LAPIERRE**.

17. On or about May 30, 2003, defendant **ALBERT W. LAPIERRE** paid \$20,000.00 toward the loan at Colonial Bank he obtained to pay off defendant **LARRY P. LANGFORD'S** loan.

18. On or about June 5, 2003, defendant **ALBERT W. LAPIERRE** paid approximately \$30,000.00 toward the loan at Colonial Bank he obtained to pay off defendant **LARRY P. LANGFORD'S** loan.

19. On or about June 12, 2003, defendant **WILLIAM B. BLOUNT** wrote a check for \$69,000.00 to defendant **ALBERT W. LAPIERRE**.

20. On or about June 16, 2003, defendant **ALBERT W. LAPIERRE** wrote a check for \$69,000.00 to defendant **LARRY P. LANGFORD**.

21. On or about July 1, 2003, defendant **LARRY P. LANGFORD** and the Jefferson County Commission approved a Resolution authorizing Jefferson County to enter into an interest rate swap transaction with JP Morgan Securities and Bank of America in the approximate amount of \$1.1 billion.

22. On or about July 25, 2003, while on a trip to New York City with defendant **LARRY P. LANGFORD** and others related to a Jefferson County bond transaction, defendant **WILLIAM B. BLOUNT** paid approximately \$2,850.00 to Oxford Clothes for clothing for defendant **LARRY P. LANGFORD**.

23. On or about July 28, 2003, defendant **WILLIAM B. BLOUNT** and his companies received approximately \$2.6 million from JP Morgan Chase in connection with a Jefferson County financial transaction.

24. On or about July 29, 2003, defendant **WILLIAM B. BLOUNT** paid defendant **ALBERT W. LAPIERRE** \$100,000.00 in connection with a Jefferson County financial transaction.

25. On or about August 5, 2003, defendant **LARRY P. LANGFORD** and the Jefferson County Commission approved a Resolution ordering the issuance of the Series 2003-C Warrants in the approximate amount of \$1.05 billion and naming JP Morgan Securities and Banc of America Securities as underwriters.

26. On or about October 1, 2003, defendant **WILLIAM B. BLOUNT** paid \$3,134.70 to Bromberg & Company for jewelry for defendant **LARRY P.**

LANGFORD.

27. On or about October 2, 2003, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received \$11,000.00 in connection with a Jefferson County financial transaction.

28. On or about October 20, 2003, defendant **LARRY P. LANGFORD**, acting for the Jefferson County Commission, entered into a financial transaction in the approximate amount of \$110 million that included Bank of America and Lehman Brothers Special Financing, Inc. The agreement required Lehman Brothers to pay a broker's fee or arrangement fee of \$35,000 to Blount Parrish & Co., Inc.

29. On or about November 6, 2003, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received \$35,000 from Lehman Brothers.

30. On or about November 7, 2003, defendant **LARRY P. LANGFORD**, acting for the Jefferson County Commission, entered into a swap transaction in the approximate amount of \$112 million with JP Morgan Chase & Company.

31. On or about November 13, 2003, defendant **WILLIAM B. BLOUNT** paid defendant **ALBERT W. LAPIERRE** \$18,500 in connection with a Jefferson

County financial transaction.

32. On or about November 24, 2003, defendant **LARRY P. LANGFORD** received a letter from JP Morgan Chase & Company confirming that JP Morgan Chase had been requested, as a condition to entering the \$112 million swap transaction, to make payments to Blount Parrish & Co., Inc., in the amount of \$225,000.00.

33. On or about November 27, 2003, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received \$11,000.00 in connection with a Jefferson County financial transaction.

34. On or about December 10, 2003, while on a trip to New York City with defendant **LARRY P. LANGFORD** and others related to a Jefferson County bond transaction, defendant **WILLIAM B. BLOUNT** paid approximately \$1,110.00 to Turnbull & Asser for clothing for defendant **LARRY P. LANGFORD**.

35. On or about February 12, 2004, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received \$11,000.00 in connection with a Jefferson County financial transaction.

36. On or about April 14, 2004, while on a trip to New York City with defendant **LARRY P. LANGFORD** and others related to a Jefferson County bond transaction, defendant **WILLIAM B. BLOUNT** paid approximately \$3,290.00 to

Ermenegildo Zegna for a suit and two jackets for defendant **LARRY P.**

LANGFORD.

37. On or about April 27, 2004, defendant **LARRY P. LANGFORD** and the Jefferson County Commission approved a Resolution authorizing Jefferson County to enter into interest rate swap transactions with Bear Stearns Capital Markets, Inc., and Bank of America in the approximate amount of \$3 billion.

38. On or about April 29, 2004, defendant **WILLIAM B. BLOUNT** paid approximately \$2,133.00 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD.**

39. On or about May 20, 2004, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received \$11,000.00 in connection with a Jefferson County financial transaction.

40. On or about May 26, 2004, defendant **ALBERT W. LAPIERRE** paid approximately \$2,707.56 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD.**

41. On or about June 10, 2004, defendant **LARRY P. LANGFORD**, acting for the Jefferson County Commission, entered into swap transactions with Bear Stearns Capital Markets, Inc., and Bank of America.

42. On or about June 22, 2004, defendant **LARRY P. LANGFORD** received letters from Bear Stearns confirming that Blount Parrish & Co., Inc., was employed in the role of banker with special knowledge of the background and structure of Jefferson County's outstanding bond issues and that Bear Stearns would pay Blount Parrish & Co., Inc., approximately \$2.4 million in connection with the swap transactions.

43. On or about June 23, 2004, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received approximately \$2.4 million from Bear Stearns in connection with the swap transactions.

44. On or about July 11, 2004, while on a trip to New York City with defendant **LARRY P. LANGFORD** and others related to a Jefferson County bond transaction, defendant **WILLIAM B. BLOUNT** paid approximately \$2,796.00 to Salvatore Ferragamo for clothing for defendant **LARRY P. LANGFORD**.

45. On or about July 13, 2004, while on a trip to New York City with defendant **LARRY P. LANGFORD** and others related to a Jefferson County bond transaction, defendant **WILLIAM B. BLOUNT** paid approximately \$1,854.96 to Century 21 for clothing for defendant **LARRY P. LANGFORD**.

46. On or about July 16, 2004, defendant **WILLIAM B. BLOUNT** paid defendant **ALBERT W. LAPIERRE** \$101,000.00 in connection with a Jefferson

County financial transaction.

47. On or about July 27, 2004, defendant **LARRY P. LANGFORD** and the Jefferson County Commission approved a Resolution ordering the issuance of the General Obligation Warrants Series 2004-A in the amount of approximately \$53 million. Defendant **LARRY P. LANGFORD** and the Jefferson County Commission selected Blount Parrish & Co., Inc., as an underwriter, for which defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received substantial fees.

48. On or about August 11, 2004, defendant **WILLIAM B. BLOUNT** wrote a check for \$30,000.00 to defendant **ALBERT W. LAPIERRE**.

49. On or about August 12, 2004, defendant **ALBERT W. LAPIERRE** wrote a check for \$30,000.00 to defendant **LARRY P. LANGFORD**.

50. On or about August 14, 2004, defendant **LARRY P. LANGFORD** obtained an official check from Compass Bank in the amount of \$29,241.00 to pay his personal taxes.

51. On or about August 18, 2004, defendant **ALBERT W. LAPIERRE** paid approximately \$3,450.00 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD**.

52. On or about August 19, 2004, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received \$11,000.00 in connection with a Jefferson County financial transaction.

53. On or about September 8, 2004, defendant **WILLIAM B. BLOUNT** paid approximately \$4,050.00 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD**.

54. On or about September 23, 2004, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received \$31,350.00 in connection with a Jefferson County financial transaction.

55. On or about October 13, 2004, defendant **ALBERT W. LAPIERRE** paid approximately \$4,250.00 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD**.

56. On or about November 7, 2004, while on a trip to New York City with defendant **LARRY P. LANGFORD** and others related to a Jefferson County bond transaction, defendant **WILLIAM B. BLOUNT** paid approximately \$895.00 to Salvatore Ferragamo for clothing for defendant **LARRY P. LANGFORD**.

57. On or about November 9, 2004, while on a trip to New York City with defendant **LARRY P. LANGFORD** and others related to a Jefferson County bond transaction, defendant **WILLIAM B. BLOUNT** paid approximately \$12,015.00

to Tourneau for a watch for defendant **LARRY P. LANGFORD**.

58. On or about November 19, 2004, defendant **ALBERT W. LAPIERRE** paid approximately \$1,662.60 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD**.

59. On or about December 9, 2004, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received \$11,000.00 in connection with a Jefferson County financial transaction.

60. On or about December 16, 2004, defendant **LARRY P. LANGFORD** and the Jefferson County Commission approved a Resolution ordering the issuance of the Series 2004-A Limited Obligation School Warrants in the amount of approximately \$675 million. Defendant **LARRY P. LANGFORD** and the Jefferson County Commission selected Blount Parrish & Co., Inc., as an underwriter, for which defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received substantial fees.

61. On or about December 29, 2004, defendant **WILLIAM B. BLOUNT** paid approximately \$11,750.40 to Bromberg & Company for a Rolex watch and other jewelry for defendant **LARRY P. LANGFORD**.

62. On or about January 11, 2005, defendant **ALBERT W. LAPIERRE** paid approximately \$2,239.97 to Remon's Clothiers for clothing for defendant

LARRY P. LANGFORD.

63. On or about February 14, 2005, defendant **ALBERT W. LAPIERRE** paid approximately \$2,800.00 to Remon's Clothiers for clothing for defendant

LARRY P. LANGFORD.

64. On or about February 24, 2005, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received \$11,000.00 in connection with a Jefferson County financial transaction.

65. On or about February 25, 2005, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received \$445,000.00 in connection with a Jefferson County financial transaction.

66. On or about June 2, 2005, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received \$11,000.00 in connection with a Jefferson County financial transaction.

67. On or about June 30, 2005, defendant **WILLIAM B. BLOUNT** paid approximately \$3,547.00 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD.**

68. On or about August 11, 2005, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received \$11,000.00 in connection with a Jefferson County financial transaction.

69. On or about October 5, 2005, defendant **WILLIAM B. BLOUNT** paid approximately \$2,000.00 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD**.

70. On or about October 6, 2005, defendant **ALBERT W. LAPIERRE** paid approximately \$5,000.00 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD**.

71. On or about October 26, 2005, defendant **WILLIAM B. BLOUNT** paid approximately \$2,500.00 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD**.

72. On or about November 18, 2005, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received \$11,000.00 in connection with a Jefferson County financial transaction.

73. On or about December 21, 2005, defendant **WILLIAM B. BLOUNT** paid approximately \$2,800.00 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD**.

74. On or about December 21, 2005, defendant **ALBERT W. LAPIERRE** paid approximately \$1,800.00 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD**.

75. On or about January 12, 2006, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received approximately \$65,000.00 from Jefferson County, Alabama, in connection with a Jefferson County financial transaction.

76. On or about March 8, 2006, defendant **WILLIAM B. BLOUNT** paid approximately \$1,876.00 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD**.

77. On or about March 23, 2006, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received \$8,608.69 in connection with a Jefferson County financial transaction.

78. On or about May 25, 2006, defendant **WILLIAM B. BLOUNT** paid approximately \$1,000.00 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD**.

79. On or about June 20, 2006, defendant **WILLIAM B. BLOUNT** paid approximately \$1,047.96 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD**.

80. On or about August 1, 2006, defendant **LARRY P. LANGFORD** and the Jefferson County Commission approved a Resolution ordering the issuance of the Series 2006 Public Building Authority Lease Revenue Warrants in the amount of approximately \$92,500,000.00. Defendant **LARRY P. LANGFORD** and the

Jefferson County Commission selected Blount Parrish & Co., Inc., as an underwriter, for which defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received substantial fees.

81. On or about September 13, 2006, defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., received \$249,062.50 in connection with a Jefferson County financial transaction.

82. On or about September 13, 2006, defendant **WILLIAM B. BLOUNT** paid approximately \$1,500.00 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD**.

83. On or about December 8, 2006, defendant **ALBERT W. LAPIERRE** paid approximately \$1,000.00 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD**.

84. On or about May 17, 2007, defendant **WILLIAM B. BLOUNT** paid approximately \$7,536.00 to Remon's Clothiers for clothing for defendant **LARRY P. LANGFORD**.

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

Count Seven
Bribery
Title 18, United States Code, Section 666(a)(1)(B)

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 7 of the Introduction to this Indictment and paragraphs 3 through 7 of Count 6 of this Indictment as though fully set out herein.

2. On or about August 12, 2004, in Jefferson County in the Northern District of Alabama and elsewhere, the defendant

LARRY P. LANGFORD,

being an agent of Jefferson County, Alabama, which county received federal benefits in excess of \$10,000 in a one-year period, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept, anything of value from any person, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of Jefferson County involving anything of value of \$5,000 and more, that is, defendant **LARRY P. LANGFORD** corruptly solicited, accepted, and agreed to accept money, cash, and checks valued at approximately \$30,000 from William B. Blount and Albert W. LaPierre, intending to be influenced and rewarded in connection with financial transactions of Jefferson County involving \$5,000 and more.

All in violation of Title 18, United States Code, Section 666(a)(1)(B).

Count Eight
Bribery
Title 18, United States Code, Sections 666(a)(2) and 2

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 7 of the Introduction to this Indictment and paragraphs 3 through 7 of Count 6 of this Indictment as though fully set out herein.

2. On or about August 12, 2004, in Jefferson County in the Northern District of Alabama and elsewhere, the defendants

WILLIAM B. BLOUNT
and
ALBERT W. LAPIERRE,

aided and abetted by each other, did corruptly give, offer, and agree to give anything of value to any person, with intent to influence and reward an agent of Jefferson County, Alabama, which county received federal benefits in excess of \$10,000 in a one-year period, in connection with any business, transaction, and series of transactions of Jefferson County involving anything of value of \$5,000 and more, that is, defendants **WILLIAM B. BLOUNT** and **ALBERT W.**

LAPIERRE corruptly offered, gave, and agreed to give money, cash, and checks valued at approximately \$30,000 to Jefferson County, Alabama, Commissioner Larry P. Langford intending to influence and reward him in connection with financial transactions of Jefferson County involving \$5,000 and more.

All in violation of Title 18, United States Code, Sections 666(a)(2) and 2.

Count Nine
Money Laundering
Title 18, United States Code, Section 1957

On or about August 14, 2004, in Jefferson County in the Northern District of Alabama, and elsewhere, the defendant

LARRY P. LANGFORD

did knowingly engage and attempt to engage in a monetary transaction by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is an exchange and transfer of funds in the amount of \$29,241.00 by, through, and to a financial institution, such property having been derived from a specified unlawful activity, that is, bribery, in violation of Title 18, United States Code, Section 666 (a)(1)(B), in that defendant **LARRY P. LANGFORD** obtained an official check in the amount of \$29,241.00 from Compass Bank to pay his personal taxes using funds paid to him as a bribe.

All in violation of Title 18, United States Code, Section 1957.

Counts Ten - Thirty Six
Bribery
Title 18, United States Code, Section 666(a)(1)(B)

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 7 of the Introduction to this Indictment and paragraphs 3 through 7 of Count 6 of this Indictment as though fully set out herein.

2. On or about the date set forth below for each count, in Jefferson County in the Northern District of Alabama and elsewhere, the defendant

LARRY P. LANGFORD,

being an agent of Jefferson County, Alabama, which county received federal benefits in excess of \$10,000 in a one-year period, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept, anything of value from any person, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of Jefferson County involving anything of value of \$5,000 and more, that is, defendant **LARRY P. LANGFORD** corruptly solicited, accepted, and agreed to accept merchandise from the store and in the amount described below for each count from the person identified below intending to be influenced and rewarded in connection with financial transactions of Jefferson County involving \$5,000.00 and more.

3. The allegations of paragraphs 1 and 2 above are realleged for each of Counts 10 through 36 below as though fully set forth therein.

| COUNT | DATE | AMOUNT | STORE | PAYOR |
|--------------|-------------------|---------------|--------------|--------------------|
| 10 | December 10, 2003 | \$1,110.00 | Turnbull | William B. Blount |
| 11 | April 14, 2004 | \$3,290.00 | Zegna | William B. Blount |
| 12 | April 29, 2004 | \$2,133.00 | Remon's | William B. Blount |
| 13 | May 26, 2004 | \$2,707.56 | Remon's | Albert W. LaPierre |
| 14 | July 11, 2004 | \$2,796.00 | Ferragamo | William B. Blount |
| 15 | July 13, 2004 | \$1,854.96 | Century 21 | William B. Blount |
| 16 | August 18, 2004 | \$3,450.00 | Remon's | Albert W. LaPierre |
| 17 | September 8, 2004 | \$4,050.00 | Remon's | William B. Blount |
| 18 | October 13, 2004 | \$4,250.00 | Remon's | Albert W. LaPierre |
| 19 | November 7, 2004 | \$895.00 | Ferragamo | William B. Blount |
| 20 | November 9, 2004 | \$12,015.00 | Tourneau | William B. Blount |
| 21 | November 19, 2004 | \$1,662.60 | Remon's | Albert W. LaPierre |
| 22 | December 29, 2004 | \$11,750.40 | Bromberg | William B. Blount |
| 23 | January 11, 2005 | \$2,239.97 | Remon's | Albert W. LaPierre |
| 24 | February 14, 2005 | \$2,800.00 | Remon's | Albert W. LaPierre |
| 25 | June 30, 2005 | \$3,547.00 | Remon's | William B. Blount |
| 26 | October 5, 2005 | \$2,000.00 | Remon's | William B. Blount |
| 27 | October 6, 2005 | \$5,000.00 | Remon's | Albert W. LaPierre |
| 28 | October 26, 2005 | \$2,500.00 | Remon's | William B. Blount |
| 29 | December 21, 2005 | \$2,300.00 | Remon's | William B. Blount |

| | | | | |
|----|--------------------|------------|---------|--------------------|
| 30 | December 21, 2005 | \$1,800.00 | Remon's | Albert W. LaPierre |
| 31 | March 8, 2006 | \$1,876.00 | Remon's | William B. Blount |
| 32 | May 25, 2006 | \$1,000.00 | Remon's | William B. Blount |
| 33 | June 20, 2006 | \$1,047.96 | Remon's | William B. Blount |
| 34 | September 13, 2006 | \$1,500.00 | Remon's | William B. Blount |
| 35 | December 8, 2006 | \$1,000.00 | Remon's | Albert W. LaPierre |
| 36 | May 17, 2007 | \$7,536.00 | Remon's | William B. Blount |

All in violation of Title 18, United States Code, Section 666(a)(1)(B).

Counts Thirty Seven through Fifty Four
Bribery
Title 18, United States Code, Sections 666(a)(2) and 2

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 7 of the Introduction to this Indictment and paragraphs 3 through 7 of Count 6 of this Indictment as though fully set out herein.

2. On or about the date set forth below for each count, in Jefferson County in the Northern District of Alabama and elsewhere, the defendant

WILLIAM B. BLOUNT

did corruptly give, offer, and agree to give anything of value to any person, with intent to influence and reward an agent of Jefferson County, Alabama, which county received federal benefits in excess of \$10,000 in a one-year period, in connection with any business, transaction, and series of transactions of Jefferson

County involving anything of value of \$5,000 and more, that is, defendant **WILLIAM B. BLOUNT** corruptly offered, gave, and agreed to give merchandise from the store and in the amount described below for each count intending to influence and reward Jefferson County, Alabama, Commissioner Larry P. Langford in connection with financial transactions of Jefferson County involving \$5,000 and more.

3. The allegations of paragraphs 1 and 2 above are realleged for each of Counts 37 through 54 below as though fully set forth therein.

| COUNT | DATE | AMOUNT | STORE |
|-------|-------------------|-------------|------------|
| 37 | December 10, 2003 | \$1,110.00 | Turnbull |
| 38 | April 14, 2004 | \$3,290.00 | Zegna |
| 39 | April 29, 2004 | \$2,133.00 | Remon's |
| 40 | July 11, 2004 | \$2,796.00 | Ferragamo |
| 41 | July 13, 2004 | \$1,854.96 | Century 21 |
| 42 | September 8, 2004 | \$4,050.00 | Remon's |
| 43 | November 7, 2004 | \$895.00 | Ferragamo |
| 44 | November 9, 2004 | \$12,015.00 | Tourneau |
| 45 | December 29, 2004 | \$11,750.40 | Bromberg's |
| 46 | June 30, 2005 | \$3,547.00 | Remon's |
| 47 | October 5, 2005 | \$2,000.00 | Remon's |
| 48 | October 26, 2005 | \$2,500.00 | Remon's |

| | | | |
|----|--------------------|------------|---------|
| 49 | December 21, 2005 | \$2,300.00 | Remon's |
| 50 | March 8, 2006 | \$1,876.00 | Remon's |
| 51 | May 25, 2006 | \$1,000.00 | Remon's |
| 52 | June 20, 2006 | \$1,047.96 | Remon's |
| 53 | September 13, 2006 | \$1,500.00 | Remon's |
| 54 | May 17, 2007 | \$7,536.00 | Remon's |

All in violation of Title 18, United States Code, Sections 666(a)(2) and 2.

Counts Fifty Five through Sixty Three

Bribery

Title 18, United States Code, Sections 666(a)(2) and 2

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 7 of the Introduction to this Indictment and paragraphs 3 through 7 of Count 6 of this Indictment as though fully set out herein.

2. On or about the date set forth below for each count, in Jefferson County in the Northern District of Alabama and elsewhere, the defendant

ALBERT W. LAPIERRE

did corruptly give, offer, and agree to give anything of value to any person, with intent to influence and reward an agent of Jefferson County, Alabama, which county received federal benefits in excess of \$10,000 in a one-year period, in connection with any business, transaction, and series of transactions of Jefferson County involving anything of value of \$5,000 and more, that is, defendant

ALBERT W. LAPIERRE corruptly offered, gave, and agreed to give merchandise from the store and in the amount described below for each count to Jefferson County, Alabama, Commissioner Larry P. Langford intending to influence and reward him in connection with financial transactions of Jefferson County involving \$5,000 and more.

3. The allegations of paragraphs 1 and 2 above are realleged for each of Counts 55 through 63 below as though fully set forth therein.

| COUNT | DATE | AMOUNT | STORE |
|--------------|-------------------|---------------|--------------|
| 55 | May 26, 2004 | \$2,707.56 | Remon's |
| 56 | August 18, 2004 | \$3,450.00 | Remon's |
| 57 | October 13, 2004 | \$4,250.00 | Remon's |
| 58 | November 19, 2004 | \$1,662.60 | Remon's |
| 59 | January 11, 2005 | \$2,239.97 | Remon's |
| 60 | February 14, 2005 | \$2,800.00 | Remon's |
| 61 | October 6, 2005 | \$5,000.00 | Remon's |
| 62 | December 21, 2005 | \$1,800.00 | Remon's |
| 63 | December 8, 2006 | \$1,000.00 | Remon's |

All in violation of Title 18, United States Code, Sections 666(a)(2) and 2.

Counts Sixty Four through Sixty Eight
Mail Fraud
Title 18, United States Code, Sections 1341, 1346, and 2

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 7 of the Introduction to this Indictment and paragraphs 3 through 7 of Count 6 of this Indictment as though fully set out herein.

Purpose of the Scheme and Artifice

2. From in or about July 2002, and continuing to in or about May 2007, the exact dates being unknown, within Jefferson County in the Northern District of Alabama, and elsewhere, defendants

LARRY P. LANGFORD
and
WILLIAM B. BLOUNT

and others known and unknown to the Grand Jury, aided and abetted by one another, devised and intended to devise a scheme and artifice to defraud Jefferson County, Alabama, and its citizens of the intangible right to Jefferson County, Alabama, Commissioner Larry P. Langford's honest services and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

3. It was a part of the scheme and artifice that defendant **LARRY P. LANGFORD** would and did use his power and influence as President of the

Jefferson County Commission and head of the Department of Finance and General Services to include defendant **WILLIAM B. BLOUNT** and Blount Parrish & Co., Inc., in Jefferson County financial transactions involving billions of dollars and thereby generate millions of dollars in fees for defendant **WILLIAM B. BLOUNT** and his companies.

4. It was a further part of the scheme and artifice that defendant **WILLIAM B. BLOUNT** and his companies would and did pay Albert W. LaPierre hundreds of thousands of dollars in connection with Jefferson County financial transactions.

5. It was a further part of the scheme and artifice that defendant **WILLIAM B. BLOUNT** and Albert W. LaPierre would and did give money to and pay off loans and buy expensive clothing and jewelry for defendant **LARRY P. LANGFORD** to influence and reward him in connection with Jefferson County financial transactions.

6. It was a further part of the scheme and artifice that defendant **LARRY P. LANGFORD** would and did solicit, demand, accept, and agree to accept items of value totaling approximately \$235,000.00 from defendant **WILLIAM B. BLOUNT** and Albert W. LaPierre, intending to be influenced and rewarded in connection with Jefferson County financial transactions.

7. It was a further part of the scheme and artifice that defendants **LARRY P. LANGFORD** and **WILLIAM B. BLOUNT** would and did conceal the payment and receipt of items of value.

THE MAILINGS

8. On or about the date set forth below for each count, in Jefferson County in the Northern District of Alabama, and elsewhere, defendants

LARRY P. LANGFORD
and
WILLIAM B. BLOUNT,

for the purpose of executing the above-described scheme and artifice and attempting to do so, caused a package containing merchandise from the store identified for each count to be to be sent and delivered by interstate carrier to Commissioner Larry P. Langford's county office at 716 Richard Arrington Blvd No., Birmingham, Alabama, 35203.

9. The allegations of paragraphs 1 through 8 above are realleged for each of Counts 64 through 68 below as though fully set forth therein.

| COUNT | DATE | AMOUNT | STORE |
|--------------|-------------------|---------------|--------------|
| 64 | December 10, 2003 | \$1,110.00 | Turnbull |
| 65 | April 14, 2004 | \$3,290.00 | Zegna |
| 66 | July 11, 2004 | \$2,796.00 | Ferragamo |

| | | | |
|----|------------------|-------------|------------|
| 67 | July 13, 2004 | \$1,854.96 | Century 21 |
| 68 | November 9, 2004 | \$12,015.00 | Tourneau |

All in violation of Title 18, United States Code, Sections 1341, 1346, and 2.

Counts Sixty Nine through Eighty
Wire Fraud
Title 18, United States Code, Sections 1343, 1346, and 2

1. The Grand Jury repeats and re-alleges the allegations contained in paragraphs 1 through 7 of Counts 64 through 68 of this Indictment as though fully set out herein.

THE WIRE COMMUNICATIONS

2. On or about the date set forth below for each count, in Jefferson County in the Northern District of Alabama, and elsewhere, defendants

LARRY P. LANGFORD
and
WILLIAM B. BLOUNT,

for the purpose of executing the above-described scheme and artifice and attempting to do so, did transmit and cause to be transmitted in interstate commerce, by means of a wire communication, certain signs and signals, that is, defendants **LARRY P. LANGFORD** and **WILLIAM B. BLOUNT** caused an interstate communication between Alabama and another state to be made on each occasion listed below when defendant **WILLIAM B. BLOUNT** used an

American Express credit card to make a purchase or pay an account for defendant

LARRY P. LANGFORD.

3. The allegations of paragraphs 1 and 2 above are realleged for each of Counts 69 through 80 below as though fully set forth therein.

| COUNT | DATE | AMOUNT | STORE |
|--------------|--------------------|---------------|--------------|
| 69 | April 29, 2004 | \$2,133.00 | Remon's |
| 70 | September 8, 2004 | \$4,050.00 | Remon's |
| 71 | December 29, 2004 | \$11,750.40 | Bromberg |
| 72 | June 30, 2005 | \$3,547.00 | Remon's |
| 73 | October 5, 2005 | \$2,000.00 | Remon's |
| 74 | October 26, 2005 | \$2,500.00 | Remon's |
| 75 | December 21, 2005 | \$2,300.00 | Remon's |
| 76 | March 8, 2006 | \$1,876.00 | Remon's |
| 77 | May 25, 2006 | \$1,000.00 | Remon's |
| 78 | June 20, 2006 | \$1,047.96 | Remon's |
| 79 | September 13, 2006 | \$1,500.00 | Remon's |
| 80 | May 17, 2007 | \$7,536.00 | Remon's |

All in violation of Title 18, United States Code, Sections 1343, 1346, and 2.

Counts Eighty One through Eighty Six
Wire Fraud
Title 18, United States Code, Sections 1343, 1346, and 2

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 7 of the Introduction to this Indictment and paragraphs 3 through 7 of Count 6 of this Indictment as though fully set out herein.

Purpose of the Scheme and Artifice

2. From in or about July 2002, and continuing to in or about May 2007, the exact dates being unknown, within Jefferson County in the Northern District of Alabama, and elsewhere, defendants

LARRY P. LANGFORD
and
ALBERT W. LAPIERRE

and others known and unknown to the Grand Jury, aided and abetted by one another, devised and intended to devise a scheme and artifice to defraud Jefferson County, Alabama, and its citizens of the intangible right to Jefferson County, Alabama, Commissioner Larry P. Langford's honest services and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

3. It was a part of the scheme and artifice that defendant **LARRY P. LANGFORD** would and did use his power and influence as President of the

Jefferson County Commission and head of the Department of Finance and General Services to include William B. Blount and Blount Parrish & Co., Inc., in Jefferson County financial transactions involving billions of dollars and thereby generate millions of dollars in fees for William B. Blount and his companies.

4. It was a further part of the scheme and artifice that William B. Blount and his companies would and did pay defendant **ALBERT W. LAPIERRE** hundreds of thousands of dollars in connection with Jefferson County financial transactions.

5. It was a further part of the scheme and artifice that William B. Blount and defendant **ALBERT W. LAPIERRE** would and did give money to and pay off loans and buy expensive clothing and jewelry for defendant **LARRY P. LANGFORD** to influence and reward him in connection with Jefferson County financial transactions.

6. It was a further part of the scheme and artifice that defendant **LARRY P. LANGFORD** would and did solicit, demand, accept, and agree to accept items of value totaling approximately \$235,000.00 from William B. Blount and defendant **ALBERT W. LAPIERRE** intending to be influenced and rewarded in connection with Jefferson County financial transactions.

7. It was a further part of the scheme and artifice that defendants **LARRY P. LANGFORD** and **ALBERT W. LAPIERRE** would and did conceal the payment and receipt of items of value.

THE WIRE COMMUNICATIONS

8. On or about the date set forth below for each count, in Jefferson County in the Northern District of Alabama, and elsewhere, defendants

LARRY P. LANGFORD
and
ALBERT W. LAPIERRE,

for the purpose of executing the above-described scheme and artifice and attempting to do so, did transmit and cause to be transmitted in interstate commerce, by means of a wire communication, certain signs and signals, that is, defendants **LARRY P. LANGFORD** and **ALBERT W. LAPIERRE** caused an interstate communication between Alabama and another state to be made on each occasion listed below when defendant **ALBERT W. LAPIERRE** used an American Express credit card to make a purchase or pay an account at Remon's Clothiers for defendant **LARRY P. LANGFORD**.

9. The allegations of paragraphs 1 through 8 above are realleged for each of Counts 81 through 86 below as though fully set forth therein.

| COUNT | DATE | AMOUNT |
|--------------|-------------------|---------------|
| 81 | May 26, 2004 | \$2,707.56 |
| 82 | October 13, 2004 | \$4,250.00 |
| 83 | November 19, 2004 | \$1,662.60 |
| 84 | October 6, 2005 | \$5,000.00 |
| 85 | December 21, 2005 | \$1,800.00 |
| 86 | December 8, 2006 | \$1,000.00 |

All in violation of Title 18, United States Code, Sections 1343, 1346, and 2.

Count Eighty Seven
Filing False Tax Return
Title 26, United States Code, Section 7206(1)

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 7 of the Introduction to this Indictment and paragraphs 3 through 7 of Count 6 of this Indictment as though fully set out herein.

2. On or about August 16, 2004, in Jefferson County in the Northern District of Alabama, and elsewhere, defendant

LARRY P. LANGFORD,

a resident of Fairfield, Alabama, did willfully make and subscribe a United States Individual Income Tax Return, Form 1040, for the calender year 2003, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which he did not believe to be

true and correct as to every material matter in that the income tax return reported taxable income of \$238,758.00 and tax of \$57,622.00 whereas, as the defendant then and there well knew and believed, his taxable income and tax for calender year 2003 was substantially in excess of the amounts reported because the income tax return failed to report as income his receipt of \$125,356.73 from William B. Blount, Blount Parrish & Co., Inc., and Albert W. LaPierre.

All in violation of Title 26, United States Code, Section 7206(1).

Count Eighty Eight
Filing False Tax Return
Title 26, United States Code, Section 7206(1)

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 7 of the Introduction to this Indictment and paragraphs 3 through 7 of Count 6 of this Indictment as though fully set out herein.

2. On or about April 15, 2005, in Jefferson County in the Northern District of Alabama, and elsewhere, defendant

LARRY P. LANGFORD,

a resident of Fairfield, Alabama, did willfully make and subscribe a United States Individual Income Tax Return, Form 1040, for the calender year 2004, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which he did not believe to be

true and correct as to every material matter in that the income tax return reported taxable income of \$130,423.00 and tax of \$34,959.00 whereas, as the defendant then and there well knew and believed, his taxable income and tax for calender year 2004 was substantially in excess of the amounts reported because the income tax return failed to report as income his receipt of \$81,419.52 from William B. Blount, Blount Parrish & Co., Inc., and Albert W. LaPierre.

All in violation of Title 26, United States Code, Section 7206(1).

Count Eighty Nine
Filing False Tax Return
Title 26, United States Code, Section 7206(1)

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 7 of the Introduction to this Indictment and paragraphs 3 through 7 of Count 6 of this Indictment as though fully set out herein.

2. On or about April 17, 2006, in Jefferson County in the Northern District of Alabama, and elsewhere, defendant

LARRY P. LANGFORD,

a resident of Fairfield, Alabama, did willfully make and subscribe a United States Individual Income Tax Return, Form 1040, for the calender year 2005, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which he did not believe to be

true and correct as to every material matter in that the income tax return reported taxable income of \$98,818.00 and tax of \$27,404.00 whereas, as the defendant then and there well knew and believed, his taxable income and tax for calender year 2005 was substantially in excess of the amounts reported because the income tax return failed to report as income his receipt of \$22,186.97 from William B. Blount, Blount Parrish & Co., Inc., and Albert W. LaPierre.

All in violation of Title 26, United States Code, Section 7206(1).

Count Ninety
Mail Fraud
Title 18, United States Code, Sections 1341, 1346, and 2

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1, 2, 5, and 6 of the Introduction to this Indictment as though fully set out herein.

2. Mary M. Buckelew was elected to the Jefferson County, Alabama, Commission in November 1990 and served on the Commission until November 2006. Based on her position with the Jefferson County Commission, Mary M. Buckelew owed a duty of loyalty to Jefferson County, Alabama, and its citizens, free from deceit, self-enrichment, concealment, and conflict between her personal interests and the interests of Jefferson County, Alabama. Specifically, as a county commissioner in Alabama, Mary M. Buckelew owed Jefferson County, Alabama,

and its citizens a duty to, among other things: (a) refrain from using her official position or office to obtain personal benefit for herself or a family member, pursuant to Ala. Code § 36-25-5; (b) refrain from soliciting or receiving a thing of value for herself or a family member for the purpose of influencing official action, pursuant to Ala. Code § 36-25-7; and (c) disclose, and not conceal, personal financial interests, the nature and amount of income received, and other material financial information, pursuant to Ala. Code § 36-25-14.

Purpose of the Scheme and Artifice

3. From in or about December 2003, and continuing to in or about November 2006, the exact dates being unknown, within Jefferson County in the Northern District of Alabama, and elsewhere, defendant

WILLIAM B. BLOUNT

and others known and unknown to the Grand Jury, aided and abetted by one another, devised and intended to devise a scheme and artifice to defraud Jefferson County, Alabama, and its citizens of the intangible right to Jefferson County, Alabama, Commissioner Mary M. Buckelew's honest services and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

4. It was a part of the scheme and artifice that, while on trips to New York City with Commissioner Mary M. Buckelew and others related to a Jefferson County bond transaction, defendant **WILLIAM B. BLOUNT** would and did buy expensive items from the Salvatore Ferragamo store and a spa treatment at the Frederic Fekkai Spa for Commissioner Mary M. Buckelew to influence and reward her in connection with Jefferson County financial transactions.

5. It was a further part of the scheme and artifice that Commissioner Mary M. Buckelew would and did accept and agree to accept items of value from defendant **WILLIAM B. BLOUNT** during times when Jefferson County financial transactions were being considered and executed by the Jefferson County Commission.

6. It was a further part of the scheme and artifice that Commissioner Mary M. Buckelew and defendant **WILLIAM B. BLOUNT** would and did conceal the payment and receipt of items of value.

THE MAILING

7. On or about December 11, 2003, in Jefferson County in the Northern District of Alabama, and elsewhere, defendant

WILLIAM B. BLOUNT,

for the purpose of executing the above-described scheme and artifice and

attempting to do so, caused a package containing merchandise from the Salvatore Ferragamo store at 655 Fifth Avenue, New York, New York, to be sent and delivered by interstate carrier to Commissioner Mary M. Buckelew's county office at 716 Richard Arrington Blvd No., Birmingham, Alabama, 35203.

All in violation of Title 18, United States Code, Sections 1341, 1346, and 2.

Count Ninety One
Mail Fraud
Title 18, United States Code, Sections 1341, 1346, and 2

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 6 of Count 90 of this Indictment as though fully set out herein.

THE MAILING

2. On or about November 7, 2004, in Jefferson County in the Northern District of Alabama, and elsewhere, defendant

WILLIAM B. BLOUNT,

for the purpose of executing the above-described scheme and artifice and attempting to do so, caused a package containing merchandise from the Salvatore Ferragamo store at 655 Fifth Avenue, New York, New York, to be sent and delivered by interstate carrier to Commissioner Mary M. Buckelew's county office at 716 Richard Arrington Blvd No., Birmingham, Alabama, 35203.

All in violation of Title 18, United States Code, Sections 1341, 1346, and 2.

Count Ninety Two
Bribery
Title 18, United States Code, Sections 666(a)(2)

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 6 of Count 90 of this Indictment as though fully set out herein.

2. On or about December 11, 2003, in Jefferson County in the Northern District of Alabama and elsewhere, the defendant

WILLIAM B. BLOUNT

did corruptly give, offer, and agree to give anything of value to any person, with intent to influence and reward an agent of Jefferson County, Alabama, which county received federal benefits in excess of \$10,000 in a one-year period, in connection with any business, transaction, and series of transactions of Jefferson County involving anything of value of \$5,000 and more, that is, defendant **WILLIAM B. BLOUNT** corruptly offered, gave, and agreed to give merchandise from Salvatore Ferragamo valued at approximately \$1,449.00 to Commissioner Mary M. Buckelew intending to influence and reward her in connection with financial transactions of Jefferson County involving \$5,000 and more.

All in violation of Title 18, United States Code, Sections 666(a)(2) and 2.

Count Ninety Three
Bribery
Title 18, United States Code, Sections 666(a)(2)

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 6 of Count 90 of this Indictment as though fully set out herein.

2. On or about November 7, 2004, in Jefferson County in the Northern District of Alabama and elsewhere, the defendant

WILLIAM B. BLOUNT

did corruptly give, offer, and agree to give anything of value to any person, with intent to influence and reward an agent of Jefferson County, Alabama, which county received federal benefits in excess of \$10,000 in a one-year period, in connection with any business, transaction, and series of transactions of Jefferson County involving anything of value of \$5,000 and more, that is, defendant **WILLIAM B. BLOUNT** corruptly offered, gave, and agreed to give merchandise from Salvatore Ferragamo in New York City valued at approximately \$1,119.00 to Commissioner Mary M. Buckelew intending to influence and reward her in connection with financial transactions of Jefferson County involving \$5,000 and more.

All in violation of Title 18, United States Code, Sections 666(a)(2) and 2.

Count Ninety Four
Bribery
Title 18, United States Code, Sections 666(a)(2)

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 6 of Count 90 of this Indictment as though fully set out herein.

2. On or about November 9, 2004, in Jefferson County in the Northern District of Alabama and elsewhere, the defendant

WILLIAM B. BLOUNT

did corruptly give, offer, and agree to give anything of value to any person, with intent to influence and reward an agent of Jefferson County, Alabama, which county received federal benefits in excess of \$10,000 in a one-year period, in connection with any business, transaction, and series of transactions of Jefferson County involving anything of value of \$5,000 and more, that is, defendant **WILLIAM B. BLOUNT** corruptly offered, gave, and agreed to give a spa treatment from the Frederic Fekkai Spa in New York City valued at approximately \$1,373.00 to Commissioner Mary M. Buckelew intending to influence and reward her in connection with financial transactions of Jefferson County involving \$5,000 and more.

All in violation of Title 18, United States Code, Sections 666(a)(2) and 2.

Count Ninety Five
Filing False Tax Return
Title 26, United States Code, Section 7206(1)

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 7 of the Introduction to this Indictment and paragraphs 3 through 7 of Count 6 of this Indictment as though fully set out herein.

2. On or about October 15, 2004, in Jefferson County in the Northern District of Alabama, and elsewhere, defendant

ALBERT W. LAPIERRE,

a resident of Birmingham, Alabama, did willfully make and subscribe a United States Individual Income Tax Return, Form 1040, for the calender year 2003, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which he did not believe to be true and correct as to every material matter in that the income tax return reported taxable income of \$102,006.00 and tax of \$37,872.00 whereas, as the defendant then and there well knew and believed, his taxable income and tax for calender year 2003 was substantially in excess of the amounts reported because the income tax return failed to report his receipt of additional taxable income of \$80,777.00.

All in violation of Title 26, United States Code, Section 7206(1).

Count Ninety Six
Filing False Tax Return
Title 26, United States Code, Section 7206(1)

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 7 of the Introduction to this Indictment and paragraphs 3 through 7 of Count 6 of this Indictment as though fully set out herein.

2. On or about October 17, 2005, in Jefferson County in the Northern District of Alabama, and elsewhere, defendant

ALBERT W. LAPIERRE,

a resident of Birmingham, Alabama, did willfully make and subscribe a United States Individual Income Tax Return, Form 1040, for the calender year 2004, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which he did not believe to be true and correct as to every material matter in that the income tax return reported taxable income of \$177,767.00 and tax of \$63,478.00 whereas, as the defendant then and there well knew and believed, his taxable income and tax for calender year 2004 was substantially in excess of the amounts reported because the income tax return failed to report his receipt of additional taxable income of \$95,700.00.

All in violation of Title 26, United States Code, Section 7206(1).

Count Ninety Seven
Filing False Tax Return
Title 26, United States Code, Section 7206(1)

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 7 of the Introduction to this Indictment and paragraphs 3 through 7 of Count 6 of this Indictment as though fully set out herein.

2. On or about October 18, 2006, in Jefferson County in the Northern District of Alabama, and elsewhere, defendant

ALBERT W. LAPIERRE,

a resident of Birmingham, Alabama, did willfully make and subscribe a United States Individual Income Tax Return, Form 1040, for the calender year 2005, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which he did not believe to be true and correct as to every material matter in that the income tax return reported taxable income of \$104,718.00 and tax of \$38,988.00 whereas, as the defendant then and there well knew and believed, his taxable income and tax for calender year 2005 was substantially in excess of the amounts reported because the income tax return failed to report his receipt of additional taxable income of \$28,561.00.

All in violation of Title 26, United States Code, Section 7206(1).

Count Ninety Eight
Filing False Tax Return
Title 26, United States Code, Section 7206(1)

1. The Grand Jury repeats and realleges the allegations contained in paragraphs 1 through 7 of the Introduction to this Indictment and paragraphs 3 through 7 of Count 6 of this Indictment as though fully set out herein.

2. On or about October 19, 2007, in Jefferson County in the Northern District of Alabama, and elsewhere, defendant

ALBERT W. LAPIERRE,

a resident of Birmingham, Alabama, did willfully make and subscribe a United States Individual Income Tax Return, Form 1040, for the calender year 2006, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which he did not believe to be true and correct as to every material matter in that the income tax return reported taxable income of \$120,459.00 and tax of \$44,093.00 whereas, as the defendant then and there well knew and believed, his taxable income and tax for calender year 2006 was substantially in excess of the amounts reported because the income tax return failed to report his receipt of additional taxable income of \$74,968.22.

All in violation of Title 26, United States Code, Section 7206(1).

Count Ninety Nine
Forfeiture Count
Title 18, United States Code, Section 981(a)(1)(C)
Title 28, United States Code, Section 2461(c)

1. Counts One, Six and Seven, Ten through Thirty Six, and Sixty Four through Eighty Six of this Indictment are incorporated by reference herein for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

FORFEITURE

2. As a result of the foregoing offenses alleged in Counts One, Six and Seven, Ten through Thirty Six, and Sixty Four through Eighty Six of this Indictment, the defendant

LARRY P. LANGFORD

shall forfeit to the United States any property constituting or derived from proceeds traceable to said violations committed by the defendant **LARRY P. LANGFORD**. Such forfeitable interests include, but are not limited to the aggregate sum of \$7,623,521.00 and all interest and proceeds derived therefrom.

3. If any of the property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the

defendant **LARRY P. LANGFORD**:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred to, sold to, or deposited with a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant **LARRY P. LANGFORD**, up to the value of the above forfeitable property.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

Count One Hundred
Forfeiture Count
Title 18, United States Code, Section 981(a)(1)(C)
Title 28, United States Code, Section 2461(c)

1. Counts Two, Six, Eight, Thirty Seven through Fifty Four, Sixty Four through Eighty, and Ninety through Ninety Four of this Indictment are incorporated by reference herein for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28,

United States Code, Section 2461(c).

FORFEITURE

2. As a result of the foregoing offense alleged in Counts Two, Six, Eight, Thirty Seven through Fifty Four, Sixty Four through Eighty, and Ninety through Ninety Four of this Indictment, the defendant

WILLIAM B. BLOUNT

shall forfeit to the United States any property constituting or derived from proceeds traceable to said violations committed by the defendant **WILLIAM B. BLOUNT**. Such forfeitable interests include, but are not limited to the aggregate sum of \$7,623,521.00 and all interest and proceeds derived therefrom.

3. If any of the property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant **WILLIAM B. BLOUNT**:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred to, sold to, or deposited with a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or

(5) has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants **WILLIAM B. BLOUNT**, up to the value of the above forfeitable property.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

Count One Hundred One
Forfeiture Count
Title 18, United States Code, Section 981(a)(1)(C)
Title 28, United States Code, Section 2461(c)

1. Counts Two, Six, Eight, Fifty Five through Sixty Three, and Eighty One through Eighty Six of this Indictment are incorporated by reference herein for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

FORFEITURE

2. As a result of the foregoing offenses alleged in Counts Two, Six, Eight, Fifty Five through Sixty Three, and Eighty One through Eighty Six of this Indictment, the defendant

ALBERT W. LAPIERRE

shall forfeit to the United States any property constituting or derived from proceeds traceable to said violations committed by the defendant **ALBERT W. LAPIERRE**. Such forfeitable interests include, but are not limited to the aggregate sum of \$7,623,521.00 and all interest and proceeds derived therefrom.

3. If any of the property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant **ALBERT W. LAPIERRE**:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred to, sold to, or deposited with a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant **ALBERT W. LAPIERRE**, up to the value of the above forfeitable property.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

/s/
Foreperson of the Grand Jury

ALICE H. MARTIN
United States Attorney

/s/
GEORGE A. MARTIN, JR.
Assistant United States Attorney

/s/
TAMARRA MATTHEWS JOHNSON
Assistant United States Attorney

/s/
SCARLETT M. SINGLETON
Assistant United States Attorney