

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

**BILL OF INFORMATION FOR PROVIDING A FALSE STATEMENT TO AN
AGENCY OF THE UNITED STATES**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
DONALD HOWARD	*	VIOLATION: 18 U.S.C. § 1001(a)(2)
	*	
*	*	*

The United States charges that:

COUNT 1

A. At all material times herein:

1. The defendant, **DONALD HOWARD**, was a supervisory petroleum engineer for the Minerals Management Service (“MMS”), a division of the United States Department of Interior, the federal agency responsible for regulating oil and gas operations on leases of federal property.

2. The defendant, **DONALD HOWARD**, was a Regional Supervisor of MMS's field operations and his official duties included regulating oil and gas operations on federal leases in the Gulf of Mexico Region.

3. As a MMS Regional Supervisor, **DONALD HOWARD**, was required to complete, certify and file a truthful Executive Branch Confidential Financial Disclosure Report (*United States Office of Governmental Ethics Form-450*) annually. Gifts and travel reimbursements received from a source in excess of two hundred and eighty-five dollars per year must be disclosed on this report.

4. This financial disclosure report provided the Executive Branch of the United States government with the mechanism to determine whether actual or potential conflicts of interest existed between **DONALD HOWARD** and the business activities he regulated.

B. On or about October 22, 2005, in the Eastern District of Louisiana, the defendant, **DONALD HOWARD**, in a matter within the jurisdiction of the Department of Interior, an agency of the United States government, knowingly and willfully made a false, fictitious and fraudulent material statement and representation, by representing in an Executive Branch Confidential Financial Disclosure Report for Fiscal Year 2004 that he had not received any gifts or travel from any one

source in excess of two hundred and eighty-five dollars, when in fact he received out-of-state travel valued in excess of two thousand dollars from a contractor which provided services within his area of supervision, in violation of Title 18, United States Code, Section 1001(a)(2).____

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New Orleans, Louisiana
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