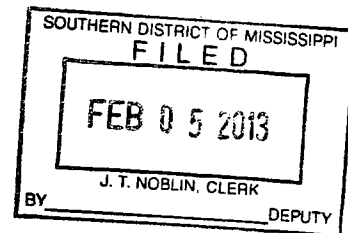


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. *3:13CR17DCB-FKB*

BRUCE BARLOW

18 U.S.C. § 371
18 U.S.C. § 1951(a)
18 U.S.C. § 666(a)(1)(B)
18 U.S.C. § 1512(b)(1)

The Grand Jury charges:

At all times relevant to this indictment:

1. The City of Mendenhall, Mississippi, was a political subdivision of the State of Mississippi and as such was a local government agency as that term is defined in Section 666(d), Title 18, United States Code, and which received benefits in excess of \$10,000 in a one year period under Federal programs providing Federal assistance to the City.

2. The Mendenhall Police Department was a law enforcement agency in Simpson County, Mississippi, whose function, among other things, was to investigate crimes committed in Mendenhall, Mississippi.

3. Defendant **BRUCE BARLOW** was the Chief of Police for the Mendenhall Police Department, and as such was an agent of the City of Mendenhall, Mississippi, as that term is defined in Section 666(d), Title 18, United States Code.

COUNT 1

4. The allegations contained in paragraphs 1 through 3 of this indictment are realleged and incorporated by reference as though fully set forth herein.

5. From in or about March 2010 through in or about July 2010, in Simpson County in the Jackson Division of the Southern District of Mississippi, and elsewhere, the defendant, **BRUCE BARLOW**, did knowingly and intentionally combine, conspire, confederate, and agree with persons known and unknown to the Grand Jury, to commit one or more of the following offenses:

- A. To knowingly obstruct, delay, or affect commerce or the movement of any article or commodity in commerce, by extortion, in violation of Section 1951(a), Title 18, United States Code.
- B. To knowingly and corruptly solicit and demand for the benefit of any person, anything of value from any person, intending to be influenced or rewarded in connection with any business, transaction, or series of transactions of such organization, government, or agency involving any thing of value of \$5,000 or more, in violation of Section 666(a)(1)(B), Title 18, United States Code.

6. It was the object of the conspiracy that defendant, **BRUCE BARLOW**, and others known and unknown to the Grand Jury, would conduct traffic stops of individual victims traveling in, around and through Mendenhall, Mississippi, detain and sometimes arrest the victims, charging some victims with various crimes, and subsequently extort from these victims money or property in return for releasing the victims and/or reducing or dismissing the criminal charges against these victims.

The manner and means by which the defendant and others known and unknown to the Grand Jury sought to accomplish the objective of the conspiracy included, among other things, the following:

7. Defendant **BARLOW**, as Chief of the Mendenhall Police Department, with responsibility over officers and employees of the police department, would instruct Mendenhall police officers to pull people over and find ways to get access into and search

people's vehicles.

8. Defendant **BARLOW** would also instruct his officers to seize cash at every arrest, including money from people arrested for misdemeanor charges.

9. Defendant **BARLOW** also instructed others known and unknown to the Grand Jury to lure drivers to Mendenhall in order for such drivers to be pulled over by Mendenhall Police with the intent to arrest or detain them and then seize their vehicle, possessions and/or money, as well as extort the victims for additional money in order to be released from custody and/or have their criminal charges dismissed or reduced.

10. After being arrested or detained, Defendant **BARLOW** would approach victims who had been arrested or detained by Mendenhall police officers and offer to have their charges lessened or dismissed and be released from jail if such victims would forfeit their money or property and in some cases give additional money to Defendant **BARLOW**, purporting to be contributions to the police department's "drug fund."

11. Defendant **BARLOW** or others known and unknown to the Grand Jury would create a receipt at the Mendenhall Police Department for such money allegedly contributed for the police department's "drug fund," and, if such money were in the form of cash, that cash would rarely be deposited into the "drug fund."

In furtherance of the conspiracy and to carry out its objectives, the following overt acts were committed:

A. Victim "E.B."

12. In or about April 2010, Defendant **BARLOW** solicited and accepted a cash payment, purportedly for the police department's "drug fund" and supposedly to repair a

damaged police car, in exchange for "E.B.," an individual who had been arrested by Mendenhall police in March 2010, being released and his charges being dismissed.

13. In or about July 2010, Defendant **BARLOW** solicited property and money but ultimately accepted a cash payment from the mother of "E.B.," an individual who had been arrested by the Mendenhall police, in exchange for "E.B." being released and his charges being dismissed.

B. Victim "F.N." #1

14. In or about February 2010, Defendant **BARLOW** met with "F.N." #1, an individual who had been arrested by the Mendenhall police, and the aunt of "F.N." #1, and **BARLOW** solicited and accepted a cash payment from the aunt of "F.N." #1 in exchange for "F.N." #1 being released and his charges being dismissed.

C. Victim "K.F."

15. On or about April 12, 2010, Defendant **BARLOW** arrested "K.F." after Defendant **BARLOW** had a person known and unknown to the Grand Jury lure "K.F." to Mendenhall so that **BARLOW** could arrest him, attempt to seize his vehicle and extort money from him in return for his being released from police custody.

16. On or about July 12, 2010, Defendant **BARLOW** told "K.F." to forfeit the vehicle he was driving and to come up with a couple thousand dollars in cash and the charges against "K.F." would be dropped and "K.F." would be released.

D. Victim "F.N." #2

17. On or about July 6, 2010, Defendant **BARLOW** detained "F.N." #2 after a traffic stop and confiscated over \$6,000 in cash from "F.N." #2, as well as personal property

and other items being transporting by "F.N."

18. A few days after July 6, 2010, Defendant **BARLOW** created a police report in the name of another Mendenhall police officer concerning the July 6, 2010, traffic stop of "F.N." #2.

19. On or about July 12, 2010, Defendant **BARLOW** required "F.N." #2 to forfeit over \$6,000 in cash and some of the property he was transporting in exchange for Defendant **BARLOW** releasing "F.N." #2 from custody and allegedly dismissing his charges.

20. After learning of a potential investigation, Defendant **BARLOW** instructed an individual known to the Grand Jury to come to the Mendenhall Police Department on August 6, 2010, in order to assist Defendant **BARLOW** in going through the confiscated belongings of "F.N." #2 in order to create and back-date an inventory of items kept by the Mendenhall Police Department, since an inventory was not completed on the day of the arrest.

D. Other Overt Acts

21. After learning on or around July 26, 2010, of a potential investigation into his activities, Defendant **BARLOW** began taking cash payments he had received purportedly for the police department's "drug fund" across the street to Mendenhall City Hall for deposit according to standard operating procedures.

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

COUNTS 2-3

22. The allegations contained in paragraphs 1 through 3 of this indictment are realleged and incorporated by reference as though fully set forth herein.

23. That beginning and continuing through in or about the dates listed below, in

Simpson County in the Jackson Division of the Southern District of Mississippi, the defendant, **BRUCE BARLOW**, did knowingly obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by extortion, as those terms are defined in Section 1951, Title 18, United States Code, in that Defendant **BARLOW** obtained money and property from victims listed below, persons known to the Grand Jury, with the consent of such person, induced by defendant **BARLOW** under color of official right and through wrongful use of fear:

Count	Dates	Victim
2	April 2010 through July 2010	"K.F."
3	July 2010	"F.N." #2

All in violation of Section 1951(a), Title 18, United States Code.

COUNTS 4-7

24. The allegations contained in paragraphs 1 through 3 of this indictment are realleged and incorporated by reference as though fully set forth herein.

25. That beginning and continuing through in or about the dates listed below, in Simpson County in the Jackson Division of the Southern District of Mississippi, the defendant, **BRUCE BARLOW**, did corruptly solicit and demand for the benefit of any person, things of value from a person, that is from the victims listed below, intending to be influenced and rewarded in connection with a transaction and series of transactions of Mendenhall Police Department involving \$5,000 or more:

Count	Dates	Victim
4	February 2010	"F.N." #1


5	April 2010 through July 2010	"K.F."
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5	April 2010 through July 2010	"K.F."
6	July 2010	"F.N." #2
7	July 2010	"E.B."

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

COUNT 8

From in or about August 2010 through in or about September 2010, in Simpson County in the Jackson Division of the Southern District of Mississippi, the defendant, **BRUCE BARLOW**, did knowingly attempt to intimidate, threaten and corruptly persuade "B.B.," a person whose identity is known to the Grand Jury, by instructing "B.B." to provide false information to the Grand Jury regarding the matters to be inquired about, with the intent to influence the testimony of "B.B." in a Federal Grand Jury proceeding, in violation of Section 1512(b)(1), Title 18, United States Code.



 GREGORY K. DAVIS
 United States Attorney

A TRUE BILL:
 S/SIGNATURE REDACTED
 Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 5th day of February, 2013.



 UNITED STATES MAGISTRATE JUDGE