

29<sup>th</sup> JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. CHARLES  
STATE OF LOUISIANA

CASE NO. 82,841

DIVISION:

FILE  
ST. CHARLES PARISH

DOCKET NO:

TAMMY GLOVER, as the Court Appointed Administratrix of the Succession of  
DANELLE KEIM MCGOVERN,

PLAINTIFF

VERSUS

HARRY MOREL and JOHN LANDRY, III,  
DEFENDANTS

FILE FOR JURY  
CLERK OF COURT  
ST. CHARLES PARISH  
2017 APR 10 PM 3:57  
Lupita M. H.

FILED: \_\_\_\_\_ DEPUTY CLERK: \_\_\_\_\_

**PETITIONER'S COMPLAINT FOR DAMAGES FOR DEFENDANTS'**

**RACKETEERING ENTERPRISE AND FRAUD**

NOW INTO COURT, through undersigned counsel, comes PETITIONER, TAMMY GLOVER who respectfully brings this civil petition for damages as the court appointed administratrix of the succession of Danelle Keim McGovern, pursuant to Louisiana's Racketeering Act, La. R.S. 15:1351-56, ("RICO") and fraud pursuant to Louisiana Civil Code Article 1953 because Defendants HARRY J. MOREL, former District Attorney of St. Charles Parish, in concert with JOHN LANDRY III, local businesses in St. Charles Parish and other as yet unnamed individuals, extorted sexual favors from Danelle Keim McGovern and at least twenty-one other women in exchange for reducing or dismissing their criminal charges and helping them with their legal problems. Petitioner brings this petition on behalf of her daughter, Danelle, who she describes as "the hero of St. Charles Parish" for standing up to "the most powerful man in St. Charles Parish"<sup>1</sup> after the 67-year-old District Attorney Harry Morel sexually assaulted the 24-year-old Danelle Keim McGovern and continued to sexually abuse her until her death in 2013.<sup>2</sup>

<sup>1</sup> Michael Kunzelman, *Called a sex predator, powerful ex-prosecutor faces prison*, AP/The Big Story (Aug. 16, 2016), available at <http://bigstory.ap.org/article/ae1a6d2a8dba4f869b42d5cf092487e4/called-sex-predator-powerful-ex-prosecutor-faces-prison> (last visited Apr. 10, 2017)

<sup>2</sup> Littice Bacon-Blood, *Listen to Harry Morel accuser's call: 'I need the cops out here'*, Nola.com (Apr. 21, 2016) [http://www.nola.com/crime/index.ssf/2016/04/i\\_need\\_to\\_make\\_a\\_sexual\\_harass.html](http://www.nola.com/crime/index.ssf/2016/04/i_need_to_make_a_sexual_harass.html)

From at least 2001 through 2013, as documented by the Federal Bureau of Investigation and the St. Charles Parish Sheriff's Office, Defendant MOREL used his position of power as the District Attorney and Assistant District Attorney of St. Charles Parish to solicit sex from vulnerable women and used others to assist him in his sex extortion enterprise by falsifying court documents, obstructing justice and subverting the legal system. (FBI Twisted Justice Report, *attached as* Exhibit P-1. Hereinafter referred to as "FBI Report") Petitioner Tammy Glover on behalf of her deceased daughter, Danelle Keim McGovern, brings this lawsuit seeking damages for the injuries that Defendants have caused, including treble damages under RICO and any other damages this court may allow under RICO the Defendants and deter others from engaging in similar abuses of power. Petitioner also hopes that this complaint will put an end to the fear that many women and their families have been living with for decades because of former District Attorney Harry Morel's sexual abuse.

## **I. JURISDICTION**

Venue is proper in St. Charles Parish pursuant to articles 42 and 74 of the Louisiana Code of Civil Procedure.

## **II. PARTIES**

### **(Plaintiff)**

1. **TAMMY GLOVER** is an adult citizen of the State of Louisiana and is domiciled in the PARISH of ST. CHARLES. (*See* Affidavit of Tammy Glover, *attached as* Exhibit P2) She is the court appointed administratrix and lawful representative for the succession of **DANELLE KEIM MCGOVERN** and GLOVER is appearing herein on behalf of KEIM's estate and particularly, for the minor child known as T.M. who was the only child of/and the sole surviving heir of KEIM. PETITIONER GLOVER is the mother of the decedent KEIM and she brings this action pursuant to her authority under In re Succession of Danelle Keim McGovern, No. P-11,831-E (29<sup>th</sup> JDC Sep. 26, 2016). (*See* Letters of Administration *attached as* Exhibit P3).

### **(Defendants)**

3. DEFENDANT HARRY J. MOREL, JR. is a person of the full age of majority and resident of the State of Louisiana, domiciled in ST. CHARLES Parish, who was the duly elected District Attorney of St. Charles Parish from January 1979 through May 31, 2012 and the Assistant District

Attorney of St. Charles Parish from May 31, 2012 until January 11, 2013, and who is sued in his individual capacity for establishing and engaging in a RICO criminal enterprise whose primary purpose was his sexual gratification, as more fully described below. MOREL is responsible for his actions and his resultant liability for abusing his power as the elected District Attorney of St. Charles Parish and later Assistant District Attorney. He abused the power of that office to sexually abuse, solicit, harass, extort, bribe, and intimidate KEIM, and many other women, as well as commit numerous other crimes in his RICO enterprise all while acting within the scope of his employment.

4. DEFENDANT JOHN LANDRY, III is a person of the full age of majority and resident of the State of Louisiana, domiciled in ST. CHARLES Parish, who was at all times pertinent hereto an officer of the Louisiana non-profit business entity known as Luling-Boutte Lions Club, chairman of the St. Charles Parish Hospital Board, and he was also an officer of the Louisiana business known as John Joseph Landry, Inc., who used his positions in such businesses to conspire with MOREL to illegally gain favor with and from MOREL by participating in MOREL's sex extortion enterprise, which is more fully described below. Defendant John Landry is sued in his individual capacity.

5. All other as yet unknown defendants are sued individually for their participation in Defendant MOREL's RICO enterprise.

### **III. STATEMENT OF FACTS**

#### **A. Structure of Harry Morel's RICO scheme to solicit sex from women defendants in exchange for leniency in their criminal cases.**

6. Defendant Harry J. Morel served as the District Attorney of St. Charles Parish for more than three decades - from January 1979 to May 31, 2012. He stepped down in May 2012 and became an Assistant District Attorney in the same office because his daughter, Michele Morel, was running for (and was subsequently elected) district judge in the same parish.

7. As District Attorney and later as an Assistant District Attorney for St. Charles Parish, MOREL was responsible for prosecuting individuals with criminal and traffic offenses. As the District Attorney, MOREL had the authority and discretion to, among other things, make bail recommendations, make sentence recommendations and bring, dismiss, forego, or reduce charges.

(Harry Morel Plea Agreement in *United States v. Harry J. Morel, Jr.*, No. 2:16-cr-00050 (Ed. La. March 31, 2016) at 1-2, *attached as Exhibit P4*)<sup>3</sup>

8. According to the FBI Report (Ex. P1) released publicly in response to a St. Charles Parish Sheriff's Office public records request, the FBI had been investigating MOREL since at least as early as 2001 when "Witness 8" contacted the FBI because MOREL had asked to meet her when offering to help her with her DWI charge in exchange for sexual favors, she believed.<sup>4</sup>

9. Although the FBI closed W8's case after no further evidence developed, they reopened their investigation into MOREL in 2009 after "Witness 12" contacted the St. Charles Parish Sheriff's Office, who then referred her to the FBI. Witness 12 told the FBI that MOREL met with her four times, offering to reduce the cost of her ticket in exchange for sex.<sup>5</sup> MOREL asked her to go to his camp in Mississippi, said they could go "play," and after reducing the cost of her ticket continued to suggest that they could "go do something" after her case resolved.<sup>6</sup> After Witness 12 refused MOREL's sexual advances, MOREL denied her help with her friend's case and her friend was sentenced to several years in prison.<sup>7</sup>

10. The FBI Report noted that over one hundred witnesses were identified during its investigation of MOREL and thirty-nine polygraph examinations were given.<sup>8</sup> As a result of the FBI's investigation, twenty-two women reported that MOREL had solicited them for sex in exchange for assisting them or their family members with their criminal cases.<sup>9</sup> Five women admitted to oral sexual contact with MOREL (one with an element of force); eight women admitted to other sexual physical contact with MOREL, nine admitted that MOREL solicited sex from them, and all of these women reported that MOREL's sexual solicitations were made in connection with his position as a public official and all of these women were seeking help with criminal charges in St. Charles Parish.<sup>10</sup>

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<sup>3</sup> See also US DOJ PRESS RELEASE: Former St. Charles District Attorney Harry Morel Pleads Guilty to Obstruction of Justice, Apr. 20, 2016, *available at* <https://www.justice.gov/usao-edla/pr/former-st-charles-district-attorney-harry-morel-pleads-guilty-obstruction-justice> (last visited Apr. 7, 2017)

<sup>4</sup> FBI PowerPoint, *Twisted Justice*, at 5. The FBI Report identified witnesses by number to protect their anonymity.

<sup>5</sup> *Id.* at 6.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.* at 7.

<sup>8</sup> *Id.* at 59.

<sup>9</sup> *Id.* at 84.

<sup>10</sup> *Id.* at 61-84.

11. While investigating MOREL, the FBI also interviewed JOHN LANDRY, III, who confessed to falsifying community service letters per MOREL's request for several years.<sup>11</sup> In return, MOREL "took care of" LANDRY's customers' traffic tickets for fifteen years.<sup>12</sup>

12. In their respective investigation, the FBI and St. Charles Parish Sheriff's Office revealed a pattern of illegal activity carried out by MOREL in partnership with LANDRY whereby LANDRY falsified documents to assist MOREL in reducing sentences, charges, and setting up pretrial diversion arrangements for the women defendants he pursued for sexual favors.<sup>13</sup>

13. On several occasions, according to the FBI Report, MOREL transmitted falsified court documents to other parish courts in exchange for sexual favors from women defendants in St. Charles Parish who were predominantly charged with drug and traffic related offenses.<sup>14</sup>

14. As the FBI reported, when women defendants resisted MOREL's sexual advances and requests, he threatened them or their loved ones, physically forced himself on many of them, bribed them, and coerced them to comply with his sexual demands.<sup>15</sup> Specific examples from the FBI Report include:

- W2 went to Morel for help with a charge against a third party. He pushed her against the wall and kissed her. She refused him. Later, she went again for help. He grabbed her, held her, and kissed her during that visit.<sup>16</sup>
- W3 asked MOREL for help with a friend's charges. When he asked her for sex, she arranged for him to have sex with another witness.<sup>17</sup>
- W4 asked for MOREL's help on at least three occasions. She had sex with him and MOREL paid her. She also had oral sex with him on two occasions for his help with other charges.<sup>18</sup>
- When W6 asked for MOREL's help with a non-criminal legal issue, MOREL grabbed her by the neck and forced her to perform oral sex on him. When she refused to perform oral sex on him again, he stopped his office's assistance.<sup>19</sup>
- MOREL dropped W7's criminal charge and helped her get a substantial portion of her bond money returned to her after she arranged for another woman to have sex with him. MOREL also asked W7 to do a favor for his friend.<sup>20</sup>
- MOREL unzipped his pants and forced W9's face into his lap after she asked for his help on behalf of another person.<sup>21</sup>

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<sup>11</sup> *Id.* at 48.

<sup>12</sup> *Id.* See also Della Hasselle, *St. Charles Council Accepts John Landry's Resignation From Hospital Board*, The Advocate (Oct. 3, 2016), available at [http://www.theadvocate.com/new\\_orleans/news/politics/article\\_67761a0e-8997-11e6-8197-23bc98eeb3f7.html](http://www.theadvocate.com/new_orleans/news/politics/article_67761a0e-8997-11e6-8197-23bc98eeb3f7.html) (last visited Apr. 7, 2017).

<sup>13</sup> FBI Report at 48.

<sup>14</sup> See generally FBI Report.

<sup>15</sup> See e.g., Anne Thibodeaux, *Former St. Charles Parish DA headed to prison*, St. Charles Herald Guide, (Sep. 26, 2016) available at <http://www.heraldguide.com/details.php?id=17540> (last visited Apr. 10, 2017) (quoting from numerous women and their family members who wrote to United States District Judge Engelhardt about the abuse MOREL inflicted upon them and their community for years in advance of MOREL's sentencing hearing).

<sup>16</sup> *Id.* at 64.

<sup>17</sup> *Id.* at 65.

<sup>18</sup> *Id.* at 66.

<sup>19</sup> *Id.* at 68.

<sup>20</sup> *Id.* at 69.

<sup>21</sup> *Id.* at 71.

- MOREL asked W14 to meet with him about her charge and when she did he forced her to put his penis in her mouth. He did this again on another occasion when giving her assistance with another case. MOREL shoved W14 on top of desk and got on top of her when she asked for help with another charge.<sup>22</sup>
- MOREL kissed and groped W15 when she met him with another woman. She later went to MOREL for help with a non-criminal legal issue.<sup>23</sup>
- MOREL prevented W16 from being arrested after he performed oral sex on her.<sup>24</sup>
- MOREL offered to help W17 with a charge in another jurisdiction and when she refused, he did not help her.<sup>25</sup>
- MOREL helped W18 bond her friend out of jail and then groped her in his office and asked her for sex.<sup>26</sup>
- MOREL groped W19 after she met him through another witness and sought help with a criminal charge. He asked to meet her for lunch and when she refused he only partially helped her with her charge.<sup>27</sup>
- MOREL grabbed W22's breasts when she visited him about a friend's charge. After refusing his sexual advances her friend was prosecuted.<sup>28</sup>

15. When MOREL believed that he was being investigated for his illegal actions, he instructed another witness, now deceased Plaintiff Danelle Keim McGovern, to destroy a memory card containing photographic evidence of two of his and KEIM's prior meetings.<sup>29</sup> He instructed KEIM to destroy the evidence although he believed that he was under FBI investigation.<sup>30</sup>

16. Upon information and belief, MOREL also used his daughter's position as district judge to try to conceal evidence of his improper interactions with KEIM.

17. For example, on March 1, 2013, St. Charles Parish Clerk of Court employee Tiffany Dewhirst submitted a judicial complaint against MOREL's daughter, Judge Michele Morel who was then a judge in the 29<sup>th</sup> Judicial District Court, for threatening and berating Ms. Dewhirst because she had supplied Nola.com/The Times Picayune with public court records pertaining to a criminal matter involving KEIM's then-boyfriend FALCON.<sup>31</sup>

18. As stated in her letter of complaint to the Louisiana Supreme Court's Judiciary Commission:

When Dewhirst explained that she was only doing her job and that the records in question are public, and asked why Morel hadn't brought up the issue sooner, the judge replied that she "had been so f\*\*king pissed for the past two weeks" that she "would have chewed [Dewhirst's] f\*\*king head off."

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<sup>22</sup> *Id.* at 76.

<sup>23</sup> *Id.* at 77.

<sup>24</sup> *Id.* at 78.

<sup>25</sup> *Id.* at 79.

<sup>26</sup> *Id.* at 80.

<sup>27</sup> FBI Report at 81.

<sup>28</sup> *Id.* at 84.

<sup>29</sup> *Id.* at 49-51; *see also* Harry Morel Plea Agreement, Exhibit P3. Morel did not turn over the memory card to the DOJ despite their repeated requests until one month after KEIM's death on February 8, 2013. *See* FBI Report at 56.

<sup>30</sup> *See* Harry Morel Plea Agreement at 8.

<sup>31</sup> Juliet Linderman, *Court employee files complaint against St. Charles judge whose father is at the center of an FBI probe*, Nola.com (Mar. 13, 2013) [www.nola.com/crime/index.ssf/2013/03/court\\_employee\\_files\\_complaint.html](http://www.nola.com/crime/index.ssf/2013/03/court_employee_files_complaint.html) (last visited Apr. 7, 2017); *see also* Kyle Barnett, *Ethics complaint filed against Judge Michele Morel*, Herald Guide.com (Mar. 14, 2013), available at <http://www.heraldguide.com/details.php?id=12205> (last visited Apr. 8, 2017).

(See Ms. Tiffany Dewhirst's Letter of Complaint *attached as Exhibit P5*.) Ms. Dewhirst told Nola.com reporters Judge Morel had also told her that she also would have "shoved [Dewhirst's head] up [Dewhirst's] a\*\*."<sup>32</sup> "I got the feeling she was trying to intimidate me, but it didn't work."<sup>33</sup>

19. The United States Department of Justice (DOJ) approved RICO charges against MOREL for at least thirty racketeering acts (solicitations of sexual bribes in violation of state law and federal obstruction of justice acts).<sup>34</sup> In a press conference on April 20, 2016, former United States Attorney Kenneth Polite stated about Harry Morel, "By title he was the embodiment of justice, the elected district attorney of St. Charles Parish for over 30 years, [h]owever, in the darkness of his heart he was something else entirely: a man who perverted his position of power to take sexual advantage of desperate women who needed help, and he did this over and over again." MOREL was not, however, prosecuted under RICO.<sup>35</sup>

#### **B. MOREL's sexual extortion of Danelle Keim McGovern**

20. On several occasions prior to April 16, 2010, MOREL, while acting in his capacity as District Attorney, came into contact with KEIM and he knew that she suffered from an addiction to drugs.

21. Upon information and belief, on April 16, 2010, KEIM called MOREL, seeking help because she was charged on March 26, 2010, with a violation of LA RS 14:98, Driving While Intoxicated.

22. Upon information and belief, on April 16, 2010, at approximately 4:00 pm, MOREL went to KEIM's home at 408 East Club Drive, Apartment I, St. Rose, Louisiana, under the pretense that he would help her with her DWI charge.

23. In a 911 phone call KEIM made on April 16, 2010, she stated that MOREL had sexually assaulted her at her home, by forcing himself on her, kissing her and physically touching her anus

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<sup>32</sup> See also Juliet Linderman, *Court employee files complaint against St. Charles judge whose father is at the center of an FBI probe*, Nola.com (Mar. 13, 2013).

<sup>33</sup> *Id.*

<sup>34</sup> FBI Report at 85.

<sup>35</sup> *Id.* at 85.

and genitals, and attempting to get her to undress. He also attempted to perform oral sex on her. (See 911 Phone Call, *attached as Exhibit P6*)

24. KEIM reported MOREL's sexual assault to the St. Charles Parish Sheriff's Office because she was afraid that MOREL would cause her bodily harm and continue to try to have sex with her.<sup>36</sup>

25. The St. Charles Parish Sheriff's Office immediately referred KEIM to the Federal Bureau of Investigation (FBI) New Orleans Office, who had been conducting a criminal investigation of MOREL since 2001.

26. Upon information and belief, MOREL continued to extort KEIM for sexual favors through repeatedly contacting her, and exerted control over her by threatening her with bodily harm, threatening to have her child taken away from her, and threatening to have her imprisoned if she reported MOREL's demands for sex to anyone.

27. From the first time MOREL sexually assaulted KEIM on April 16, 2010 until her death on February 9, 2013, MOREL continued to demand sexual favors from KEIM, he continued to demand a sexual relationship with her, and he sexually assaulted her on multiple occasions, the last known incident occurring on October 11, 2012.<sup>37</sup>

28. MOREL used his position of power as the parish District Attorney and then Assistant District Attorney, as well as his daughter's position as Judge in the parish, to assist KEIM with her legal matters, including upon information and belief, assisting her with getting custody of and child support for her minor son T.M., *see McGovern v. McGovern*, Case No. #74,673 (29<sup>th</sup> Judicial District Court), and leniency for her boyfriend FALCON, in exchange for sexual favors from KEIM.

29. On July 1, 2010 MOREL placed KEIM on pre-trial intervention for her 2010 DWI.<sup>38</sup> However, KEIM never participated in or completed any of the requirements for the program.<sup>39</sup> Despite her not completing any of the requirements in the pre-trial intervention program, MOREL closed KEIM's case on August 24, 2010.<sup>40</sup>

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<sup>36</sup> See Tammy Glover Affidavit, Exhibit P2.

<sup>37</sup> FBI Report at 44.

<sup>38</sup> *Id.* at 9.

<sup>39</sup> *Id.* at 9-10.

<sup>40</sup> Harry Morel Plea Agreement, at 2.



30. MOREL used the arrest of KEIM's then boyfriend ERROL FALCON, JR., to attempt to extort sex from KEIM in exchange for leniency in the matter of STATE v. ERROL FALCON, JR., which was a St. Charles Parish (29<sup>th</sup> Judicial District Court) case, and this extortion continued upon information and belief until KEIM's death.

31. On July 4, 2011, KEIM telephoned MOREL to ask for his help with FALCON's pending charges in St. Charles Parish as well as a DWI she had been charged with in Lafourche Parish.<sup>41</sup> She explained that her boyfriend would cooperate with law enforcement in exchange for leniency.<sup>42</sup> MOREL asked KEIM to meet him at the courthouse to talk in person.<sup>43</sup> FALCON followed KEIM there and took photographs of MOREL's and KEIM's vehicles in the parking lot.<sup>44</sup>

32. During that meeting MOREL asked KEIM for sexual favors and whether she was on "the pill" and when KEIM said she was not, MOREL said that was not a good thing.<sup>45</sup> MOREL felt her breasts and kissed her.<sup>46</sup> KEIM managed to avoid MOREL's sexual advances by saying that she thought someone was in the courthouse and MOREL made KEIM agree to meet him at another office.<sup>47</sup> KEIM called her boyfriend to let him know that she and MOREL were relocating to a satellite office of the District Attorney's Office.<sup>48</sup> FALCON followed them to that building and took photographs of each of their vehicles at that location as well.<sup>49</sup>

33. KEIM reported the following to the FBI, which was included in their report to the St. Charles Parish Sheriff's Office, as follows:<sup>50</sup>

- During the meeting at the satellite office, MOREL told KEIM that she could only ask him questions about her boyfriend's case if he could touch her sexually.
- MOREL felt KEIM's breasts in exchange for answering her first question, then put his hands in her pants, and placed his erect penis against her body.
- MOREL asked KEIM to touch his penis and she told him that she was menstruating.
- MOREL told her he wanted to smell her menstruation.
- MOREL claimed that he would be quick if they had sex.
- MOREL then asked KEIM if she wanted to get a hotel room, whereupon KEIM made up an excuse to leave.

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<sup>41</sup> *Id.*

<sup>42</sup> *Id.*

<sup>43</sup> *Id.*

<sup>44</sup> *Id.*

<sup>45</sup> FBI Report at 12.

<sup>46</sup> *Id.*

<sup>47</sup> *Id.*

<sup>48</sup> Harry Morel Plea Agreement at 2.

<sup>49</sup> *Id.*

<sup>50</sup> FBI Report at 14-15.

34. On July 8, 2011, MOREL asked KEIM to meet him at a daiquiri shop and then in his vehicle, whereupon he asked her to touch him sexually.<sup>51</sup>

35. MOREL then attempted to extort KEIM for sex by saying that he was doing everything for her, but he was not getting satisfied.<sup>52</sup>

36. MOREL told KEIM that he was thinking of a sentence for FALCON, including 7 years and 5 years.<sup>53</sup>

37. MOREL then exposed himself in front of KEIM and he began masturbating while sitting next to her in his vehicle.<sup>54</sup>

38. In August of 2011, KEIM was arrested on theft charges in St. Charles Parish and the FBI and St. Charles Parish Sheriff's Office helped to get her into a residential drug treatment program.<sup>55</sup> After that, KEIM agreed to record her conversations with MOREL for the FBI.<sup>56</sup>

39. In the spring of 2012 MOREL's daughter, Michele Morel, was running for district judge for the 29<sup>th</sup> Judicial District Court and MOREL decided to step down as District Attorney, becoming an Assistant District Attorney.

40. In a meeting on May 29, 2012, two days before stepping down as District Attorney, MOREL offered to help KEIM with outstanding traffic tickets and a DWI in Lafourche Parish.<sup>57</sup> MOREL said he had been afraid of calling KEIM, which FBI agents noted was most likely a reference to rumors about KEIM cooperating with the FBI.<sup>58</sup>

41. During a recorded conversation with MOREL on June 21, 2012, MOREL contacted KEIM and offered to help her with her Lafourche Parish charges.<sup>59</sup> He arranged for a lawyer in Lafourche Parish to handle her DWI charge there.<sup>60</sup> On June 22, 2012, KEIM pleaded guilty to DWI in the Louisiana 17<sup>th</sup> Judicial District Court, Lafourche Parish.<sup>61</sup> She was sentenced to five months in the parish jail and ordered to pay a fine of \$750.00.<sup>62</sup> However, KEIM's jail sentence was suspended and she was placed on unsupervised probation for one year.<sup>63</sup> As part of this probation she was

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<sup>51</sup> *Id.* at 17.

<sup>52</sup> *Id.*

<sup>53</sup> *Id.*

<sup>54</sup> *Id.*

<sup>55</sup> *Id.* at 18.

<sup>56</sup> *Id.*

<sup>57</sup> FBI Report at 25.

<sup>58</sup> FBI Report at 26.

<sup>59</sup> *Id.* at 27.

<sup>60</sup> Plea Agreement at 3.

<sup>61</sup> *Id.*

<sup>62</sup> *Id.*

<sup>63</sup> *Id.*

ordered to perform sixty-four hours of community service, complete an alcohol information school, and refrain from other criminal conduct.<sup>64</sup>

42. KEIM did not do anything that she was ordered to do for her probation.

43. Instead, MOREL took care of it. He told KEIM that she would not have to perform her community service hours but that it would appear that she had done them at the Luling-Boutte Lions Club.<sup>65</sup>

44. On July 23, 2012 in a meeting that the FBI audio and video recorded, MOREL visited KEIM at her apartment and brought two bottles of wine.<sup>66</sup> KEIM asked MOREL about the community service letters and MOREL told her he was working on them.<sup>67</sup> MOREL groped and kissed KEIM.<sup>68</sup> (Copy of Community Service Letters, attached as Exhibit P7; Copy of video recording of July 23, 2012 meeting *attached as* Exhibit P8)

45. After continued phone calls and meetings about the community service letters, MOREL gave the falsified documents to KEIM on October 11, 2012.<sup>69</sup> MOREL called the Lafourche Parish Sheriff's Office and identified himself as an assistant district attorney and asked how to send the papers to the sheriff's office.<sup>70</sup> MOREL then had District Attorney's Office staff send the papers via facsimile and U.S. Mail to the Lafourche Parish Sheriff's Office.<sup>71</sup> MOREL commented on KEIM's butt and she asked him not to be "too kinky" with her.<sup>72</sup> KEIM reported to FBI agents that MOREL had groped and kissed her and coerced her into paying him sexually for providing her with the papers.<sup>73</sup> KEIM told FBI agents that what MOREL had done to her in his office during that meeting was worse than what he had done to her at her apartment.<sup>74</sup>

46. On October 16, 2012 KEIM called MOREL who was in Florida at the time and told him that one of her community service papers was missing.<sup>75</sup> MOREL called his office in St. Charles Parish and had the staff fax the papers again to Lafourche Parish, which individuals in his office did.<sup>76</sup> MOREL then called KEIM back to let her know that this had been done.<sup>77</sup>

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<sup>64</sup> Plea Agreement at 3.

<sup>65</sup> *Id.* at 4.

<sup>66</sup> *Id.* at 5.

<sup>67</sup> *Id.* and FBI Report at 34.

<sup>68</sup> FBI Report at 34.

<sup>69</sup> *Id.* at 45.

<sup>70</sup> *Id.* at 42; Plea Agreement at 6.

<sup>71</sup> *Id.*

<sup>72</sup> FBI Report at 43.

<sup>73</sup> *Id.* See copies of the community service papers from LANDRY, Exhibit P7.

<sup>74</sup> FBI Report at 44.

<sup>75</sup> Plea Agreement at 6; FBI Report at 45.

<sup>76</sup> *Id.*

<sup>77</sup> *Id.*

47. On November 29, 2012 KEIM met with MOREL and told him that her boyfriend FALCON called her and asked for the camera memory card containing photographs he had taken of KEIM and MOREL's vehicles at their July 4, 2011 meeting.<sup>78</sup> (See also a copy of FBI video recording of MOREL telling KEIM to give him the video to destroy, *attached as* Exhibit P9) In the recorded conversation between MOREL and KEIM, MOREL told KEIM to destroy the memory card and offered to destroy it for her.<sup>79</sup> KEIM asked him what to do when investigators came looking for it and he told her to tell the investigators she did not have it.<sup>80</sup> They agreed that KEIM would meet MOREL the following day to give him the memory card so he could destroy it.<sup>81</sup>

48. On November 30, 2012 KEIM met MOREL at his office and in an FBI-recorded conversation she gave MOREL the memory card.<sup>82</sup> MOREL told KEIM again to deny knowing anything about the memory card if asked by investigators.<sup>83</sup> When MOREL asked KEIM what she did with the memory card, KEIM said something about her boyfriend "going to the people with it or something."<sup>84</sup> The following is an excerpt of the FBI – recorded phone call between KEIM and MOREL on November 29, 2012:<sup>85</sup>

MOREL: "where's the memory card?"

KEIM: "The Feds?"

MOREL: "well, throw it- destroy it."

KEIM says her boyfriend was dragging her into this.

MOREL: "well, you're dragging me into it with that. You need to get rid of that."

KEIM later asks: "Well, I mean how do I get rid of it?"

MOREL: "What? The pictures?"

KEIM: "this is pissing me off. Like, its really –it's...he..."

MOREL: "Give it to me. I'll get rid of it."

49. MOREL knew as a prosecutor and an attorney that the memory card could be used as evidence in an official proceeding, specifically a grand jury proceeding and that he was possibly

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<sup>78</sup> Plea Agreement at 7; FBI Report at 49.

<sup>79</sup> *Id.*

<sup>80</sup> *Id.*

<sup>81</sup> *Id.*

<sup>82</sup> Plea Agreement at 7; FBI Report at 51.

<sup>83</sup> *Id.*

<sup>84</sup> Plea Agreement at 7.

<sup>85</sup> Quoted from Harry Morel's signed Plea Agreement at 8.

under investigation by the FBI at that time. He knew or should have known that destroying photographic evidence of his and KEIM's earlier meetings was a crime.

50. Yet, at MOREL and KEIM's November 30, 2012 meeting after KEIM handed him a copy of the memory card, MOREL again told KEIM that he would destroy it, "with a hammer," and he again told her to deny knowing anything about it if asked by investigators.<sup>86</sup>

51. Upon a later search of MOREL's office, federal agents found only the cardboard backing for the memory card in MOREL's desk, but no memory card.<sup>87</sup> MOREL denied having the card for several months, but finally turned over the memory card pursuant to a Grand Jury subpoena on March 7, 2013.<sup>88</sup>

52. Upon information and belief, MOREL also requested that his daughter Michele Morel who was then a Judge in the 29<sup>th</sup> Judicial District obstruct the FBI's investigation of MOREL by attempting to prevent the release of court documents regarding KEIM's boyfriend Errol Falcon on whose behalf KEIM had requested MOREL's assistance in her July 4, 2011 meetings with MOREL.

53. On February 8, 2013 NOLA.com reported that MOREL had offered KEIM's boyfriend FALCON a "sweetheart plea deal" for his multiple burglary charges in exchange for FALCON's girlfriend providing MOREL with sexual favors.<sup>89</sup> The news article did not identify KEIM by name but quoted her as "FALCON's girlfriend" stating "[MOREL] needs to be investigated." She then hung up and declined to say more to reporters.<sup>90</sup>

54. KEIM was found dead in her apartment the following day on February 9, 2013 by her then-boyfriend Matthew Savoie.<sup>91</sup> It was determined that she had died of a drug overdose and Savoie, who was initially charged with second degree murder, pled guilty to felony murder by providing her with methyllone, aka "molly."<sup>92</sup>

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<sup>86</sup> Plea Agreement, citing the recorded conversation, at 12-13.

<sup>87</sup> FBI Report at 52.

<sup>88</sup> Plea Agreement at 14; FBI Report at 56.

<sup>89</sup> FBI Report at 54; *see also* Gordon Russell and Juliet Linderman, *FBI probe into former St. Charles DA includes sexual allegations*, Nola.com (Feb. 8, 2013 at 5:53 pm), [http://www.nola.com/education/index.ssf/2013/02/fbi\\_investigation\\_into\\_former.html](http://www.nola.com/education/index.ssf/2013/02/fbi_investigation_into_former.html) (last visited on Apr. 7, 2017)

<sup>90</sup> *Id.*

<sup>91</sup> FBI Report at 54; *see also* Juliet Linderman, *Woman involved in FBI probe into former St. Charles Parish DA found dead*, Nola.com (Feb. 15, 2013), [http://www.nola.com/crime/index.ssf/2013/02/woman\\_involved\\_in\\_fbi\\_probe\\_in.html](http://www.nola.com/crime/index.ssf/2013/02/woman_involved_in_fbi_probe_in.html) (last visited on Apr. 7, 2017)

<sup>92</sup> Littice Bacon-Blood, *Boyfriend of Destrehan woman in FBI's Harry Morel probe admits drug charge*, Nola.com (Nov. 19, 2013) *see also* Gordon Russell and Richard Thompson, *May 2014: Woman was aiding FBI in scrutiny of DA Harry Morel Morel allegedly solicited favors from two women to offset charges*,

55. While investigating KEIM's death, St. Charles Parish Sheriff's deputies discovered a note in KEIM's handwriting saying, "I worked with the FBI because of what he did to me."<sup>93</sup> According to an article in the Advocate, KEIM's boyfriend at the time, Matthew Savoie, told St. Charles Parish sheriff's deputies in recorded interviews that KEIM abused drugs in part because of her fear of MOREL.<sup>94</sup> Savoie also told authorities that MOREL called KEIM on the phone at times and it upset her.<sup>95</sup>

56. MOREL was able to intimidate KEIM because of her vulnerability not only because of her criminal charges, her drug addiction, and resulting instability at home, but also because he knew that she relied on him for her freedom as well as the freedom of her boyfriend. MOREL targeted her because of her vulnerability as a defendant criminally charged by his office, but also because she was a young woman he sexually desired.

57. From the first interaction that KEIM had with MOREL at which time he sexually assaulted her, MOREL sexually harassed KEIM for several years, humiliated her, caused her distress, anxiety, fear, and subjected her family to incredible pain and suffering as a result of his illegal and unethical conduct.<sup>96</sup>

58. On March 31, 2016 the United States Attorney's Office charged MOREL with Obstruction of Justice, in violation of Title 18, United States Code, Section 1512(d)(1) for harassing KEIM, attempting to prevent her from "attending or testifying in ... a federal grand jury proceeding" concerning MOREL's unethical and illegal sexual conduct with KEIM and others, and for asking KEIM to conceal evidence that would have likely led to her being a witness before a federal grand jury.<sup>97</sup>

59. On the same day that the Bill of Information was unsealed, MOREL's attorney notified the press that his client was going to plead guilty to the charge, which he did.<sup>98</sup> In fact, MOREL had

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The Advocate, (May 16, 2014) [http://www.theadvocate.com/new\\_orleans/news/article\\_85b0d615-525f-5cdd-a3ab-723dce95d861.html](http://www.theadvocate.com/new_orleans/news/article_85b0d615-525f-5cdd-a3ab-723dce95d861.html) (last visited Apr. 7, 2017) citing interviews with FALCON after KEIM'S death where he told deputies that MOREL called KEIM numerous times and upset her.

<sup>93</sup> See an un-redacted version of the FBI Report attached to the Nola.com article: Littice Bacon-Blood, *Here's what the FBI had on Harry Morel, St. Charles' corrupt DA*, Nola.com (Sep. 21, 2016) available at [http://www.nola.com/crime/index.ssf/2016/09/fbi\\_evidence\\_harry\\_morel\\_corrupt\\_da.html](http://www.nola.com/crime/index.ssf/2016/09/fbi_evidence_harry_morel_corrupt_da.html) (last visited on Apr. 8, 2017)

<sup>94</sup> Russell & Thompson, *May 2014: Woman was aiding FBI in scrutiny of DA Harry Morel Morel allegedly solicited favors from two women to offset charges*, The Advocate, (May 16, 2014).

<sup>95</sup> *Id.*

<sup>96</sup> See for example, affidavit of Tammy Glover, Exhibit P2.

<sup>97</sup> Morel Plea Agreement at 14.

<sup>98</sup> Wilborn P. Nobles, III and Emily Lane, *Former St. Charles DA to admit crime, his attorney says*, Nola.com (Apr. 5, 2016) available at [http://www.nola.com/crime/index.ssf/2016/04/former\\_st\\_charles\\_da\\_will\\_plea.html#incart\\_river\\_home](http://www.nola.com/crime/index.ssf/2016/04/former_st_charles_da_will_plea.html#incart_river_home) (last visited Apr. 7, 2017)

signed the Factual Basis for his guilty plea on March 30, 2016.<sup>99</sup> MOREL not only confessed to obstructing justice, but he also admitted that between 2007 and 2009 “he solicited sex from other individuals who were defendants or who had family members who were defendants in the St. Charles Parish criminal justice system.”<sup>100</sup> He also admitted that he “likewise used the office of the District Attorney to provide benefits to these other individuals, including falsifying community service reports.”<sup>101</sup>

60. Although KEIM’s family and friends were unable to testify at MOREL’s sentencing because KEIM’s identity had not been revealed in the case – she was referred to instead as “Individual ‘A’” in court documents – KEIM’s sister and mother described the impact MOREL had on KEIM to the press before and after his sentencing.

61. KEIM’s mother and petitioner herein told WWLTV reporter Mike Perlstein in a recorded interview on August 18, 2016, the eve of MOREL’s sentencing, that “Harry Morel had everything to do with her death,” referring to her daughter Danelle Keim.<sup>102</sup> She continued, “Even physically if he didn’t, mentally, emotionally, he tore my daughter up.”<sup>103</sup> GLOVER told reporters how afraid MOREL’s abuse made her daughter. “She was fearful. She didn’t want to be around people. She was scared. And I was scared. For her life.”<sup>104</sup>

62. KEIM even moved away from St. Charles Parish to protect herself from MOREL because she feared that he would have her killed.<sup>105</sup>

63. KEIM’s sister told reporters after United States District Judge Engelhardt sentenced MOREL to three years in federal prison, “He made her feel like dirt. He targeted these women specifically for who and what they were and where they were in their life.”<sup>106</sup> KEIM’s mother and sister said they have heard from other victims who, despite MOREL’s guilty plea, remain afraid to tell their stories. “If he would have gotten what he deserved, maybe they would have come forward,” Glover said.<sup>107</sup>

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<sup>99</sup> Plea Agreement at 15.

<sup>100</sup> Plea Agreement at 14.

<sup>101</sup> *Id.*

<sup>102</sup> Mike Perlstein, *Former DA’s sex-for-leniency scheme haunts mother of dead witness*, Interview with Tammy Glover for WWLTV (Aug. 18, 2016) (last viewed on Apr. 7, 2017)

<sup>103</sup> *Id.*

<sup>104</sup> *Id.*

<sup>105</sup> Affidavit of Petitioner Glover, Exhibit P2.

<sup>106</sup> Michael Kunzelman, *Called a sex predator, powerful ex-prosecutor faces prison*, AP/The Big Story (Aug. 16, 2016), available at <http://bigstory.ap.org/article/ae1a6d2a8dba4f869b42d5cf092487e4/called-sex-predator-powerful-ex-prosecutor-faces-prison> (last visited Apr. 10, 2017)

<sup>107</sup> *Id.*

64. KEIM and other women similarly situated feared being jailed and feared bodily harm if they did not submit to MOREL's demands for sexual favors.

#### **IV. CLAIMS FOR RELIEF**

##### **FIRST CLAIM FOR RELIEF:**

##### **RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT**

LA. R.S. 15 § 1531 et seq.

##### **DAMAGES**

*Petitioner GLOVER against Defendants MOREL, LANDRY, and any as yet unknown defendants who committed or conspired to commit any of the predicate acts comprising Defendant MOREL's RICO sex scheme.*

65. Plaintiff re-alleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

66. Plaintiff's claims under Louisiana's Racketeer Influenced and Corrupt Organizations Act (RICO), La. R.S. 15 § 1351- 56, are brought against Defendants Harry J. Morel, John Landry, III, and all other as yet unnamed defendants.

67. Plaintiff is a private party who has standing to sue within the meaning of La. R.S. 15 § 1356(E).

68. Defendant Harry J. Morel, Defendant John Landry, III, and other unnamed defendants are proper defendants with the capacity to be sued pursuant to La. R.S. 15 § 1356(E).

##### **A. The RICO Enterprise**

69. Defendant MOREL's arrangement with LANDRY constitutes an enterprise according to Louisiana's RICO Act. Louisiana's definition of enterprise specifically includes individuals, lawful and unlawful enterprise and "governmental as well as other entities." La. R. S. 15 § 1352(B).

70. Defendants MOREL and LANDRY as well as the St. Charles Parish District Attorney's Office, LANDRY's businesses, and other judicial offices (the attempted use of MOREL's daughter who was district court judge to conceal evidence of MOREL's improper conduct with KEIM) functioned as a continuing unit.



71. Specifically, Defendant MOREL's sexual solicitation scheme relied on the cooperation of Defendant LANDRY, staff working in the District Attorney's Office as well as other unnamed defendants, to facilitate MOREL's "payment" for sexual services.

72. LANDRY enabled MOREL's sex extortion scheme, through his role as president of the Luling- Lion's Club Bingo Hall to falsify community service documents for KEIM and others which MOREL used to sexually bribe KEIM and at least twenty other known women as documented by the FBI and the St. Charles Parish Sheriff's Office through 2012.

73. LANDRY used the Lion's Club Bingo Hall as a front to provide false proof that KEIM and others had satisfied their probation terms and as LANDRY confessed to the FBI, he had been doing this for years. MOREL's federal plea agreement confirmed this.

74. At least three women were given such letters, according to federal court documents, but none had actually performed the community service LANDRY attested to.

75. In exchange for assisting MOREL with his sexual bribery of women defendants, MOREL "fixed" the tickets of LANDRY's customers for fifteen years. As such, LANDRY financially benefited from helping MOREL "fix" the criminal charges and legal problems of the women he sexually extorted.

76. Defendants MOREL and LANDRY as well as personnel employed by the St. Charles Parish District Attorney's Office used that Office's Pretrial Diversion Program unethically and illegally for Defendant MOREL's sexual gratification.

77. Defendants' RICO enterprise was comprised, therefore, of the St. Charles Parish District Attorney's Office, LANDRY's businesses, MOREL himself, as well as other individuals and businesses as yet unknown who assisted in dismissing the criminal charges of, recalling the warrants for, decreasing the sentences of, and waiving the fines of the defendant women that MOREL sought sexual favors from.

78. Defendants have further violated Louisiana's RICO Act by directly or indirectly participating in or affecting MOREL's sex extortion enterprise through a pattern of illegal activity spanning at least seven years as described in preceding paragraphs in detail. LA. R.S. 15 § 1353 (C).

79. Defendants violated Louisiana's RICO Act by conspiring or attempting to engage in prohibited RICO activity. LA. R.S. 15 § 1353 (D).

80. Specifically, Defendants violated Louisiana's RICO Act by knowingly and intentionally engaging in or conspiring to or attempting to engage in the following predicate activities from at least 2001 through 2013:

- Extortion (La. R.S. 14 § 66)
- Abuse of Office (La. R.S. 14 § 134.3)
- Injuring Public Records (La. R.S. 14 § 132)
- Intimidating, impeding, or injuring witnesses (La. R.S. 14 § 129.1)
- Inciting to Prostitution (La. R.S. 14 § 831.1)

#### **B. Prohibited RICO Activity**

81. Defendants committed, attempted to commit, conspired to commit, or solicited, coerced, or intimidated other persons to commit the following prohibited acts in furtherance of MOREL's sex extortion enterprise from at least 2009 through 2012. *See* La. R.S. 15 § 1352(A) & (C).

82. Each of the predicate acts were related to each other for purposes of Louisiana's RICO Act in that Defendants attempted to, conspired to, or committed the predicate acts all with the intention of furthering and facilitating Defendant MOREL's sex extortion scheme. *See* La. R.S. 15 § 1352 (C).

##### **i. Extortion (La. R.S. 14:66)**

83. As set forth in the preceding paragraphs, Defendant MOREL extorted sexual favors from KEIM and others by using his position as the District Attorney and Assistant District Attorney to threaten them with criminal prosecution, jailing, sexual abuse, and other harm to them and their loved ones if they did not succumb to his sexual advances.

##### **ii. Abuse of Office (La. R.S. 14:134.3)**

84. As set forth in the preceding paragraphs, Defendant MOREL knowingly and intentionally abused his office as the District Attorney both directly and indirectly to coerce KEIM and at least twenty other women to provide him with sexual favors. He used the District Attorney's Office to

reduce or drop charges, recall warrants, assist with KEIM's child custody and support issues, and to manufacture false pre-trial and probation documents for KEIM, her boyfriend FALCON, and others.

**iii. Injuring Public Records (La. R.S. 14:132)**

85. As set forth in the preceding paragraphs upon information and belief Defendant LANDRY committed the crime of injury to public records by falsifying community service documents that MOREL then transmitted to the Lafourche Parish Sheriff's Office on behalf of KEIM.

86. LANDRY admitted to falsifying community service documents for other individuals pursuant to MOREL's requests.

87. Upon information and belief, MOREL attempted to conceal public court documents regarding KEIM's boyfriend, FALCON, through his daughter's position as district judge in St. Charles Parish.

88. MOREL "fixed" traffic tickets and dismissed charges for numerous people in exchange for LANDRY's assistance with manufacturing false community service documents, and also in exchange for sexual favors from the women he was helping.

**iv. Intimidating, impeding, or injuring witnesses (La. R.S. 14:129.1)**

89. As set forth in the preceding paragraphs, MOREL intentionally intimidated and impeded or conspired to impede KEIM's testifying against him before a federal grand jury or acting as a witness against him by conspiring, attempting to, or doing the following:

- 1.) instructing KEIM to lie to investigators about evidence of his and KEIM's prior meetings;
- 2.) instructing KEIM to destroy photographic evidence of his and KEIM's prior meetings; and
- 3.) causing KEIM to fear for her life and safety and that of her loved ones.

90. As stated in preceding paragraphs, MOREL threatened and intimidated KEIM while believing that the FBI was investigating him. MOREL pleaded guilty to Obstruction of Justice

under Title 18, United States Code, and Section 1512(d) (1) by harassing, preventing, and dissuading KEIM from attending or testifying in a federal grand jury.

**v. Soliciting for Prostitutes (La. R.S. 14:83)**

91. As described in detail above, MOREL intentionally and knowingly solicited or conspired to solicit prostitution from women defendants from at least 2001 through 2013 according to FBI records, for example by inviting them (or their friends) to specific locations to have sex with him and then paying them directly or compensating them by assisting with bond reductions, waiving probation fees, drug court costs, or other monetary charges associated with their criminal convictions.

92. As set forth in preceding paragraphs, MOREL asked multiple women to come to his camp in Mississippi to have sex with him. As payment for their sexual favors, he offered KEIM and other women assistance with their criminal charges, traffic tickets, as well as the dismissal or reduction of fines and fees they were instructed to pay as a result of their charges.

93. Defendants MOREL and LANDRY, as well as all other yet unknown individuals, worked in concert through their legal businesses and through the public office of the District Attorney to facilitate MOREL's sexual gratification by vulnerable women who faced criminal prosecution often from MOREL himself.

94. As such, Defendants MOREL and LANDRY should be held liable under LA R.S. 15 § 1351, *et seq.*, in solido for all damages, treble damages, attorney's fees, costs of investigation, and the costs of litigation under Louisiana's RICO Act.

**SECOND CLAIM FOR RELIEF: FRAUD**

LA. Civil Code Article 1953

DAMAGES

*Petitioner GLOVER against Defendants MOREL, LANDRY, and any as yet unknown defendants who committed fraud through their misrepresentations about petitioner's completion of probation requirements, payment of required fees, and other matters.*

95. Plaintiff re—alleges and incorporates by reference each and every allegation contained in Paragraphs 1 to 94 as if fully set forth herein.

96. Defendants MOREL and LANDRY committed fraud by falsifying community service documents stating that KEIM had completed her probation terms on at least one occasion on July

30, 2012, which in fact she had not done. Both MOREL and LANDRY admitted to federal agents – and MOREL admitted in his plea agreement – to falsifying probation documents for other women as well for several years.

97. Defendant MOREL misrepresented KEIM's probation completion in exchange for her gratifying him sexually.

98. Defendant LANDRY misrepresented KEIM's probation completion by falsifying community service documents on her behalf in exchange for continued benefits from MOREL, such as "fixing" LANDRY's Lion's Club customers' traffic tickets.

#### **V. DEMAND FOR JURY TRIAL**

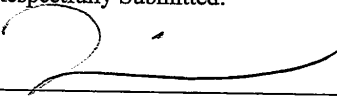
99. PLAINTIFF hereby demands a trial by jury on all issues so triable.

#### **CONCLUSION AND PRAYER FOR RELIEF**

WHEREFORE, PETITIONER GLOVER prays that, after due proceedings been had before a jury on all issues so triable, that there be judgment herein in her favor and against DEFENDANTS HARRY MOREL, JOHN LANDRY, III, and all other as yet unknown defendants individually and jointly for all injuries DEFENDANTS caused through their criminal RICO enterprise and for committing fraud and PETITIONER seeks an ORDER from this Court:

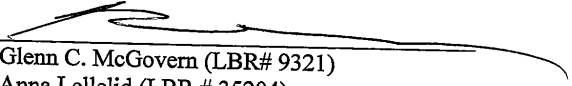
- (1) awarding PETITIONER compensatory damages, including damages for pain and suffering, mental anguish, humiliation, and medical and psychological/psychiatric treatment as per the allegations made herein;
- (2) awarding PETITIONER treble damages;
- (3) awarding PETITIONER attorney's fees;
- (4) awarding PETITIONER litigation and investigation costs; and
- (5) awarding PETITIONER any other relief as this court deems just and equitable under the circumstances as alleged herein.

Respectfully Submitted:

  
\_\_\_\_\_  
Tregg Connell Wilson (LBR# 27328)  
8550 United Plaza Boulevard, Suite 702  
Baton Rouge, LA 70809

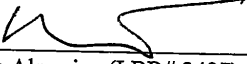
(225) 663-1900  
Email: [treggc@yahoo.com](mailto:treggc@yahoo.com)

-AND-



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Anna Lellelid (LBR # 35204)  
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-AND-



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*Attorneys for Petitioner Tammy Glover*

PLEASE SERVE:

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13145 Highway 90 West  
Boutte, LA 70039

AND

PLEASE SERVE  
PURSUANT TO LOUISIANA LONG ARM STATUTE

Harry J. Morel  
Register Number 36691-034  
FCI Seagoville  
Federal Correctional Institution  
PO Box 9000  
Seagoville, TX 75159

**STATE OF LOUISIANA  
PARISH OF ST. CHARLES**

**VERIFICATION**

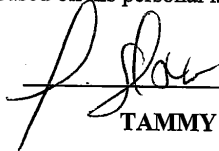
BEFORE ME, the undersigned authority, personally came and appeared:

**TAMMY GLOVER**


Who after being duly sworn did depose and state as follows:

That she is a person of the full age of majority and competent to provide this affidavit.  
All facts set forth herein are based upon her personal knowledge.

That she has been read the foregoing COMPLAINT FOR DAMAGES AND DEMAND  
FOR JURY TRIAL and attests that the allegations made therein are true, accurate, and  
complete and are based on his personal knowledge of the facts stated therein.

  
\_\_\_\_\_  
**TAMMY GLOVER**

Sworn to and subscribed before me, on this the 30<sup>th</sup> day of March, 2017.

  
\_\_\_\_\_  
**TREGG C. WILSON, NOTARY PUBLIC**

29<sup>th</sup> JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. CHARLES

STATE OF LOUISIANA

DIV. E

JUDGE

CASE NO. 82,841

DIVISION: TIMOTHY S. MARCEL DOCKET NO:

TAMMY GLOVER, as the Court Appointed Administratrix of the Succession of  
DANELLE KEIM MCGOVERN,

PLAINTIFF

VERSUS

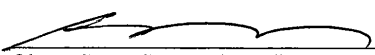
HARRY MOREL and JOHN LANDRY, III,

DEFENDANTS

EXHIBIT STATEMENT

Undersigned counsel for Petitioner Tammy Glover do hereby certify that all exhibits are attached electronically on DVD and Exhibits P-2 – P-5 and P-7 are attached to Petitioner's complaint in paper form.

FBI Twisted Justice Report.....EXHIBIT P-1  
Affidavit of Tammy Glover.....EXHIBIT P-2  
McGovern Letters of Administration.....EXHIBIT P-3  
Harry Morel Federal Plea Agreement .....EXHIBIT P-4  
Tiffany Dewhirst Complaint Letter to Judiciary Commission.....EXHIBIT P-5  
Danelle Keim McGovern 911 Phone Call.....EXHIBIT P-6  
Lion's Club Community Service Letter for McGovern.....EXHIBIT P-7  
FBI Video Recording of Meeting Between KEIM and MOREL  
in KEIM's Apartment.....EXHIBIT P-8  
FBI Video Recording of KEIM AND MOREL Meeting  
about Destroying Photographs.....EXHIBIT P-9

  
Glenn C. McGovern (LBR# 9321)  
Anna Lellelid (LBR # 35204)  
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Metairie, LA 70002  
(504) 456-3610  
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2017 APR 10 PM 3:37  
CLERK OF COURT  
ST. CHARLES PARISH, LA  
DEPUTY



**EXHIBIT P-1**

**ON ATTACHED DISC**

**STATE OF LOUISIANA  
PARISH OF ST. CHARLES**

**EXHIBIT**

**P-2**

**Affidavit of Tammy Glover**

I, Tammy Glover, a person of full age of majority, who after being duly sworn, do state I have no prior felony convictions, and state as follows:

1. I am the mother of Danielle Keim McGovern.
2. Danielle Keim McGovern feared she would be killed by D.A. Harry Morel if she filed suit.
3. Danielle Keim McGovern feared she would be killed by D.A. Harry Morel because she believed other women who had sex with D.A. Harry Morel died.
4. Danielle Keim McGovern feared she would lose custody of her child due to District Attorney Harry Morel's power and position as District Attorney in St. Charles Parish.
5. I was fearful for Danielle Keim McGovern's life that she would be killed by D.A. Harry Morel.
6. Danielle Keim McGovern assisted in the F.B.I. investigation of D.A. Harry Morel.
7. Danielle Keim McGovern did not tell me she assisted in the F.B.I. investigation until after the investigation was over. I feared for her life and would have told Daniel Keim McGovern not to do anything against D.A. Harry Morel or cooperate in the F.B.I investigation because Danielle Keim McGovern would be killed.
8. Danielle Kiem McGovern feared filing a civil suit against D.A. Harry Morel for fear she would be killed.
9. Danielle Kiem McGovern made a statement to the press as per the attached news story February 8, 2013, as Exhibit A.
10. The next day Danielle Keim McGovern died February 9, 2013, of a drug overdose.
11. Danielle Keim McGovern was fearful and intimidated by D.A. Harry Morel which prevented her from filing any suit.
12. Danielle Keim McGovern told me she feared for her life in the end of January 2013 and if anything happened to her to make sure her child Tyler McGovern, a minor child, was taken care of.
13. Danielle Keim McGovern told me she was also afraid of the other women that D.A. Harry Morel had sex with.
14. Danielle Keim McGovern feared for her life and she would be harmed as D.A. Harry Morel paid for a breast augmentation surgery for one woman

from Drug Court he got sexual favors from and from another woman in Drug Court he got a liquor license for. Danielle Keim McGovern feared if she did anything to file suit against D.A. Harry Morel they would harm her.

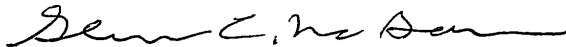
15. Danielle Keim McGovern has a DWI arrest in Lafourche Parish in November 12, 2010 as the arrest record attached hereto as Exhibit B.
16. In March 6, 2010, Danielle Keim McGovern was arrested in St. Charles Parish for DWI while she was under the strict supervision of Drug Court and D.A. Harry Morel destroyed her DWI arrest records so Danielle Keim McGovern would not be jailed for violation of the terms of her probation/drug court conditions. The records of arrest were destroyed by D.A. Harry Morel so he could get sexual favors from Danielle Keim McGovern.
17. D.A. Harry Morel would go to women in Drug Court and tell them if they needed any help to call him. D.A. Harry Morel contacted Danielle Keim McGovern while she was in Drug Court for the DWI.
18. Danielle Keim feared she had to meet with D.A. Harry Morel who asked her for sexual favors due to his position as D.A. of St. Charles Parish.
19. D.A. Harry Morel visited her at her home and sexually assaulted her and tried to rape her and Danielle Keim McGovern called 911 to report him.
20. Danielle Keim McGovern feared for her life and at one point she moved away to Lafourche Parish to protect herself from D.A. Harry Morel out of fear of being killed by D.A. Harry Morel.



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Tammy Glover, mother of Danielle Keim McGovern, affiant

Sworn to and subscribed before me Notary Public on this 30<sup>th</sup> day of September, 2016 at St. Charles Parish, La.



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Glenn C. McGovern, Notary Public La. Bar. 9321

EXHIBIT

P-3

29TH JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. CHARLES  
STATE OF LOUISIANA

PROBATE NUMBER:

111,831

DIV. E  
JUDGE  
TIMOTHY S. MARCEL

SUCCESSION OF DANELLE KEIM MCGOVERN

FILED:

DEPUTY CLERK:

ORDER

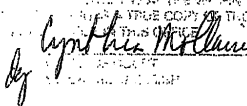
It is ordered that TAMMY GLOVER be appointed administratrix of the succession of DANELLE KEIM MCGOVERN and that letters of administration issue on her complying with all requisites of law;

It is further ordered that security to be provided by TAMMY GLOVER and it is set at \$ 0; and the sworn detailed descriptive list, attached to the petition for appointment of administratrix be filed.

HAHNVILLE, Louisiana, on this the 27 day of September 2016.

  
DISTRICT JUDGE  
JUDGE TIMOTHY S. MARCEL

FILE FOR RECORD  
CLERK OF COURT  
ST. CHARLES PARISH, LA.  
2016 SEP 26 AM 11:51  
DEPUTY CLERK

  
Cynthia McAllister

**EXHIBIT**

P-4

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

|                                 |   |                     |
|---------------------------------|---|---------------------|
| <b>UNITED STATES OF AMERICA</b> | * | <b>CRIMINAL NO:</b> |
|                                 | * | <b>SECTION:</b>     |
| <b>HARRY J. MOREL, JR.</b>      | * |                     |
|                                 | * |                     |
| *                               | * | *                   |

**FACTUAL BASIS**

Had this case proceeded to trial, the Government would have presented credible testimony, documents, cellular phone records, cell site information, recorded conversations, video recordings, and other reliable evidence to prove, beyond a reasonable doubt, that **HARRY J. MOREL, JR.** obstructed justice, in violation of federal law.

The defendant, **HARRY J. MOREL, JR.** (hereinafter **MOREL**) served as the elected prosecutor of St. Charles Parish, Louisiana from on or about January 1, 1979 until May 31, 2012. Thereafter, he became an Assistant District Attorney in the Office of the District Attorney for St. Charles Parish and remained in that position until January 11, 2013. **MOREL** resided in, and his office was located in, St. Charles Parish, Louisiana, in the Eastern District of Louisiana.

As District Attorney and as an Assistant District Attorney for St. Charles Parish, Louisiana, **MOREL** was responsible for prosecuting individuals charged with criminal and traffic offenses against the State of Louisiana. As the District Attorney, the defendant had the authority and

discretion to, among other things, make bail recommendations, make sentence recommendations and bring dismiss, forego or reduce charges.

On March 6, 2010, an individual, who will be referred to as individual "A" was arrested for driving while intoxicated (DWI) in St. Charles Parish. **MOREL** and Individual "A" subsequently discussed the possibility of **MOREL** dropping the charge. Thereafter, **MOREL** visited Individual "A" at her house. While at her house, **MOREL** engaged in inappropriate behavior with individual "A" and continued to discuss the possibility of dismissing the prosecution of Individual "A" for the DWI offense. After **MOREL** left her residence Individual "A" reported this incident to the emergency 911 operator.

On July 1, 2010, **MOREL** placed Individual "A" on pre-trial intervention for her 2010 DWI. However, Individual "A" never participated in or completed any of the requirements for the pre-trial intervention. Despite not carrying out her responsibilities as required by this program, Individual "A"'s case was closed as per **MOREL'S** order on August 24, 2010.

On Monday July 4, 2011, (a federal and state holiday) **MOREL** and Individual "A" spoke on the telephone. Individual "A" asked to speak to **MOREL** about her Lafourche Parish DWI and possibly doing a favor for her boyfriend, who had pending criminal charges against him in St. Charles Parish, but was willing to cooperate with law enforcement. **MOREL** asked Individual "A" to meet him at the courthouse to continue this discussion in person. Her boyfriend followed Individual "A" there and took photographs of **MOREL's** and Individual "A"'s vehicles in the parking lot. Individual "A" called her boyfriend and told him that she and **MOREL** were leaving the courthouse and going to a separate satellite office of the District Attorney's Office. Her

boyfriend went to that building and took photographs of each of their vehicles at that location as well.

In November 2011, Individual "A" agreed to again record conversations with **MOREL** on behalf of the FBI as they undertook an investigation into her allegations against **MOREL**.

Individual "A" continued to record conversations with **MOREL** during 2012 when **MOREL** assisted her with theft charges she was facing in St. Charles Parish and offered to assist her with a new DWI charge pending in Lafourche Parish, Louisiana. Individual "A"'s last theft charge in St. Charles Parish was dismissed on March 26, 2012.

On May 29, 2012, Individual "A" met with **MOREL** again and asked about traffic tickets and her DWI in Lafourche Parish. **MOREL** told Individual "A" he was stepping down as district attorney on May 31, 2012, but he would remain an assistant district attorney. **MOREL** stepped down as district attorney on May 31, 2012 but remained at the district attorney's office as an assistant district attorney. During a recorded conversation with **MOREL** on June 21, 2012, **MOREL** arranged for a lawyer in Lafourche Parish to continue to handle Individual "A"'s DWI charge there. On June 22, 2012, Individual "A" pleaded guilty to DWI in the Louisiana 17th Judicial District Court (Lafourche Parish). She was sentenced to five months in the parish jail and to pay a fine of \$750.00. However, the jail sentence was suspended and the defendant was placed on unsupervised probation for a period of one year. As part of this probation she was ordered to perform 64 hours of community service, complete an alcohol information school (which was marked satisfied that day), and refrain from other criminal conduct.

**MOREL** offered to help Individual "A" with her community service hours. He later told her that she would not have actually perform her community service hours but that it would appear that she had done them at the Luling-Boutte Lions Club.

On July 17, 2012, Individual "A" recorded a conversation she had with **MOREL** about her pending legal issues, including her community service hours in Lafourche Parish. The following conversation took place:

Individual "A": "So what do I have to do at this Lion's Club?"

**MOREL**: "You have to do what?"

Individual "A": "Like what do I have to do?"

**MOREL**: "The Lion's Club? Nothing."

During the conversation, Individual "A" told **MOREL** that Lafourche Parish officials told her that her community service hours in St. Charles Parish had to be performed under the supervision of the St. Charles Parish Sheriff's Office. The following exchange took place:

Individual "A": "I can ask, but it's, they, they said that it can't, it's gotta be through the Sheriff's Office."

**MOREL**: "No."

Individual "A": "That's what they told me."

**MOREL**: "No."

Individual "A": "So, and they already have people who clean the churches and stuff."

**MOREL** "It doesn't have to be through, all, all we need is a letter from them saying that you've done it because this is another Parish."

Individual "A": "Yeah."



**MOREL:** "And I'm, I'm handling it. The Sheriff has nothing to do with it or tell 'em."

Individual "A": "The Sheriff has nothing to do with it?"

**MOREL:** "Not our Sheriff, no."

On July 20, 2012, Individual "A" called **MOREL** as he instructed her during the July 17, 2012 meeting. She recorded the conversation which went as follows:

**MOREL:** "Good, I talked to the guy and he's working on a letter for your uh, uh community service for part of it so, uh, hopefully we'll have something by the end of next week and have the letter done."

Individual "A": "By the end of next week, we'll have the letter done with community service?"

**MOREL:** "Yeah showing how much you've done. We're going to have to space it out so it won't look like you did it all at once, you know."

Individual "A": "Yeah, if I space it out, yeah, if I space it out it won't look like I did it all at once."

**MOREL:** "Yeah..."

On July 23, 2012, **MOREL** visited Individual "A" at her apartment. FBI agents made both audio and video recordings of the meeting. **MOREL** brought Individual "A" two bottles of wine. When Individual "A" asked about the status of the letters for her community service, **MOREL** told her that he spoke to the man writing the letters and he was working on them. **MOREL** again attempted to engage in inappropriate behavior with individual "A". The conversation continued:

Individual "A": "I got a deal for you though. Let's see if we can make a deal."

**MOREL**: "What is it?"

Individual "A": "What's the furthest? We, we never really went, really, we never really went further than kissing and just kinda touching and feeling. What do you want from me?"

**MOREL**: "I don't know. I want to spend some time with you."

Individual "A": "You say that but you never – and I know you're busy – but you never."

**MOREL**: "Well, I think about making love to you but then, you know, it gets me nervous too. And I don't – but that's not why I'm helping you. So I just sort of back off."

Individual "A" then asked **MOREL** to see the community service papers. **MOREL** told her he could not give her the papers all at once. **MOREL** agreed to do so and then decided to leave.

On October 11, 2012, **MOREL** showed Individual "A" the falsified community service papers and told her what work she had purportedly done. He called the Lafourche Parish Sheriff's Office and identified himself as an assistant district attorney and asked about how to send the papers to the sheriff's office. **MOREL** then had District Attorney's office staff send the papers via facsimile and U.S. Mail to the Lafourche Parish Sheriff's Office. **MOREL** and Individual "A" then had an inappropriate sexual discussion.

On October 16, 2012, Individual "A" called **MOREL**, who was then in Florida on vacation, and told him that one of the community service papers was missing. **MOREL** called the district attorney's office and had the staff send the papers again. He called Individual "A" to tell her this had been done. The papers were sent again, and were intercepted and obtained by law enforcement.

On November 29, 2012, Individual "A" recorded a meeting with **MOREL**. She told **MOREL** that her boyfriend had been calling and asking for a camera memory card which contained photographs he had taken of **MOREL'S** and Individual "A"'s vehicles at the courthouse and satellite office back on July 4, 2011. In the recorded conversation, **MOREL** told Individual "A" to destroy the card and offered to take the card from her so he could destroy it. When Individual "A" asked **MOREL** what to tell investigators who came looking for the memory card, **MOREL** told her to tell investigators that she did not have any card. Individual "A" and **MOREL** agreed that Individual "A" would return the next day to give the card to **MOREL**. In a recorded conversation on November 30, 2012, Individual "A" met with **MOREL** at his office and gave him a copy of the card, claiming that it was the original. **MOREL** told Individual "A" that he would throw it in the garbage or hit it with a hammer. He also said he would see what was on it. **MOREL** told Individual "A" again to deny knowing anything about photographs if investigators spoke to her. As an attorney and prosecutor, **MOREL** was aware at the time of these conversations, that the memory card could be used as evidence in an official proceeding, specifically a federal grand jury, investigating any possible violation of federal criminal law by him. Specifically, on November 29, 2012, Individual "A" told **MOREL** about her boyfriend calling her from jail using a smuggled cellular telephone. Individual "A" told **MOREL** that he was asking for the memory card from the camera he used to take photographs when Individual "A" met with **MOREL** at the courthouse and "the other office" on July 4, 2011.

**MOREL** asked Individual "A" what she did with the memory card. Individual "A" said that her boyfriend said something about "going to the people with it or something." The recorded conversation continued as follows:

**MOREL:** "Where's the memory card?"

Individual "A": "The Feds?"

Individual "A" says she has the memory card.

**MOREL:** "Well, throw it-destroy it."

Individual "A": "Well, I don't know. Should I?"

**MOREL:** "Sure."

Individual "A" says that her boyfriend was dragging her into this.

**MOREL:** "Well, you're dragging me into it with that. You need to get rid of that."

Later, Individual "A" asks, "Well, I mean how do I get rid of it?"

**MOREL:** "What? The pictures?"

Individual "A": "This is pissing me off. Like, it's really-it's...he..."

**MOREL:** "Give it to me. I'll get rid of it."

Individual "A" and **MOREL** discussed what other pictures were on there.

**MOREL:** "Get rid of it."

Individual "A" pointed out that the pictures were of her boyfriend's children as babies.

**MOREL:** "That's his problem. [He] wants to play hardball, we gotta play hardball."

When they talked about what phone her boyfriend was using to contact her from prison,

**MOREL** said, "I'll check with, I'll check and see if uh, I think there's a way you can plug your number into the computer, now if he's got a cell phone we can have them check that and see."

Later, the conversation continues:

**MOREL:** "Well, destroy that card."

Individual "A": "Alright, I just, I just, what if he says something and..."

**MOREL:** "What do you mean? Don't worry about it."

Individual "A": "...and they come talk to me, and, I don't, I don't want to get, uh (sigh)..."

**MOREL:** "'What card?'"

Individual "A": "Wher-just tell him that, 'What card?'"

**MOREL:** "Yeah."

Individual "A": "Alright."

**MOREL:** "'I don't have any card.'"

Individual "A": "'Cause I thought, I mean it's only, there's no, there's no proof, except for what he's saying."

**MOREL:** "Well, that just has-leaves doubts. So, get rid of it, and say, 'What card?' Say, 'Yeah, I talked to Mr. **MOREL**. Tried to help him.' And I'll, and I'll agree. You know. We met."

Individual "A": "Do you want me to go, do you want me to get it and bring it to you?"

**MOREL:** "[unintelligible] I trust you, you can destroy it. Just shred it.

Individual "A": "I don't wanna get in trouble, I don't want anything to do with it."

**MOREL:** "How you? You don't what?"

Individual "A": "I don't want anything to do with it."

**MOREL:** "Well, then, get it and bring it over here we'll put it in the thing."

Later, **MOREL** said, "You shoulda got rid of it a long time ago."

Individual "A": "I know, but I didn't want you to think I'm holding this over you, I'm holding that over you, cause I'm not. I'm not that kind of person."

**MOREL:** [unintelligible]

Individual "A": "People can say whatever they want about me, but I'm not that kind of person. You've helped me so much."

**MOREL:** "Well, that's what concerned me before you know."

Individual "A": "What?"

**MOREL:** "About the, about that when he was saying on tape in jail that uh you were doing stuff and all that, remember?"

Individual "A": "Yeah, I remember, and you..."

**MOREL:** "I was upset about it."

Individual "A": "You were very upset, you were like don't call me..."

**MOREL:** "Yeah."

Later, **MOREL** took a telephone call, after the phone call, he resumed the conversation with Individual "A".

**MOREL:** "Yeah I-you know, I don't like hearing all this. We got to get rid of that and put this behind us. You can't talk to that guy."

Individual "A": "I know, I tol-that's why I come to you."

**MOREL:** "K, well."

Individual "A": "I'm not going to fucking talk to him. I'm not answering my phone. I'm changing my fucking number. Something or I can block it. I can block his number."

**MOREL:** "Well do that."

Individual "A": "So."

**MOREL:** "And give me the number I'm going to check and see what kind phone-if I can figure out what kind of phone it is."

Individual "A": "Alright, I'm pretty sure it's a smuggled cell phone."

**MOREL:** "So, whatcha gonna do with the, uh, card? Get rid of it?"

Individual "A": "Yeah, unless you-unless you think it [unintelligible]..."

**MOREL:** "I mean, it doesn't really-it doesn't really say any-does anything, but, on the other hand, get rid of it then there's nothing there."

Individual "A": "I don't want to get in trouble, you, you..."

**MOREL:** "Huh?"

Individual "A": "I'll bring it to you."

**MOREL:** "Ok."

Individual "A": "You, you, just, do what-I don't care about the pictures, just do what you want with it."

**MOREL:** "Ok. Bring it to me tomorrow morning."

On November 30, 2012, Individual "A" recorded a meeting with **MOREL**. The FBI gave Individual "A" a copy of the original memory card used by her boyfriend on July 4, 2011.

During the conversation, **MOREL** explained how he would "get rid of" the memory card:

Individual "A": "Yep. So um...I don't know how you would get rid of it. It's hard."

**MOREL:** "Hm?"

Individual "A": "How are you going to destroy it? It's hard."

**MOREL:** "[unintelligible] destroy it."

Individual "A": "You can't even-I can't even break it. I tried to crack it."

**MOREL:** "Put it in the garbage."

Individual "A": "In the garbage?"

**MOREL:** "Yeah."

Individual "A": "Well, aren't you going to break it or something or cut it up?"

**MOREL:** "Well yeah. I mean I can do that. With a hammer. See what's on it."

Individual "A": "I just don't want to throw it in the garbage."

**MOREL:** "How many pictures are on it?"

Individual "A": "I don't know, like four or-or five."

**MOREL:** "What do they have? You just going into the office?"

Individual "A": "Yeah. He's got us at the court house and it's on-and it says 4<sup>th</sup> of July and it was closed and now he-you know, he's like, 'Hmm.'"

**MOREL:** "But, I mean, it's just you going into the court house? I mean, I wasn't even in it. 'You didn't go in there with me.'"

Individual "A": "[unintelligible] Yeah, it's us going in and then we're walking out and then we went to the other office."

**MOREL:** "Oh, ok."

Individual "A": "I just don't wanna keep it. Just get rid of it."

**MOREL:** "Yeah."

Individual "A": "Destroy it. [unintelligible]."

**MOREL:** "So, when it comes up, just don't answer it."

Individual "A": "So, if they do come talk to me, or say they do..."

**MOREL:** "Who?"

Individual "A": "I don't know, whoever he's talking to. Just-I mean-what do I say?

Nothing about it? I don't know nothing? 'Cause he doesn't even-it's just..."



**MOREL:** "Just tell them, 'Yeah, you talked to me. You tried to help him.'"

Individual "A": "Well, no, but, like, if they ask about the memory card, what if he says something about the pictures?"

**MOREL:** "'What pictures?'"

Individual "A": "Alright, that's what I tell them? 'Cause I mean..."

**MOREL:** "Where's the camera?"

Individual "A": "It's ju-oh, he's-it's his camera. It's with him somewhere, but you gotta have a, a special thing to look. You gotta have have the same camera, 'cause I tried to plug it in the computer and delete the pictures, and it won't-it won't come up."

**MOREL:** "Yeah."

Individual "A": "So."

**MOREL:** "[unintelligible] just tell them you don't-you don't know anything about a camera."

Individual "A": "Which, I mean it's just his word, you know."

**MOREL:** "Yeah, I mean, it's his camera, you-you can say, 'Yeah he had-I know he had a camera.'"

Individual "A": "Alright."

**MOREL:** "And he said, well, he took a picture. 'Well, he may have. I don't know. I haven't seen it.'"

Individual "A": "Alright."

On January 11, 2013, **MOREL's** office was searched with the consent of the District Attorney who replaced **MOREL**. A package for a memory card reader was found on his desk.

**MOREL** was served with a Grand Jury subpoena for the memory card. On March 7, 2013, **MOREL** surrendered the memory card that he had received from Individual "A" through his attorney.

**MOREL**, on other occasions, between 2007 and 2009, has solicited sex from other individuals who were defendants or who had family members who were defendants in the St. Charles Parish criminal justice system. While soliciting sex from these individuals, **MOREL** likewise used the office of the District Attorney to provide benefits to these other individuals, including falsifying community service reports.

By pleading guilty to this count **HARRY J. MOREL, JR.** freely admits that he is guilty of Obstruction of Justice, in violation of Title 18, United States Code, Section 1512(d)(1) in that he harassed Individual "A" and attempted to prevent and dissuade Individual "A" from attending or testifying in an official proceeding, *i.e.*, the federal grand jury, concerning any of the above conduct, by telling Individual "A" to "get rid of" and to "destroy" the evidence of a meeting they had and to deny the inappropriate nature of the meeting to law enforcement officials. Furthermore, based on Individual "A"'s representations, **HARRY J. MOREL, JR.** believed there would be a federal Grand Jury investigation, and as a result asked her to conceal information that would have likely led to her being a witness before that body.

**Limited Nature of Factual Basis**

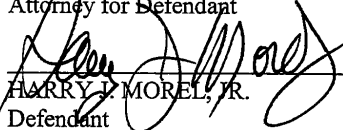
This factual basis is not intended to constitute a complete statement of all facts known by **HARRY J. MOREL, JR.**, but rather is a minimum statement of facts intended to prove the necessary factual predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal and factual basis for **HARRY J. MOREL, JR.**'s plea of guilty to the charged offense of Obstruction of Justice listed in the Bill of Information.

  
RALPH CAPITELLI  
Attorney for Defendant

3-30-16  
Date

  
JAMES S. C. BAEHR  
Assistant United States Attorney

3/30/16  
Date

  
HARRY J. MOREL, JR.  
Defendant

3-30-16  
Date

March 1, 2013

At approximately 2:45 p.m. on Friday, March 01, 2013, Judge Michele Morel called me at the Clerk of Court's office requesting me to come to her office. Joann Roudeze was present in her office. Judge Morel told me "she knew I was the one who faxed over documentation to the Times Picayune regarding the case involving her father, Harry Morel". I am not really sure what case I faxed, I believe it was regarding either Errol Falcon's or Eric Gros' case. At the time, I was not aware that either case had anything to do with her father.

Judge Morel told me that it was "not my job to fax information to the newspaper or any other type of media". I asked her why she didn't let me know sooner that she was upset with me about this. She said that "she has been so fucking pissed off at me for the past 2 weeks" and that she would have "chewed my fucking head off if she would have spoken to me about it". I explained that I was only doing my job and this is what I would have normally done for anyone calling for information as are public records.

Furthermore, in the future, I am not to "go out of my way for the Times Picayune or any other media who needs information regarding her father or her". I am to forward the phone calls to Lance Marino or tell them to come to the courthouse and get the information themselves.

She also informed me someone else was giving information to the media from the Courthouse regarding her father but did not reveal that name to me. She knows who this person is but did not reveal it to me.

In my defense, I was truly only doing my job. I always go out of my way to help ANYONE calling the Clerk of Court's office for information concerning ANY criminal case. You can ask any employee in the Clerk of Court office that I go out of my way to help the public. I feel as though Judge Morel has used her position as Judge to intimidate me.



Tiffany Templet Dewhirst

**EXHIBIT P-6**

**ON ATTACHED DISC**

---

**EXHIBIT**

P-7

The Luling-Boutte Lions Club  
P.O. Box 1327  
Boutte La. 70039



JULY 30th, 2012

To whom it may concern  
Lafourche Parish District Attorney Office  
1032 Marange Street  
Thibodaux La. 70301

Ms Danielle McSavern 76 Carriaga Lane Apt 3 Destrehan La. 70047

has volunteered with our organization to do community service in our community on the following days.

On Friday 7/06/2012, Ms. Danielle McSavern, worked with me for 8 hours.

Sweeping area, cleaning food pantry and organizing food and supplies for needy families.

On Friday 7/13/2012, Ms. Danielle McSavern worked with me for 8 hours.

Assembling and delivering food baskets to needy families in St Charles Parish.

On Friday 07/20/2012, Ms. Danielle McSavern worked with me for 8 hours.

Organizing our Nursing Home supplies, labeling boxes and boxing up gifts for our Nursing Home Bingo.

On Saturday 07/21/2012 Ms. Danielle McSavern worked for 8 hours.

Delivering snacks and gifts, along with assisting our club with bingo and entertainment for the residents at the Luling Nursing Home...

All total Ms Danielle McSavern volunteered with our Lions Club for 32 hours or 4 days...

With any questions you can contact me @ 885-785-921 Office or 885-233-1701 Cell

With Regards,

Mr. John Landry

Community Service Director

Luling-Boutte Lions Charter President

EXHIBIT

**EXHIBIT P-8**

**ON ATTACHED DISC**

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**EXHIBIT P-9**

**ON ATTACHED DISC**



29<sup>th</sup> JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. CHARLES  
STATE OF LOUISIANA

CASE NO.

DIVISION:

DOCKET NO:

TAMMY GLOVER, as the Court Appointed Administratrix of the Succession of  
DANELLE KEIM MCGOVERN,

PLAINTIFF

VERSUS

HARRY MOREL and JOHN LANDRY, III,  
DEFENDANTS

JURY ORDER

FILED  
CLERK OF COURT  
ST. CHARLES PARISH, LA  
2017 APR 10 PM 3:30  
DEPUTY

IT IS ORDERED that plaintiff is granted trial by jury as requested with plaintiff ordered  
to pay \$ \_\_\_\_\_ jury fee and post \$ \_\_\_\_\_ cash or bond to be posted  
\_\_\_\_\_ days prior to date of jury trial.

Signed at St. Charles Parish on this \_\_\_\_\_ day of April, 2017.

\_\_\_\_\_  
JUDGE