

STATE OF LOUISIANA

DOCKET No.: 518-101

VERSUS

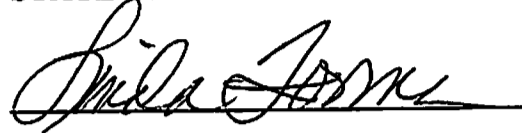
22nd JUDICIAL DISTRICT COURT

RICHARD A. SHARP

PARISH OF ST. TAMMANY

STATE OF LOUISIANA

FILED: June 03, 2015



DEPUTY CLERK

FACTUAL BASIS/ALLOCATION

I, Richard Sharp, do hereby give the following factual basis/allocation acknowledging the crimes I committed and recanting any and all false allegations and claims made against any and all victims identified by the State of Louisiana.

GDH International, Inc. (GDHI), was a Louisiana based company formed to provide temporary housing for workers in the oil servicing industry. GDHI members included Daniel Buras, Jared Riecke, Bruce Cucchiara and Dudley Guigerman. Sometime in August of 2011 the members of GDHI were introduced to Richard Sharp. Richard Sharp proclaimed to be a petroleum engineer and promised the members of GDHI that, through his multitude of alleged contacts in the oil business, he could get the company contracts to provide housing in oil fields of the middle east.

Based on the opportunity and experience that Richard Sharp could provide, the members of GDHI decided to offer Richard Sharp a membership interest in the company subject to a financial investment by Richard Sharp. When approached with the offer, Richard Sharp accepted, but stated he was currently having financial trouble and could not afford to buy into the company at that time. However, he informed the members of GDHI that he was owed \$154,975.00 by ENI (a large foreign oil company) and was willing to pledge that money to GDHI in order to become a partner and member of the board of directors. After being provided documented proof of money owed to Richard Sharp, the members of GDHI agreed to accept the pledge of \$154,975.00 and made Richard Sharp a partner and member of board of directors.

To procure advance payments from the Company, Richard Sharp again relied on the money owed to him by ENI and his pledge of that money to GDHI. The company incurred expenses and made advances based on Richard Sharp's promises and assertions that certain actions be taken to position the company in such a manner to get housing contracts from oil companies. GDHI made several separate and distinct payments of money to Richard Sharp based on the assertions and fraudulent inducement of Richard Sharp thereby constituting the pattern of racketeering activity.

In September of 2011, the money owed by ENI to Sharp, that was to go directly to GDHI, was to be paid. That date came and no payment was made. When questioned by the members of GDHI, Richard Sharp informed them that on September 21, 2011 ENI made payment directly to his (Richard Sharp's) personal bank account that ENI already had on file. Sharp promised to deposit the \$154,975.00 into the GDHI bank account immediately.

Over the next few weeks and months, through a series of misrepresentations and fraud, Richard Sharp issued two worthless checks to GDHI, one for the amount of \$105,000 and the other for the amount of \$100,000.

ALLOCUTION

I, Richard Sharp, admit the above stated factual basis accurately reflects the crimes I perpetrated against GDHI and its members. I admit guilt and accept full responsibility for the charges against me in St. Tammany Parish. I made numerous misrepresentations to Riecke, Cucchiara, Geigerman, Buras, and Gros in an effort to convince them to fund a business to conduct engineering and housing business overseas. I fabricated and forged documents evidencing accounts receivable owed to me by an oil and gas company named ENI. I assigned all rights, title, and interest in the ENI accounts receivable to GDHI to secure their investment in this new venture. I provided false resumes, false claims of military service, false work histories, set up fake offices, and provided false financial reports to GDHI as part of my scheme to defraud. I provided documentation and promised that the ENI payment would be received on or before September 20, 2011. I knew that GDHI would never receive the money by this date, as I made up the entire ENI scheme so that I could obtain additional money and resources from GDHI.

I apologize to GDHI, Jared Riecke, Bruce Cucchiara, Daniel Buras, Dudley Geigerman, Patrick Gros, and their family members for the trouble that I put them through by my misconduct, threats, false claims, and misrepresentations. I took their money with full knowledge and intent of stealing from them, wrote them bad checks, and filed numerous lawsuits against them containing false allegations in an effort to divert attention from my crimes.

I want to apologize to GDHI, Jared Riecke, Bruce Cucchiara, Daniel Buras, Dudley Geigerman, Patrick Gros for lying about my military service. When I realized that they were proud supporters of the United States Military, I falsely claimed that I was an Army Ranger. I used this false claim of being a Ranger to support my scheme to defraud GDHI.

I fully and completely admit that the facts alleged in the petition for damages in *GDH International, Inc. versus Richard A. Sharp, et. al.*, under docket number 2011-16710, are in fact true and accurate. *See State's Exhibit #1.* Daniel Buras and Bruce Cucchiara of GDHI were relentless in their efforts to recover the money I fraudulently obtained from GDHI, Jared Riecke, Daniel Buras, Dudley Geigerman and Patrick Gros. I admit that I threatened Daniel Buras and Bruce Cucchiara when they exposed my scheme to defraud GDHI and alerted GEP and Aspect of my misconduct.

I admit that I used blogs, forums, meetings with reporters, third parties, anonymous names, pseudonyms, and other names to post false and misleading information about GDHI, Jared Riecke, Bruce Cucchiara, the family of Bruce Cucchiara, Daniel Buras, Dudley Geigerman, Patrick Gros, their businesses, agents, employees, attorneys, representatives, or family members, American Bank & Trust, and numerous public officials to harm their reputations and deflect attention from my guilt. I apologize for the harm my actions caused. The different user names I have used on various forums include, but are not limited to: Rs990892, luke1972, theyarecriminals, Dale, rocketmanwinning, Uh Oh.

I apologize to GDHI, Jared Riecke, Bruce Cucchiara, Daniel Buras, Dudley Geigerman, Patrick Gros, their agents, attorneys, representatives, and family members for the rumors, misstatements, false allegations, and fabricated stories that I disseminated over the past four years. I intended to intimidate, harass, disparage, and defame them, and my actions were wrong.

I personally apologize to Jared Riecke, his family, and American Bank and Trust for the false



allegations that I made in various frivolous civil suits. They did nothing wrong. I am sorry for posting numerous hate-filled rants and attacks on NOLA.com, Slabbed.org, and other blogs/web sites over the course of the past several years to defame, disparage, and deflect attention from my wrong doing.

I also admit that I attempted to harm and intimidate GDHI, Jared Riecke, Bruce Cucchiara, Daniel Buras, Dudley Geigerman, Patrick Gros, their agents, attorneys, representatives, and family members by fabricating and spreading lies and rumors following Bruce Cucchiara's death. I admit and express remorse for fabricating, communicating and spreading this false and baseless information. I distorted facts, spread rumors, and engaged in libelous, defamatory, and slanderous actions by falsely insinuating that GDHI, Jared Riecke, Dudley Geigerman, Daniel Buras, and Patrick Gros were involved in the death of Bruce Cucchiara. I made sure that these rumors were seen and delivered to Bruce Cucchiara's family. I further admit that I fabricated arguments to the Court wherein I claimed that Bruce Cucchiara was my star witness after Bruce was murdered. I falsely accused GDHI, Jared Riecke, Bruce Cucchiara, Daniel Buras, Dudley Geigerman, Patrick Gros, their agents, attorneys, representatives, and family members in the murder of Bruce Cucchiara without having any evidence. I spread these false allegations and rumors over the internet and in person. All of my claims were false. I apologize to the family of Bruce Cucchiara for any heartache and harm that my misconduct caused.

As part of my scheme to cover up my misconduct and intimidate and disparage GDHI, Jared Riecke, Bruce Cucchiara, Daniel Buras, Dudley Geigerman, Patrick Gros, their agents, attorneys, representatives, or family members, I had numerous communications with the media wherein I provided false and misleading information about them, including, but not limited to, falsely suggesting that they were involved in Bruce Cucchiara's murder.

As further part of my scheme to cover up my misconduct and intimidate and disparage GDHI, Jared Riecke, Bruce Cucchiara, Daniel Buras, Dudley Geigerman, Patrick Gros, their agents, attorneys, representatives, and family members, I had numerous meetings with law enforcement agencies and police departments. I falsely accused GDHI, Jared Riecke, Daniel Buras, Dudley Geigerman, Patrick Gros, their agents, attorneys, representatives, and family members of inappropriate or unlawful behavior, including, but not limited to, Bruce Cucchiara's murder.

I admit that the assertions I made through my motion entitled "Motion to Re-Open Civil Action to Set Aside Settlement Obtained By False Imprisonment With Complicity, From Failure to Disclose Judicial Conflict, Incorporated Memorandum and Request For Appointment of Ad Hoc Judge and Order," under docket No. 2011-16710, were false, misleading and completely fabricated by me and my then attorney Daniel Abel. *See State's Exhibit #2.* I make the same admission for the allegations contained in the petition I filed in the Southern District of Texas under Case No. 3:12-CB-00305, those allegations were also false, misleading and completely fabricated by me. *See State's Exhibit #3.* I fabricated the numerous false and outlandish accusations in the above referenced pleadings against GDHI, Jared Riecke, Bruce Cucchiara, Daniel Buras, Dudley Geigerman, Patrick Gros, their agents, attorneys, business interests, representatives, and family members in an effort to destroy their credibility and cast doubt on the charges to which I now admit guilt. In addition to admitting the above referenced pleadings are entirely false, I would like to specifically admit the following:

- 1) I was not falsely imprisoned as I claimed.
- 2) That I fabricated the allegations, and had no evidence to support any claim that GDHI, Jared Riecke, Bruce Cucchiara, Daniel Buras, Dudley Geigerman, Patrick Gros, their agents, attorneys, business interests, representatives, or family members conspired with any Judge of the Twenty-Second Judicial District to set my bond amounts.
- 3) I am aware that a Trustee in the Southern District of Texas filed an action against GDHI to recover property I transferred to GDHI when I entered into a Settlement and Consent Judgment in the Civil Case. I purchased the fishing camp and boat referenced in this litigation. I donated the property to Seiran, and when I left the company, the property was returned to me. Seiran obtained a judgment against me for this property while I was in jail or in Iraq. I was in jail when the final injunction was granted to Seiran and was not served with notice of the judgment or orders of the Texas Court. I admit that I told GDHI and the Court that I owned the property prior to the transfer. GDHI had no knowledge of any alleged wrongdoing between me and Seiran, my old company. I did not advise the Court, GDHI, or its attorneys that the ownership of the property transferred to

GDHI in the Settlement and Consent Judgment was in dispute. I was not aware of any judgment against me in any Texas State Court actions when I transferred the property to GDHI. I was in jail and did not participate in those proceedings, and received no notice of the judgment or proceedings prior to transferring the property to GDHI. I further admit that it was my idea to use the property in Plaquemines Parish to settle the civil suit against me in St. Tammany Parish.

- 4) I falsified all allegations regarding threats allegedly made by GDHI, Jared Riecke, Bruce Cucchiara, Daniel Buras, Dudley Geigerman, Patrick Gros, their agents, attorneys, representatives, or family members. No one threatened me. To the contrary, I attempted to bully, intimidate, and threaten them in an effort to dissuade them from pursuing any actions against me.
- 5) I admit that I lied, falsified and fabricated all allegations related to misconduct, public corruption, undue influence, or similar claims by GDHI, Jared Riecke, Bruce Cucchiara, Daniel Buras, Dudley Geigerman, Patrick Gros, Julian J. Rodrigue, Jr., Mike Cooper, their agents, attorneys, representatives, and family members.
- 6) I fabricated the allegations of a conflict of interest and inappropriate contact and/or communications between GDHI, Jared Riecke, Bruce Cucchiara, Daniel Buras, Dudley Geigerman, Patrick Gros, their agents, attorneys, representatives, and family members, and the Covington Police Department, the St. Tammany Parish District Attorney's Office, the Covington Mayors Office and the Judges of the Twenty-Second Judicial District.

I fully and completely admit that I spread false rumors and fabricated claims against Brian Palmisano regarding any alleged involvement in the false schemes I alleged against GDHI, Jared Riecke, Bruce Cucchiara, Daniel Buras, Dudley Geigerman, Patrick Gros, their agents, attorneys, representatives, and family members. He had nothing to do with my guilt or my arrest. I wanted to disparage him and tarnish his reputation because I attempted to mislead Palmisano in an effort to obtain funds from him to pay GDHI for the amounts I stole. I apologize for the harm I caused Mr. Palmisano.

In USDC Southern District of Texas Civil Matter H-13-0836, Bankruptcy Matter Adversary



No 12-3113, I admit that I contacted the Trustee and spread the same malicious lies and rumors against GDHI, Jared Riecke, Bruce Cucchiara, Daniel Buras, Dudley Geigerman, Patrick Gros, their agents, attorneys, representatives, and family members that are set forth in this allocation. I apologize for this action.

I, Richard Sharp, have made the following admission/allocation under my own free will, I have not been forced to make any of the statements listed above. In fact, I, Richard Sharp, make the above admissions and statements because they are in fact true and correct.


Richard A. Sharp

June 3rd, 2015
Date

A TRUE COPY

Clerk, 22nd Jud. Dist. Court
ST. TAMMANY PARISH, LA.