

FELONY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

BILL OF INFORMATION FOR THEFT OF GOVERNMENT FUNDS

UNITED STATES OF AMERICA * CRIMINAL NO.
v. * SECTION:
BILLY RAY LAWRENCE * VIOLATION: 18 U.S.C. §641
* * *

The United States Attorney charges that:

COUNT 1 - THEFT OF GOVERNMENT FUNDS

A. AT ALL MATERIAL TIMES HEREIN:

1. Prior to and in August 2005, the defendant, **BILLY RAY LAWRENCE**, resided at and used as his primary residence 2227 Easter Lane, New Orleans, Louisiana 70114, in the Eastern District of Louisiana.

2. From on or about May 28, 2004, up to and including August and September 2005, the defendant, **BILLY RAY LAWRENCE**, also owned a residence located at 3417 Short Street, New Orleans, Louisiana 70125, in the Eastern District of Louisiana, which he did not occupy.

3. From on or about March 2005 to about August 29, 2005, **J.B.**, a sibling of defendant, **BILLY RAY LAWRENCE**, lived alone in the residence located at 3417 Short Street, New Orleans, Louisiana 70125, and used it as her primary residence.

4. Hurricane Katrina made landfall in Louisiana on August 29, 2005, and caused widespread damage to the Gulf Coast region of Louisiana, including the New Orleans, Louisiana area.

5. Pursuant to legislation passed by the Congress of the United States of America, with the approval of the President of the United States, funds were appropriated to the Department of Housing and Urban Development (“HUD”), an agency or department of the United States of America, for a Community Development Block Grant (“CDBG”) for Louisiana hurricane victims. The purpose of this CDBG was to assist and aid owners of property damaged or destroyed by Hurricanes Katrina and Rita in August and September of 2005. The grant money was disbursed under a program known as the Louisiana Road Home Program (“LRHP”). HUD prepared the rules and regulations governing the disbursement of grant money through the State of Louisiana. The State of Louisiana, through the Office of Community Development, Division of Administration, contracted with ICF International, Inc. to administer the LRHP.

6. One of the major requirements for receiving grant money from the LRHP was that the damaged property be the primary residence of the applicant on August 29, 2005.

7. On or about February 28, 2007, in the Eastern District of Louisiana, the defendant, **BILLY RAY LAWRENCE**, submitted his completed application for LRHP funds, declaring in the application that on August 29, 2005, his primary residence was 3417 Short Street, New Orleans, Louisiana 70125.

8. On or about January 17, 2008, in the Eastern District of Louisiana, the defendant, **BILLY RAY LAWRENCE**, attended and completed his closing to obtain his LRHP grant funds. As part of the closing, the defendant, **BILLY RAY LAWRENCE**, submitted a completed, signed LRHP Grant Recipient Affidavit stating that his primary residence on the date Hurricane Katrina struck Louisiana was 3417 Short Street, New Orleans, Louisiana 70125. As a result of his representations, on January 28, 2008, the defendant, **BILLY RAY LAWRENCE**, received \$68,486.31 in federal funds from the Department of Housing and Urban Development Community Development Block Grant disbursed under LRHP. On or about October 23, 2008, the defendant, **BILLY RAY LAWRENCE**, received an additional \$30,000 in federal funds from the Department of Housing and Urban Development Community Development Block Grant disbursed under LRHP.

B. THE OFFENSE OF THEFT OF GOVERNMENT FUNDS

9. From on or about February 28, 2007, to on or about October 23, 2008, in the Eastern District of Louisiana, the defendant, **BILLY RAY LAWRENCE**, did knowingly steal, purloin, and convert to his own use money of the United States Department of Housing and Urban Development, a department and agency of the United States, to which he was not entitled, having a value of \$98,486.30; all in violation of; all in violation of Title 18, United States Code, Section 641.

NOTICE OF FORFEITURE

1. The allegations in this Bill of Information are re-alleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Count 1, the defendant, **BILLY RAY LAWRENCE**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461, any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 641.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

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

All in violation of Title 18, United States Code, Sections 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.



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New Orleans, Louisiana
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