

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

**UNITED STATES OF AMERICA** \* **CRIMINAL DOCKET NO.**  
\*  
**v.** \* **SECTION: “K”**  
\*  
**ROBERT LOMBARDINO** \* **VIOLATION: 18 U.S.C. 641**  
\* \* \*

**F A C T U A L B A S I S**

The Defendant, **ROBERT LOMBARDINO** (hereinafter, “Lombardino”), has agreed to plead guilty as charged to the one-count bill of information charging him with theft of government money, in violation of Title 18, United States Code, Section 641.

Should this matter have gone to trial, the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the indictment now pending against the defendant:

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”) for a Community Development Block Grant

("CDBG") for Louisiana hurricane victims. HUD is, and was, at the time of the offense, an agency or department of the United States of America. 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 LRHP.

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

At the time Hurricane Katrina made landfall, on August 29, 2005, **DEFENDANT LOMBARDINO** owned a home located at 2501 Livaccari Drive, New Orleans, Louisiana 70092, which he rented and did not occupy.

From on or about November 2004 to about August 29, 2005, **DEFENDANT LOMBARDINO** rented the home located at 2501 Livaccari Drive, New Orleans, Louisiana 70092, to **S. W. and R. W.**, who used the property as their primary residence.

At the time Hurricane Katrina made landfall, **DEFENDANT LOMBARDINO** used as his primary residence a home located at 63 Fritz Whitfield Road, Picayune, Mississippi 39466.

On or about October 24, 2006, **DEFENDANT LOMBARDINO** submitted his completed application for a grant under Road Home. The application stated that **DEFENDANT LOMBARDINO'S** primary residence on the date Hurricane Katrina struck Louisiana, August

29, 2005, was 2501 Livaccari Drive, New Orleans, Louisiana 70092.

On or about January 2, 2007, in the Eastern District of Louisiana, **DEFENDANT LOMBARDINO** attended his initial LRHP appointment and listed his primary residence on the date Hurricane Katrina struck Louisiana, August 29, 2005, was 2501 Livaccari Drive, New Orleans, Louisiana 70092.

On or about December 17, 2007, in the Eastern District of Louisiana, **DEFENDANT LOMBARDINO** closed on the Road Home grant. As part of the closing process, **DEFENDANT LOMBARDINO** was required to confirm and sign various closing documents, including a Road Home Grant Recipient Affidavit. The Road Home Grant Recipient Affidavit signed by **DEFENDANT LOMBARDINO** stated that **DEFENDANT LOMBARDINO'S** primary residence on the date Hurricane Katrina struck Louisiana, August 29, 2005, was 2501 Livaccari Drive, New Orleans, Louisiana 70092.

As a result of his actions on his application for funds and money described above, on December 19, 2007, the defendant, **ROBERT LOMBARDINO**, received direct financial assistance from the LRHP totaling \$134,000. Of this amount, \$84,000 was provided to **DEFENDANT LOMBARDINO** in the form of a "Compensation Grant," which he received for selling the property located at 2501 Livaccari Drive, New Orleans, Louisiana 70092 to Road Home pursuant to Road Home Benefit Selection Option Two.

By engaging in the behavior outlined above, **DEFENDANT LOMBARDINO** did knowingly embezzle, steal, purloin, and convert to his own use HUD benefits to which he knew he was not entitled.

The above facts come from an investigation conducted by agents from the Department

