

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 08-140

v. * SECTION: "B"

BETTY JEFFERSON * VIOLATIONS: 18 U.S.C. §371
ANGELA COLEMAN *

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FACTUAL BASIS

Should this matter have gone to trial, the government would have proved beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible exhibits, including the testimony of employees of the Federal Bureau of Investigation ("FBI"), employees of the Internal Revenue Service ("IRS"), employees of the State of Louisiana, employees of the federal government, family members of the defendants, and others, the following facts to support the allegations charged by the United States Attorney in the Third Superseding Bill of Information now pending against the defendants, **BETTY JEFFERSON** and **ANGELA COLEMAN**.

Through the testimony of the individuals described above and admissible exhibits, the government would have proved that **BETTY JEFFERSON** and **ANGELA COLEMAN**, along with Mose Jefferson, Renee Gill Pratt, Brenda Jefferson Foster, and others known and unknown to the United States Attorney, organized and schemed with each other to obtain money and property through fraud from the United States of America, the State of Louisiana, the City of New Orleans, Orleans Parish, its citizens, and others, within the Eastern District of Louisiana and elsewhere; and in so doing, also:

- organized, incorporated and controlled tax exempt companies which were eligible to receive Grants and line item appropriations from the State of Louisiana;
- wrote and submitted Grant proposals and reports to state and federal agencies, purporting to use all funds for charitable, educational and public purposes, and ultimately misappropriated portions of the funds for their own personal financial benefit, as more fully described below;
- opened bank accounts in the non-profits' names, listing themselves or individuals under their control as signatories on the non-profits' bank accounts in order to maintain check writing authority over the funds;
- submitted expenditure reports to the state and federal agencies that falsely and fraudulently represented that the Grant funds had been spent according to the Grant requirements, knowing they had misappropriated portions of these funds for their personal financial benefit;

- submitted false and fraudulent reports representing that a certain number of individuals had been assisted with Grant funds, knowing such representations to be false;
- wrote checks from non-profit bank accounts to companies associated with the conspiracy to create the appearance to an outside auditor that the checks had been written to pay for legitimate business expenses, knowing the Conspiracy's companies that received the funds had provided no services to the non-profits and had been used as a means to direct money to members of the conspiracy and others for their personal use and financial benefit;
- hired an outside accountant to write non-profit checks in order to give the appearance that the non-profit funds were being properly used and accounted for, knowing that the accountant signed the checks from a list prepared and provided to him by members of the conspiracy and the accountant had no day to day knowledge of the non-profits' operations;
- made it appear on budget summaries that the provided funds were being paid to employees who worked for the non-profits, knowing these purported employees (hereinafter referred to as "straw payees") did not work for the non-profits, never received the checks or money, and were not aware that a payment had been issued to them;
- forged straw payees' signatures and deposited the checks into their own bank accounts, the defendants' companies' bank accounts, or mailed the checks directly

to credit card companies for payment of the defendants' personal credit card charges, and otherwise utilized the funds for their own personal benefit;

- appropriated funds and obtained grants from the State of Louisiana's general fund, the Governor's Office of Urban Affairs, and other sources in the name of the conspiracy's non-profits, in furtherance of the scheme to defraud;
- wrote checks to straw payees from bank accounts associated with the Tax Assessor's Office for the 4th Municipal District for Orleans Parish and deposited those checks into personal bank accounts, defendants companies' bank accounts, or mailed those checks to pay off personal credit card debt, and otherwise utilized State of Louisiana and Orleans Parish funds for their personal benefit;
- engaged in financial transactions designed to obscure, hide, and otherwise perpetuate the fraud described above;

Through the testimony of various family members, associates, and others, the government would have presented testimony and admissible tangible exhibits to prove that Mose Jefferson was the brother of defendant **BETTY JEFFERSON** and Brenda Jefferson Foster, the uncle of defendant **ANGELA COLEMAN**, and the boyfriend of Renee Gill Pratt.

The government would have further proved through the introduction of competent testimony and documentation that Mose Jefferson controlled the finances and general operation of the non-profits Orleans Metropolitan Housing and Community Development, Inc. ("Orleans Metro") and Care Unlimited Project Chance ("Project Chance") and the for-profit companies Southwind Consultants, Inc., and Southwind Consultants, LLC ("Southwind"), Enterprise Consultants, Inc. and Enterprise Consultants, LLC ("Enterprise Consultants") and B.E.P. Consulting Services, LLC

("B.E.P."). The government would have introduced competent testimony to prove that Mose Jefferson, in consultation and concert with Renee Gill Pratt, Louisiana Legislator A, his niece, and former United States Congressman A, his brother, worked to secure and ensure funding for Orleans Metro, Care Unlimited Project Chance, Care Unlimited Bridge Program, New Orleans Drug Education and Intervention Center, Central City Adult Education, and other non-profit entities.

Through the introduction of competent testimony of friends, associates, and family members, the government would have proved beyond any reasonable doubt that Mose Jefferson's primary occupation was as a political organizer and that in this capacity he held a key role in the elections of Renee Gill Pratt, first to the House of Representatives for District 91, State of Louisiana, and then to the position of City Councilmember for District B in the City of New Orleans and of defendant **BETTY JEFFERSON** to the position of Tax Assessor for the 4th Municipal District of Orleans Parish.

The government would have also proved that Mose Jefferson owned, operated, and received rental income from 3313 South Saratoga Street, New Orleans, Louisiana, through his corporate entity, Southwind and later, B.E.P and received further rental income from 2712-2716 Loyola Avenue, New Orleans, Louisiana, also known as "Mose Manor," through his corporate entity, Enterprise Consultants. The government would have further proved that inter-related familial companies and political offices of Renee Gill Pratt and Louisiana Legislator A were the exclusive source of rental income Mose Jefferson received through his ownership of 3313 South Saratoga Street. The government would have introduced exhibits and testimony to prove Orleans Metro retained nominal title and ownership of 3313 South Saratoga Street, New Orleans, Louisiana from

June 24, 1992 to June 12, 2002, at which time Mose Jefferson effected its transfer to his company, Southwind.

Should this matter have gone to trial, the government would have proved that from May 4, 1998 through the date of the Superseding Bill of Information, **BETTY JEFFERSON** was the duly elected Tax Assessor for the 4th Municipal District of Orleans Parish in the State of Louisiana. Further documentation and testimony would be introduced to prove that as Tax Assessor for the 4th Municipal District of Orleans Parish, the defendant **BETTY JEFFERSON** used and operated a bank account associated with the tax assessor's office, for which she alone was listed as signatory.

Also through the introduction of competent testimony and admissible, tangible exhibits the government would have proved beyond any reasonable doubt that **BETTY JEFFERSON** retained check signing authority for and oversaw the general operation of the non-profits known as Central City Adult Education Agency, Inc. and Greater St. Stephen Manor, and, along with defendant **ANGELA COLEMAN**, retained check signing authority for and oversaw the general operation of the non-profit known as Bridge Program. The government would have further proved that while **BETTY JEFFERSON** and **ANGELA COLEMAN** retained check signing authority over the non-profit Project Chance, they deferred decision-making, grant writing, expenditure of funds, and nearly all other operational facets of Project Chance to Mose Jefferson and to a lesser extent Bennie Jefferson, brother to **BETTY JEFFERSON**, Mose Jefferson, and Brenda Jefferson Foster. The government would have also introduced evidence to prove that at various times, the above-described non-profit entities, with the exception of Greater St. Stephen Manor, were funded through the efforts of Renee Gill Pratt, in concert with Mose Jefferson, and that these non-profits paid rent with funds

provided by Renee Gill Pratt and Mose Jefferson to Mose Jefferson, through one or more of his corporate entities.

Testimony and exhibits would be introduced to prove that **BETTY JEFFERSON** retained check signing authority and oversaw the general operation of the for-profit entities known as Jefferson Consultants, Inc., Jefferson Consultants, LLC ("Jefferson Consultants") Jeffco Services, Inc. and Jeffco Services, LLC ("Jeffco"), and Maximal Home Mortgage, LLC ("Maximal Mortgage").

Should this matter have gone to trial, the government would have proved through the testimony of witnesses and the admission of exhibits that **ANGELA COLEMAN** was the daughter of defendant **BETTY JEFFERSON** and the niece of Mose Jefferson and Brenda Jefferson Foster and that she was also known at various times as "Angela Howard."

Evidence would have been presented to prove that **ANGELA COLEMAN** retained check signing authority and oversaw the general operation of the for-profit entities known as A Plus Promotional Printing, LLC ("A Plus"), Matco, Inc. and The Matco Group, LLC ("Matco").

The government would have introduced exhibits and testimony to prove that **ANGELA COLEMAN** had a credit card with American Express in the name of "Angela Coleman/Coleman Certified Shorthand" for three approved card users: **BETTY JEFFERSON**, **ANGELA COLEMAN** and Marvin Coleman, her husband, and that the payments for the three American Express cards were reflected on account ending #3002 ("AmExCC3002").

Evidence would have been introduced to prove that beginning in January 2003, Standard Mortgage Corporation had a mortgage on 1723 Valmont Street ("Standard Mgt. Loan #117513"),

for which defendant **ANGELA COLEMAN** and Marvin Coleman owed a monthly mortgage note of approximately \$1,344.25.

Should this matter have gone to trial, the government would have proved through the testimony of witnesses and the admission of exhibits that Brenda Jefferson Foster was at various times listed in documentation submitted to the State of Louisiana as being an executive and board member of the non-profit Care Unlimited, and its programs, Project Chance and the Bridge Program. Evidence would also be introduced to prove that Brenda Jefferson Foster was also at various times listed as the contact person for Care Unlimited.

Further testimony would have been introduced to prove that Brenda Jefferson Foster performed general office duties, including typing, filing, and mailing, for **BETTY JEFFERSON** and her companies, Mose Jefferson and his companies, and others. Further testimony would have been introduced to prove that Brenda Jefferson Foster, with the full knowledge, assistance, and consultation of **BETTY JEFFERSON**, **ANGELA COLEMAN**, Mose Jefferson, and others, forged signatures, falsified records, submitted fraudulent documentation, and otherwise perpetrated a fraud upon the State of Louisiana, the United States of America, the City of New Orleans and others in the purported operation of the non-profits Project Chance, Bridge Program, Central City Adult Education, Community Empowerment and Redevelopment Program ("CERP"), and Orleans Metro. Included among the evidence the government would have presented is that Brenda Jefferson Foster's name was submitted to all overseeing authorities as "Brenda Foster" in an effort to create the impression that an individual not related to the Jefferson's was associated with and overseeing the various non-profits.

Testimony and exhibits would further be introduced to prove that Project Chance, Bridge Program, Central City Adult Education, New Orleans Drug Education and Intervention, and CERP were funded at various times through line item appropriations and grant money provided by the State of Louisiana and that these grant monies and line item appropriations were provided through the authority and efforts of Renee Gill Pratt and Louisiana Legislator A, who utilized their authority to fund these non-profits as a direct result of the efforts of Mose Jefferson. Further evidence and testimony would be introduced to prove that for the 2003 fiscal year, Care Unlimited Bridge Program was funded by a \$99,350.00 federal earmark provided by former United States Congressman A, also the direct result of the efforts of Mose Jefferson.

Should this matter have gone to trial, the government would have introduced testimony and exhibits to prove that the Legislative Office of State Representative for the State of Louisiana ("State Representative's Office") was an elected position within the Legislative Branch of the State of Louisiana and that an elected State Representative was entrusted with the authority to participate in the legislative process for the State of Louisiana, including voting on budgetary measures, appropriating funds to various entities, including non-profits, and otherwise representing the district by which he or she was elected. The government would have presented evidence to prove that among the authorities of the Office of State Representative for District 91 were the appropriation of State of Louisiana funds to qualifying non-profits, the direction of grant money to qualifying non-profits from money designated to the Governor's Office of Urban Affairs, and the direction of grant money designated to the Louisiana Stadium and Exposition District, and the ability to lease office space within the district of representation.

The 1999-2000 Louisiana Appropriation to Central City Adult Education

Through the introduction of competent testimony and admissible exhibits, the government would have proved beyond any reasonable doubt that in the regular Legislative session for the State of Louisiana in the year 1999, Renee Gill Pratt, the representative for House District 91, through the use of her position as a legislator, and in consultation and concert with Mose Jefferson, secured funding for the non-profit Central City Adult Education of at least \$55,000 for the fiscal year 1999-2000. The government would have also proved that after the funds had been appropriated, members of the conspiracy, including **BETTY JEFFERSON**, **ANGELA COLEMAN**, and Brenda Jefferson Foster submitted paperwork and documentation to the State of Louisiana falsely promising that the funds would be used to tutor both adults and high school drop outs so that they could pass the state's graduate equivalency test. Evidence would show that instead of using the funds as represented, the defendants directed approximately \$39,998 in grant funds to members of the conspiracy and others, through the use of straw payees, payments to and on behalf of companies controlled by the various conspirators, including Mose Jefferson, and direct payments to members of the conspiracy. The government would have further proved that none of the above-described misappropriation of funds served in any way to further the stated goals of the non-profits or to comply with the conditions by which the funds were awarded.

The 2000-2001 Louisiana Grant to Care Unlimited Project Chance

Through the introduction of competent testimony and admissible exhibits, the government would have proved beyond any reasonable doubt that in the regular Legislative session for the State of Louisiana in the year 2000, Renee Gill Pratt, the representative for House District 91, through the use of her position as a legislator, and in consultation and concert with Mose Jefferson, secured funding for the non-profit Care Unlimited Project Chance of at least \$103,801.00 for the fiscal year

2000-2001. Evidence would show that after the funds had been appropriated, Mose Jefferson, along with Brenda Jefferson Foster, and with the knowledge of **BETTY JEFFERSON, ANGELA COLEMAN**, and Renee Gill Pratt submitted paperwork and documentation to the State of Louisiana falsely promising that the funds would be used exclusively for educational and charitable purposes. Further evidence would show that instead of using the funds as represented, the defendants directed approximately \$88,644.00 in grant funds to members of the conspiracy and others, through the use of straw payees, payments to and on behalf of companies controlled by the various conspirators, including Mose Jefferson, direct payments to members of the conspiracy and payments to handymen who performed services exclusively for Mose Jefferson (and never functioned in any not-for-profit capacity). As above, the government would have further proved that none of the above-described misappropriation of funds served in any way to further the stated goals of the non-profits or to comply with the conditions by which the funds were awarded.

The 2001-2002 Louisiana Grant to Care Unlimited Project Chance

Through the introduction of competent testimony and admissible exhibits, the government would have proved beyond any reasonable doubt that in the regular Legislative session for the State of Louisiana in the year 2001, Renee Gill Pratt, the representative for House District 91, through the use of her position as a legislator, and in consultation and concert with Mose Jefferson, secured funding for the non-profit Care Unlimited Project Chance of at least \$178,000.00 for the fiscal year 2001-2002. Evidence would show that after the funds had been appropriated, Mose Jefferson, along with Brenda Jefferson Foster, and with the knowledge of **BETTY JEFFERSON, ANGELA COLEMAN**, and Renee Gill Pratt submitted paperwork and documentation to the State of Louisiana falsely promising that the funds would be used exclusively to train, counsel and focus on the broad

problems of black males, between the ages of 9 through 21. Further evidence would show that instead of using the funds as represented, the defendants directed approximately \$176,029.00 in grant funds to members of the conspiracy and others, in fashions consistent with and similar to those described immediately above.

Through the introduction of competent testimony and admissible exhibits the government would prove that the defendants also submitted falsified documentation and paperwork to the State of Louisiana indicating that the following individuals would be hired to be a full time executive director, a trainer, counselors, a coordinator, and a private contractor, knowing that:

- Eddy Oliver, listed as the full time executive director receiving a salary of \$32,000, did not perform such services and did not receive any money, benefits or salary as represented in the Grant application;
- Lionel Brown, listed as a full time trainer receiving a salary of \$20,000, worked exclusively full time as Mose Jefferson's handyman and carpenter, did not function as a trainer for Project Chance, and in fact performed no work whatsoever for this Grant program;
- Larry Bryant, listed as a full time counselor receiving a salary of \$18,000, worked exclusively full time at the Tax Assessor's Office for the defendant **BETTY JEFFERSON** and did not work for Project Chance, and in fact never received any of the funds as listed in the Grant application;
- Akil Scott, son of Brenda Jefferson Foster, listed as the full time coordinator receiving a salary of \$27,000, did not receive a salary of \$27,000 as listed in the

Grant application, and did not perform any tasks associated with the operation of this non-profit;

- Aisha Duniver, listed as a private contractor, was living approximately half of the Grant period in Austria as a student, did not work as a private contractor, and did not receive the \$6,000 as listed in the Grant application; and
- Lawrence Edwards, listed as a full time counselor receiving a salary of \$20,200, did not receive any money, benefits or salary from the Grant program.

The 2001-2002 Louisiana Appropriation to Care Unlimited Bridge Program

Through the introduction of competent testimony and admissible exhibits, the government would have proved beyond any reasonable doubt that in the regular Legislative session for the State of Louisiana in the year 2001, defendant Renee Gill Pratt, the representative for House District 91, through the use of her position as a legislator, and in consultation and concert with Mose Jefferson, secured funding for the non-profit Care Unlimited Bridge Program of at least \$200,000.00 for the fiscal year 2001-2002. Evidence would also show that after the funds had been appropriated, members of the conspiracy, including **BETTY JEFFERSON, ANGELA COLEMAN**, and Brenda Jefferson Foster submitted paperwork and documentation to the State of Louisiana falsely promising that the funds would be used exclusively to provide a continuous academic program for students whose academic programs are disrupted because of pregnancy. Further exhibits and testimony would be introduced to prove that instead of using the funds as represented, members of the conspiracy directed \$143,941 of the 2001-2002 Appropriation for Care Unlimited Bridge Program to members of the conspiracy and others in fashions consistent with and similar to those described above.

The 2003-2004 Federal Grant to Care Unlimited Bridge Program

Should this matter have proceeded to trial, the government would have proved beyond a reasonable doubt that through the efforts of Mose Jefferson and former United States Congressman A, brother of Mose Jefferson and **BETTY JEFFERSON**, on October 1, 2003 the United States Department of Education made a direct grant of \$99,350.00 to the non-profit Care Unlimited Bridge Program. Evidence and testimony would have proved beyond a reasonable doubt that former United States Congressman A provided these funds to his sister's non-profit during a period of time after which Louisiana Legislator A had lost a special election to fill the seat of Renee Gill Pratt. Further testimony and exhibits would be introduced to prove that in securing this funding, members of the conspiracy, including **BETTY JEFFERSON**, submitted paperwork and documentation to the United States Department of Education falsely promising that the federal funds would be used to provide educational support to pregnant teenagers. Evidence would be introduced to prove that instead of using the funds as represented, members of the conspiracy directed \$60,358.00 of the 2003-2004 United States Department of Education Grant for Care Unlimited Bridge Program to members of the conspiracy or its companies in fashions consistent with and similar to those described above.

The 2004-2005 Louisiana Grant to Care Unlimited Bridge Program

Through the introduction of competent testimony and admissible exhibits, the government would have proved beyond any reasonable doubt that in the regular Legislative session for the State of Louisiana in the year 2004, Louisiana Legislator A, the representative for House District 91 and niece of **BETTY JEFFERSON** and Mose Jefferson, through the use of her position as a legislator,

in consultation and concert with Mose Jefferson, secured funding for the non-profit Care Unlimited Bridge Program of at least \$100,000.00 for the fiscal year 2004-2005. Evidence would also show that after the funds had been appropriated, members of the conspiracy, including **BETTY JEFFERSON**, **ANGELA COLEMAN**, and Brenda Jefferson Foster submitted paperwork and documentation to the State of Louisiana falsely promising that the funds would be used exclusively to provide educational support services to pregnant teenagers. Further evidence would show that instead of using the funds as represented, members of the conspiracy directed \$71,447.00 of the 2004-2005 Grant to Care Unlimited Bridge Program to members of the conspiracy or its companies in fashions consistent with and similar to those described above.

Evidence would also be introduced to prove that members of the conspiracy also submitted documentation and paperwork to the State of Louisiana indicating that Harriet Singleton would be hired to be the program coordinator, and confirmed such in follow up documents to the State, knowing that Harriet Singleton was not involved in the program, was not a teacher; and in fact received no funds from the grant.

Further exhibits and testimony would be introduced to prove that on February 28, 2005, members of the conspiracy submitted a report to the State purportedly certified by Harriet Singleton that Harriet Singleton had provided certified teachers for 6-8 weeks to twenty-five pregnant teenage clients, knowing that Harriet Singleton did not certify the February 28, 2005 submission and did not work for the Care Unlimited Bridge Program.

Further exhibits and testimony would be introduced to prove that on May 18, 2005, **BETTY JEFFERSON**, **ANGELA COLEMAN** and Brenda Jefferson Foster received from the State of Louisiana, by common carrier Federal Express, a check in the amount of \$25,000 dated March 13,

2005, representing the issuance of the third quarter funding for fiscal year 2004-2005 for the Care Unlimited Bridge Program.

The 2003-2004 HUD Payments to Greater St. Stephen Manor, Inc.

Should this matter have proceeded to trial, the government would have proved, through the introduction of competent testimony and admissible exhibits, that through the efforts of the members of the conspiracy and others, from around 2003 to around 2004, the United States Office of Housing and Urban Development ("HUD"), provided funding to Greater St. Stephen Manor. Evidence would prove that in securing this funding, members of the conspiracy submitted paperwork and documentation to HUD promising that the federal funds would be used to improve the Greater St. Stephen Manor and to provide housing assistance to qualifying elderly poor. Evidence would further prove that instead of using the funds exclusively as represented, members of the conspiracy, including **BETTY JEFFERSON** and **ANGELA COLEMAN**, directed approximately \$9,320.00 in federal funds to members of the conspiracy and others, by using the Great St. Stephen Manor bank account, and ultimately personally benefitted from the use of these checks as follows:

Amount	Check # Date	Payable to	Final Disposition or Deposited to
\$375	#1086 04/30/03	Norma Rochez	ANGELA COLEMAN (Checking Account HB606)
\$465	#1103 05/29/03	Norma Rochez	ANGELA COLEMAN (Checking Account HB606)
\$2,528	#1203 04/02/04	Norma Rochez	ANGELA COLEMAN (Savings Account HB6518)

Amount	Check # Date	Payable to	Final Disposition or Deposited to
\$460	#1104 06/30/03	Norma Rochez	ANGELA COLEMAN (Checking Account HB606)
\$1,969	#1209 04/06/04	Derrick Jefferson	BETTY JEFFERSON (HBCC0088)
\$455.50	#1210 04/20/04	Norma Rochez	ANGELA COLEMAN (Savings Account HB6518)
\$168	#1221 08/30/04	Tawanda Coleman	BETTY JEFFERSON (DiscoverCC3721)
\$2,900	#1229 09/27/04 (Converted to cashiers check)	Aisha Duniver	ANGELA COLEMAN (Savings Account HB6518)

The 2005 Louisiana Appropriation to Care Unlimited—post-Katrina Funding

Through the introduction of competent testimony and admissible exhibits, the government would have proved beyond any reasonable doubt that in the regular Legislative session for the State of Louisiana in the year 2005, Louisiana Legislator A, the representative for House District 91, through the use of her position as a legislator, in consultation and concert with Mose Jefferson, secured funding for non-profit Care Unlimited of at least \$275,000.00 for the fiscal year 2005-2006. Evidence and testimony would be introduced to prove that this money was appropriated purportedly under the condition that it would be used exclusively for charitable purposes in service of the community in the Central City area of New Orleans.

Evidence and testimony would be introduced to prove that because of the damage inflicted as a result of Hurricane Katrina, in September of 2005, the Governor of the State of Louisiana, suspended all funding for discretionary grants to non-profits, such as Care Unlimited, but that on February 13, 2006, members of the conspiracy submitted a written request to the State of Louisiana purporting that in the time immediately prior to Hurricane Katrina, services had been performed by employees of the non-profit Care Unlimited. Termed a request for reimbursement, Care Unlimited sought approximately \$37,928.28 purportedly to pay employees and contractors for services rendered prior to Hurricane Katrina. Evidence would show that as a result of this written request on February 13, 2006, the State of Louisiana later mailed a payment of \$36,213.55 to the non-profits' accountant, Jack Swetland, on Poydras Street, New Orleans on August 11, 2006. Further exhibits would be introduced to prove that members of the conspiracy requested an additional \$7,441.50 to "offer a disaster aid package to employees," which was denied by the State of Louisiana. Testimony would be introduced to prove that no non-profit work whatsoever had been done, nor any funds expended, in the period of time between when the money was appropriated and when Hurricane Katrina struck New Orleans.

Exhibits and testimony would be introduced to prove that instead of using the \$36,213.55 granted by the State of Louisiana as represented, members of the conspiracy misappropriated the funds and took the following actions in the course of this misuse:

- On August 17, 2006, members of the conspiracy caused the check for \$36,213.55 from the State of Louisiana to be deposited into a Care Unlimited bank account.
- On August 18, 2006, Brenda Jefferson Foster sent a list of names at the suggestion of Mose Jefferson, to the accountant, Jack Swetland, with an accompanying dollar

amount beside each payee's name for the accountant to write checks out of the \$36,213.55 in grant funds.

Evidence would further prove that members of the conspiracy then directly benefitted from the distribution of these checks by directing:

- Approximately \$6,414 to Brenda Jefferson Foster;
- Approximately \$2,600 to B.E.P.;
- Approximately \$3,724 issued to Dana Turner, which checks were deposited into A-Plus;
- Approximately \$1,050 to Jeffco;
- Approximately \$872 to Tawanda Coleman, which was deposited into A Plus; and
- Approximately \$184 to Angela Howard, a/k/a defendant **ANGELA COLEMAN**, which was deposited into A Plus.

The Tax Assessor's Scheme (2000-2004)

Should this matter have proceeded to trial, the government would have introduced testimony to prove that in the course of her official duties as Tax Assessor for the 4th Municipal District of Orleans Parish, defendant **BETTY JEFFERSON**, misappropriated money designated by the State of Louisiana for the operation of her office by writing the following checks from her Tax Assessor's checking account, to the below listed straw payees and family members for the personal benefit of herself and defendant **ANGELA COLEMAN** as follows:

Amount	Check # Date	Payable to	Final Disposition or Deposited to
\$300	#566 7/01/00	Aisha Duniver	BETTY JEFFERSON (Savings Account HB779)

\$750	#938 07/15/02	Aisha Duniver	BETTY JEFFERSON (AdvantaCC0006)
\$560	#1062 02/28/03	Norma Rochez	ANGELA COLEMAN (Checking Account #606)
\$750	#1134 04/15/03	Aisha Duniver	ANGELA COLEMAN (Checking Account #606)
\$560	#1135 05/04/03	Norma Rochez	ANGELA COLEMAN (Checking Account #606)
\$750	#1076 06/01/03	Aisha Duniver	BETTY JEFFERSON (Jefferson Consultants HB6942)
\$410	#1085 07/15/03	Norma Rochez	BETTY JEFFERSON (Jefferson Consultants HB6942)
\$750	# 1178 09/15/03	Marvin Coleman	BETTY JEFFERSON (Jeffco HB656)
\$700	#1344 10/30/04	Tawanda Coleman	BETTY JEFFERSON (Chase Mortgage219 : 1725 Valmont Street)
\$700	#1370 12/15/04	Tawanda Coleman	BETTY JEFFERSON (Chase Mortgage 219: 1725 Valmont Street)
\$800	#1322 7/1/04	Tawanda Coleman	BETTY JEFFERSON (Chase Mortgage 219: 1725 Valmont Street)

The Tax Evasion Scheme

Should this matter have proceeded to trial, the government would have introduced exhibits and testimony to prove that from 1999 through 2005, **BETTY JEFFERSON** and **ANGELA COLEMAN** wrote and negotiated at least 198 checks payable to "straw payees" totaling at least \$219,468.29. Evidence would show that these checks were written in a manner to disguise the

nature of payment by making them appear to be payroll checks. Further testimony would prove that the straw payees had no knowledge of the checks being written or that their identities were being used by **BETTY JEFFERSON** and **ANGELA COLEMAN**. Exhibits would prove that the checks were then deposited into personal and business accounts controlled by **BETTY JEFFERSON** and **ANGELA COLEMAN**.

Further exhibits and testimony would be introduced to prove that from 1999 through 2005, **BETTY JEFFERSON** wrote and negotiated at least 66 checks totaling \$138,123.16 payable in the names of business entities that they controlled. Exhibits would be introduced to prove that these checks were then deposited into the respective business accounts controlled by **BETTY JEFFERSON** and **ANGELA COLEMAN**. Evidence would be introduced to prove that these checks were written in a manner to disguise the nature of the payment by making them appear to be legitimate business expenses.

Evidence and testimony would be introduced to prove that on October 7, 2003, **BETTY JEFFERSON** and **ANGELA COLEMAN** opened Care Unlimited Bridge Program bank account number 865 at Bank One (BO865) and that **BETTY JEFFERSON** and **ANGELA COLEMAN** were the only individuals with signature authority. Exhibits would be introduced to prove that this account received \$199,350 in funds from the State of Louisiana and the U.S. Department of Education. Testimony would be introduced to prove that neither **BETTY JEFFERSON** and **ANGELA COLEMAN** notified the CPA for Care Unlimited, Jack Swetland, that this account existed or that the proceeds were received by Care Unlimited, Inc. Evidence would prove that of the \$199,350 in grant proceeds received by Care Unlimited from the State of Louisiana and U.S. Department of Education, the majority of the funds were paid by **BETTY JEFFERSON** and

ANGELA COLEMAN to business or personal accounts they controlled and from which they benefitted. Exhibits would be introduced to prove beyond any reasonable doubt that these proceeds were not reported to the IRS.

Exhibits would be introduced to prove that on May 16, 2005, Care Unlimited's Form 990, Return of Organization Exempt from Income Tax, for the period ended June 30, 2004, was filed with the IRS. The return, which would be introduced into evidence, did not report the \$89,000 in gross receipts received from the State of Louisiana.

Exhibits would be introduced to prove that on October 23, 2000, **BETTY JEFFERSON's** 1999 U.S. Individual Income Tax Return was received at the IRS Memphis Service Center. This return, which would be introduced into evidence, did not report the \$42,166.46 in misappropriated funds. Further testimony would be introduced to prove that **BETTY JEFFERSON** did not inform her tax return preparer that she received additional income from the non-profit entities nor from her for-profit corporate entities.

Exhibits would be introduced to prove that on August 28, 2001, **BETTY JEFFERSON's** 2000 U.S. Individual Income Tax Return was received at the IRS Memphis Service Center. This return, which would be introduced into evidence, did not report the \$42,774.83 in misappropriated funds, and the exhibit would show that **BETTY JEFFERSON** signed the return under the penalty of perjury before she filed it. Testimony would further prove that **BETTY JEFFERSON** did not inform her tax return preparer that she received additional income from the non-profit entities nor from her for-profit corporate entities.

Exhibits would be introduced to prove that on December 9, 2002, **BETTY JEFFERSON's** 2001 U.S. Individual Income Tax Return was received at the IRS Memphis Service Center. This

return, which would be introduced into evidence, did not report the \$47,260.79 in misappropriated funds. Further testimony would be introduced to prove that **BETTY JEFFERSON** did not inform her tax return preparer that she received additional income from the non-profit entities nor from her for-profit corporate entities.

Exhibits would be introduced to prove that on April 15, 2002, **ANGELA COLEMAN's** 2001 U.S. Individual Income Tax Return was received at the IRS Memphis Service Center. This return, which would be introduced into evidence, did not report the \$15,907.98 in misappropriated funds.

Exhibits would be introduced to prove that on March 8, 2004, **BETTY JEFFERSON's** 2002 U.S. Individual Income Tax Return was received at the IRS Austin Service Center. This return, which would be introduced into evidence, did not report the \$76,261.00 in misappropriated funds and Jefferson signed the return under the penalty of perjury before she filed it. Testimony would be introduced to prove that **BETTY JEFFERSON** did not inform her tax return preparer that she received additional income from the non-profit entities nor from her for-profit corporate entities.

Exhibits would be introduced to prove that on April 15, 2003, **ANGELA COLEMAN's** 2002 U.S. Individual Income Tax Return was received at the Austin Service Center. This return, which would be introduced into evidence, did not report the \$30,307.01 in misappropriated funds. Further testimony would be introduced to prove that **ANGELA COLEMAN** did not inform her tax return preparer that she received additional income from any other source or business, nor did she mention Care Unlimited, Jeffco Services or Jefferson Consultants.

Exhibits and testimony would be further introduced to prove that on a variety of dates between October 21, 2004 and April 15, 2006, **BETTY JEFFERSON** and **ANGELA**

COLEMAN's 2003, 2004, and 2005 returns were received at the Austin Service Center. The returns, which would also be introduced into evidence, did not report the misappropriated funds. Further testimony would be introduced to prove that neither **BETTY JEFFERSON** nor **ANGELA COLEMAN** informed the relevant tax return preparer that they received additional income from the non-profit entities nor the their for-profit corporate entities.

The Money Laundering

Should this matter have proceeded to trial, the government would have proved beyond a reasonable doubt that on September 27, 2004, defendant **BETTY JEFFERSON** caused check number 1229 to be drawn from Greater St. Stephen Dryades Savings Bank Account 170 ("DSB 170"), made payable to Aisha Duniver, in the amount of approximately \$2,900.00. Evidence would have shown that the defendant, **BETTY JEFFERSON**, derived these funds through the perpetration of a mail fraud.

Evidence would also show that **BETTY JEFFERSON** then converted check number 1229 into Dryades Savings Bank cashier's check number 15618, also for approximately \$2,900.00 and also in the name of Aisha Duniver. Further exhibits would be introduced to prove that on September 30, 2004, defendant **ANGELA COLEMAN** then deposited the Dryades Savings Bank cashier's check number 15618 into her personal Hibernia National Bank Savings Account #518.

The Aggravated Identity Theft

Should this matter have proceeded to trial, the government would have proved beyond a reasonable doubt that in the course of the commission of multiple acts of mail fraud, **BETTY JEFFERSON** and **ANGELA COLEMAN** used, without permission and with a criminal intent, the

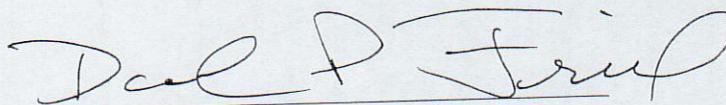
identities of the following individuals to misappropriate money granted to Care Unlimited Bridge Program for what was supposed to be purely charitable purposes:

Amount	Check # Date	Grant (bank account)	Payable to	Final Disposition or Deposited to
\$576.00	#1042 02/24/04	2003-2004 Bridge Program (BO865)	Norma Rochez	Defendants ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
\$576.00	#1070 05/28/04	2003-2004 Bridge Program (BO865)	Norma Rochez	Defendant BETTY JEFFERSON (FirstCC0168)
\$502.00	#1073 06/15/04	2003-2004 Bridge Program (BO865)	Kim Jones	Defendants ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
\$665.00	#1081 09/01/04	2004-2005 Bridge Program (BO865)	Kim Jones	Defendant ANGELA COLEMAN (Savings Account HB#6518)
\$827	#1130 03/25/05	2004-2005 Bridge Program (BO865)	Kim Jones	BETTY JEFFERSON (DiscoverCC3721)
\$954	#1144 05/30/05 (Converted to cashiers check)	2004-2005 Bridge Program (BO865)	Kim Jones	Defendants ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)

Amount	Check # Date	Grant (bank account)	Payable to	Final Disposition or Deposited to
\$882	#999996 06/07/05 (Converted to cashiers check)	2004-2005 Bridge Program (BO865)	Norma Rochez	Defendant ANGELA COLEMAN (Matco HB234)
\$630	#1145 06/15/05	2004-2005 Bridge Program (BO865)	Harriet Singleton	Defendant BETTY JEFFERSON (Converted into cashiers check deposited to ChaseCC7749)
\$906	#1156 06/20/05	2004-2005 Bridge Program (BO865)	Patrice Strickland	Defendant BETTY JEFFERSON (Jeffco HB656)
\$708.53	#1159 06/20/05	2004-2005 Bridge Program (BO865)	Marguerite Benberry	Defendant ANGELA COLEMAN (Checking Account HB606)

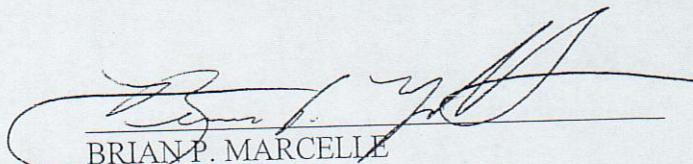
Through the introduction of testimony and exhibits as detailed herein, the government would have proved beyond a reasonable doubt the above-described facts to convict **BETTY JEFFERSON** and **ANGELA COLEMAN** of the conspiracy with which they are charged in the Third Superseding Bill of Information.

BETTY JEFFERSON
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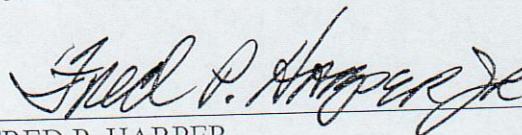
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