

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

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO. 09-280</b>
<b>v.</b>	*	<b>SECTION: "F"</b>
<b>SHANDA MOORE</b>	*	

\*       \*       \*

**FACTUAL BASIS**

Should this matter have proceeded to trial, the Government would have proved beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible exhibits, the following facts to support the allegations charged in the Indictment now pending against the defendant, Shanda Moore:

An employee of the American Red Cross would testify that in the weeks and months after Hurricane Katrina, which struck southeastern Louisiana on August 29, 2005, the Red Cross maintained disaster recovery centers to assist victims of Hurricane Katrina. Through these recovery assistance efforts, the Red Cross provided financial assistance to residents displaced or otherwise affected by Hurricane Katrina. People affected by the storms were able to apply for a one-time only financial grant of up to \$1,565 from the Red Cross. In order to receive these funds, applicants needed to present identification to a Red Cross representative that indicated residence in an affected zone. Applicants were also required to swear and attest that they had not previously received any

undisclosed additional American Red Cross financial assistance at any other Red Cross assistance location.

Competent testimony would be introduced to establish that once approved, the Red Cross made these disaster assistance funds available in one of four ways: (1) A personal check made payable to the applicant, issued on-site, and cashed with the assistance of the Red Cross; (2) A Red Cross-issued “Discover” card, issued on-site, and activated via phone by the applicant; (3) A Red Cross-issued Client Assistance Card, issued on-site, and purchased by the Red Cross from private banking institutions; and (4) A personal check authorized by the Red Cross, issued by Paychex, Inc.

Testimony by an employee of the Red Cross and admissible exhibits would be introduced to prove that the defendant, Shanda Moore, presented herself to Red Cross assistance centers on approximately seven (7) occasions between September 18, 2005 and October 25, 2005. During these visits she applied for financial assistance and indicated that she had, in fact, not received any other funds from the Red Cross on prior occasions, even though she had received prior Red Cross assistance. As a result of her actions in connection with these applications, Shanda Moore received direct financial assistance from the Red Cross totaling \$10,305, of which approximately \$8,490 was obtained by fraud.

More specifically, competent testimony and admissible exhibits would be introduced to prove that Shanda Moore fraudulently applied for assistance at a Red Cross Center on or about October 16, 2005 in Bogalusa, Louisiana (within the Eastern District of Louisiana), at which time she indicated that she had not received prior Red Cross assistance, which was false. An employee of Paychex, Inc. would testify, and admissible records from that company and the Red Cross would be submitted to prove that on or about October 27, 2005, based on the application the defendant

submitted, a personal check authorized by the Red Cross in the amount of \$1,565.00 (check no. 1028002626) was mailed by Paychex, Inc. through the U.S. Postal Service to Shanda Moore at 41489 West Interstate-55 Service Road, Hammond, Louisiana. The Government would further prove through competent evidence that the defendant cashed this check on November 4, 2005.

**READ AND APPROVED:**

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GARY SCHWABE  
Assistant Federal Public Defender

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PETER M. THOMSON  
Assistant U.S. Attorney

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SHANDA MOORE  
Defendant