

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

\*

CRIMINAL NO. 10-101

\*

SECTION: "N"

SHARI D. WHEELER

\*

VIOLATION: 18 U.S.C. §1341

\*

\*

\*

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 special agents of the Federal Bureau of Investigation ("FBI"), employees of the American Red Cross ("Red Cross"), employees of Paychex, Inc. ("Paychex"), and others, the following facts to support the allegations charged in the Bill of Information now pending against the defendant, **SHARI D. WHEELER (WHEELER)**.

An employee of the 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. The Red Cross also established and maintained disaster recovery centers for those residents affected by Hurricane Rita, which made landfall on September 24, 2005. 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 an Red Cross representative that indicated residence in an affected zone. Applicants were also required to swear and attest that they had not received any undisclosed additional American Red Cross financial assistance at any other Red Cross assistance location.

Competent testimony would be introduced that once approved, the Red Cross made these disaster assistance funds available in one of following 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; (4) A personal check authorized by the Red Cross, issued by Paychex, Inc.

Paychex, Inc., a Rochester, NY-based company that had volunteered its services to the Red Cross, processed personal checks

to applicants as deemed appropriate and authorized by the Red Cross. These checks were processed and issued to applicants via the United States Postal Service.

Testimony by an employee of the Red Cross and admissible exhibits would be introduced to prove that the defendant, **WHEELER**, presented herself to Red Cross assistance centers on thirteen (13) occasions between on or about September 15, 2005 and on or about October 26, 2005. On each visit, **WHEELER** applied for financial assistance and indicated that she had not received any other financial assistance from the Red Cross. As a result of her actions on these thirteen applications, **WHEELER** received direct financial assistance from the Red Cross totaling \$12,520.00 of which \$10,995.00 was obtained by fraud.

Testimony by employees of Paychex and other admissible exhibits would be introduced to prove that on or about November 9, 2005, in the Eastern District of Louisiana, **WHEELER** knowingly caused to be delivered to her listed address of P. O. Box 1274, Natalbany, Louisiana, through the United States mail, the following personal check authorized by the Red Cross and issued by Paychex, Inc.:

<b>Date of Application</b>	<b>Date of Mailing</b>	<b>Amount</b>	<b>Check Number</b>
10/24/2005	11/09/2005	\$1,565	1041002371

Finally, had this matter proceeded to trial, the Government would have introduced through appropriate witnesses, inculpatory statements by **WHEELER** that would prove her acknowledgment of guilt.

READ AND APPROVED:

\_\_\_\_\_  
Valerie Jusselin (Date)  
Counsel for Shari D. Wheeler

\_\_\_\_\_  
Irene Gonzalez (Date)  
Assistant U.S. Attorney

\_\_\_\_\_  
SHARI D. WHEELER (Date)  
Defendant