

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR MAIL FRAUD

FELONY

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO.
v.	*	SECTION:
TAMARA SHERETHA MORRIS	*	VIOLATION: 18 U.S.C. §1341
	*	*
	*	*

The Grand Jury charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. On or about August 29, 2005, Hurricane Katrina struck southeastern Louisiana and shortly thereafter a major disaster was declared. Similarly, a major disaster was declared in Louisiana as a result of Hurricane Rita, which made landfall on September 24, 2005. In response to these hurricanes and the damage inflicted upon the Southeastern Louisiana area, the American Red Cross (“Red Cross”) established assistance centers throughout the region in the late summer and early fall of 2005.

2. At these assistance centers, 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 asked if they had previously received financial assistance from the Red Cross and were required to attest and sign a statement that certified that the applicant had not received any other financial assistance from the Red Cross from any other assistance center.

3. Once approved, the Red Cross made these disaster assistance funds available in one of the 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, which the Red Cross purchased from national banks and which operated in a manner consistent with debit/credit/ATM cards, issued on-site; (4) A personal check authorized by the Red Cross and mailed through the United States Postal Service to an address provided by the applicant.

4. 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.

5. The defendant, **TAMARA SHEREETHA MORRIS**, presented herself to Red Cross assistance centers in Louisiana and Mississippi on eight occasions between on or about September 14, 2005 and on or about December 7, 2005. On each visit following her initial September 14 visit, **MORRIS** applied for financial assistance and falsely and fraudulently stated that she had not received any other financial assistance from the Red Cross. As a result of her false and fraudulent statements on six of these occasions, **TAMARA SHEREETHA MORRIS** received direct financial

assistance from the Red Cross in at least three of the four manners described above, totaling approximately \$10,945.00, of which approximately \$9,380.00 was obtained by fraud.

B. THE SCHEME TO DEFRAUD:

1. From on or about September 14, 2005 to on or about December 7, 2005 in the Eastern District of Louisiana and elsewhere, the defendant, **TAMARA SHERETHA MORRIS**, did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and to obtain money and property from the Red Cross, by means of false representations, pretenses, and promises, by falsely and fraudulently obtaining financial assistance from the Red Cross, beyond that to which she was entitled.

2. It was part of the scheme and artifice to defraud that on or about October 22, 2005, in the Eastern District of Louisiana, the defendant, **TAMARA SHERETHA MORRIS**, stated that she had not received any other Hurricane Katrina or Rita financial assistance from the Red Cross at any other assistance center when, in truth and in fact, she had received such assistance on prior occasions.

C. THE MAILING:

On or about October 31, 2005 the defendant, **TAMARA SHERETHA MORRIS**, for the purpose of executing the scheme and artifice to defraud, as alleged in Paragraphs A and B above, did knowingly cause to be sent to her address at P.O. Box 643, Hammond, Louisiana 70404, located in the Eastern District of Louisiana, a personal check authorized by the Red Cross, check number 1030001970 in the amount of \$1,565.00, said check issued by Paychex, Inc. and sent and delivered to the defendant via United States Postal Service, which check the defendant cashed on or about November 15, 2005;

All in violation of Title 18, United States Code, Section 1341.

COUNT 2

A. AT ALL TIMES MATERIAL HEREIN:

The allegations contained in Part A of Count 1 are re-alleged and incorporated herein as though fully set forth.

B. THE SCHEME TO DEFRAUD:

1. The allegations contained in Part B, Paragraph 1, of Count 1 are re-alleged and incorporated herein as though fully set forth.

2. It was part of the scheme and artifice to defraud that on or about November 4, 2005, in Lafayette, Louisiana, the defendant, **TAMARA SHERETHA MORRIS**, stated that she had not received any other Hurricane Katrina or Rita financial assistance from the Red Cross at any other assistance center when, in truth and in fact, she had received such assistance on prior occasions.

C. THE MAILING:

On or about November 4, 2005 the defendant, **TAMARA SHERETHA MORRIS**, for the purpose of executing the scheme and artifice to defraud, as alleged in Paragraphs A and B above, did knowingly cause to be sent to her address at P.O. Box 643, Hammond, Louisiana 70404, located in the Eastern District of Louisiana, a personal check authorized by the Red Cross, check number 1036001410 in the amount of \$1,565, said check issued by Paychex, Inc. and sent and delivered to

the defendant via United States Postal Service, which check the defendant cashed on or about November 21, 2005;


All in violation of Title 18, United States Code, Section 1341.

A TRUE BILL:

FOREPERSON



JIM LETTEN
UNITED STATES ATTORNEY
Louisiana Bar Roll No. 8517



JAN MASELLI MANN
First Assistant United States Attorney
Louisiana Bar Roll No. 9020



PETER M. THOMSON
Assistant United States Attorney
Louisiana Bar Roll No. 2147

New Orleans, Louisiana
September 2, 2010