

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**SUPERSEDING BILL OF INFORMATION
FOR CONSPIRACY TO COMMIT MAIL
FRAUD, AGGRAVATED IDENTITY THEFT,
MONEY LAUNDERING, AND TAX EVASION**

UNITED STATES OF AMERICA

* CRIMINAL NO. 08-140

v.

* SECTION: "B"

BETTY JEFFERSON
ANGELA COLEMAN

* VIOLATIONS: 18 U.S.C. §371

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The United States Attorney charges that:

COUNT ONE
(CONSPIRACY)

A. At All Times Material Herein:

Relevant Entities and Individuals

1. Renee Gill Pratt:

a. From on or about April 23, 1991 to on or about May 6, 2002, Renee Gill Pratt was the duly elected State Representative for House District 91, State of Louisiana. As a member of the

House of Representatives for the State of Louisiana, Renee Gill Pratt was able by law, practice, and custom to appropriate certain funds and money to non-profit entities, charities, schools, and municipal districts. These funds were derived from the State of Louisiana General Fund, money designated by the Governor's Office of Urban Affairs, money received by the Louisiana Stadium and Exposition District, and other sources.

b. From on or about May 6, 2002 through on or about May 31, 2006, Renee Gill Pratt was a duly elected Councilmember for Orleans Parish for District B ("City of New Orleans City Council"). As a City Councilmember, Renee Gill Pratt secured a so-called satellite office, paid for by the City of New Orleans, at 3313 South Saratoga Street.

c. Renee Gill Pratt was the girlfriend of Mose Jefferson.

d. In or around the year 2006, after leaving office as the City Councilmember for District B, Renee Gill Pratt was employed as the executive director of Care Unlimited, Inc., a non-profit organization (hereinafter non-profit) described below.

e. Renee Gill Pratt used and operated a personal bank account at Liberty Bank & Trust, ending in 532 ("LB532").

f. Renee Gill Pratt owned property located at 3311 Annunciation Street, New Orleans, Louisiana.

g. Renee Gill Pratt owned and resided in a property located at 1718 Toledano Street, New Orleans, Louisiana.

2. Mose Jefferson:

- a. 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.
- b. Mose Jefferson retained control over the finances of a bank account at Liberty Bank & Trust, ending in 963 ("LB963") associated with the non-profit Orleans Metropolitan Housing and Community Development, Inc., an account for which Mose Jefferson and Individual N were listed as signatories.
- c. Mose Jefferson retained control over the finances of the non-profit Care Unlimited Project Chance, in that he was able to direct **BETTY JEFFERSON** and **ANGELA COLEMAN**, who were listed as signatories on accounts associated with that non-profit.
- d. Mose Jefferson retained control over finances and operation of 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.").
 - i. Mose Jefferson used, operated, and controlled a bank account associated with Southwind at Liberty Bank & Trust, ending in 447 ("LB447"), for which Individual N was listed as signatory.
 - ii. Mose Jefferson used, operated, and controlled a bank account associated with Enterprise Consultants at Liberty Bank & Trust, ending in 726 ("LB726"), for which Mose Jefferson and Family Member 10 were listed as signatories and a second bank

account at Liberty Bank, ending in 537 ("LB537"), for which Mose Jefferson was listed as the sole signatory.

iii. Mose Jefferson used, operated, and controlled a bank account associated with B.E.P. at Liberty Bank & Trust, ending in 521 ("LB521"), for which Mose Jefferson was listed as signatory.

e. Mose Jefferson's primary occupation was as a political organizer. In this capacity Mose Jefferson held a key role in the elections of defendant **BETTY JEFFERSON** and Renee Gill Pratt.

f. 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.

g. Mose Jefferson operated and received rental income from 2712-2716 Loyola Avenue, New Orleans, Louisiana, also known as "Mose Manor," through his corporate entity, Enterprise Consultants.

3. **BETTY JEFFERSON:**

a. From on or about May 4, 1998 through the date of this 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.

i. As Tax Assessor for the 4th Municipal District of Orleans Parish, defendant **BETTY JEFFERSON** used, operated, and controlled a bank account at Hibernia National Bank ending in 4942 ("HB4942") associated with the tax assessor's office, an account for which **BETTY JEFFERSON** was listed as signatory.

b. **BETTY JEFFERSON** was the mother of defendant **ANGELA COLEMAN** and the sister of Mose Jefferson and Brenda Jefferson Foster.

c. Defendant **BETTY JEFFERSON** retained control over the finances and operation of the non-profit known as Central City Adult Education Agency, Inc. and, along with defendant **ANGELA COLEMAN**, retained control over the non-profit known as Care Unlimited Bridge Program.

d. Defendant **BETTY JEFFERSON** was the president of the non-profit known as Greater St. Stephen Manor, Inc. ("Greater St. Stephen Manor").

i. Defendant **BETTY JEFFERSON** used, operated, and controlled a bank account at Dryades Savings Bank, ending in 170 ("DSB170") associated with the non-profit Greater St. Stephen Manor, an account for which **BETTY JEFFERSON** had signature authority.

ii. Greater St. Stephen Manor was operated primarily through funds disbursed and provided by the United States Department of Housing and Urban Development ("HUD").

e. Defendant **BETTY JEFFERSON** retained control over the finances and 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").

- i. Defendant **BETTY JEFFERSON** used, operated, and controlled a bank account associated with Jefferson Consultants at Hibernia National Bank, ending in 6942 ("HB6942"), for which **BETTY JEFFERSON** was listed as signatory
- ii. Defendant **BETTY JEFFERSON** used, operated, and controlled a bank account associated with Jeffco at Hibernia National Bank, ending in 656 ("HB656"), for which **BETTY JEFFERSON** and **ANGELA COLEMAN** were listed as signatories.
- iii. Defendant **BETTY JEFFERSON** used, operated, and controlled a bank account associated with Maximal Mortgage at Hibernia National Bank, ending in 589 ("HB589"), for which **BETTY JEFFERSON** and **ANGELA COLEMAN** were listed as signatories.
- f. Defendant **BETTY JEFFERSON** had the following credit card accounts in her name:
 - i. Discover Credit Card, account ending #3721 ("DiscoverCC3721");
 - ii. First USA/JP Morgan Chase, account ending #0168 ("FirstCC0168");
 - iii. First National Bank of Omaha/Hibernia Visa, account ending #0088 ("HBCC0088");
 - iv. Advanta Credit Card, account ending #0006 ("AdvantaCC0006");
 - v. Chase / Bank One Credit Card, account ending #7749 ("ChaseCC7749");
 - vi. Citi Bank Credit Card, account ending #7485 ("CitiCC7485");
 - vii. Bank of America, account ending #3356 ("BOACC3356");
 - viii. MBNA Credit Card, account ending #4358 ("MBNACC4358"); and
 - ix. MBNA Credit Card, account ending #3356 ("MBNACC3356").

g. Defendant **BETTY JEFFERSON** purchased 1723-25 Valmont Street, New Orleans, Louisiana, on or about October 24, 1995. On or about November 12, 2001, 1723-25 Valmont Street was transferred to Jeffco.

h. On or about December 26, 2002, 1723 Valmont Street was transferred to defendant **ANGELA COLEMAN** and Family Member 9. **BETTY JEFFERSON** retained ownership of 1725 Valmont Street through Jeffco.

i. Beginning on or about July 23, 2003, Chase Manhattan Mortgage Corporation ("Chase Mgt Loan #6219") had a mortgage on 1725 Valmont Street, for which defendant **BETTY JEFFERSON** owed a monthly mortgage note of approximately \$965.24.

4. **ANGELA COLEMAN:**

a. Defendant **ANGELA COLEMAN** was the daughter of defendant **BETTY JEFFERSON** and the niece of Mose Jefferson and Brenda Jefferson Foster. **ANGELA COLEMAN** was also known at various times as "Angela Howard."

b. Defendant **ANGELA COLEMAN** was, at various times relevant to this Superseding Bill of Information, listed as an executive of Care Unlimited and along with defendant **BETTY JEFFERSON**, retained control over the finances of Care Unlimited Bridge Program.

c. Defendant **ANGELA COLEMAN** retained control over the finances and operation of the for-profit entities known as A Plus Promotional Printing, LLC ("A Plus"), Matco, Inc. and The Matco Group, LLC ("Matco").

i. Defendant **ANGELA COLEMAN** used, operated, and controlled a bank account associated with A Plus at Hibernia National Bank, ending in 967 ("HB967"), for which **ANGELA COLEMAN** and Family Member 9 were listed as signatories.

ii. Defendant **ANGELA COLEMAN** used, operated, and controlled a bank account associated with Matco at Hibernia National Bank, ending in 234 ("HB234"), for which **ANGELA COLEMAN** and Family Member 9 were listed as signatories.

d. Defendant **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 Family Member 9. The payments for the three American Express cards were reflected on account ending #3002 ("AmExCC3002").

e. From in or around January 2003, Standard Mortgage Corporation had a mortgage on 1723 Valmont Street ("Standard Mgt. Loan #117513"), for which defendant **ANGELA COLEMAN** and Family Member 9 owed a monthly mortgage note of approximately \$1,344.25.

5. Brenda Jefferson Foster:

a. Brenda Jefferson Foster was the sister of defendant **BETTY JEFFERSON** and Mose Jefferson and the aunt of defendant **ANGELA COLEMAN**. Brenda Jefferson Foster is an unindicted co-conspirator relative to the allegations herein.

b. 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. She was also at various times listed as the contact person for Care Unlimited.

6. Central City Adult Education Agency, Inc.:

a. Central City Adult Education Agency, Inc. ("Central City Adult Education") was a non-profit located within the City of New Orleans, Louisiana, which, at various times, stated its purpose to be providing "a basic education and GED preparation program for educationally disadvantaged adults for the Orleans area."

b. Defendant **BETTY JEFFERSON** used, operated, and controlled a bank account associated with Central City Adult Education at Hibernia National Bank, ending in 343 ("Central City Adult Education HB343"), for which **BETTY JEFFERSON** and Individual N were listed as signatories.

7. Care Unlimited, Inc.:

a. Care Unlimited, Inc. ("Care Unlimited") was a non-profit located within the City of New Orleans, Louisiana, which included, among others, the programs known as Project Chance, Bridge Program, Making Great Strides, and Community Empowerment and Redevelopment Program ("CERP").

b. From in or around 2000 to in or around 2006, Care Unlimited utilized as its nominal headquarters 3313 South Saratoga Street, a property owned by Mose Jefferson, through his company, Southwind and B.E.P.

c. Project Chance was a program of Care Unlimited, which, at various times, stated its general purpose as helping at-risk black males in the Central City-area of New Orleans. Care Unlimited Project Chance was funded at various times through grant money provided by the State of Louisiana and State of Louisiana line item appropriations.

- i. Defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** held check signing authority over a bank account associated with Project Chance at Regions Bank, ending in 061 ("Project Chance RB061"), for which **BETTY JEFFERSON** and **ANGELA COLEMAN** were listed as signatories.
- ii. Mose Jefferson used, operated, and controlled a bank account associated with Project Chance at Liberty Bank & Trust, ending in 507 ("Project Chance LB507"), for which Brenda Jefferson Foster and Individual O were listed as signatories.
- iii. Defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** held check signing authority over a bank account associated with Project Chance at Bank One, ending in 321 ("Project Chance BO321"), for which **ANGELA COLEMAN** was listed as signatory.
- iv. Mose Jefferson, aided by other members of the conspiracy, as described below, used, operated, and controlled a bank account associated with Project Chance at Liberty Bank & Trust, ending in 361 ("Project Chance LB361"), for which Individual D was listed as signatory.

d. The Bridge Program was a program of Care Unlimited, which, at various times, stated its general purpose as providing educational support services to pregnant teenagers. Care Unlimited Bridge Program was funded at various times by grant money provided through the United States

Department of Education and the State of Louisiana and State of Louisiana line item appropriations.

- i. Defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** used, operated, and controlled a bank account associated with the Bridge Program at Bank One, ending in 865 ("Bridge Program BO865"), for which **BETTY JEFFERSON** and **ANGELA COLEMAN** were listed as signatories.
- ii. Defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** used, operated, and controlled a bank account associated with Bridge Program at Hibernia National Bank, ending in 161 ("Care Unlimited HB161"), for which **BETTY JEFFERSON** and **ANGELA COLEMAN** were listed as signatories.

8. Orleans Metropolitan Housing and Community Development, Inc.:

- a. Orleans Metropolitan Housing and Community Development, Inc. ("Orleans Metro") was a non-profit within the City of New Orleans, Louisiana, which, at various times, had as its general purpose the improvement of the Central City area of New Orleans.
- b. From a time prior to or around 1999 to in or around 2006, Orleans Metro utilized as its nominal headquarters the following addresses: 936 Jackson Avenue, 2031 Jackson Avenue, and 3313 South Saratoga Street, all locations within the City of New Orleans, Louisiana.
- c. Orleans Metro retained nominal title and ownership of 936 Jackson Avenue, New Orleans, Louisiana from on or about May 29, 1992 to on or about November 29, 1999, at which time title was transferred to **BETTY JEFFERSON**.
- d. Orleans Metro retained nominal title and ownership of 3313 South Saratoga Street, New Orleans, Louisiana from on or about June 24, 1992 to on or about June 12, 2002, at which time title was transferred to Southwind.

9. Authority of the Legislative Office of State Representative District 91:

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. 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.

10. Authority of the Office of City Councilmember District B:

The Office of City Council for the City of New Orleans was an elected position within the Legislative Branch for the City of New Orleans. An elected City Councilmember was entrusted with the authority to participate in the legislative process for the City of New Orleans, including voting on budgetary measures, passing city ordinances, and other duties inherent to representing the district by which he or she was elected.

11. Authority of the Office of Tax Assessor:

The Office of Tax Assessor for the 4th Municipal District of Orleans Parish was an elected position within the Executive Branch for Orleans Parish. An elected Tax Assessor was entrusted with the authority to determine the property taxes to be paid by the constituents within his or her district. The Office was appropriated funds by the State of Louisiana to pay staff who assisted in the performance of the Office's duties.

B. THE CONSPIRACY

Beginning at a time unknown, but prior to January 1, 1998 and continuing through in or around 2006, in the Eastern District of Louisiana and elsewhere, **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, did knowingly and willfully conspire and agree to conspire, along with people known and unknown to the United States Attorney, to commit mail fraud, in violation of Title 18, United States Code, Section 1341, to commit money laundering in violation of Title 18, United States Code, Section 1956, to commit aggravated identity theft, in violation of Title 18, United States Code, Section 1028A, and to commit tax evasion by defrauding the United States Treasury and the Internal Revenue Service, in violation of Title 26, United States Code, Section 7201, and thereby defrauded the United States of America, the State of Louisiana, the City of New Orleans, and citizens thereof, and others.

C. THE SCHEME AND ARTIFICE TO DEFRAUD

It was part of the conspiracy 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, did devise and intend to devise a scheme and artifice to defraud and to obtain money and property from the United States of America, the State of Louisiana, the City of New Orleans, Orleans Parish, its citizens, and others; and in so doing, also:

1. organized, incorporated, and controlled tax exempt companies which were eligible to receive Grants and State of Louisiana line item appropriations;
2. 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 said funds for their own personal financial benefit, as more fully described below;

3. opened bank accounts in the non-profit names listing themselves, or individuals under their control, as signatories on the non-profit bank accounts in order to maintain check signing authority over the funds;
4. 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;
5. submitted false and fraudulent reports representing that a certain number of individuals had been assisted with Grant funds, knowing such representations to be false;
6. wrote checks from non-profit bank accounts to defendants' companies 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 the individual defendants and others for their personal use and financial benefit;
7. hired an outside accountant to write non-profit checks in order to give the appearance the non-profit funds were being properly used and accounted for, knowing the accountant signed the checks prepared from a list provided to him by the defendants and the accountant had no day to day knowledge of the non-profits' operations;
8. made it appear on budget summaries that Grant 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;

9. 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;
10. appropriated and distributed money 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
11. wrote checks to straw payees from bank accounts associated with the Tax Assessor's Office for 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;

D. OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

On or about the dates below, in furtherance of the conspiracy and to effect the unlawful objects thereof, and in a manner and fashion consistent with the fraudulent receipt and misuse of the funds and property described above, the defendants **BETTY JEFFERSON** and **ANGELA COLEMAN**, along with Mose Jefferson, Renee Gill Pratt, Brenda Jefferson, and others known and unknown to the United States Attorney, committed and caused to be committed the following Overt Acts, among others, in the Eastern District of Louisiana and elsewhere:

a. The 1999-2000 Louisiana Appropriation to Central City Adult Education

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, 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. 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. Instead of using the funds as represented, the defendants directed approximately \$39,998 in grant funds to members of the conspiracy and others by using the Central City Adult Education HB343 bank account as follows:

1. Members of the conspiracy caused to be written checks from the 1999-2000 Central City Adult Education grant funds to straw payees totaling approximately \$10,565, said straw payee checks were ultimately used for the personal financial benefit of defendant **BETTY JEFFERSON**.
2. Members of the conspiracy caused to be written checks from 1999-2000 Central City Adult Education grant funds totaling approximately \$2,750 to the corporate entity Southwind., owned by Mose Jefferson.
3. Members of the conspiracy caused to be written a check from 1999-2000 Central City Adult Education grant funds in the amount of \$475.64 to pay the insurance premium on 2712-2716 Loyola Avenue ("Mose Manor"), a building owned by Mose Jefferson through the corporate entity Enterprise Consultants.
4. Members of the conspiracy caused to be written checks from 1999-2000 Central City Adult Education grant funds totaling approximately \$13,333 directly to defendant **BETTY JEFFERSON**.

5. Members of the conspiracy caused to be written checks from 1999-2000 Central City Adult Education grant funds totaling approximately \$5,912 directly to defendant **ANGELA COLEMAN**, in her name or in the name of her alias, "Angela Howard."

6. Members of the conspiracy caused to be written checks from 1999-2000 Central City Adult Education grant funds totaling approximately \$2,016 to Brenda Jefferson Foster.

b. The 2000-2001 Louisiana Grant to Care Unlimited Project Chance

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, 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. 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. Instead of using the funds as represented, the defendants directed approximately \$88,644.00 in grant funds to members of the conspiracy and others, by using the Project Chance BO321 bank account, as follows:

1. Members of the conspiracy caused to be written checks from the 2000-2001 Project Chance Grant funds to straw payees and family members totaling approximately \$22,098;

2. Members of the conspiracy caused to be written checks from the 2000-2001 Project Chance Grant funds totaling approximately \$13,541 which were used to pay the wages of Mose Jefferson's handyman, Individual O;

3. Members of the conspiracy caused to be written checks from the 2000-2001 Project Chance Grant funds made payable to Individual Q totaling approximately \$5,416, which the Mose Jefferson deposited into his Southwind and Enterprise Consultants bank accounts; and

4. Members of the conspiracy caused to be written checks totaling approximately \$2,800 to Individual S for work done on defendant **BETTY JEFFERSON'** s personal residence at 936 Jackson Avenue.

c. The 2001-2002 Louisiana Grant to Care Unlimited Project Chance

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, 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. 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. Instead of using the funds as represented, the defendants directed approximately \$176,029.00 in grant funds to members of the conspiracy and others. The defendants also submitted 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, when in truth and fact the defendants well knew that:

1. Individual N, listed as the full time executive director receiving a salary of \$32,000, did not receive any money, benefits or salary as represented in the Grant application;

2. Individual O, 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;

3. Individual H, 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;

4. Family Member 6, 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;

5. Family Member 3, 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

6. Individual Q, listed as a full time counselor receiving a salary of \$20,200, did not receive any money, benefits or salary from the Grant program.

7-29. On or about the below listed dates, in the below listed amounts, and on other dates and amounts known and unknown to the U.S. Attorney, members of the conspiracy directed the 2001-2002 Louisiana Grant for Care Unlimited Project Chance to members of the conspiracy or its companies by writing checks out of Project Chance RB061 to the below listed straw payees, and ultimately personally benefitted from the use of these checks as follows:

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
7	\$1,999.98	(no #) 09/27/01	Family Member 3	ANGELA COLEMAN (Checking Account CO901)
8	\$2,200	(no #) 09/28/01	Individual H	BETTY JEFFERSON (Jeffco HB656)
9	\$1,100	#1006 10/12/01	Individual H	BETTY JEFFERSON (DiscoverCC3721)
10	\$2,000	#1016 10/31/01	Family Member 4	BETTY JEFFERSON (FirstUSACC0168)
11	\$2,000	#1020 11/14/01	Family Member 4	BETTY JEFFERSON (Jeffco HB656)
12	\$340	#1019 11/15/01	Family Member 5	ANGELA COLEMAN (Checking Account CO901)
13	\$2,916	#1023 11/15/01	Family Member 3	ANGELA COLEMAN (Checking Account CO901)
14	\$500	#1026 11/15/01	Family Member 6	BETTY JEFFERSON (AdvantaCC0006)
15	\$704	#1022 12/03/01	Family Member 2	BETTY JEFFERSON (FirstUSACC0168)
16	\$1,800	#1039 12/11/01	Individual J	BETTY JEFFERSON (Jeffco HB656)
17	\$1,250	#1057 12/20/01	Individual H	BETTY JEFFERSON (MBNA4358)
18	\$1,333	#1059 12/20/01	Family Member 3	ANGELA COLEMAN (Checking Account CO901)
19	\$1,600	#1061 01/15/02	Individual H	BETTY JEFFERSON (DiscoverCC3721)

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
20	\$816.67	#1072 01/26/02	Individual H	ANGELA COLEMAN (Checking Account CO901)
21	\$1,000	#1071 01/30/02	Individual J	ANGELA COLEMAN (Savings Account HB6518)
22	\$300	#1077 02/03/02	Family Member 7	BETTY JEFFERSON (HBCC0088)
23	\$816.67	#1118 03/25/02	Individual H	BETTY JEFFERSON (MBNA4358)
24	\$1,000	#1119 03/25/02	Individual I	BETTY JEFFERSON (FirstCC0168)
25	\$800	#1136 04/15/02	Family Member 3	ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
26				
27	\$1,000	#1144 05/15/02	Individual H	BETTY JEFFERSON (DiscoverCC3721)
28	\$2,066	#1177 06/28/02	Individual I	Mose Jefferson (Enterprise Consultants LB726)
29	\$2,000	#1327 06/28/02	Family Member 7	BETTY JEFFERSON (Jefferson Consultants HB6942)

30-40. Beginning in or around September 2001 and continuing through in or around June 2002, members of the conspiracy caused to be written checks from the Care Unlimited Project Chance RB061 bank account associated with the 2001-2002 Louisiana Grant for Care Unlimited

Project Chance RB061, to themselves, their companies, employees, personal remodeling contractors and family members, as follows:

- 30. Approximately \$39,585 to Mose Jefferson;
- 31. Approximately \$31,833 to Family Member 8;
- 32. Approximately \$25,276 to Brenda Jefferson Foster;
- 33. Approximately \$10,418 to Mose Jefferson's handyman, Individual O, as compensation, in part, for work Individual O and others performed in the renovation of 3311 Annunciation Street, New Orleans, LA, a property owned by Renee Gill Pratt.

a. As a result of this renovation work, Renee Gill Pratt claimed a deduction on her 2002 Federal Tax Return of \$3,000.

- 34. Approximately \$8,608 directly to defendant **BETTY JEFFERSON**;
- 35. Approximately \$7,950 to Southwind;
- 36. Approximately \$2,400 to pay a worker who never heard of Care Unlimited to remodel defendant **BETTY JEFFERSON**'s personal residence at 936 Jackson Avenue;
- 37. Approximately \$4,150 to Individual J to remodel defendant **BETTY JEFFERSON**'s personal residence at 936 Jackson Avenue;
- 38. Approximately \$1,661 to Matco; and
- 39. Approximately \$625 to Jeffco.
- 40. The Mose Jefferson took additional checks written out of Project Chance RB061, which were made payable to Individual O, totaling approximately \$11,456, and deposited them into his personal checking account and Enterprise Consultants' checking account.

d. The 2001-2002 Louisiana Appropriation to Care Unlimited Bridge Program

1-26. 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, in consultation and concert with Mose Jefferson, secured funding for non-profit Care Unlimited Bridge Program of at least \$200,000.00 for the fiscal year 2001-2002. 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. 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 or its companies by writing checks out of Care Unlimited HB161 to the below listed straw payees, and ultimately personally benefitted the from the use of these checks as follows:

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
1	\$2,600	(not legible) 12/14/01	Family Member 3	BETTY JEFFERSON (Jefferson Consultants HB6942)
2	\$1,078	#1002 12/17/01	Individual K	BETTY JEFFERSON (CitiCC7485)
3	\$1,944	#1026 12/30/01	Family Member 3	BETTY JEFFERSON (DiscoverCC3721)

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
4	\$1,944	#1029 12/30/01	Individual K	ANGELA COLEMAN (Savings Account HB6518)
5	\$6,000	#1012 01/11/02 (Converted to Cashier Check	Family Member 4	BETTY JEFFERSON (Jeffco HB656)
6	\$7,500	#1013 01/11/02	Family Member 3	BETTY JEFFERSON (FirstCC0168)
7	\$1,296	#1022 01/11/02	Individual F	BETTY JEFFERSON (AdvantaCC0006)
8	\$2,500	#1025 01/11/02	Family Member 3	BETTY JEFFERSON (CitiCC7485)
9	\$ 884	#1042 01/11/02	Individual L	BETTY JEFFERSON (CitiCC7485)
10	\$ 760	#1052 02/28/02	Individual F	BETTY JEFFERSON (DiscoverCC3721)
11	\$1,025	#1053 02/28/02	Individual M	BETTY JEFFERSON (MBNACC4358)
12	\$ 635	#1074 03/15/02	Individual M	BETTY JEFFERSON (Jefferson Consultants HB6942)
13	\$2,500	#1060 03/20/02	Family Member 3	BETTY JEFFERSON (HBCC0088)

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
14	\$1,338	#1106 03/24/02	Family Member 2	BETTY JEFFERSON (MBNACC4358)
15	\$ 687	#1104 05/15/02	Individual M	BETTY JEFFERSON (CitiBankCC7485)
16	\$1,118	#1119 05/20/02	Family Member 2	BETTY JEFFERSON (HBCC0088)
17	\$ 960	#1062 06/09/02	Individual A	BETTY JEFFERSON (FirstCC0168)
18	\$2,000	#1135 06/20/02	Family Member 4	BETTY JEFFERSON (Jeffco HB656)
19	\$5,000	#1131 06/24/02 (Converted to cashier check)	Family Member 3	ANGELA COLEMAN (Savings Account HB6518)

20-26. Beginning on or about December 11, 2001 and continuing through November 26, 2002, members of the conspiracy wrote checks from the bank account associated with the 2001-2002 Appropriation to Care Unlimited Bridge Program (HB161), to themselves, their companies, employees, family members, and others as follows:

- 20. Approximately \$29,188 directly to defendant **BETTY JEFFERSON**;
- 21. Approximately \$19,598 to Brenda Jefferson Foster;
- 22. Approximately \$4,000 to Southwind;
- 23. Approximately \$3,434 to Family Member 4's company;

24. Approximately \$2,650 to Jeffco;

25. Approximately \$1,810 to Matco; and

26. Approximately \$1,467 to Maximal Mortgage.

e. The 2002 LSED Grant to Care Unlimited Project Chance

1-5. Through the authority of her position as the Louisiana representative for House District 91, Renee Gill Pratt, in consultation and concert with Mose Jefferson, secured funding for the non-profit Care Unlimited Project Chance of at least \$93,453.76 for the fiscal year 2002-2003 from the Louisiana Stadium and Exposition District ("LSED"). After Renee Gill Pratt, through the use of her position as a legislator, had secured these funds, Mose Jefferson, along with Brenda Jefferson Foster, and with the knowledge of Renee Gill Pratt submitted paperwork and documentation to the LSED, and auditors working on its behalf falsely promising that the funds would be used exclusively to teach basic building and painting skills to at risk youth males. Instead of using the funds as represented, members of the conspiracy directed approximately \$67,038.00 in grant funds to members of the conspiracy and others. From on or about September 11, 2002 to on or about August 6, 2003 members of the conspiracy misappropriated the donated funds, by using the Project Chance LB507 bank account as follows:

1. Mose Jefferson caused approximately \$27,300 of the grant funds in Project Chance LB507 to be transferred to his personal Orleans Metro LB963, as described in Section A, to pay his handymen and to purchase supplies for his personal projects;

2. Mose Jefferson used approximately \$23,438 of grant funds in Project Chance LB507 to pay his handymen for work on personal projects, unrelated to the purpose of the grant, including renovation work on property owned by Mose Jefferson or his associated for-profit companies and

the personal residence of defendant Renee Gill Pratt, located at 1718 Toledano Street, New Orleans, LA and 3311 Annunciation Street, New Orleans, LA;

3. Mose Jefferson caused checks to be written totaling approximately \$7,800 in grant funds to Southwind;

4. Mose Jefferson caused checks to be written totaling approximately \$6,300 in grant funds to Individual N, which Mose Jefferson deposited into his Enterprise Consultants bank account;

5. Mose Jefferson caused checks to be written out of Project Chance LB507 totaling approximately \$2,200 in grant funds to Brenda Jefferson Foster.

f. The 2003-2004 Federal Grant to Care Unlimited Bridge Program

1-5. Through the efforts of the members of the conspiracy and others, on or about October 1, 2003 the United States Department of Education, at the request of former United States Congressman A, in consultation and concert with Mose Jefferson, made a direct grant of \$99,350.00 to the non-profit Care Unlimited Bridge Program. This grant represented an earmark directed by former United States Congressman A. In securing this funding, members of the conspiracy, including **BETTY JEFFERSON**, **ANGELA COLEMAN**, and Brenda Jefferson Foster 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. 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 by writing checks out of Bridge Program BO865 to the below listed straw payees, and ultimately personally benefitted from the use of these checks as follows:

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
1	\$862.00	#1018 11/17/03	Individual A	BETTY JEFFERSON (MBNACC3356)
2	\$576.00	#1042 02/24/04	Individual B	ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
3	\$576.00	#1070 05/28/04	Individual B	BETTY JEFFERSON (FirstCC0168)
4	\$502.00	#1073 06/15/04	Individual A	ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
5	\$665.00	#1081 09/01/04	Individual A	ANGELA COLEMAN (Savings Account HB6518)

6-27. On or about the below listed dates, in the below listed amounts, and on other dates and amounts known and unknown to the U.S. Attorney, members of the conspiracy caused the United States Department of Education to provide federal grant funds in the 2003-2004 budget year to the non-profit Care Unlimited Bridge Program; these funds were then directed to members of the conspiracy or their associated companies and others by writing checks out of Bridge Program BO865 to the below listed family member straw payees:

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
6	\$916.00	#1007 11/05/03	Brenda Jefferson Foster	BETTY JEFFERSON (Jeffco HB656)

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
7	\$360.00	#1009 11/05/03	Family Member 2	ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
8	\$1,327.43	#10000 11/10/03	Brenda Jefferson Foster	ANGELA COLEMAN (Savings Account HB6518)
9	\$576.00	#1020 12/07/03	Family Member 2	ANGELA COLEMAN (Savings Account HB6518)
10	\$548.00	#1024 12/21/03	Family Member 2	BETTY JEFFERSON (Jeffco HB656)
11	\$260.00	#1028 12/21/03	Brenda Jefferson Foster	ANGELA COLEMAN (Matco HB234)
12	\$300.00	#1037 01/30/04	Brenda Jefferson Foster	ANGELA COLEMAN (A Plus HB967)
13	\$465.44	#10028 02/20/04	Brenda Jefferson Foster	ANGELA COLEMAN (A Plus HB967)
14	\$1,654.28	#10034 03/30/04	Brenda Jefferson Foster	BETTY JEFFERSON (A Plus HB967)
15	\$1,654.28	#10040 04/28/04	Brenda Jefferson Foster	ANGELA COLEMAN (A Plus HB967)
16	\$400.00	#1064 04/30/04	Family Member 2	ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
17	\$916.67	#1038 06/15/04	Brenda Jefferson Foster	ANGELA COLEMAN (A Plus HB967)
18	\$916.00	#1067 07/01/04	Brenda Jefferson Foster	BETTY JEFFERSON (Jefferson Consultants HB6942)
19	\$1,700.00	#1083 07/30/04	Brenda Jefferson Foster	BETTY JEFFERSON (Jefferson Consultants HB6942)
20	\$350.00	#1085 08/15/04	Family Member 2	ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
21	\$850.00	#1086 08/15/04	Brenda Jefferson Foster	BETTY JEFFERSON (Chase Mgt Loan #6219)
22	\$850.00	#1080 09/01/04	Brenda Jefferson Foster	BETTY JEFFERSON (Jefferson Consultants HB6942)
23	\$802.00	#1087 09/30/04	Family Member 2	ANGELA COLEMAN (Checking Account HB606)
24	\$850.00	#1088 10/01/04	Brenda Jefferson Foster	BETTY JEFFERSON (Jeffco HB656)
25	\$850.00	#1091 10/14/04	Brenda Jefferson Foster	BETTY JEFFERSON (Jeffco HB656)
26	\$850.00	#1092 10/15/04	Brenda Jefferson Foster	BETTY JEFFERSON (Jefferson Consultants HB6942)

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
27	\$850.00	#1093 11/30/04	Brenda Jefferson Foster	BETTY JEFFERSON (Jefferson Consultants HB6942)

28-32. Beginning on or about November 5, 2003 and continuing through December 31, 2004, members of the conspiracy wrote checks from the bank account associated with the 2003-2004 federal grant for Care Unlimited Bridge Program (BO865), to themselves, their companies, employees, personal remodeling contractors and family members, as follows:

28. Approximately \$5,100 to Jeffco, in addition to the already described concealed payments;

29. Approximately \$8,650 to Jefferson Consultants, in addition to the already described concealed payments;

30. Approximately \$1,119 to A Plus, in addition to the already described concealed payments;

31. Approximately \$8,799 to Matco; and

32. Approximately \$2,500 to Southwind.

g. The 2004-2005 Louisiana Grant to Care Unlimited Bridge Program

1-15. Through the efforts of the members of the conspiracy and others, in the course of the regular legislative session for the State of Louisiana in the year 2004, the non-profit Care Unlimited Bridge Program received a grant from the State of Louisiana for at least \$100,000.00. 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. 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 by writing checks out of Bridge Program BO865 to the below listed straw payees, and ultimately personally benefitted from the use of these checks as follows:

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
1	\$855	#1108 02/15/05	Individual B	BETTY JEFFERSON (ChaseCC7749)
2	\$900	#1107 03/15/05	Individual F	BETTY JEFFERSON (Jefferson Consultants HB6942)
3	\$818	#1123 03/25/05	Individual B	ANGELA COLEMAN (Checking Account HB606)
4	\$827	#1130 03/25/05	Individual A	BETTY JEFFERSON (DiscoverCC3721)
5	\$1065	#1131 03/25/05	Individual F	BETTY JEFFERSON (Jeffco HB656)
6	\$1,107.75	#1134 04/15/05	Individual B	ANGELA COLEMAN (A Plus BO343)

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
7	\$954.00	#1144 05/30/05 (Converted to cashiers check)	Individual A	ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
8	\$2,000.00	#1141 06/07/05 (Converted to cashiers check)	Individual D	ANGELA COLEMAN (Checking account CO211)
9	\$882.00	#999996 06/07/05 (Converted to cashiers check)	Individual B	ANGELA COLEMAN (Matco HB234)
10	\$619	#1135 06/15/05	Individual E	BETTY JEFFERSON (BoACC3356)
11	\$630	#1145 06/15/05 (Converted to cashiers check)	Individual C	BETTY JEFFERSON (ChaseCC7749)
12	\$818.26	#1153 06/20/05	Individual B	ANGELA COLEMAN (Checking Account HB606)
13	\$906	#1156 06/20/05	Individual G	BETTY JEFFERSON (Jeffco HB656)
14	\$708.53	#1159 06/20/05	Individual F	ANGELA COLEMAN (Checking Account HB606)

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
15	\$540.43	#1150 07/15/05	Individual A	BETTY JEFFERSON (Jeffco HB656)

16-20. Beginning on or about February 3, 2005 and continuing through on or about June 30, 2005, members of the conspiracy caused to be written checks from the Bridge Program BO865 bank account associated with the 2004-2005 Louisiana Grant for Care Unlimited Bridge Program (BO865), to themselves, their companies, employees, personal remodeling contractors and family members, as follows:

16. Approximately \$9,800 to Jeffco, in addition to the already described concealed payments;

17. Approximately \$6,800 to Maximal Mortgage, which the defendant **BETTY JEFFERSON** then transferred \$3,000 to Jefferson Consultants and checks totaling approximately \$1,965 to herself;

18. Approximately \$1,858 to Matco.

19. Approximately \$14,902 to Brenda Jefferson Foster.

20. Approximately \$7,683 to Brenda Jefferson Foster that **BETTY JEFFERSON** and **ANGELA COLEMAN** deposited into bank accounts under their control to pay their personal expenses.

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

22. On or about February 28, 2005, members of the conspiracy submitted a report to the State of Louisiana purportedly certified by Individual C that Individual C had provided certified teachers for 6-8 weeks to twenty-five pregnant teenage clients, knowing that Individual C did not certify the February 28, 2005 submission and did not work for the Care Unlimited Bridge Program; and,

23. On or about May 18, 2005, the defendants **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.

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

1-8. Through the efforts of the members of the conspiracy and others, from in and around 2003 to in and around 2004, the United States Office of Housing and Urban Development ("HUD"), provided funding to Greater St. Stephen Manor. 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. 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 Greater St. Stephen Manor DSB170 bank account, and ultimately personally benefitted from the use of these checks as follows:

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
1	\$375	#1086 04/30/03	Individual B	ANGELA COLEMAN (Checking Account HB606)
2	\$465	#1103 05/29/03	Individual B	ANGELA COLEMAN (Checking Account HB606)
3	\$2,528	#1203 04/02/04	Individual B	ANGELA COLEMAN (Savings Account HB6518)
4	\$460	#1104 06/30/03	Individual B	ANGELA COLEMAN (Checking Account HB606)
5	\$1,969	#1209 04/06/04	Family Member 7	BETTY JEFFERSON (HBCC0088)
6	\$455.50	#1210 04/20/04	Individual B	ANGELA COLEMAN (Savings Account HB6518)
7	\$168	#1221 08/30/04	Family Member 2	BETTY JEFFERSON (DiscoverCC3721)
8	\$2,900	#1229 09/27/04 (Converted to cashiers check)	Family Member 3	ANGELA COLEMAN (Savings Account HB6518)

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

1-8. Through the efforts of the members of the conspiracy and others, in the course of the regular legislative session for the State of Louisiana in the year 2005, the non-profit Care Unlimited received an appropriation from the State of Louisiana for at least \$275,000.00, under the condition that this appropriation would be used exclusively for charitable purposes in service of the community in the Central City area of New Orleans.

Because of the damage inflicted as a result of Hurricane Katrina, in or around September of 2005, the Governor of the State of Louisiana, suspended all funding for discretionary grants to non-profits, such as Care Unlimited. Nevertheless, on or about 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. As a result of this written request on or about February 13, 2006, the State of Louisiana later mailed a payment of \$36,213.55 to the non-profits' accountant, Individual D, on Poydras Street, New Orleans on or about August 11, 2006. 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.

Instead of using the \$36,213.55 granted by the State of Louisiana as represented, members of the conspiracy misappropriated the funds by using the Care Unlimited bank account LB361 and took the following actions in the course of this misuse:

1. On or about August 17, 2006, members of the conspiracy caused the check from the State of Louisiana to be deposited into the Care Unlimited bank account LB361.
2. On or about August 18, 2006, Brenda Jefferson Foster sent a list of names to the accountant, Individual D, with an accompanying dollar amount beside each payee's name for the accountant to write checks out of the \$36,213.55. Members of the conspiracy then directly benefitted from the distribution of these checks by directing:
 3. Approximately \$6,414 to Brenda Jefferson Foster;

4. Approximately \$2,600 to B.E.P.;
5. Approximately \$3,724 issued to Individual R, which checks were deposited into A-Plus;
6. Approximately \$1,050 to Jeffco;
7. Approximately \$872 to Family Member 2, which was deposited into A Plus; and
8. Approximately \$184 to Angela Howard, a/k/a defendant **ANGELA COLEMAN**, which was deposited into A Plus.

j. The Tax Assessor's Scheme (2000-2004)

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 HB4942, to the below listed straw payees and family members for the personal benefit of herself and defendant **ANGELA COLEMAN** as follows:

Act	Amount	Check # Date	Payable to	Final Disposition or Deposited to
1	\$300	#566 7/01/00	Family Member 3	BETTY JEFFERSON (Savings Account HB779)
2	\$750	#938 07/15/02	Family Member 3	BETTY JEFFERSON (AdvantaCC0006)
3	\$560	#1062 02/28/03	Individual B	ANGELA COLEMAN (Checking Account #606)
4	\$750	#1134 04/15/03	Family Member 3	ANGELA COLEMAN (Checking Account #606)
5	\$560	#1135 05/04/03	Individual B	ANGELA COLEMAN (Checking Account #606)
6	\$750	#1076 06/01/03	Family Member 3	BETTY JEFFERSON (Jefferson Consultants HB6942)

7	\$410	#1085 07/15/03	Individual B	BETTY JEFFERSON (Jefferson Consultants HB6942)
8	\$750	# 1178 09/15/03	Family Member 9	BETTY JEFFERSON (Jeffco HB656)
9	\$700	#1344 10/30/04	Family Member 2	BETTY JEFFERSON (Chase Mortgage 219 : 1725 Valmont Street)
10	\$700	#1370 12/15/04	Family Member 2	BETTY JEFFERSON (Chase Mortgage 219: 1725 Valmont Street)
11	\$800	#1322 7/1/04	Family Member 2	BETTY JEFFERSON (Chase Mortgage 219: 1725 Valmont Street)

k. **The Tax Evasion Scheme**

1. On or about December 17, 2001, defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** opened Care Unlimited, Inc. bank account number 161 at Hibernia National Bank (HB161). **BETTY JEFFERSON** and **ANGELA COLEMAN** were the only individuals with signature authority.
2. On or about September 26, 2001, **BETTY JEFFERSON** and **ANGELA COLEMAN** opened Care Unlimited, Inc. bank account number 061 at Regions Bank (RB061). **BETTY JEFFERSON** and **ANGELA COLEMAN** were the only individuals with signature authority.
3. On or about May 23, 2003, **BETTY JEFFERSON** and **ANGELA COLEMAN** opened Maximal Home Mortgage, LLC bank account number 589 at Hibernia National Bank (HB589). **BETTY JEFFERSON** and **ANGELA COLEMAN** were the only individuals with signature authority.

4. On or about February 17, 2000, **BETTY JEFFERSON** opened "Assessor Betty Jefferson" bank account number 4942 at Hibernia National Bank (HB4942). Jefferson was the only individual with signature authority on the account.

5. During the years 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. These checks were written in a manner to disguise the nature of payment by making them appear to be payroll checks. The straw payees had no knowledge of the checks being written or that their identities were being used by **BETTY JEFFERSON** and **ANGELA COLEMAN**. The checks were then deposited into personal and business accounts controlled by **BETTY JEFFERSON** and **ANGELA COLEMAN**. Some of these checks were sent to pay down credit card liabilities belonging to **BETTY JEFFERSON** and **ANGELA COLEMAN**.

6. During the years 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. The checks were then deposited into the respective business accounts controlled by **BETTY JEFFERSON** and **ANGELA COLEMAN**. These checks were written in a manner to disguise the nature of the payment by making them appear to be legitimate business expenses.

7. On or about October 7, 2003, **BETTY JEFFERSON** and **ANGELA COLEMAN** opened Care Unlimited Bridge Program bank account number 865 at Bank One (BO865). **BETTY JEFFERSON** and **ANGELA COLEMAN** were the only individuals with signature authority. This account received \$199,350 in funds from the State of Louisiana and the U.S. Department of Education. Neither **BETTY JEFFERSON** and **ANGELA COLEMAN** notified the CPA for Care Unlimited, Individual D, that this account existed or that the proceeds were received by Care

Unlimited, Inc. 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 benefitted from. These proceeds were not reported to the IRS.

8. On or about 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 did not report the \$89,000 in gross receipts received from the State of Louisiana.

9. On or about October 23, 2000, **BETTY JEFFERSON's** 1999 U.S. Individual Income Tax Return was received at the IRS Memphis Service Center. This return did not report the \$42,166.46 in misappropriated funds. **BETTY JEFFERSON** did not inform her return preparer that she received additional income from the non-profit entities nor from her for-profit corporate entities.

10. On or about August 28, 2001, **BETTY JEFFERSON's** 2000 U.S. Individual Income Tax Return was received at the IRS Memphis Service Center. This return did not report the \$42,774.83 in misappropriated funds, and **BETTY JEFFERSON** signed the return under the penalty of perjury before she filed it. **BETTY JEFFERSON** did not inform her return preparer that she received additional income from the non-profit entities nor from her for-profit corporate entities.

11. On or about December 9, 2002, **BETTY JEFFERSON's** 2001 U.S. Individual Income Tax Return was received at the IRS Memphis Service Center. This return did not report the \$47,260.79 in misappropriated funds. **BETTY JEFFERSON** did not inform her return preparer that she received additional income from the non-profit entities nor from her for-profit corporate entities.

12. On or about April 15, 2002, **ANGELA COLEMAN's** 2001 U.S. Individual Income Tax Return was received at the IRS Memphis Service Center. This return did not report the \$15,907.98 in misappropriated funds.

13. On or about March 8, 2004, **BETTY JEFFERSON's** 2002 U.S. Individual Income Tax Return was received at the IRS Austin Service Center. This return did not report the \$76,261.00 in misappropriated funds and Jefferson signed the return under the penalty of perjury before she filed it. **BETTY JEFFERSON** did not inform her return preparer that she received additional income from the non-profit entities nor from her for-profit corporate entities.

14. On or about April 15, 2003, **ANGELA COLEMAN's** 2002 U.S. Individual Income Tax Return was received at the Austin Service Center. This return did not report the \$30,307.01 in misappropriated funds. **ANGELA COLEMAN** did not inform her return preparer that she received additional income from any other source or business, nor did she mention Care Unlimited, Jeffco Services or Jefferson Consultants.

15. 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 did not report the misappropriated funds. Neither **BETTY JEFFERSON** nor **ANGELA COLEMAN** informed the relevant return preparer that they received additional income from the non-profit entities nor the their for-profit corporate entities.

1. The Money Laundering

1. On or about 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 Family Member 3, in the amount of approximately \$2,900.00.

2. Defendant **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 Family Member 3.

3. On or about 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.

m. The Aggravated Identity Theft

As a result of their receipt and misappropriation of grant funds secured by fraud to the Care Unlimited Bridge Program, defendants **BETTY JEFFERSON** and **ANGELA COLEMAN**, illegally and without consent used the identities of the following individuals, in the following manner:

Overt Act	Amount	Check # Date	Grant (bank account)	Payable to	Final Disposition or Deposited to
1	\$576.00	#1042 02/24/04	2003-2004 Bridge Program (BO865)	Individual B	Defendants ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
2	\$576.00	#1070 05/28/04	2003-2004 Bridge Program (BO865)	Individual B	Defendant BETTY JEFFERSON (FirstCC0168)
3	\$502.00	#1073 06/15/04	2003-2004 Bridge Program (BO865)	Individual A	Defendants ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)

Overt Act	Amount	Check # Date	Grant (bank account)	Payable to	Final Disposition or Deposited to
4	\$665.00	#1081 09/01/04	2004-2005 Bridge Program (BO865)	Individual A	Defendant ANGELA COLEMAN (Savings Account HB#6518)
5	\$827	#1130 03/25/05	2004-2005 Bridge Program (BO865)	Individual A	BETTY JEFFERSON (DiscoverCC3721)
6	\$954	#1144 05/30/05 (Converted to cashiers check)	2004-2005 Bridge Program (BO865)	Individual A	Defendants ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
7	\$882	#999996 06/07/05 (Converted to cashiers check)	2004-2005 Bridge Program (BO865)	Individual B	Defendant ANGELA COLEMAN (Matco HB234)
8	\$630	#1145 06/15/05	2004-2005 Bridge Program (BO865)	Individual C	Defendant BETTY JEFFERSON (Converted into cashiers check deposited to ChaseCC7749)
9	\$906	#1156 06/20/05	2004-2005 Bridge Program (BO865)	Individual G	Defendant BETTY JEFFERSON (Jeffco HB656)
10	\$708.53	#1159 06/20/05	2004-2005 Bridge Program (BO865)	Individual F	Defendant ANGELA COLEMAN (Checking Account HB606)

All in violation of Title 18, United States Code, Section 371.

NOTICE OF MAIL FRAUD FORFEITURE

1. The allegations of Count 1 of this Third Superseding Bill of Information are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1341 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

2. As a result of the offenses alleged in Count 1, defendants, **BETTY JEFFERSON** and **ANGELA COLEMAN**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461, any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1341, including, but not limited to, the following described properties:

- a Property currently recorded in the name of Betty Jefferson and described as follows: One certain lot of ground, together with all the buildings and improvements thereon, and all of the rights, ways, privileges, servitudes, advantages, and appurtenances thereunto belonging or in anywise appertaining, situated in the Fourth District of the City of New Orleans, Louisiana, in Square No. 109, Lot No. 9 on a plan of survey made by J.J. Krebs & Sons, Inc., Civil Engineers and Surveyors, dated August, 17, 1965, a copy of which is annexed to an act passed before Jerome Mevunier, Notary Public, dated September 9, 1965, and made part thereof, and according to which said Lot No. 9 commences at a distance of thirty-one feet, eleven inches (31'11") from the intersection of Jackson Avenue and Constance Street and measures thence thirty-one feet, eleven inches (31'11") front on Jackson Avenue, the same width in the rear, by a depth between equal and parallel lines of one hundred twenty feet (120), all as

more fully shown on a plat of survey by Gilbert, Kelly & Couturie, Inc., Surveyors, dated April 11, 1980, before Charles F. Barbera, Notary Public, dated May 19, 1980. The improvements thereon bear municipal number: 936 Jackson Avenue, New Orleans, Louisiana;

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 1341 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

NOTICE OF MONEY LAUNDERING FORFEITURE

1. The allegations of Count 1 of this Third Superseding Bill of Information are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 982.

2. As a result of the offense, alleged in Count 1, defendants **BETTY JEFFERSON** and **ANGELA COLEMAN**, shall forfeit to the United States all property real or personal, involved in the aforesaid offenses and all property traceable to such property which was involved in the said violations of Title 18, United States Code, Section 1956.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

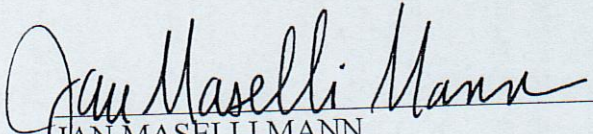
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1) to seek forfeiture of any other property of said defendants.

All in violation of Title 18, United States Code, Section 982.



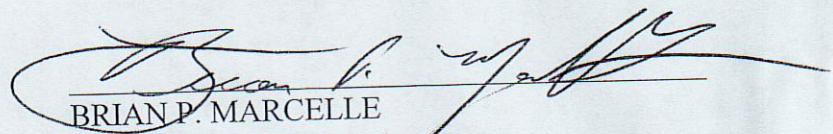
JIM LETTEN
UNITED STATES ATTORNEY
Louisiana Bar Roll No. 8514



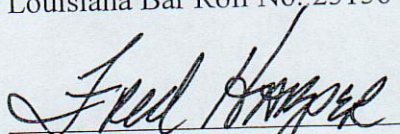
JAN MASELLI MANN
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Chief, Criminal Division
Louisiana Bar Roll No. 9020



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Assistant United States Attorney
Massachusetts Bar Roll No. 660583



BRIAN P. MARCELLE
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Louisiana Bar Roll No. 25156



FRED P. HARPER
Assistant United States Attorney
Louisiana Bar Roll No. 6568

New Orleans, Louisiana
February 25, 2010