UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

BILL OF INFORMATION FOR THEFT OF GOVERNMENT MONEY

UNITED STATES OF AMERICA * CRIMINAL DOCKET NO.

v. * SECTION:

JEFFERSON THOMPSON * VIOLATION: 18 U.S.C. § 641

* * *

The United States Attorney charges that:

COUNT 1

A. AT ALL MATERIAL TIMES HEREIN:

- 1. Beginning no later than December 1, 2005, through on or about December 31, 2008, the defendant, **JEFFERSON THOMPSON** ("**THOMPSON**"), was a certified landlord under the Jefferson Parish Housing Authority's Low-Income or Section 8 Program.
- 2. The Jefferson Parish Housing Authority is located in the Eastern District of Louisiana and is funded directly by federal funds supplied by the United States Department of Housing and Urban Development ("HUD"). The low income, or Section 8, program, is administered locally by officials at the Jefferson Parish Housing Authority.

- 3. On or about December 1, 2005, A.K. was certified as a tenant under the Jefferson Parish Housing Authority's low-income housing program, and was assigned to the defendant, **THOMPSON**, as A.K.'s landlord, at a house **THOMPSON** owned at 7306 Mistletoe, Metairie, Louisiana 70003, located in the Eastern District of Louisiana. A.K. and **THOMPSON** executed a lease agreement through the Jefferson Parish Housing Authority for the year 2006. In 2007, A.K. and **THOMPSON** signed a new lease agreement, again through the Jefferson Parish Housing Authority, for A.K.'s rental of **THOMPSON**'s house. A.K.'s rental subsidy was paid directly to **THOMPSON**, in varying amounts, by the Jefferson Parish Housing Authority, which was funded by HUD.
- 4. Upon being assigned A.K. as his tenant, **THOMPSON** was informed that he was not permitted to receive any funds, other than the Jefferson Parish Housing Authority funds to pay for A.K.'s rent. **THOMPSON** also signed a contract which similarly informed him of the prohibition on receiving other funds to pay for A.K.'s rent.
- 5. In or about August 2006, **THOMPSON** raised A.K.'s rent from the price agreed by all parties pursuant to the Jefferson Parish Housing Authority's contract. A.K. informed **THOMPSON** that A.K. could not afford the newly-increased rent.
- 6. After being informed A.K. could not afford the new price, **THOMPSON** went to a disaster assistance center run by the Federal Emergency Management Agency ("FEMA") and applied for funds on A.K.'s behalf to cover A.K.'s newly-increased rent. FEMA is an agency or department of the United States which, in the aftermath of Hurricane Katrina, made funds available to qualifying individuals. FEMA was familiar with A.K. because, in the aftermath of Hurricane Katrina, A.K. received these disaster funds as a result of being displaced.

7. **THOMPSON** was approved to receive FEMA funds on A.K.'s behalf and, beginning

in or about August 2006, began receiving these funds, in addition to the monthly HUD funds he

was receiving from the Jefferson Parish Housing Authority.

8. On or about January 31, 2008, **THOMPSON** informed FEMA that he no longer

needed FEMA funds to pay for A.K.'s rent.

В. THE OFFENSE OF THEFT OF GOVERNMENT FUNDS

8. From on or about August 1, 2006, to on or about January 31, 2008, in the Eastern

District of Louisiana, the defendant, JEFFERSON THOMPSON, did embezzle, steal, purloin,

and knowingly convert to his own use, money belonging to the U.S. Department of Housing and

Urban Development, a department or agency of the United States, namely HUD funds

administered through the Jefferson Parish Housing Authority, to which he was not entitled,

having a value of \$13,770.00; all in violation of Title 18, United State Code, Section 641.

JIM LETTEN

United States Attorney

Louisiana Bar Roll Number 8517

JAN MASELLI MANN

First Assistant U.S. Attorney

Louisiana Bar Roll Number 9020

MATTHEW S. CHESTER

Assistant United States Attorney

Texas Bar No. 24045650

New Orleans, Louisiana

April , 2011

3