

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

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO. 11-129</b>
v.	*	<b>SECTION: "B"</b>
<b>AMANDA JACKSON</b>	*	

\* \* \*

**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, the following facts to support the allegations charged by the United States Attorney in the Bill of Information now pending against the defendant **AMANDA JACKSON**.

The defendant, **AMANDA JACKSON**, has agreed to plead guilty as charged to Count One of the Bill of Information charging her with violating Title 18, United States Code, Section 371, by conspiring to violate Title 18, United States Code, Section 666(a)(1)(A) as follows:

From on or about July 1, 2008 through September 2, 2009, defendants **GESELLE SAVOY**, and **AMANDA JACKSON** together did knowingly and wilfully combine, conspire and agree to submit false and fraudulent payroll documentation to JPPSS, which received federal funds in excess of \$10,000 annually, to illegally obtain stipends and overtime payments for themselves for services they were not qualified to perform and did not perform from JPPSS' LEAP remediation fund, GEE

tutoring fund, EE fund and its general fund for which they knew they were not entitled, in violation of Title 18, United States Code, Section 666(a)(1)(A).

An agent from the United States Department of Education, Office of Inspector General (“DOE-OIG”) would testify that the Jefferson Parish Public School System (JPPSS) is governed by the Jefferson Parish School Board, an independent legislative body, subject to control by the State of Louisiana for the purpose of administering public education in Jefferson Parish, Louisiana. The JPPSS received federal funds in excess of \$10,000 annually.

An employee of JPPSS would testify that **AMANDA JACKSON** was first employed by JPPSS on October 18, 1993 as a Teaching Assistant. On or about March 5, 2008, **AMANDA JACKSON** was transferred from the Payroll Department at JPPSS to the Accounts Payable Department where she worked as a clerk until she was terminated on September 2, 2009. The defendant’s job duties included inputting JPPSS vendor data into the JPPSS computer system. **AMANDA JACKSON** was not a certified teacher and was not qualified to perform tutoring, testing and remediation for JPPSS, and did not perform these services.

A Special Agent from the United States Secret Service would testify that he reviewed the supplemental payroll documents from JPPSS for the time period of September 1, 2006 through July 31, 2009 and determined that **AMANDA JACKSON** received 13 unauthorized payments from JPPSS totaling \$15,041.50. The first illegal payment **AMANDA JACKSON** received was on August 22, 2008 and the last payment was on July 10, 2009. A copy of JPPSS payroll pay stubs for **AMANDA JACKSON** would be offered as further evidence at trial.

On April 5, 2011, **AMANDA JACKSON** was interviewed by Special Agents from the DOE-OIG and U.S. Secret Service. **AMANDA JACKSON** admitted to investigators that she received illegal funds from JPPSS and that the unauthorized payments which were deposited into her bank account were facilitated by her cousin **GESELLE SAVOY**.

**AMANDA JACKSON** admitted to investigators that while employed in the Accounts Payable Department at JPPSS, she had unauthorized access to other JPPSS employee payroll accounts. **AMANDA JACKSON** looked at **SAVOY'S** payroll account and noticed **SAVOY** was "working overtime and making too much money". **AMANDA JACKSON** told **SAVOY**, "you can make only so much money in overtime, you better be careful."

**AMANDA JACKSON** admitted to investigators that she recruited **TRACY WALKER** to receive illegal JPPSS supplemental pay prior to **AMANDA JACKSON** directly receiving illegal supplemental pay. From on or about July 23, 2008 to on or about August 15, 2008, **AMANDA JACKSON** told **SAVOY** to provide unauthorized stipends and overtime payments to an employee named **TRACY WALKER**. **SAVOY** has never met or talked to **TRACY WALKER**. **AMANDA JACKSON** provided **SAVOY** with **WALKER'S** name and employee number.

On or about July 25, 2008, **SAVOY** entered three unauthorized stipend payments for summer remediation work for a total of \$7,920 in the name and employee number belonging to **TRACY WALKER**. On or about August 15, 2008, **SAVOY** entered two unauthorized stipend payments for student testing for a total of \$3,900 in the name and employee number belonging to **TRACY WALKER**. **SAVOY** processed a total of 5 unauthorized supplemental payments to **WALKER** totaling \$11, 820.

**AMANDA JACKSON** admitted to investigators that she met **WALKER** on two occasions in a parking lot near the Jefferson Financial Credit Union on the West Bank. On both occasions, **WALKER** provide **AMANDA JACKSON** with a portion of the illegal funds she received from JPPSS. **AMANDA JACKSON** provided a portion of the money to **SAVOY**. **AMANDA JACKSON** stated that on the second and final time she met **WALKER**, **AMANDA JACKSON** met **SAVOY** on 12<sup>th</sup> Street, Gretna, Louisiana after meeting **WALKER** and provided **SAVOY** with the money she received from **WALKER** and kept \$200.00 for herself.

Thereafter, **SAVOY** submitted fraudulent instruction forms, batch sheets and payroll sheets with the employee number belonging to defendant **AMANDA JACKSON**, so that **AMANDA JACKSON** would directly receive the following illegal stipends and unauthorized overtime pay:

<b>DATE</b>	<b>AMOUNT</b>
<b>August 22, 2008 (placement testing)</b>	<b>\$ 1,100.00</b>
<b>August 28, 2008 (interval assessment)</b>	<b>\$ 1,625.00</b>
<b>September 26, 2008 (testing)</b>	<b>\$ 875.00</b>
<b>October 3, 2008(remediation)</b>	<b>\$ 1,000.00</b>
<b>January 9, 2009 (tutoring)</b>	<b>\$ 300.00</b>
<b>June 5, 2009 (testing)</b>	<b>\$ 99.00</b>
<b>June 19, 2009 (remediation)</b>	<b>\$ 1,950.00</b>
<b>June 26, 2009 (remediation &amp; testing)</b>	<b>\$ 3,810.00</b>
<b>July 2, 2009 (remediation)</b>	<b>\$ 3,217.50</b>
<b>July 10, 2009 (remediation)</b>	<b>\$ 1,065.00</b>
<b>Total</b>	<b>\$15,041.50</b>

**AMANDA JACKSON** told investigators that she shared a Regions Bank account with her daughter, **DANAY JACKSON**, also an employee of JPPSS. **AMANDA JACKSON**, stated that

she had one ATM/debit card with the Regions Bank account and that she allowed **DANAY JACKSON** use the bank card. **AMANDA JACKSON** denied telling her daughter, **DANAY JACKSON**, about the embezzlement scheme but admitted that she knew **SAVOY** and **DANAY JACKSON** discussed the embezzlement scheme.

An employee of JPPSS would testify that the five employees who received unauthorized supplemental pay as a part of this embezzlement scheme were **WILLIAMS, SAVOY, AMANDA JACKSON, DANAY JACKSON**, and **TRACY WALKER** and the total loss to JPPSS was \$132,152.08.

Both the Government and the defendant, **AMANDA JACKSON**, do hereby stipulate and agree that the above facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the government would have proven these facts beyond a reasonable doubt at trial.

\_\_\_\_\_  
AMANDA JACKSON  
Defendant

\_\_\_\_\_  
DATE

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WAYNE MANCUSO  
Counsel for Defendant

\_\_\_\_\_  
DATE

\_\_\_\_\_  
JULIA K. EVANS  
Assistant United States Attorney

\_\_\_\_\_  
DATE

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

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO. 11-129</b>
v.	*	<b>SECTION: "B"</b>
<b>DANAY JACKSON</b>	*	

\* \* \*

**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, the following facts to support the allegations charged by the United States Attorney in the Bill of Information now pending against the defendant **DANAY JACKSON**.

The defendant, **DANAY JACKSON**, has agreed to plead guilty as charged to Count One of the Bill of Information charging her with violating Title 18, United States Code, Section 371, by conspiring to violate Title 18, United States Code, Section 666(a)(1)(A) as follows:

From on or about January 1, 2009 through September 2, 2009, defendants **GESELLE SAVOY** and **DANAY JACKSON** together did knowingly and wilfully combine, conspire and agree to submit false and fraudulent payroll documentation to JPPSS, which received federal funds in excess of \$10,000 annually, to illegally obtain stipends and overtime payments for themselves for services they were not qualified to perform and did not perform from JPPSS' LEAP remediation

fund, GEE tutoring fund, EE fund and its general fund for which they knew they were not entitled, in violation of Title 18, United States Code, Section 666(a)(1)(A).

An agent from the United States Department of Education, Office of Inspector General (“DOE-OIG”) would testify that the Jefferson Parish Public School System (JPPSS) is governed by the Jefferson Parish School Board, an independent legislative body, subject to control by the State of Louisiana for the purpose of administering public education in Jefferson Parish, Louisiana. The JPPSS received federal funds in excess of \$10,000 annually.

An employee of JPPSS would testify that **DANAY JACKSON** was first employed by JPPSS on January 5, 2004 as a General Clerk. On or about October 6, 2008, **DANAY JACKSON** worked a clerk at Estelle Elementary School in Jefferson Parish until she was terminated on September 2, 2009. **DANAY JACKSON** was not a certified teacher and was not qualified to perform tutoring, testing and remediation for JPPSS, and did not perform these services.

A Special Agent from the United States Secret Service would testify that he reviewed the supplemental payroll documents from JPPSS for the time period of September 1, 2006 through July 31, 2009 and determined that **DANAY JACKSON** received 7 unauthorized payments from JPPSS totaling \$9,712.50. The first illegal payment **DANAY JACKSON** received was on February 6, 2009 and the last payment was on July 10, 2009. A copy of JPPSS payroll pay stubs for **DANAY JACKSON** would be offered as further evidence at trial.

On April 6, 2011, **DANAY JACKSON** was interviewed by Special Agents from the DOE-OIG and U.S. Secret Service. **DANAY JACKSON** admitted to investigators that she received illegal funds from JPPSS and that the unauthorized payments which were deposited into her joint bank account with her mother were facilitated by her cousin, **GESELLE SAVOY**. **DANAY**

**JACKSON** also admitted to investigators that she knew that the illegal JPPSS supplemental pay was being deposited into her bank account and that she utilized the JPPSS online payroll system to view her deposits and paycheck stubs.

**SAVOY** would testify that she received a phone call from **DANAY JACKSON**, an employee of JPPSS, who stated that her mother, **AMANDA JACKSON**, told her about the embezzlement scheme and she needed money too and requested that she be included in the scheme to obtain unauthorized overtime payments. **SAVOY** would also testify that when she asked **AMANDA JACKSON** if she told **DANAY JACKSON** about the embezzlement scheme, **AMANDA JACKSON** responded, “Yes, she is my daughter.”

A Special Agent with the U.S. Secret Service would testify that **SAVOY** submitted fraudulent instruction forms, batch sheets and payroll sheets with the employee number belonging to defendant **DANAY JACKSON**, so that **DANAY JACKSON** would receive the following illegal stipends and unauthorized supplemental pay:

<b>DATE</b>	<b>AMOUNT</b>
<b>February 6, 2009 (tutoring)</b>	<b>\$ 300.00</b>
<b>June 26, 2009 (remediation)</b>	<b>\$2,925.00</b>
<b>July 2, 2009 (remediation)</b>	<b>\$3,217.50</b>
<b>July 10, 2009 (remediation)</b>	<b>\$3,270.00</b>
<b>Total</b>	<b>\$9,712.50</b>

An employee of JPPSS would testify that the five employees who received unauthorized supplemental pay as a part of this embezzlement scheme were **WILLIAMS, SAVOY, AMANDA**

**JACKSON, DANAY JACKSON, and TRACY WALKER** and the total loss to JPPSS was \$132,152.08.

Both the Government and the defendant, **DANAY JACKSON**, do hereby stipulate and agree that the above facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the government would have proven these facts beyond a reasonable doubt at trial.

\_\_\_\_\_  
DANAY JACKSON  
Defendant

\_\_\_\_\_  
DATE

\_\_\_\_\_  
JUANA MARINE-LOMBARD  
Counsel for Defendant

\_\_\_\_\_  
DATE

\_\_\_\_\_  
JULIA K. EVANS  
Assistant United States Attorney

\_\_\_\_\_  
DATE

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

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO. 11-129</b>
<b>v.</b>	*	<b>SECTION: "B"</b>
<b>KIMBERLY M. WILLIAMS</b>	*	

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**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, the following facts to support the allegations charged by the United States Attorney in the Bill of Information now pending against the defendant **KIMBERLY M. WILLIAMS**.

The defendant, **KIMBERLY M. WILLIAMS**, has agreed to plead guilty as charged to Count One of the Bill of Information charging her with violating Title 18, United States Code, Section 371, by conspiring to violate Title 18, United States Code, Section 666(a)(1)(A) as follows:

From on or about February 11, 2007 through September 2, 2009, defendants **KIMBERLY M. WILLIAMS** and **GESELLE SAVOY**, together, did knowingly and wilfully combine, conspire, and agree to submit false and fraudulent testing and accountability instruction forms, batch sheets and payroll sheets to the JPPSS payroll office, in order to illegally obtain stipends and overtime payments for themselves and each other for services they were not qualified to perform and did not perform, in violation of Title 18, United States Code, Section 666(a)(1)(A).

An agent from the United States Department of Education, Office of Inspector General (“DOE-OIG”), would testify that the Jefferson Parish Public School System (JPPSS) is governed by the Jefferson Parish School Board, an independent legislative body, subject to control by the State of Louisiana for the purpose of administering public education in Jefferson Parish, Louisiana. The JPPSS received federal funds in excess of \$10,000 annually.

An employee of JPPSS would testify that from May 29, 2006 until September 2, 2009, defendant **KIMBERLY M. WILLIAMS** was employed as a Testing Technician in the Testing and Accountability Department of the Jefferson Parish Public School System (JPPSS). The defendant’s duties included entering supplemental pay in the JPPSS computer system for certified teachers who performed tutoring, testing and remediation under the JPPSS’ Louisiana Education Assessment Program (LEAP), Graduate Exit Examination (GEE) tutoring fund, Education Excellent (EE) Fund as well as a general fund. **KIMBERLY M. WILLIAMS**, was not a certified teacher and was not qualified to perform tutoring, testing and remediation for JPPSS, and did not perform these services.

A Special Agent from the United States Secret Service would testify that he reviewed the supplemental payroll documents from JPPSS for the time period of September 1, 2006 through July 31, 2009 and determined that **KIMBERLY M. WILLIAMS** received 57 unauthorized payments from JPPSS totaling \$57,619.08. The first illegal payment **WILLIAMS** received was on February 11, 2007 and the last payment was on July 10, 2009. A copy of JPPSS payroll pay stubs for **WILLIAMS** would be offered as further evidence at trial.

On December 19, 2010, **WILLIAMS** was interviewed by Special Agents from the DOE-OIG and U.S. Secret Service. **WILLIAMS** told investigators that she began stealing money from JPPSS in 2007 because she “saw an opportunity to make some overtime without actually working long

hours.” **WILLIAMS** began stealing money from JPPSS by adding additional unauthorized hours to payroll batch sheets.

**WILLIAMS** stated that at sometime after **WILLIAMS** started stealing money from JPPSS, **GESELLE SAVOY** approached **WILLIAMS** at her cubical and saw that **WILLIAMS** had the JPPSS payment program open on her computer. **SAVOY** asked **WILLIAMS** if she was paying herself and asked if **WILLIAMS** would also add **SAVOY’S** name to the payroll so **SAVOY** would receive unauthorized pay.

Thereafter, **SAVOY** approached **WILLIAMS** and stated “I can get you paid as a teacher.” **SAVOY** had access to the LEAP remediation program budget and stated she would add additional hours for herself and **WILLIAMS**. **WILLIAMS** admitted that while inputting information in the computer system for the Interval Assessment Program, she noticed **AMANDA JACKSON’S** name on a LEAP remediation payroll batch sheet. **WILLIAMS** asked **SAVOY**, “Why do you have **AMANDA JACKSON’S** name on here?” **SAVOY** told **WILLIAMS** that **SAVOY** was contacted by **AMANDA JACKSON** who still had computer access to view the JPPSS payroll from when she previously worked in the payroll department. **WILLIAMS** told **SAVOY** not to get anyone else involved in the embezzlement scheme. **WILLIAMS** stated that she did not know everything that **SAVOY** did in the embezzlement scheme but she believed **SAVOY** was paying other JPPSS employees illegal stipends and/or supplemental income.

An employee of JPPSS would testify that the five employees who received unauthorized supplemental pay as a part of this embezzlement scheme were **WILLIAMS, SAVOY, AMANDA JACKSON, DANAY JACKSON,** and **TRACY WALKER** and the total loss to JPPSS was \$132,152.08.

Both the Government and the defendant, **KIMBERLY M. WILLIAMS**, do hereby stipulate and agree that the above facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the government would have proven these facts beyond a reasonable doubt at trial.

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KIMBERLY M. WILLIAMS  
Defendant

\_\_\_\_\_  
DATE

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BRUCE NETTERVILLE  
Counsel for Defendant

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DATE

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JULIA K. EVANS  
Assistant United States Attorney

\_\_\_\_\_  
DATE

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

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO. 11-129</b>
v.	*	<b>SECTION: "B"</b>
<b>TRACY WALKER</b>	*	

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**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, the following facts to support the allegations charged by the United States Attorney in the Bill of Information now pending against the defendant **TRACY WALKER**.

The defendant, **TRACY WALKER**, has agreed to plead guilty as charged to Count Two of the Bill of Information charging her with violating Title 18, United States Code, Section 4, misprision of a felony, as follows:

From on or about July 1, 2008 to on or about September 2, 2009, in the Eastern District of Louisiana, the defendant **TRACY WALKER**, having knowledge of the actual commission of a felony cognizable by a court of the United States, to wit, conspiracy to steal and purloin money and funds belonging to and administered by the Jefferson Parish Public School System (JPPSS), in violation of Title 18, United States Code, Section 666(a)(1)(A), did conceal the same from law

enforcement and did not as soon as possible make the illegal activity known to a judge, agent or other person in civil or military authority under the United States.

An employee of JPPSS would testify that **TRACY WALKER** was first employed by JPPSS on August 7, 2007 as a four-hour technician at Estelle Elementary School in Jefferson Parish. On or about September 3, 2008, **TRACY WALKER** was promoted and transferred to Vic A. Pitre Elementary School in Jefferson Parish where she worked as a child nutrition employee until she was terminated on September 2, 2009. **TRACY WALKER** was not a certified teacher and was not qualified to perform tutoring, testing and remediation for JPPSS, and did not perform these services.

A Special Agent from the United States Secret Service would testify that he reviewed the supplemental payroll documents from JPPSS for the time period of September 1, 2006 through July 31, 2009 and determined that **TRACY WALKER** received 5 unauthorized payments from JPPSS totaling \$11,820.00. The first illegal payment **TRACY WALKER** received was on July 25, 2008 and the last payment was on August 15, 2008. A copy of JPPSS payroll pay stubs for **TRACY WALKER** would be offered as further evidence at trial.

On February 11, 2011, **TRACY WALKER** was interviewed by Special Agents from the DOE-OIG and U.S. Secret Service. **TRACY WALKER** admitted to investigators that she received illegal funds from JPPSS. **WALKER** told investigators that she was approached by a family friend, **AMANDA JACKSON** (also known as “Sue Brown”), who is employed by JPPSS. **AMANDA JACKSON** asked **WALKER** if she wanted to make some extra cash. When **WALKER** asked **AMANDA JACKSON** where would she have to work, **AMANDA JACKSON** said “ you don’t have to work to earn the extra money.”

**WALKER** told investigators that she received a phone call from **AMANDA JACKSON** who told **WALKER** that she would be receiving additional money into her bank account but that the money was to be divided between **WALKER** and three other individuals. **AMANDA JACKSON** also told **WALKER**, “if JPPSS finds out, you will be responsible for paying all the money back yourself.”

After the illegal funds were deposited into **WALKER’S** bank account at Jefferson Financial Credit Union, **WALKER** agreed to meet **AMANDA JACKSON** in the parking lot of the bank. **WALKER** withdrew the illegal money that was deposited into her bank account and gave **AMANDA JACKSON** 3/4 of the money.

**TRACY WALKER** told investigators that she was contacted by **AMANDA JACKSON** a second time and was told “something is going to be put in your account again” and **AMANDA JACKSON** told **WALKER** the exact amount of money that would be illegally deposited into her bank account. After the illegal money was again deposited into **WALKER’S** account and **WALKER** met **AMANDA JACKSON** the second time at Jefferson Financial Credit Union, she gave **AMANDA JACKSON** 3/4 of the money illegally deposited into her bank account and told **AMANDA JACKSON**, “I am done, I do not want to be involved with this anymore.”

Payroll documents from JPPSS would be introduced into evidence which show that on or about July 25, 2008, **GISELLE SAVOY** entered three unauthorized stipend payments for summer remediation work for a total of \$7,920 in the name and employee number belonging to **TRACY WALKER**. On or about August 15, 2008, **SAVOY** entered two unauthorized stipend payments for student testing for a total of \$3,900 in the name and employee number belonging to

**TRACY WALKER. SAVOY** processed a total of 5 unauthorized supplemental payments to **WALKER** totaling \$11,820.

An agent from the United States Department of Education, Office of Inspector General (“DOE-OIG”) would testify that the JPPSS is governed by the Jefferson Parish School Board, an independent legislative body, subject to control by the State of Louisiana for the purpose of administering public education in Jefferson Parish, Louisiana. The JPPSS received federal funds in excess of \$10,000 annually.

Both the Government and the defendant, **TRACY WALKER**, do hereby stipulate and agree that the above facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the government would have proven these facts beyond a reasonable doubt at trial.

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TRACY WALKER  
Defendant

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DATE

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WAYNE WALKER  
Counsel for Defendant

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DATE

\_\_\_\_\_  
JULIA K. EVANS  
Assistant United States Attorney

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DATE