UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA



INDICTMENT FOR THEFT OF PUBLIC MONEY

UNITED STATES OF AMERICA * CRIMINAL NO.

v. * SECTION:

SHEILA MORRIS * VIOLATION: 18 U.S.C. §641

* * *

The Grand Jury charges that:

COUNT 1

A. <u>AT ALL TIMES MATERIAL HEREIN:</u>

- 1. The defendant, **SHEILA MORRIS**, was the daughter of J.P., a qualified recipient of United States Social Security Administration ("SSA") retirement benefits.
- 4. SSA benefits were paid to J.P. in the form of United States Treasury checks mailed to a Post Office Box under the control of the defendant, SHEILA MORRIS.
 - 5. J.P. died on October 20, 1994.
- 6. After J.P.'s death, and continuing through September 2011, the defendant, **SHEILA MORRIS**, received and negotiated, by in some cases forging the signature of J.P., United States

 Treasury checks made payable to J.P.

B. THE OFFENSE OF THEFT OF PUBLIC MONEY

7. From on or about November 3, 1994 and continuing thereafter through on or about September 6, 2011, in the Eastern District of Louisiana and elsewhere, the defendant, **SHEILA MORRIS**, did willfully and knowingly steal, purloin, and convert to her own use money of the United States in the amount of approximately \$261,665.00, with the intent to deprive the United States of the use of the money; all in violation of Title 18, United States Code, Section 641.

NOTICE OF FORFEITURE

- 1. The allegations in paragraphs 1 through 7 are re-alleged 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 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).
- 2. As a result of the offenses alleged in Count 1, the defendant, **SHEILA MORRIS**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 641 and 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 641, including but not limited to the following:
 - a. A sum of money equal to \$261,665.00 in United States currency.
- 3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant:
 - 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 defendant up to the value of the above forfeitable property; all in violation of Title 18, United States Code, Sections 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

A TRUE BILL:

FOREPERSON

JIM LETTEN # 8517 United States Attorney

JAN MASELLI MANN. # 9020

First Assistant United States Attorney

HAYDEN M. BROCKETT, Maryland Bar Assistant United States Attorney

New Orleans, Louisiana April 13, 2012