

U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
FILED 8-18-2016
WILLIAM W. BLEVINS
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 16-31
v. * SECTION: "I"
JESSICA HENDERSON BERTHELOT * VIOLATION: 18 U.S.C. § 1708

* * *

FACTUAL BASIS

Should this matter have proceeded to trial, the government would have proven, through the introduction of competent testimony and admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the Superseding Bill of Information now pending against the defendant.

The government would establish that the case against the defendant, **JESSICA HENDERSON BERTHELOT** ("**BERTHELOT**"), began shortly before midnight on September 17, 2015, as a result of a 911 complaint to the Tangipahoa Parish Sheriff's Office ("TPSO") regarding a person stealing mail from residential mailboxes. A TPSO deputy responded to the call for service and observed the defendant, **BERTHELOT**, on Beau Chateau Blvd., exit her vehicle, and remove U.S. mail from a residential mailbox. The TPSO deputy activated his lights and sirens on his marked police unit and stopped **BERTHELOT** after she pulled into her driveway located on Beau Chateau Blvd.

BERTHELOT exited her vehicle with a bank statement in her hands. The bank statement was later determined to be stolen. The TPSO deputy placed **BERTHELOT** under

Defendant's Initials JB Defense Attorney's Initials AMC

arrest and advised her of her *Miranda* rights shortly after midnight on September 18, 2015. The TPSO deputy observed in plain view numerous pieces of mail in the defendant's vehicle located on the passenger seat and the floor of her vehicle. The TPSO deputy obtained written consent from the defendant's husband to search the vehicle and recovered the mail items from the defendant's vehicle.

The TPSO contacted the U.S. Postal Inspection Service ("Postal Inspector") and advised them of their arrest. A Postal Inspector responded to the Amite jail and met with TPSO detectives in order to interview the defendant. **BERTHELOT** executed a written *Miranda* rights waiver at approximately 3:00 a.m. During the interview, **BERTHELOT** said she had been taking mail from mailboxes twice a week for at least a month. **BERTHELOT** said she cashed checks and deposited checks that were not hers. **BERTHELOT** stated that she had more mail in a green trash bin located outside of her home in Ponchatoula, LA.

After the interview of the defendant, law enforcement officers returned to **BERTHELOT**'s residence and obtained consent from the defendant's husband to conduct a search of the green bin located outside of the **BERTHELOT**'s home. The defendant's husband also voluntarily turned over to the investigators another container that contained stolen mail. The defendant's husband told the investigators he found the container under their bed in the master bedroom. The investigators recovered several trash bags full of stolen U.S. mail.

Among the evidence recovered during this investigation, Postal Inspectors determined the defendant stole approximately 1428 items of mail. In addition, investigators identified three (3) instances where the defendant deposited stolen checks into her checking account at the Florida Parishes Bank according to the following schedule:

Defendant's Initials

JB

Defense Attorney's Initials


ASJ

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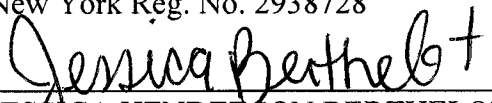
Date	Issuing Bank of Check	Bank and Location Where Check Deposited	Amount of Check	Check No.	Payee	Description
8/26/15	Regions Bank	Florida Parishes Bank, Ponchatoula, LA	\$650	6351	Jessica Henderson	R.P.
9/15/15	Regions Bank	Florida Parishes Bank, Ponchatoula, LA	\$800	9258	Cash	E.F.
9/16/15	Barclays Bank	Florida Parishes Bank, Hammond, LA	\$1,200	6073	Cash	J.H.

The government would establish that **BERTHELOT** forged the signatures of the account holders each time she deposited the stolen checks. The government would establish, through the testimony of the account holders of the stolen checks referenced *supra*, that they never saw or received the stolen checks nor did they give **BERTHELOT** permission to steal their mail or sign their names on the stolen checks.

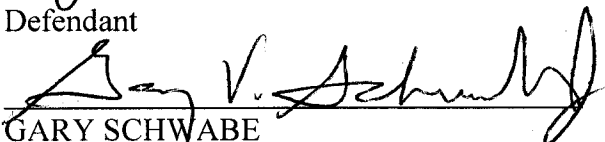
Various records and testimonial evidence, including testimony from representatives of the U.S. Postal Inspection Service, Tangipahoa Parish Sheriff's Office, and other witnesses would also be admitted to prove the facts set forth above.


 BRIAN M. KLEBBA
 Assistant United States Attorney
 New York Reg. No. 2938728

8-18-16
 Date


 JESSICA HENDERSON BERTHELOT
 Defendant

8-18-16
 Date


 GARY SCHWABE
 Counsel for Defendant

8-18-16
 Date