UNITED STATES DISTRICT COURT EASTERN DISTRICT FOLUISIANA FELOUISIANA INDICTMENT FOR FALSE STATEMENTS UNITED STATES OF AMERICA * CRIMINAL NO. v. * SECTION: CHERKISSA JACKSON * VIOLATION: 18 U.S.C. § 10001(a)(2) 18 U.S.C. § 2

The Grand Jury charges that:

COUNT 1

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

1. Hurricane Gustav hit the State of Louisiana on September 1, 2008.

2. Napoleonville, Louisiana in Assumption Parish was among the municipalities impacted by Gustav.

3. **CHERKISSA JACKSON** filed an application with the Department of

Homeland Security Federal Emergency Management Agency on September 3, 2008 claiming a loss for a trailer located at 3342 Back Marais Street, Napoleonville, Louisiana.

4. On October 31, 2008, **CHERKISSA JACKSON** received via wire transfer into her account at Teche Federal Credit Union in the amount of \$28,800 based on her claim of a loss to a trailer at 3342 Back Marais Street, Napoleonville, Louisiana.

5. On January 6, 2007 **CHERKISSA JACKSON** sold the trailer to another party as evidenced by a bill of sale witnessed by Brian P. Baldwin, Justice of the Peace of Napoleonville, Louisiana, and thus did not own the trailer on September 1, 2008.

B. <u>THE FALSE STATEMENT</u>:

On or about February 23, 2012 in the Eastern District of Louisiana in a matter within the jurisdiction of the Department of Homeland Security, Office of Inspector General, the defendant **CHERKISSA JACKSON** did knowingly and willfully make a material false, fictitious, and fraudulent statement and representation to a special agent of the Office of the Inspector General, Department of Homeland Security: to wit **CHERKISSA JACKSON** told the agent that she owned the trailer at 3342 Back Marais St., Napoleonville, Louisiana at the time Hurricane Gustav impacted Napoleonville, Louisiana when in truth and in fact she had sold the trailer on January 6, 2007 to another person; all in violation of Title 18, United States Code, Section 1001(a)(2) and 2.

A TRUE BILL:

FOREPERSON

KENNETH ALLEN POLITE, JR. UNITED STATES ATTORNEY

CARTER K. D. GUICE, JR. Assistant United States Attorney Louisiana Bar Roll No. 16771

New Orleans, Louisiana December 11, 2014

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