

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

BILL OF INFORMATION FOR FINANCIAL AID FRAUD

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
SHANERA WASHINGTON-SYLVE	*	VIOLATIONS: 20 U.S.C. § 1097(a)
	*	18 U.S.C. § 2
	*	
	*	
	*	

The United States Attorney charges that:

COUNT ONE

A. AT ALL TIMES MATERIAL HEREIN:

1. The Department of Education (DOE) is a department and agency of the United States of America charged with the responsibility to operate, administer and regulate various federal student financial assistance programs, including programs offering financial assistance to eligible students pursuing post-secondary education at participating schools.

2. The Federal Pell Grant Program provided DOE grants to assist eligible, needy students in meeting the costs of a post-secondary education. Federal Pell grants are considered "gift" aid and do not have to be repaid by the student recipient.

3. Students applied for financial aid under Title IV of the Higher Education Act of 1965, as amended, by submitting a Free Application for Federal Student Aid (FAFSA) form, either by mailing it or electronically transmitting it to a DOE processing center. The FAFSA contained basic information regarding a student's identity and economic status and was used to determine the student's eligibility to obtain federal financial aid funds.

4. Question 58 on the FAFSA asks: "Parent's marital status". If the applicant's parents are married at the time of the application, she is required to report it. Question 86 on the FAFSA asks for the applicant's "father's/stepfather's income earned from work". If the applicant's father had earned income from work at the time of the application, she is required to report it.

5. Delgado Community College, located in New Orleans, Louisiana, was an educational institution which participated in federal student financial programs administered by the DOE, including but not limited to the Federal Pell Grant program and the Federal Family Educational Loan Programs.

6. Southern University at New Orleans, located in New Orleans, Louisiana, was an educational institution which participated in federal student financial programs administered by the DOE, including but not limited to the Federal Pell Grant program and the Federal Family Educational Loan Programs.

B. THE OFFENSE:

From on or about March 22, 2009 to on or about May 15, 2012, in the Eastern District of Louisiana and elsewhere, in a matter within the jurisdiction of the Department of Education, a department of the United States, the defendant, **SHANERA WASHINGTON-SYLVE**, willfully and knowingly did embezzle, misapply, steal and obtain by fraud and false statements, by submitting

and causing to be submitted on behalf of her daughter, a false and fraudulent Free Application for Federal Student Aid (FAFSA) for the 2008-2009; 2009-2010; 2010-2011; 2011-2012; and 2012-2013 academic years, claiming defendant's marital status was "single", and omitting any information related to her husband's existence or his income, thereby causing the defendant's daughter to qualify for Federal Pell Grants in the amount of \$23,196, when the defendant well knew that the FAFSA applications contained false statements regarding her marital status and omitted assets and income; in violation of Title 20, United States Code, Section 1097(a) and Title 18, United States Code, Section 2.



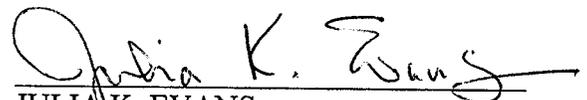
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New Orleans, Louisiana
June 10, 2013