

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

INDICTMENT FOR WIRE FRAUD & OBSTRUCTION OF JUSTICE

UNITED STATES OF AMERICA	*	CRIMINAL NO.
VERSUS	*	SECTION:
EBONY WILLIAMS WHITE	*	VIOLATIONS: 18 USC § 1343
	*	18 USC § 2
	*	18 USC § 1519

The Grand Jury charges that:

COUNTS 1 – 7

WIRE FRAUD

A. AT ALL TIMES MATERIAL HEREIN:

1. Jefferson Community Health Care Centers, Inc. (“Clinic”) was a non-profit corporation established in 2004 to deliver health care to uninsured and underinsured residents in Jefferson Parish and the surrounding area.

2. The Clinic was a quasi-public agency and was funded by public subsidies, including federal funding.

3. The Chief Financial Officer (“CFO”), or Interim Chief Financial Officer (“Interim CFO”), directly reported to the Chief Executive Officer (“CEO”) for the Clinic.

4. The Special Projects Officer (“SPO”) for the Clinic was responsible for managing various projects which fell under the scope of “Special Projects” on behalf of the Clinic. The SPO reported to the Deputy CEO.

5. Defendant **EBONY WILLIAMS WHITE (“WHITE”)** was employed by the Clinic from on or about February 22, 2008, until on or about March 12, 2010. **WHITE** was first employed at the Clinic as an accountant, then as the Interim CFO, and finally as the CFO. As the Interim CFO and CFO, **WHITE** was responsible for the Clinic’s finances and accounts, including reconciling accounts payables and receivables, tracking the employee health benefits program, overseeing the Clinic’s employee payroll, and disbursing funds to pay Clinic bills.

6. The Clinic maintained JP Morgan Chase bank account numbers XXXXXXXX88 and XXXXXXXX70.

7. **WHITE** maintained Gulf Coast Bank and Trust Company account number XXXXXXXX54 and JP Morgan Chase account number XXXXXXXX25.

8. The Hartford was a company that managed the Clinic’s employee pension funds, employee life insurance policies, and the employees’ health benefits.

B. THE SCHEME TO DEFRAUD:

Beginning on or about May 13, 2009, and continuing until on or about December 21, 2009, in the Eastern District of Louisiana and elsewhere, defendant **EBONY WILLIAMS WHITE** knowingly and willfully devised and intended to devise a scheme to defraud the Clinic and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

C. MANNER AND MEANS:

1. It was part of the scheme and artifice to defraud that **WHITE** began working at the Clinic as an accountant on about February 22, 2008. In or about April 2009, **WHITE** was promoted to Interim CFO.

2. It was further part of the scheme and artifice to defraud that on about April 20, 2009, **WHITE** obtained an access code for the Clinic's JP Morgan Chase bank accounts XXXXXXXX88 and XXXXXXXX70 enabling **WHITE** to electronically access the Clinic's bank accounts to pay Clinic bills and payroll.

3. It was further part of the scheme and artifice to defraud that **WHITE** set up electronic wire transfers from the Clinic's accounts by naming the payee and designating the bank accounts to which the funds would be wired. **WHITE** manually entered a description for the transfer that appeared on the Clinic's bank statements each month.

4. It was further part of the scheme and artifice to defraud that on about November 20, 2008, **WHITE** opened up Gulf Coast Bank and Trust Company account XXXXXXXX54; however, **WHITE** continued to have her bi-weekly payroll check directly deposited into her JP Morgan Chase account XXXXXXXX25 for the entirety of her employment at the Clinic.

5. It was further part of the scheme and artifice to defraud that after **WHITE** received the access code allowing her to electronically manipulate the Clinic's JP Morgan Chase bank accounts, **WHITE** began making fraudulent wire transfers from the Clinic's bank accounts to **WHITE'S** Gulf Coast Bank and Trust Company account XXXXXXXX54. **WHITE** manually entered a false description that she knew would appear on the Clinic's bank statements and would

conceal the nature of the transaction from the Clinic. **WHITE** falsely directed the wired funds not to The Hartford but, instead, to an account she well knew was under her own control.

6. It was further part of the scheme and artifice to defraud that on about May 13, 2009, **WHITE** fraudulently executed wire transfers from the Clinic's JP Morgan Chase account XXXXXXXX88 in the amounts of \$8,370.22 and \$15,540.23, to be deposited directly into **WHITE'S** Gulf Coast Bank and Trust Company bank account XXXXXXXX54 and **WHITE** caused the Clinic bank accounts records to be falsified to conceal the fraudulent transactions.

7. It was further part of the scheme and artifice to defraud that on about May 13, 2009, **WHITE** named the payee of the two fraudulent wire transfers "The Hartford" in order to disguise that she was the actual recipient and owner of the account into which the funds were deposited and **WHITE** manually entered the descriptions of the two fraudulent wire transfers "To Benefits" (*sic*) so that this description would show up on the Clinic's bank statements when received by the Clinic.

8. It was further part of the scheme and artifice to defraud that **WHITE** concealed the true nature of the transfers and falsely reported to the CEO that the fraudulent transfers were to The Hartford for payments to the Clinic's employee life insurance policy premiums that were in danger of cancellation for non-payment.

9. It was further part of the scheme and artifice to defraud that between on or about May 13, 2009, and December 21, 2009, **WHITE** made approximately forty-eight (48) fraudulent wire transfers in the total amount of approximately \$207,135 from the Clinic's JP Morgan Chase accounts XXXXXXXX70 and XXXXXXXX88 into **WHITE'S** Gulf Coast Bank and Trust Company account XXXXXXXX54.

D. USE OF THE WIRES:

On or about each of the dates set forth below, in the Eastern District of Louisiana and elsewhere, the defendant, **EBONY WILLIAMS WHITE**, for the purpose of executing and attempting to execute the scheme and artifice to defraud and for the purpose of obtaining money and property by means of false and fraudulent pretenses, representations and promises described above, did knowingly and willfully transmit and cause to be transmitted in interstate commerce certain writings, signals and sounds by means of wire communications from the Eastern District of Louisiana, specifically from a JP Morgan Chase Bank branch located in New Orleans, Louisiana, to the Chase Internet Group (CIP) server located in Delaware, when **WHITE** initiated the below-described unauthorized and fraudulent wire transfers, to be then wired to Gulf Coast Bank and Trust Company account XXXXXXXX54 under **WHITE'S** control, with such funds to be used for **WHITE'S** personal use:

COUNT	DATE	FRAUDULENT DESCRIPTION	CLINIC ACCOUNT	AMOUNT
1	05/13/2009	"To Benifits"	XXXXXXXX88	\$8,370.22
2	05/13/2009	"To Benifits"	XXXXXXXX88	\$15,540.23
3	06/15/2009	"To Benifits"	XXXXXXXX70	\$4,961.02
4	06/15/2009	"To Benifits"	XXXXXXXX70	\$6,291.34
5	09/10/2009	"To The Hartford"	XXXXXXXX88	\$5,837.29
6	09/10/2009	"To The Hartford"	XXXXXXXX70	\$4,024.02
7	12/21/2009	"To Hartford"	XXXXXXXX70	\$3,276.05

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT 8

OBSTRUCTION OF JUSTICE

FALSIFICATION OF RECORDS IN FEDERAL INVESTIGATIONS:

A. AT ALL TIMES MATERIAL HEREIN:

1. Paragraphs A(1) – A(8) of this Indictment are realleged and incorporated as though fully set forth herein.

2. On or about May 19, 2011 and again on or about September 8, 2011, the defendant **EBONY WILLIAMS WHITE** was interviewed by auditors from the Louisiana Legislative Auditor’s Office in conjunction with her position as CFO at the Clinic. In both interviews, defendant **WHITE** was questioned by the auditors about the wire transfers made from the Clinic’s bank accounts and deposited into her Gulf Coast Bank and Trust Company account XXXXXXXX54.

3. On or about August 15, 2013, the defendant **WHITE** was personally notified that she was the target of a federal grand jury investigation that included investigation by the Federal Bureau of Investigation (“FBI”), the United States Department of Health and Human Services’ Office of Inspector General (“HHS OIG”) and the Louisiana Legislative Auditor’s Office.

B. THE OBSTRUCTION:

On or about December 11, 2013, in the Eastern District of Louisiana and elsewhere, the defendant, **EBONY WILLIAMS WHITE**, did knowingly present or cause to be presented, a falsified document dated May 4, 2009, purportedly a contract between herself, the CEO, and the SPO, a document with the intent to impede, obstruct, and influence the investigation and proper administration of a criminal matter involving fraudulent wire transactions, a matter that the defendant **WHITE** knew was being investigated by the FBI and HHS OIG, in violation of Title 18, United States Code, Section 1519.

NOTICE OF WIRE FRAUD FORFEITURE

1. The allegations of Count 1 through 7 of this Indictment are realleged 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 1343 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 Counts 1 through 7, defendant **EBONY WILLIAMS WHITE**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), 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 1343, including but not limited to:

- a. At least \$207,135 in United States Currency and all interest and proceeds traceable thereto.
- b. The government specifically provides notice of its intent to seek a personal money judgment against the defendant in the amount of the fraudulently-obtained proceeds.

3. If any of the property subject to 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's up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

KENNETH ALLEN POLITE, JR.
UNITED STATES ATTORNEY



JULIANA ETLAND
Special Assistant United States Attorney
Louisiana Bar Roll No. 25115

New Orleans, Louisiana
January 9, 2014