

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**INDICTMENT FOR WIRE FRAUD
AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA	*	CRIMINAL NUMBER:
v.	*	SECTION:
TRINA MARIE BOURG	*	VIOLATIONS: 18 U.S.C. § 1343
	*	18 U.S.C. § 2
	*	*

The Grand Jury charges that:

**COUNT 1
WIRE FRAUD**

A. AT ALL TIMES MATERIAL HEREIN:

1. Beginning on or about February 24, 2010, and continuing to on or about July 22, 2014, defendant, **TRINA MARIE BOURG** (“**BOURG**”), worked as a Spanish interpreter in Terrebonne Parish, Louisiana.

2. In her capacity as a Spanish interpreter, **BOURG** routinely encountered individuals incarcerated or detained for alleged violations of state law or United States immigration laws.

3. **BOURG** provided Spanish interpreter services for a fee and submitted her invoices to the Office of the District Public Defender for the 32nd Judicial District for Terrebonne Parish (“Public Defenders’ Office”).

4. **BOURG** submitted invoices in the name of “**TRINA M. BOURG Interpreting Services**” located in Houma, Louisiana.

B. THE SCHEME TO DEFRAUD:

It was part of the scheme and artifice to defraud that, while providing Spanish interpreting services for attorneys employed by the Public Defender’s Office, the defendant, **TRINA MARIE BOURG**, would identify clients facing criminal charges who were subject to potential removal from the United States.

It was further part of the scheme and artifice to defraud that after identifying clients with potential immigration issues, the defendant, **TRINA MARIE BOURG**, would initiate contact with the client or the client’s family outside of the presence or knowledge of their court appointed attorney.

It was further part of the scheme and artifice to defraud that the defendant, **TRINA MARIE BOURG**, would falsely represent to the client or the client’s family that for a certain amount of money, she could bribe Federal immigration officials not to seek federal prosecution or initiate removal proceedings against the client.

It was further part of the scheme and artifice to defraud that the defendant, **TRINA MARIE BOURG**, would charge the client or the client’s family approximately \$2,000.00 to bribe Federal immigration officials in order to secure the client’s release from immigration custody.

It was further part of the scheme and artifice to defraud that the defendant, **TRINA MARIE BOURG**, would obtain the unlawful payment or payments from the client or client's family in the form of a bank wire transfer or in cash.

C. THE WIRE FRAUD:

The allegations contained in Parts A and B of Count 1 are hereby re-alleged and incorporated herein by reference.

On or about the date listed below, in the Eastern District of Louisiana and elsewhere, the defendant, **TRINA MARIE BOURG**, for the purpose of executing the scheme and artifice to defraud set forth in Part B, caused the following bank wire transfer, among others, to be transmitted in interstate commerce, by means of a wire communication:

ORIGINATING BANK	RECIPIENT BANK	WIRE AMOUNT	DATE OF WIRE TRANSFER
J.P. Morgan Chase Edinburg, TX	J.P. Morgan Chase Houma, LA	\$1,500.00	April 18, 2014

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

NOTICE OF WIRE FRAUD FORFEITURE

1. The allegations of Count 1 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 offense alleged in Count 1, defendant, **TRINA MARIE BOURG**, 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.

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 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



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

New Orleans, Louisiana
August 8, 2014