

UNITED STATES OF AMERICA	*	CRIMINAL NO. 15-18
v.	*	SECTION: "K"
TRENISE DEBOUE MURPHY	*	
	*	*

The defendant, **TRENISE DEBOUE MURPHY**, (hereinafter, the “defendant” or “**MURPHY**”), has agreed to plead guilty as charged to the Bill of Information now pending against her, charging her with conspiracy to commit theft of government funds, in violation of Title 18, United States Code, Sections 371 and 641. Both the Government and the defendant, **TRENISE DEBOUE MURPHY**, do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crimes to which the defendant is pleading guilty. The Government and the defendant further stipulate that the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant:

The Government would show, through the testimony of special agents with the Department of Housing and Urban Development – Office of the Inspector General (“HUD-OIG”), that the Department of Housing and Urban Development (“HUD”) is, and was, at the time of the offense, an agency or department of the United States.

The Government would further establish, through the testimony of special agents with HUD-OIG that HUD provided federal funds to local public housing authorities to assist low-income citizens with private market rental payments, including utility payments, through a tenant-based voucher program known as the Housing Choice Voucher Program (“HCVP”). At least seventy-five percent of the families admitted to the HCVP during a fiscal year were required to have income at or below thirty percent of their locality’s median income. In Jefferson Parish, Louisiana, within the Eastern District of Louisiana, federal funds for the HCVP were allocated to citizens and landlords by the Jefferson Parish Housing Authority (“JPHA”).

At trial, a representative from the JPHA would testify, and documentary evidence would be offered to show, that citizens of Jefferson Parish who were eligible for and received HCVP vouchers were required to inform JPHA of all changes in family income or household membership that occurred after their acceptance to the program so that the JPHA could review their continued eligibility for assistance under the HCVP. Additionally, JPHA conducted re-examinations of HCVP recipients’ eligibility and required HCVP recipients to certify in writing any changes in household income and/or household membership during the re-examinations.

The Government would introduce evidence that on about May 29, 1999, the defendant, **TRENISE DEBOUE MURPHY**, married **L.M.** On about May 8, 2002, **L.M.** purchased a home located at 2208 Westmere Street, Harvey, Louisiana. From in or about May 2002, through

the present, the defendant, **TRENISE DEBOUE MURPHY**, resided at 2208 Westmere Street, Harvey, Louisiana, with her husband, **L.M.**

The Government would introduce evidence, as well as the testimony of JPHA representatives and special agents with HUD-OIG that on about August 7, 2003, the defendant, **TRENISE DEBOUE MURPHY**, representing herself as "Trenise Deboue," submitted an application to receive HCVP assistance. The defendant listed her family composition as she, her son, and her daughter. The defendant did not include **L.M.** in her family composition. As a result of these representations, in about September 2003 JPHA awarded **MURPHY** rental assistance and utility cost assistance through the HCVP program for herself and her children to rent a residence located at 2208 Westmere Street, Harvey, Louisiana. Despite her marriage, **MURPHY** continued to represent herself to the JPHA as Trenise Deboue and did not divulge to the JPHA that **L.M.** also lived at 2208 Westmere Street, Harvey, Louisiana, thereby increasing the annual income for her household.

Documents would be admitted to show that on an approximately yearly basis, including in or about July 2005, February 2008, April 2009, July 2010, and June 2011, **MURPHY**, representing herself as Trenise Deboue, completed, signed, dated, and submitted recertification documents that falsely represented the members and income of her household to the JPHA during re-certification for eligibility for federal funds from HCVP.

Further, documents would be admitted to show that **MURPHY** represented to the JPHA, that **L.M.** was "Trenise Deboue's" landlord, including by signing and submitting to the JPHA landlord information forms. The forms did not disclose the **L.M.** lived at 2208 Westmere Street, Harvey, Louisiana, or was married to **MUPRHY**.



The Government would introduce documents and testimony from representatives of the JPHA and special agents with HUD-OIG that as a direct result of the false representations made by **MURPHY** on the application and certification forms (namely, that **L.M.** was her landlord, that she did not live with **L.M.**, and that under-reported her income), **MURPHY** received the benefit of HCVP funds to rent the residence located at 2208 Westmere Street, Harvey, Louisiana from September 2003 through September 2012 totaling approximately \$68,593.00 to which she would not have been entitled had she been truthful on the aforementioned documents.

The Government would further introduce documents and testimony from representatives of the JPHA that **MURPHY** and **L.M.** each (and collectively) concealed that **L.M.** did not rent to **MURPHY**, but instead that **L.M.** owned, 2208 Westmere Street, Harvey, Louisiana.

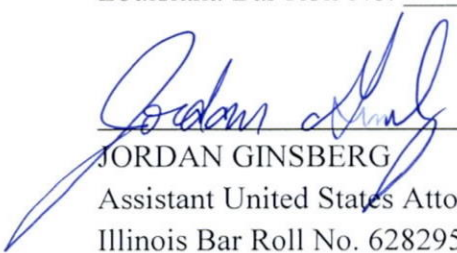
The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from, Special Agents from HUD-OIG, representatives of the Jefferson Parish Housing Authority, business records from JPHA, documents and tangible exhibits in the custody of HUD-OIG, and the statements of the defendant, **TRENISE DEBOUE MURPHY**.

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TRENISE DEBOUE MURPHY  
Defendant

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CLIFTON M. DAVIS, III, ESQ.  
Attorney for Defendant Murphy  
Louisiana Bar Roll No. \_\_\_\_\_



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JORDAN GINSBERG  
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