

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA

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CRIMINAL DOCKET NO. 15-93

v.

*

SECTION: "G"

JENNIFER WILLIAMS

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FACTUAL BASIS

Should this matter proceed to trial, the United States will prove the defendant **JENNIFER WILLIAMS** (Williams) guilty beyond a reasonable doubt of knowingly making a materially false, fictitious, and fraudulent statement and representation to FEMA in an application for benefits authorized in connection with the Presidential Disaster Declaration for the State of Louisiana (FEMA - 4080 - DR), effective on or about August 29, 2012, all in violation of Title 18, United States Code, Section 1040(a)(2); and of willfully and knowingly embezzling, stealing, purloining, and converting to her own use electronic fund transfers from FEMA in the respective amounts exceeding \$1,000.00, that is, the defendant applied for FEMA rental assistance for property located at 1129 Teakwood Drive, Harvey, Louisiana, and in relation to that application, claimed that she rented the said residence after Hurricane Isaac made landfall in Louisiana, when, in fact, the defendant never rented property located at 1129 Teakwood Drive, Harvey, Louisiana, or anywhere else, and therefore did not qualify for FEMA relief; all in violation of Title 18, United States Code, Section 641. The government would establish the following through credible testimony and the production of reliable evidence:

On August 28, 2012, Hurricane Isaac struck the southern coast of Louisiana. As a result, the President of the United States issued a Presidential Disaster Declaration for the State of Louisiana (Federal Emergency Management Agency or "FEMA" DR-4080), effective on or about August 29, 2012. On September 6, 2012, Williams initially applied for property damage assistance to FEMA for a property that she claimed as her primary residence located at 3821 Agateway Drive, Harvey, LA. FEMA gave her an initial payment of \$2,516.00 for emergency rental assistance as it deemed her home uninhabitable. There was no requirement with this one-time payment that the recipient provide proof as to its proper usage.

On October 15, 2012, Williams submitted an additional rental assistance claim to FEMA and asserted that due to damage to her home, she was now living at a residence located at 1129 Teakwood Drive, Harvey, LA. Correspondence documents submitted by Williams to FEMA included a residential lease for 1129 Teakwood Drive, Harvey, Louisiana, 70058, that was dated October 1, 2012. The lease was signed by Williams and "Terri Sanders." Also submitted were a deposit receipt for \$1,000 and several rent receipts for \$1,200, dated October 1, 2012 to November 1, 2013. The receipts were also signed by "Terri Sanders." Williams also listed "Terri Sanders" as her Landlord in her application for continued assistance. Overall, Williams submitted the following rent receipts to FEMA regarding her need for rental assistance:

Receipt Date	Receipt Number	Amount
October 18, 2012	919409	\$1,200
December 1, 2012	919500	\$1,200
January 1, 2013	919506	\$1,200
February 1, 2013	919515	\$1,200

March 1, 2013	919421	\$1,200
April 1, 2013	919427	\$1,200
May 1, 2013	919434	\$1,200
June 1, 2013	919533	\$1,200
July 1, 2013	919542	\$1,200
August 1, 2013	919549	\$1,200
September 1, 2013	919558	\$1,200
October 1, 2013	919566	\$1,200
November 1, 2013	919575	\$1,200

During the course of her entire interaction with FEMA, Williams received two checks and five Electronic Fund Transfers or "EFTs." The checks were issued to Williams at 3821 Agateway Drive. The EFTs were transferred into an account at Jefferson Financial Credit Union, 7701 Airline Drive, Metairie, Louisiana, 70003. The payments were as follows:

1. Check 12712638, dated 09-10-2012, \$1,173.89 (property damage)
2. Check 12979992, dated 09-17-2012, \$2,516.00 (payment for emergency rental)
3. EFT, dated 10-24-2012, \$4,260.00 (additional rental assistance)
4. EFT, dated 02-21-2013, \$4,260.00 (additional rental assistance)
5. EFT, dated 05-17-2013, \$4,260.00 (additional rental assistance)
6. EFT, dated 08-07-2013, \$2,840.00 (additional rental assistance)
7. EFT, dated 08-08-2013, \$1,420.00 (additional rental assistance)

The EFTs were deposited into an account at Jefferson Financial Credit Union, 7701 Airline Drive, Metairie, Louisiana, 70003. The total amount of additional rental assistance issued to Williams by FEMA was \$17,040.00, said funds belonging to the United States of America.

The Department of Homeland Security, Office of Inspector General (DHS OIG), initiated an investigation on Jennifer Williams after receiving a complaint that Williams fraudulently applied for FEMA disaster assistance concerning Hurricane Isaac. The complainant stated that Williams was living at 3821 Agate Way Drive, Harvey, Louisiana, 70058, though she was receiving rental assistance for living at 1129 Teakwood Drive, Harvey, Louisiana, 70058.

DHS OIG queried Jefferson Parish Tax Assessor website, to find out who was listed as the owner of 1129 Teakwood Drive. The query revealed that Robert Bradley, Jr. (Bradley) is the owner of 1129 Teakwood Drive and that Bradley has an active homestead exemption on the property. No other address was listed for Bradley.

DHS OIG received electricity records for Williams at 3821 Agateway Drive. A review of the records revealed that Williams was billed for electricity service, by Entergy, from April 2012 to January 2014. DHS OIG received electricity records for Bradley at 1129 Teakwood Drive. A review of the records revealed that Bradley was billed for electricity service, by Entergy, from August 2012 to May 2014. The account was registered to Bradley. No other customer names appeared to be listed on the account.

DHS OIG interviewed Bradley and he stated that he currently owns the property at 1129 Teakwood Drive, Harvey, Louisiana, 70058. Bradley stated that he has lived at 1129 Teakwood Drive for over twenty years. Bradley stated that he has never rented the property to anyone. Bradley stated that

he did not know "Terri Sanders" or Williams. Bradley stated that he never gave Williams or anyone permission to use his address in a lease or a FEMA claim.

DHS OIG interviewed Jennifer Williams twice. During the first interview, Williams confirmed that she received rental assistance while she was living at 1129 Teakwood Drive. Williams stated that she moved out of 1129 Teakwood at the beginning of 2014. Williams failed to provide DHS OIG with any documentation to prove that Williams resided at 1129 Teakwood Drive. During the second interview, Williams stated that she did not want to continue to claim that she lived at 1129 Teakwood Drive because she knew that she was wrong. Williams stated that "Terri Sanders" did not exist. Williams stated that Tamika Washington (Washington) was the individual who filled out the lease and receipts for 1129 Teakwood Drive. Williams stated that Washington's husband is the brother of Robert Bradley, Jr. Williams stated that Washington wrote the name "Terri Sanders" on the lease and signed the lease as "Terri Sanders." Williams stated that after Hurricane Isaac, she did not receive enough money from FEMA to fix the damage to her house. Williams claimed that when she told Washington that she needed more money to fix her house, Washington told Williams that Washington could get Williams a lease to send to FEMA to get more money.

Williams stated that she lived with her mother and Washington after Hurricane Isaac. Williams stated that she went back and forth between the two houses and that she stayed at Washington's house about three to four nights a week until Williams's house was fixed. Williams stated that she gave Washington about half of the rental assistance for rent.

DHS OIG interviewed John Mille, owner of 511 Franklin Avenue. Mille confirmed that he owned 511 Franklin Avenue and that Washington was the last person to live in the house. Mille stated that he could not locate a copy of Washington's lease. Mille stated that he usually shreds leases after the

tenants move out of his properties for security precautions. Mille presented DHS OIG with a copy of his standard lease. Mille was presented with a copy of the lease that Williams used for her FEMA claim. Mille identified the lease as his standard lease. Mille stated that the handwriting in sections 249-254 was his handwriting, but the rest of the writing on the document was not his. Mille stated that he was the only person that processed leases for his properties and that he did not give a lease to Williams.

Williams acknowledges that the facts described above constitute knowing violations of Title 18, United States Code, Sections 1040(a)(2) and 641.

READ AND APPROVED:



Edward J. Rivera
Assistant United States Attorney

2/30/15

DATE

George Chaney, Jr.
Counsel for Jennifer Williams

DATE

Jennifer Williams
Defendant

DATE