

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
2015 JAN 30 AM 9:23
WILLIAM W. BLEVINS
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR CONSPIRACY TO COMMIT
THEFT OF GOVERNMENT FUNDS AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

*

CRIMINAL NO.

15-18

v.

*

SECTION:

SECT. K MAG. 2

TRENISE DEBOUE MURPHY

*

VIOLATIONS: 18 U.S.C. § 371

18 U.S.C. § 641

*

18 U.S.C. § 981(a)(1)(C)

* * *

The United States Attorney charges that:

COUNT ONE

(Conspiracy to Commit Theft of Government Funds)

A. AT ALL TIMES MATERIAL HEREIN:

1. The United States Department of Housing and Urban Development ("HUD"), an agency and department of the United States, 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").

2. 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.

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3. 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").

4. The 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.

5. The JPHA also 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.

6. On or about May 29, 1999, the defendant, **TRENISE DEBOUE MURPHY**, married **L.M.**

7. On about May 8, 2002, **L.M.** purchased a home located at 2208 Westmere Street, Harvey, Louisiana.

8. 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.**

9. Starting in or about September 2003, the JPHA provided the defendant, **TRENISE DEBOUE MURPHY**, with monetary assistance through the HCVP program to rent a residence located at 2208 Westmere Street, Harvey, Louisiana.

B. THE CONSPIRACY:

Beginning at a time unknown, but not later than September 2003, and continuing until in or about September 2012, in the Eastern District of Louisiana, the defendant, **TRENISE**

DEBOUE MURPHY, did willfully and knowingly combine, conspire, confederate, and agree to steal and purloin over \$1,000, which belonged to the United States, in violation of Title 18, United States Code, Section 641.

C. OVERT ACTS:

In furtherance of the conspiracy, in the Eastern District of Louisiana, the defendant, **TRENISE DEBOUE MURPHY**, committed the following overt acts:

1. 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.

2. On about July 13, 2005, the defendant, **TRENISE DEBOUE MURPHY**, signed, dated, and submitted a landlord information form listing **L.M.** as her landlord at 2208 Westmere Street, Harvey, Louisiana. The defendant, **TRENISE DEBOUE MURPHY**, did not disclose that **L.M.** was her husband or that **L.M.** lived with her at 2208 Westmere Street, Harvey, Louisiana.

3. On approximately a yearly basis, including in or about July 2005, February 2008, April 2009, July 2010, and June 2011, the defendant, **TRENISE DEBOUE MURPHY**, representing herself as Trenise Deboue, completed, signed, dated, and submitted a document pursuant to the HCVP re-examination process indicating that she and her children were the only residents of 2208 Westmere Street, Harvey, Louisiana. The personal declaration/recertification documents completed, signed, dated, and submitted to HCVP by the defendant, **TRENISE DEBOUE MURPHY**, did not disclose that she was married to and lived with **L.M.** The documents also underreported the household income for the residence.

4. Directly as a result of the false representations made by the defendant, **TRENISE DEBOUE MURPHY**, she received 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.

All in violation of Title 18, United States Code, Section 371.

NOTICE OF FORFEITURE

1. The allegations of Count 1 of this Bill of Information 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 371, 641, and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

2. As a result of the offense alleged in Count 1, the defendant, **TRENISE DEBOUE MURPHY**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 371, 641, and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461, any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Sections 371 and 641.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant:

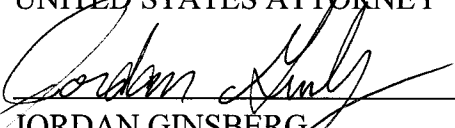
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

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 371, 641, and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

KENNETH ALLEN POLITE, JR.
UNITED STATES ATTORNEY



JORDAN GINSBERG
Assistant United States Attorney
Illinois Bar No. 6282956

New Orleans, Louisiana
January 30, 2015

No. _____

United States District Court

FOR THE

EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

vs.

TRENISE DEBOUE MURPHY

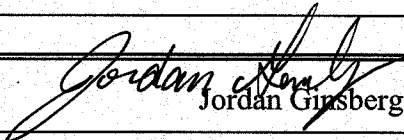
BILL OF INFORMATION FOR CONSPIRACY TO
COMMIT THEFT OF GOVERNMENT FUNDS

Violation(s): 18 U.S.C. Section 371

Filed _____, 20 15

_____, Clerk.

By _____, Deputy


Jordan Ginsberg

Assistant United States Attorney