

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**SUPERSEDING INDICTMENT FOR WIRE FRAUD,  
ATTEMPT TO COMMIT WIRE FRAUD, AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA	*	CRIMINAL NUMBER: 14-170
v.	*	SECTION: "E"
TRINA MARIE BOURG	*	VIOLATIONS: 18 U.S.C. § 1343
	*	18 U.S.C. § 1349
	*	
	*	
	*	

The Grand Jury charges that:

**COUNTS 1 - 4  
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 Defender's Office").

4. **BOURG** submitted invoices in the name of "Trina M. Bourg Interpreting Services" located in Houma, Louisiana.

5. **BOURG** was not an attorney and was not permitted by the Public Defender's Office to meet with or have discussions with clients of the Public Defender's Office without the knowledge of an Assistant Public Defender.

6. Chase Bank is the U.S. consumer banking business of JP Morgan Chase & Co., a global financial services firm with operations worldwide. Chase Bank has more than 5,500 branches and more than 18,000 ATMs throughout the United States and worldwide.

7. **BOURG** maintained a bank account with an account number ending in x6629 at a Chase Bank branch 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**, threatened and intimidated "Client A" and "Client A's" family members into believing that "Client A" was going to be deported in order to pressure them into making illegal payments to **BOURG**.

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

It was further part of the scheme and artifice to defraud that the defendant, **TRINA MARIE BOURG**, would charge "Client A" or "Client A's" family members approximately \$2,000.00 to \$4,000.00, and represent or imply that she would pay federal immigration officials in order to secure "Client A's" release from immigration custody.

It was further part of the scheme and artifice to defraud that the defendant, **TRINA MARIE BOURG**, solicited payments ranging from \$12,000 to \$20,000 from "Client A" and claimed that, in return for the unlawful payment, **BOURG** would marry "Client A" in order to improve "Client A's" immigration status.

It was further part of the scheme and artifice to defraud that the defendant, **TRINA MARIE BOURG**, used her cellular telephone to instruct "Client A's" family members or family friends of "Client A" with directions for making the unlawful payments to the defendant.

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 "Client A," "Client

A's" family members, or family friends of "Client A," in various forms, including but not limited to bank wire transfer, deposit, or cash payment.

It was further part of the scheme and artifice to defraud that the defendant, **TRINA MARIE BOURG**, attempted to have "Client A" transfer title of his vehicles and other property to **BOURG**.

**C. THE OFFENSE:**

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 to be transmitted by means of a wire communication in interstate commerce the writings, signs, signals, pictures, and sounds described below:

<b>COUNT</b>	<b>DATE</b>	<b>DESCRIPTION OF USE OF WIRE</b>
1	October 11, 2011	\$800.00 deposited into Chase Bank acct. # x5616 at a Chase branch located in McAllen, TX causing wire communications to be transmitted across state lines resulting in the availability of those funds for withdrawal at a Chase Bank branch in Houma, LA.
2	December 5, 2011	\$2,000.00 deposited into Chase Bank acct. # x7347 at a Chase branch located in McAllen, TX causing wire communications to be transmitted across state lines resulting in the availability of those funds for withdrawal at a Chase Bank branch in Houma, LA.
3	December 6, 2011	\$1,000.00 deposited into Chase Bank acct. # x7347 at a Chase branch located in McAllen, TX causing wire communications to be transmitted across state lines resulting in the availability of those funds for withdrawal at a Chase Bank branch in Houma, LA.
4	April 18, 2014	\$1,500.00 wired from Chase Bank acct. # x2696 at a Chase branch located in Edinburg, TX to the Chase Bank acct # x6629 located in Houma, LA.

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

**COUNT 5**  
**ATTEMPT TO COMMIT WIRE FRAUD**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations contained in Parts A and B of Counts 1 - 4 are hereby re-alleged and incorporated herein by reference.

**B. THE OFFENSE:**

On or about July 14, 2014, 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 of Counts 1 - 4, caused and attempted to cause the transmission by means of a wire communication in interstate commerce the writings, signs, signals, pictures, and sounds described below:

<b>COUNT</b>	<b>DATE</b>	<b>DESCRIPTION OF USE OF WIRE</b>
5	July 14, 2014	Interstate telephone call between the defendant and an individual located outside of the State of Louisiana wherein the defendant provided instructions for the payment of an additional \$500.00.

All in violation of Title 18, United States Code, Sections 1343 and 1349.

**NOTICE OF WIRE FRAUD FORFEITURE**

1. The allegations of Counts 1 - 5 of this Superseding 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, 1349 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 - 5, 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 violations of Title 18, United States Code, Sections 1343 and 1349.

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;

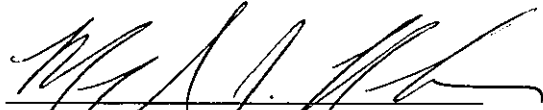
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 1343, 1349 and 981(a)(1)(C),  
made applicable through Title 28, United States Code, Section 2461(c).

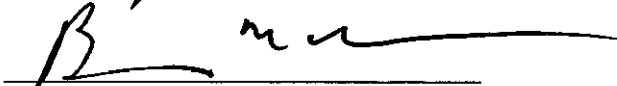
A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

KENNETH ALLEN POLITE, JR.  
UNITED STATES ATTORNEY



\_\_\_\_\_  
MARQUEST J. MEEKS  
Assistant United States Attorney  
Washington Bar Roll No. 39888



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

New Orleans, Louisiana  
May 21, 2015