

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

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO. 15-283
v.	*	SECTION: "F"
PAMELA PARKER	*	VIOLATION: 18 U.S.C. § 201(c)(1)(B)

* * *

FACTUAL BASIS

If this matter had proceeded to trial, the United States would have proved through the introduction of competent testimony and admissible evidence the facts below to support the allegations charged by the government in the Bill of Information now pending against defendant **PAMELA PARKER**: Count 1, demand of a gratuity in violation of Title 18, United States Code, Section 201(c).

At all times relevant to the above captioned matter, Southeast Louisiana Veterans Health Care System ("The VA") was a regional office of the United States Department of Veterans Affairs, which covered New Orleans and other nearby areas. Ms. Parker has two degrees from Louisiana State University: Bachelor of Science in Nursing and Master of Nursing. From in or about 2014 through in or about 2015, Ms. Parker was a Registered Nurse and employed by The VA as a clinical instructor assigned to The VA's Workforce Development Program. During

Ms. Parker's time at The VA, her official duties included administration of CPR training, management of scholarship programs, recruitment of nurses, and liaison activities with The VA's facility services. Based on Ms. Parker's work experience with The VA and her background in nursing, Ms. Parker's supervisor assigned her to explore a federal grant partnership proposed by LSU School of Nursing.


In or about the fall of 2014, LSU School of Nursing began to prepare an application for the Nurse Education, Practice, Quality and Retention ("NEPQR"): Veterans' Bachelor of Science Degree in Nursing Program ("VBSN") grant, which was highly competitive. On or about October 22, 2014, Ms. Parker met with LSU School of Nursing's designated point of contact for the grant proposal. During that initial meeting, LSU School of Nursing requested a partnership with The VA, which would have greatly strengthened the school's grant application. In response, Ms. Parker provided LSU School of Nursing's point of contact with a handwritten list of things of value, including a Doctor of Nursing Science degree, that Ms. Parker wrote before the meeting. Ms. Parker conditioned her assistance with the grant proposal on receipt of the items on her list of demands. On or about March 5, 2015 and May 20, 2015, Ms. Parker had follow-up meetings with the Dean of LSU School of Nursing to discuss Ms. Parker's demands and the grant. At these meetings, Ms. Parker again sought the items on her handwritten list in exchange for assistance with LSU School of Nursing's grant proposal. Ms. Parker was not authorized by The VA to request the items on her list, and the items on Ms. Parker's list were of personal value to her.

Prior to Ms. Parker's interactions with LSU School of Nursing regarding the VBSN grant in 2014, she unsuccessfully sought a Doctor of Nursing Science degree from the institution. In 2006, Ms. Parker completed all of the necessary requirements for the degree and submitted a


completed dissertation for consideration by the Dissertation Review Panel. Prior to 2007, Ms. Parker went before the Dissertation Review Panel on two occasions, and on both occasions, the panel rejected Ms. Parker's dissertation, directing that she collect more data. In August 2007, although Ms. Parker had not completed the requirements for the Doctor of Nursing Science degree according to the Dissertation Review Panel, the Registrar sent Ms. Parker a Doctor of Nursing Science diploma in error. The degree designation was never placed on Ms. Parker's official transcript, and she was advised that the LSU School of Nursing would only place the degree designation on her official transcript, after she completed her dissertation and the Dissertation Review Panel accepted her submission. In fall 2007, spring 2008, and fall 2008, Ms. Parker continued to participate in course work for the Doctor of Nursing Science degree. But, in fall 2008, Ms. Parker dropped out of the program, for health reasons, without attaining the Doctor of Nursing Science degree designation. In December 2008, Ms. Parker submitted a completed dissertation; however, the Dissertation Review Panel never accepted it, therefore, the degree designation still was not placed on Ms. Parker's transcript.


MARQUEST J. MEEKS
Assistant United States Attorney

1/6/2016
Date


RICHARD T. SIMMONS
Counsel for the defendant
Louisiana Bar Roll No. 12089

11/30/2015
Date


PAMELA PARKER
Defendant

11/30/2015
Date
