

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

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CRIMINAL NO. 22-208

v.

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SECTION: "J"

DANIELLE COLEMAN

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FACTUAL BASIS

The defendant, DANIELLE COLEMAN ("COLEMAN"), has agreed to plead guilty to the one-count indictment, which charges her with theft of government funds, in violation of Title 18, United States Code, Section 641.

Should this matter have proceeded to trial, COLEMAN stipulates that the government would have proven, through the introduction of credible testimony from witnesses, and admissible, tangible exhibits, the following facts beyond a reasonable doubt, to support the allegations in the indictment now pending against COLEMAN. Both the government and COLEMAN stipulate and agree that the following facts set forth a sufficient factual basis for the crime to which COLEMAN is pleading guilty. The following acts occurred within the jurisdiction of the Eastern District of Louisiana.

Social Security was a social insurance program that provided eligible applicants with retirement, disability, and survivor benefits. The Social Security Administration ("SSA") was a government agency responsible for the management of the Social Security program, as defined in the Social Security Act.

According to SSA records, in February 1986, COLEMAN's grandmother, [REDACTED]

[REDACTED] began receiving Retirement Insurance Benefit Program benefits. SSA sent those funds

AUSA RC
Defendant DSC
Defense Counsel GC

directly to ██████████ Hancock Whitney Bank account. On September 8, 2009, ██████████
██████████ died in Orleans Parish. COLEMAN did not inform SSA of her grandmother's death.
Unaware of ██████████ death, SSA erroneously continued releasing government funds in
monthly payments via electronic wire transfer to ██████████ Hancock Whitney Bank
account. From September 8, 2009 through May 29, 2020, SSA erroneously released \$86,280 into
██████████ Hancock Whitney Bank account. On April 29, 2020, a COVID-19 stimulus
check of \$1,200.00 was also erroneously released into ██████████ Hancock Whitney Bank
account.

From September 2009 through May 29, 2020, COLEMAN spent the SSA funds and the
COVID-19 stimulus funds on personal expenses. The SSA attempted to recover the erroneously
released funds; however, Hancock Whitney Bank reported ██████████ account had a balance
of \$18.00. Most of the withdrawals had occurred via a debit card issued on the account. SSA
investigated and determined that COLEMAN was the person who withdrew the funds from the
account.

In total, COLEMAN fraudulently received approximately \$86,280 in U.S. Social Security
funds and \$1,200 in COVID-19 stimulus funds from her deceased grandmother's bank account.

Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts
known by COLEMAN, and it is not a complete statement of all facts described by COLEMAN
to the government. Rather, it is a minimum statement of facts intended to prove the necessary

factual predicate for her guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for COLEMAN's plea of guilty to the charged offense.

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Spiro Latsis 1-18-23
Spiro Latsis (Date)
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