

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR THEFT OF GOVERNMENT FUNDS
AND FOR FALSE STATEMENTS TO AN AGENCY OF THE UNITED STATES**

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO.
v.	*	SECTION:
NEDRA BELL	*	VIOLATIONS: 18 U.S.C. § 2 18 U.S.C. § 641 18 U.S.C. § 1001
	*	
	*	
	*	

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. Prior to and including August and September of 2005, the defendant, **NEDRA BELL**, occupied and used as her primary residence, a home located at 4317 Annette Street in New Orleans, Louisiana, which was owned by her brother.
2. Prior to and including August and September of 2005, the defendant's brother resided in Algiers, Louisiana.
3. From June 2002 to the present, the defendant, **NEDRA BELL**, owned property located at 5223 North Claiborne Avenue, New Orleans, Louisiana 70117 which she did not live in, but used as business property to operate her beauty salon.

4. The United States Department of Housing and Urban Development (hereinafter "HUD") is an agency of the United States of America.

5. Hurricane Katrina struck southeastern Louisiana on or about August 29, 2005.

6. After Hurricane Katrina devastated the Gulf Coast area, including New Orleans, Louisiana, and as a result of legislation passed by the Congress of the United States of America with the approval of the President of the United States, funds were appropriated to HUD for a Community Development Block Grant ("CDBG") for Louisiana hurricane victims. The purpose of the CDBG was to assist and aid owners of property damaged or destroyed by Hurricanes Katrina and Rita in August and September of 2005. The grant money was disbursed under a program known as the Louisiana Road Home Program (the "Program"). HUD prepared the rules and regulations governing the disbursement of grant money through the State of Louisiana. The State of Louisiana, through the Office of Community Development, Division of Administration, contracted with ICF International, Inc. to administer the Program.

7. A requirement for receiving grant money from the Program was the applicant must have been the owner of the damaged property on August 29, 2005, and the property was the primary residence of the applicant on August 29, 2005.

8. On or about June 26, 2007, the defendant, **NEDRA BELL**, and her brother, applied for a Louisiana Road Home grant to obtain funds for the property located at 4317 Annette Street in New Orleans, Louisiana, in the Eastern District of Louisiana. In the application, **NEDRA BELL** said that the property located at 4317 Annette Street was not her primary residence on August 29, 2005, but that it was her brother's primary residence on that date. As a result of her false and fraudulent representations, the defendant, **NEDRA BELL**, received federal funds disbursed under

the Louisiana Road Home Program in the amount of \$24,371.97 on March 19, 2008 and \$30,000 on or about September 15, 2008.

B. THE OFFENSE:

From on or about June 26, 2007 to on or about September 15, 2008, in the Eastern District of Louisiana, the defendant, **NEDRA BELL**, did knowingly steal, purloin, and convert to her own use, money of the United States Department of Housing and Urban Development, a department and agency of the United States, to which she knew she was not entitled, having a value of \$54,371.97;

All in violation of Title 18, United States Code, Section 641.

COUNT 2

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 monetary assistance in the form of rental assistance and utility allowances to persons of low and very low income under a program entitled Housing Choice Voucher Program ("HCVP"), also known as "Section 8".

2. The Housing Authority of New Orleans ("HANO"), was the public housing authority charged with providing housing in accordance with HUD rules and regulations in the New Orleans area.

3. HUD provides federal funds to HANO to administer monetary assistance in the form of rental subsidies to eligible tenant families under its Section 8 program.

4. HANO's selection of tenants for the HUD Section 8 rental subsidy program is subject to compliance with applicable HUD income eligibility criteria, occupancy requirements and other rules and regulations of HUD.

B. THE FALSE STATEMENT:

From on or about October 20, 2007 to on or about June 1, 2012, in the Eastern District of Louisiana, the defendant, **NEDRA BELL**, did knowingly and willfully make false, fictitious and fraudulent statements and representations as to a material fact in a matter within the jurisdiction of HUD, an agency of the United States, and its agents, in that she completed and submitted a re-certification application and a HUD Income Questionnaire to HANO for HUD rental subsidized housing under its Section 8 program. The defendant, **NEDRA BELL**, falsely represented her address and family's income by denying that she received self-employment income and that she owned property, when in truth and in fact, as defendant, **NEDRA BELL**, well knew, she received income from her business as a hair stylist and owned property;

All in violation of Title 18, United States Code, Section 1001.

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

2. As a result of the offense alleged in Count 1, defendant, **NEDRA BELL**, 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 a violation of Title 18, United States Code, Section 641.

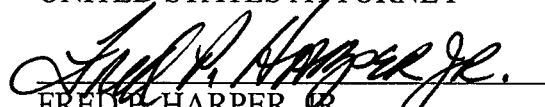
3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:


- 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;

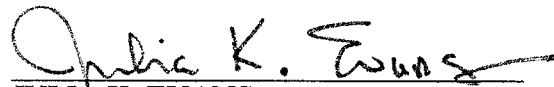
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).


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New Orleans, Louisiana
February 4, 2013