

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

**SUPERSEDING INDICTMENT FOR
CONSPIRACY TO VIOLATE THE RACKETEER INFLUENCED AND
CORRUPT ORGANIZATIONS ACT (RICO) AND TO DEFRAUD THE U.S.,
MAIL AND HONEST SERVICES FRAUD, AGGRAVATED IDENTITY
THEFT, MONEY LAUNDERING, FALSE STATEMENTS AND TAX EVASION**

UNITED STATES OF AMERICA	*	CRIMINAL NO. 08-140
v.	*	SECTION: "B"(4)
RENEE GILL PRATT	*	VIOLATIONS: 18 U.S.C. §1962(d)
MOSE JEFFERSON		18 U.S.C. §1341
BETTY JEFFERSON	*	18 U.S.C. §1346
ANGELA COLEMAN		18 U.S.C. §1028A
	*	18 U.S.C. §1956
		18 U.S.C. §1001
	*	26 U.S.C. §7201
		18 U.S.C. §982
	*	18 U.S.C. §2
		18 U.S.C. §371
	* * *	

The Grand Jury charges that:

**COUNT ONE
(CONSPIRACY TO VIOLATE THE RACKETEER
INFLUENCED AND CORRUPT ORGANIZATIONS ACT)**

A. At All Times Material Herein:

Relevant Entities and Individuals

1. RENEE GILL PRATT:

a. From on or about April 23, 1991 to on or about May 6, 2002, **RENEE GILL PRATT** was the duly elected State Representative for House District 91, State of Louisiana. As a member

of the House of Representatives for the State of Louisiana, **RENEE GILL PRATT** was able by law, practice, and custom to appropriate certain funds and money to non-profit entities, charities, schools, and municipal districts. These funds were derived from the State of Louisiana General Fund, money designated by the Governor's Office of Urban Affairs, money received by the Louisiana Stadium and Exposition District, and other sources.

b. From on or about May 6, 2002 through on or about May 31, 2006, **RENEE GILL PRATT** was a duly elected Councilmember for Orleans Parish for District B ("City of New Orleans City Council"). As a City Councilmember, **RENEE GILL PRATT** secured a so-called satellite office, paid for by the City of New Orleans, at 3313 South Saratoga Street.

c. Defendant **RENEE GILL PRATT** was the girlfriend of defendant **MOSE JEFFERSON**.

d. In or around the year 2006, after leaving office as the City Councilmember for District B, the defendant **RENEE GILL PRATT** was employed as the executive director of Care Unlimited, Inc., a non-profit organization (hereinafter non-profit) described below.

e. Defendant **RENEE GILL PRATT** used and operated a personal bank account at Liberty Bank & Trust, ending in 532 ("LB532").

f. Defendant **RENEE GILL PRATT** owned property located at 3311 Annunciation Street, New Orleans, Louisiana.

g. Defendant **RENEE GILL PRATT** owned and resided in a property located at 1718 Toledano Street, New Orleans, Louisiana.

2. **MOSE JEFFERSON:**

a. Defendant **MOSE JEFFERSON** was the brother of defendant **BETTY JEFFERSON** and Brenda Jefferson Foster, the uncle of defendant **ANGELA COLEMAN**, and the boyfriend of defendant **RENEE GILL PRATT**.

b. Defendant **MOSE JEFFERSON** retained control over the finances of a bank account at Liberty Bank & Trust, ending in 963 ("LB963") associated with the non-profit Orleans Metropolitan Housing and Community Development, Inc., an account for which **MOSE JEFFERSON** and Individual N were listed as signatories.

c. Defendant **MOSE JEFFERSON** retained control over finances and operation of the for-profit companies Southwind Consultants, Inc., and Southwind Consultants, LLC ("Southwind"), Enterprise Consultants, Inc. and Enterprise Consultants, LLC ("Enterprise Consultants") and B.E.P Consulting Services, LLC ("B.E.P.").

- i. Defendant **MOSE JEFFERSON** used, operated, and controlled a bank account associated with Southwind at Liberty Bank & Trust, ending in 447 ("LB447"), for which Individual N was listed as signatory.
- ii. Defendant **MOSE JEFFERSON** used, operated, and controlled a bank account associated with Enterprise Consultants at Liberty Bank & Trust, ending in 726 ("LB726"), for which **MOSE JEFFERSON** and Family Member 10 were listed as signatories and a second bank account at Liberty Bank, ending in 537 ("LB537"), for which **MOSE JEFFERSON** was listed as the sole signatory.

iii. Defendant **MOSE JEFFERSON** used, operated, and controlled a bank account associated with B.E.P. at Liberty Bank & Trust, ending in 521 ("LB521"), for which **MOSE JEFFERSON** was listed as signatory.

d. Defendant **MOSE JEFFERSON**'s primary occupation was as a political organizer. In this capacity **MOSE JEFFERSON** held a key role in the elections of defendants **RENEE GILL PRATT** and **BETTY JEFFERSON**.

e. Defendant **MOSE JEFFERSON** owned, operated, and received rental income from 3313 South Saratoga Street, New Orleans, Louisiana, through his corporate entity, Southwind and later, B.E.P.

f. Defendant **MOSE JEFFERSON** operated and received rental income from 2712-2716 Loyola Avenue, New Orleans, Louisiana, also known as "Mose Manor," through his corporate entity, Enterprise Consultants.

3. **BETTY JEFFERSON:**

a. From on or about May 4, 1998 through the date of this Superseding Indictment, **BETTY JEFFERSON** was the duly elected Tax Assessor for the 4th Municipal District of Orleans Parish in the State of Louisiana.

i. As Tax Assessor for the 4th Municipal District of Orleans Parish, defendant **BETTY JEFFERSON** used, operated, and controlled a bank account at Hibernia National Bank ending in 4942 ("HB4942") associated with the tax assessor's office, an account for which **BETTY JEFFERSON** was listed as signatory.

b. **BETTY JEFFERSON** was the mother of defendant **ANGELA COLEMAN** and the sister of defendant **MOSE JEFFERSON** and Brenda Jefferson Foster.

c. Defendant **BETTY JEFFERSON** retained control over the finances and operation of the non-profit known as Central City Adult Education Agency, Inc. and, along with defendant **ANGELA COLEMAN**, retained control over the non-profit known as Care Unlimited, Inc., and two of its programs known as Project Chance and the Bridge Program.

d. Defendant **BETTY JEFFERSON** was the president of the non-profit known as Greater St. Stephen Manor, Inc. (“Greater St. Stephen Manor”).

i. Defendant **BETTY JEFFERSON** used, operated, and controlled a bank account at Dryades Savings Bank, ending in 170 (“DSB170”) associated with the non-profit Greater St. Stephen Manor, an account for which **BETTY JEFFERSON** had signature authority.

ii. Greater St. Stephen Manor was operated primarily through funds disbursed and provided by the United States Department of Housing and Urban Development (“HUD”).

e. Defendant **BETTY JEFFERSON** retained control over the finances and operation of the for-profit entities known as Jefferson Consultants, Inc., Jefferson Consultants, LLC (“Jefferson Consultants”) Jeffco Services, Inc. and Jeffco Services, LLC (“Jeffco”), and Maximal Home Mortgage, LLC (“Maximal Mortgage”).

i. Defendant **BETTY JEFFERSON** used, operated, and controlled a bank account associated with Jefferson Consultants at Hibernia National Bank, ending in 6942 (“HB6942”), for which **BETTY JEFFERSON** was listed as signatory.

ii. Defendant **BETTY JEFFERSON** used, operated, and controlled a bank account associated with Jeffco at Hibernia National Bank, ending in 656 (“HB656”), for

which **BETTY JEFFERSON** and **ANGELA COLEMAN** were listed as signatories.

- iii. Defendant **BETTY JEFFERSON** used, operated, and controlled a bank account associated with Maximal Mortgage at Hibernia National Bank, ending in 589 ("HB589"), for which **BETTY JEFFERSON** and **ANGELA COLEMAN** were listed as signatories.
- f. Defendant **BETTY JEFFERSON** had the following credit card accounts in her name:
 - i. Discover Credit Card, account ending #3721 ("DiscoverCC3721");
 - ii. First USA/JP Morgan Chase, account ending #0168 ("FirstCC0168");
 - iii. First National Bank of Omaha/Hibernia Visa, account ending #0088 ("HBCC0088");
 - iv. Advanta Credit Card, account ending #0006 ("AdvantaCC0006");
 - v. Chase / Bank One Credit Card, account ending #7749 ("ChaseCC7749");
 - vi. Citi Bank Credit Card, account ending #7485 ("CitiCC7485");
 - vii. Bank of America, account ending #3356 ("BOACC3356");
 - viii. MBNA Credit Card, account ending #4358 ("MBNACC4358"); and
 - ix. MBNA Credit Card, account ending #3356 ("MBNACC3356").
- g. Defendant **BETTY JEFFERSON** purchased 1723-25 Valmont Street, New Orleans, Louisiana, on or about October 24, 1995. On or about November 12, 2001, 1723-25 Valmont Street was transferred to Jeffco.
- h. On or about December 26, 2002, 1723 Valmont Street was transferred to defendant **ANGELA COLEMAN** and Family Member 9. **BETTY JEFFERSON** retained ownership of 1725 Valmont Street through Jeffco.

- i. Beginning on or about July 23, 2003, Chase Manhattan Mortgage Corporation (“Chase Mgt Loan #6219”) had a mortgage on 1725 Valmont Street, for which defendant **BETTY JEFFERSON** owed a monthly mortgage note of approximately \$965.24.

4. **ANGELA COLEMAN:**

a. Defendant **ANGELA COLEMAN** was the daughter of defendant **BETTY JEFFERSON** and the niece of defendant **MOSE JEFFERSON** and Brenda Jefferson Foster. **ANGELA COLEMAN** was also known at various times as “Angela Howard.”

b. Defendant **ANGELA COLEMAN** was, at various times relevant to this indictment, listed as an executive of Care Unlimited and along with defendant **BETTY JEFFERSON**, retained control over the finances of Care Unlimited and its programs Project Chance and the Bridge Program.

c. Defendant **ANGELA COLEMAN** retained control over the finances and operation of the for-profit entities known as A Plus Promotional Printing, LLC (“A Plus”), Matco, Inc. and The Matco Group, LLC (“Matco”).

- i. Defendant **ANGELA COLEMAN** used, operated, and controlled a bank account associated with A Plus at Hibernia National Bank, ending in 967 (“HB957”), for which **ANGELA COLEMAN** and Family Member 9 were listed as signatories.
- ii. Defendant **ANGELA COLEMAN** used, operated, and controlled a bank account associated with Matco at Hibernia National Bank, ending in 234 (“HB234”), for which **ANGELA COLEMAN** and Family Member 9 were listed as signatories.

d. Defendant **ANGELA COLEMAN** had a credit card with American Express in the name of “Angela Coleman/Coleman Certified Shorthand” for three approved card users: **BETTY JEFFERSON**, **ANGELA COLEMAN** and Family Member 9. The payments for the three American Express cards were reflected on account ending #3002 (“AmExCC3002”).

e. From in or around January 2003, Standard Mortgage Corporation had a mortgage on 1723 Valmont Street (“Standard Mgt. Loan #117513”), for which defendant **ANGELA COLEMAN** and Family Member 9 owed a monthly mortgage note of approximately \$1,344.25.

5. Brenda Jefferson Foster:

a. Brenda Jefferson Foster was the sister of defendants **MOSE JEFFERSON** and **BETTY JEFFERSON** and the aunt of defendant **ANGELA COLEMAN**. Brenda Jefferson Foster is an unindicted co-conspirator relative to the allegations herein.

b. Brenda Jefferson Foster was at various times listed in documentation submitted to the State of Louisiana as being an executive and board member of the non-profit Care Unlimited, and its programs, Project Chance and the Bridge Program. She was also at various times listed as the contact person for Care Unlimited.

6. Central City Adult Education Agency, Inc.:

a. Central City Adult Education Agency, Inc. (“Central City Adult Education”) was a non-profit located within the City of New Orleans, Louisiana, which, at various times, stated its purpose to be providing “a basic education and GED preparation program for educationally disadvantaged adults for the Orleans area.”

b. Defendant **BETTY JEFFERSON** used, operated, and controlled a bank account associated with Central City Adult Education at Hibernia National Bank, ending in 343 (“Central

City Adult Education HB343"), for which **BETTY JEFFERSON** and Individual N were listed as signatories.

7. Care Unlimited, Inc.:

a. Care Unlimited, Inc. ("Care Unlimited") was a non-profit located within the City of New Orleans, Louisiana, which included, among others, the programs known as Project Chance, Bridge Program, Making Great Strides, and Community Empowerment and Redevelopment Program ("CERP").

b. From in or around 2000 to in or around 2006, Care Unlimited utilized as its nominal headquarters 3313 South Saratoga Street, a property owned by defendant **MOSE JEFFERSON**, through his company, Southwind and B.E.P.

c. Project Chance was a program of Care Unlimited, which, at various times, stated its general purpose as helping at-risk black males in the Central City-area of New Orleans. Care Unlimited Project Chance was funded at various times through grant money provided by the State of Louisiana and State of Louisiana line item appropriations.

i. Defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** used, operated, and controlled a bank account associated with Project Chance at Regions Bank, ending in 061 ("Project Chance RB061"), for which **BETTY JEFFERSON** and **ANGELA COLEMAN** were listed as signatories.

ii. Defendant **MOSE JEFFERSON** used, operated, and controlled a bank account associated with Project Chance at Liberty Bank & Trust, ending in 507 ("Project Chance LB507"), for which Brenda Jefferson Foster and Individual O were listed as signatories.

- iii. Defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** used, operated, and controlled a bank account associated with Project Chance at Bank One, ending in 321 ("Project Chance BO321"), for which **ANGELA COLEMAN** was listed as signatory.
 - iv. Members of the Enterprise, as described below, used, operated, and controlled a bank account associated with Project Chance at Liberty Bank & Trust, ending in 361 ("Project Chance LB361"), for which Individual D was listed as signatory.
- d. The Bridge Program was a program of Care Unlimited, which, at various times, stated its general purpose as providing educational support services to pregnant teenagers. Care Unlimited Bridge Program was funded at various times by grant money provided through the United States Department of Education and the State of Louisiana and State of Louisiana line item appropriations.
- i. Defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** used, operated, and controlled a bank account associated with the Bridge Program at Bank One, ending in 865 ("Bridge Program BO865"), for which **BETTY JEFFERSON** and **ANGELA COLEMAN** were listed as signatories.
 - ii. Defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** used, operated, and controlled a bank account associated with Bridge Program at Hibernia National Bank, ending in 161 ("Care Unlimited HB161"), for which **BETTY JEFFERSON** and **ANGELA COLEMAN** were listed as signatories.

8. Orleans Metropolitan Housing and Community Development, Inc.:

a. Orleans Metropolitan Housing and Community Development, Inc. (“Orleans Metro”) was a non-profit within the City of New Orleans, Louisiana, which, at various times, had as its general purpose the improvement of the Central City area of New Orleans.

b. From a time prior to or around 1999 to in or around 2006, Orleans Metro utilized as its nominal headquarters the following addresses: 936 Jackson Avenue, 2031 Jackson Avenue, and 3313 South Saratoga Street, all locations within the City of New Orleans, Louisiana.

c. Orleans Metro retained nominal title and ownership of 936 Jackson Avenue, New Orleans, Louisiana from on or about May 29, 1992 to on or about November 29, 1999, at which time title was transferred to **BETTY JEFFERSON**.

d. Orleans Metro retained nominal title and ownership of 3313 South Saratoga Street, New Orleans, Louisiana from on or about June 24, 1992 to on or about June 12, 2002, at which time title was transferred to Southwind.

9. Duties, Powers, and Authorities of the Legislative Office of State Representative District 91:

The Legislative Office of State Representative for the State of Louisiana (“State Representative’s Office”) was an elected position within the Legislative Branch of the State of Louisiana. An elected State Representative was entrusted with the duties of participating in the legislative process for the State of Louisiana, including voting on budgetary measures, appropriating funds to various entities, including non-profits, and otherwise representing the district by which he or she was elected.

10. Duties, Powers, and Authorities of the Office of City Councilmember District B:

The Office of City Council for the City of New Orleans was an elected position within the Legislative Branch for the City of New Orleans. An elected City Councilmember was entrusted with the duties of participating in the legislative process for the City of New Orleans, including voting on budgetary measures, passing city ordinances, and other duties inherent to representing the district by which he or she was elected.

11. Duties, Powers, and Authorities of the Office of Tax Assessor:

The Office of Tax Assessor for the 4th Municipal District of Orleans Parish was an elected position within the Executive Branch for Orleans Parish. An elected Tax Assessor was entrusted with the duties of determining the property taxes to be paid by the constituents within his or her district. The Office was appropriated funds by the State of Louisiana to pay staff who assisted in the performance of the Office's duties.

12. Louisiana Laws Regarding the Conduct of Government Officials:

a. Defendants **RENEE GILL PRATT** and **BETTY JEFFERSON**, while serving as officers of the State of Louisiana, were bound by the following laws, duties, policies, and procedures:

b. As a State Representative, **RENEE GILL PRATT**, was required to take an oath of office to support the Constitution and the laws of the United States of America and the State of Louisiana, and to faithfully discharge the duties of the Legislative Office of State Representative to the best of her ability and understanding.

c. As a City Councilmember, **RENEE GILL PRATT** was a chartered officer of Orleans Parish and as such, at the outset of her term, was required to take an oath of office to support the Constitution and the laws of the United States of America and the State of Louisiana, and to

faithfully and impartially discharge and perform the duties of her office to the best of her ability and understanding.

d. As a Tax Assessor, **BETTY JEFFERSON** was a chartered officer of Orleans Parish and as such, at the outset of her term, was required to take an oath of office to support the Constitution and laws of the United States of America and the State of Louisiana, and to faithfully discharge the duties of the Office of Tax Assessor to the best of her ability and understanding.

e. As officers of the State of Louisiana, **RENEE GILL PRATT** and **BETTY JEFFERSON** owed a duty of honest services to the people of the State of Louisiana and Orleans Parish in the performance of their public duties, as defined by Louisiana Revised Statutes Title 42, Chapter 15, Section 1101, which provides the following:

A. Whereas the people of the State of Louisiana have in Article X, Section 21 of the Louisiana Constitution mandated that the legislature enact a code of ethics for officials and employees of this state and its political subdivisions, the legislature does hereby enact a Code of Governmental Ethics.

B. It is essential to the proper operation of democratic government that elected officials and public employees be independent and impartial; that governmental decisions and policy be made in the proper channel of the governmental structure; that public office and employment not be used for private gain other than the remuneration provided by law; and that there be public confidence in the integrity of government. The attainment of one or more of these ends is impaired when a conflict exists between the private interests of an elected official or a public employee and his duties as such. The public interest, therefore, requires that the law protect against such conflicts of interest and that it establish appropriate ethical standards with respect to the conduct of elected officials and public employees without creating unnecessary barriers to public service. It is the purpose of this Chapter to implement these policies and objectives.

f. As elected officials, defendants **RENEE GILL PRATT** and **BETTY JEFFERSON** were also bound by the following provisions of Louisiana law:

§ 42:1112. Participation in certain transactions involving the governmental entity

A. No public servant, except as provided in R.S. 42:1120, shall participate in a transaction in which he has a personal substantial economic interest of which he may be reasonably expected to know involving the governmental entity.

B. No public servant, except as provided in R.S. 42:1120, shall participate in a transaction involving the governmental entity in which, to his actual knowledge, any of the following persons has a substantial economic interest:

- (1) Any member of his immediate family.
- (2) Any person in which he has a substantial economic interest of which he may reasonably be expected to know.
- (3) Any person of which he is an officer, director, trustee, partner, or employee.
- (4) Any person with whom he is negotiating or has an arrangement concerning prospective employment.
- (5) Any person who is a party to an existing contract with such public servant, or with any legal entity in which the public servant exercises control or owns an interest in excess of twenty-five percent, or who owes any thing of economic value to such public servant, or to any legal entity in which the public servant exercises control or owns an interest in excess of twenty-five percent, and who by reason thereof is in a position to affect directly the economic interests of such public servant.

B. The Enterprise:

At all times material to this superseding indictment, defendants **MOSE JEFFERSON, BETTY JEFFERSON, ANGELA COLEMAN, RENEE GILL PRATT**, Central City Adult Education, Care Unlimited, Orleans Metro, Southwind, B.E.P., the State Representative's Office for District 91, the City Councilmember's Office for District B, the Office of the Tax Assessor for the 4th Municipal District of New Orleans, and Greater St. Stephen Manor, were associated in fact, and constituted an "enterprise" as that term is defined in Title 18, United States Code, Section 1961(4), which enterprise was engaged in, and the activities of which affected interstate commerce. This enterprise is referred to for purposes of this count as the "Enterprise." The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

C. Purpose of the Enterprise:

The primary purpose of the Enterprise was to exercise and preserve power over and within the government of the State of Louisiana, the City of New Orleans, Orleans Parish, and elsewhere,

for the financial and political benefit of defendants **MOSE JEFFERSON, BETTY JEFFERSON, ANGELA COLEMAN,** and **RENEE GILL PRATT,** both directly and through the use of the non-profit entities known as Central City Adult Education, Care Unlimited, Orleans Metro, and Greater St. Stephen Manor, and the for-profit companies known as Southwind, B.E.P., Enterprise Consultants, Jefferson Consultants, Jeffco, Maximal Mortgage, A Plus, and Matco, and the elected offices of the State Representative's Office for District 91, the City Councilmember's Office for District B, and the Office of the Tax Assessor for the 4th Municipal District of Orleans Parish

D. The Racketeering Conspiracy:

1. From in or around 1991 to in or around 2006, in the Eastern District of Louisiana and elsewhere, **MOSE JEFFERSON, BETTY JEFFERSON, ANGELA COLEMAN,** and **RENEE GILL PRATT,** defendants herein, together with Brenda Jefferson Foster, and other associates known and unknown to the Grand Jury, being persons employed by and associated with an enterprise, namely the Enterprise, which enterprise engaged in, and the activities of which affected, interstate commerce, did conspire and agree, with each other and others known to and unknown to the Grand Jury, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and (5), consisting of:

- a. multiple acts indictable under the following provisions of federal law:
 - i. Title 18, United States Code, Sections 1341 and 1346 (mail fraud and honest services fraud);
 - ii. Title 18, United States Code, Section 1956 (money laundering).

2. Each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

E. Means and Method of the Conspiracy and Scheme to Defraud:

It was part of the conspiracy that **MOSE JEFFERSON, BETTY JEFFERSON, ANGELA COLEMAN, RENEE GILL PRATT**, Brenda Jefferson Foster, and others known and unknown to the Grand Jury, did devise and intend to devise a scheme and artifice to deprive the citizens of the State of Louisiana, the City of New Orleans, and Orleans Parish of their intangible right to the honest services of defendants **RENEE GILL PRATT** and **BETTY JEFFERSON**, and further, did devise and intend to devise a scheme and artifice to defraud and to obtain money and property from the United States Department of Education, the United States Department of Housing and Urban Development, the State of Louisiana, the City of New Orleans, Orleans Parish, its citizens, and others; and in so doing, the Enterprise, in addition to the factual allegations as described in Counts 2-14 and 26-28, which are realleged herein, also:

1. organized, incorporated and controlled tax exempt companies which were eligible to receive Grants and State of Louisiana line item appropriations;
2. wrote and submitted Grant proposals and reports to state and federal agencies, purporting to use all funds for charitable, educational and public purposes, and ultimately missappropriated said funds for their own personal financial benefit;
3. opened bank accounts in the non-profit names listing themselves, or individuals under their control, as signatories on the non-profit bank accounts in order to maintain control of the funds;

4. submitted expenditure reports to the state and federal agencies that falsely and fraudulently represented that the Grant funds had been spent according to the Grant requirements, knowing they had misappropriated these funds for their personal financial benefit;
5. submitted false and fraudulent reports representing that a certain number of individuals had been assisted with Grant funds, knowing such representations to be false;
6. wrote checks from non-profit bank accounts to defendants' companies to create the appearance to an outside auditor that the checks had been written to pay for legitimate business expenses, knowing the Enterprise's companies that received the funds had provided no services to the non-profits and had been used as a means to direct money to the individual defendants and others for their personal use and financial benefit;
7. hired an outside accountant to write non-profit checks in order to give the appearance the non-profit funds were being properly used and accounted for, knowing the accountant signed the checks prepared from a list provided to him by the defendants and the accountant had no day to day knowledge of the non-profits' operations;
8. made it appear on budget summaries that Grant funds were being paid to employees who worked for the non-profits, knowing these purported employees (hereinafter referred to as "straw payees") did not work for the non-profits, never received the checks or money, and were not aware that a payment had been issued to them;
9. forged straw payees' signatures and deposited the checks into their own bank accounts, the defendants' companies' bank accounts, or mailed the checks directly to credit card

companies for payment of the defendants' personal credit card charges, and otherwise utilized the funds for their own personal benefit;

10. issued themselves W-2s or Form 1099s which reflected only a limited amount of funds paid to them in their individual names by the non-profits, knowing the W-2s and Form 1099s did not state the true amount of compensation and benefits they received through the scheme;
11. appropriated grants from the State of Louisiana's general fund, the Governor's Office of Urban Affairs, and other sources for the exclusive benefit of the Enterprise's non-profits;
12. appropriated funds from the State of Louisiana's general fund for the exclusive purchase of *I Can Learn* software, knowing that the Enterprise stood to gain a personal financial benefit from the allocation of these funds;
13. directed vehicles donated by DaimlerChrysler to the City of New Orleans to aid in the recovery effort from Hurricane Katrina to the Enterprise non-profits and subsequently used the donated vehicles personally, in direct contravention of the purpose of the donation;
14. directed that funds provided by the State of Louisiana and the City of New Orleans for the purpose of legislative and satellite political offices to the Enterprise's building at 3313 South Saratoga Street, causing the State of Louisiana and the City of New Orleans to pay rent to the Enterprise's for-profit company known as Southwind;
15. wrote checks to straw payees from bank accounts associated with the Tax Assessor's Office for 4th Municipal District for Orleans Parish and deposited those checks into

personal bank accounts, defendants companies' bank accounts, or mailed those checks to pay off personal credit card debt, and otherwise utilized State of Louisiana and Orleans Parish funds for their personal benefit;

16. collected personal benefits, including home renovations, monetary payments, and other things of value, through the use of authority and discretion available to the Enterprise through the offices of elected officials.
17. It was further part of the conspiracy, and the scheme to defraud as described above, that the defendants, along with other associates, acted during and in furtherance of the conspiracy as follows:

a. The 1999-2000 Louisiana Appropriation to Central City Adult Education

In the regular Legislative session for the State of Louisiana in the year 1999, defendant **RENEE GILL PRATT**, the representative for House District 91, through the use of her position as a legislator, secured funding for the Enterprise's non-profit Central City Adult Education of at least \$55,000 for the fiscal year 1999-2000. After the funds had been appropriated, members of the Enterprise, including **BETTY JEFFERSON**, **ANGELA COLEMAN**, and Brenda Jefferson Foster submitted paperwork and documentation to the State of Louisiana falsely promising that the funds would be used to tutor both adults and high school drop outs so that they could pass the state's graduate equivalency test. Instead of using the funds as represented, the defendants directed approximately \$39,998 in grant funds to members of the Enterprise and others by using the Central City Adult Education HB343 bank account as follows:

1. The Enterprise caused to be written checks from the 1999-2000 Central City Adult Education grant funds to straw payees totaling approximately \$10,565, said straw payee checks were ultimately used for the personal financial benefit of defendant **BETTY JEFFERSON**.

2. The Enterprise caused to be written checks from 1999-2000 Central City Adult Education grant funds totaling approximately \$2,750 to the Enterprise corporate entity Southwind.

3. The Enterprise caused to be written a check from 1999-2000 Central City Adult Education grant funds in the amount of \$475.64 to pay the insurance premium on 2712-2716 Loyola Avenue (“Mose Manor”), a building owned by defendant **MOSE JEFFERSON** through the Enterprise’s corporate entity Enterprise Consultants.

4. The Enterprise caused to be written checks from 1999-2000 Central City Adult Education grant funds totaling approximately \$13,333 directly to defendant **BETTY JEFFERSON**.

5. The Enterprise caused to be written checks from 1999-2000 Central City Adult Education grant funds totaling approximately \$5,912 directly to defendant **ANGELA COLEMAN**, in her name or in the name of her alias, “Angela Howard.”

6. The Enterprise caused to be written checks from 1999-2000 Central City Adult Education grant funds totaling approximately \$2,016 to Brenda Jefferson Foster.

b. The 2000-2001 Louisiana Grant to Care Unlimited Project Chance

In the regular Legislative session for the State of Louisiana in the year 2000, defendant **RENEE GILL PRATT**, the representative for House District 91, through the use of her position as a legislator, secured funding for the Enterprise’s non-profit Care Unlimited Project Chance of at least \$103,801.00 for the fiscal year 2000-2001. After the funds had been appropriated, members of the Enterprise, including **BETTY JEFFERSON**, **ANGELA COLEMAN**, and Brenda Jefferson

Foster submitted paperwork and documentation to the State of Louisiana falsely promising that the funds would be used exclusively for educational and charitable purposes. Instead of using the funds as represented, the defendants directed approximately \$88,644.00 in grant funds to members of the Enterprise and others, by using the Project Chance BO321 bank account, as follows:

1. The Enterprise caused to be written checks from the 2000-2001 Project Chance Grant funds to straw payees and family members totaling approximately \$22,098;

2. The Enterprise caused to be written checks from the 2000-2001 Project Chance Grant funds totaling approximately \$13,541 which were used to pay the wages of **MOSE JEFFERSON**'s handyman, Individual O;

3. The Enterprise caused to be written checks from the 2000-2001 Project Chance Grant funds made payable to Individual Q totaling approximately \$5,416, which the defendant **MOSE JEFFERSON** deposited into his Southwind and Enterprise Consultants bank accounts; and

4. The Enterprise caused to be written checks totaling approximately \$2,800 to Individual S for work done on defendant **BETTY JEFFERSON**'s personal residence at 936 Jackson Avenue.

c. The 2001-2002 Louisiana Grant to Care Unlimited Project Chance

In the regular Legislative session for the State of Louisiana in the year 2001, defendant **RENEE GILL PRATT**, the representative for House District 91, through the use of her position as a legislator, secured funding for the Enterprise's non-profit Care Unlimited Project Chance of at least \$178,000.00 for the fiscal year 2001-2002. After the funds had been appropriated, members of the Enterprise, including **BETTY JEFFERSON**, **ANGELA COLEMAN**, and Brenda Jefferson Foster submitted paperwork and documentation to the State of Louisiana falsely promising that the funds would be used exclusively to train, counsel and focus on the broad problems of black males,

between the ages of 9 through 21. Instead of using the funds as represented, the defendants directed approximately \$176,029.00 in grant funds to members of the Enterprise and others. The defendants also submitted documentation and paperwork to the State of Louisiana indicating that the following individuals would be hired to be a full time executive director, a trainer, a counselors, a coordinator, and a private contractor, when in truth and fact the defendants well knew that:

1. Individual N, listed as the full time executive director receiving a salary of \$32,000, did not receive any money, benefits or salary as represented in the Grant application;

2. Individual O, listed as a full time trainer receiving a salary of \$20,000, worked exclusively full time as **MOSE JEFFERSON**'s handyman and carpenter, did not function as a trainer for Project Chance, and in fact performed no work whatsoever for this Grant program;

3. Individual H, listed as a full time counselor receiving a salary of \$18,000, worked exclusively full time at the Tax Assessor's Office for the defendant **BETTY JEFFERSON** and did not work for Project Chance, and in fact never received any of the funds as listed in the Grant application;

4. Family Member 6, listed as the full time coordinator receiving a salary of \$27,000, did not receive a salary of \$27,000 as listed in the Grant application;

5. Family Member 3, listed as a private contractor, was living approximately half of the Grant period in Austria as a student, did not work as a private contractor, and did not receive the \$6,000 as listed in the Grant application; and

6. Individual Q, listed as a full time counselor receiving a salary of \$20,200, did not receive any money, benefits or salary from the Grant program.

7-29. On or about the below listed dates, in the below listed amounts, and on other dates and amounts known and unknown to the grand jury, the Enterprise directed the 2001-2002 Louisiana Grant for Care Unlimited Project Chance to members of the Enterprise or its companies by writing checks out of Project Chance RB061 to the below listed straw payees, and ultimately personally benefitted from the use of these checks as follows:

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
7	\$1,999.98	(no #) 09/27/01	Family Member 3	ANGELA COLEMAN (Checking Account CO901)
8	\$2,200	(no #) 09/28/01	Individual H	BETTY JEFFERSON (Jeffco HB656)
9	\$1,100	#1006 10/12/01	Individual H	BETTY JEFFERSON (DiscoverCC3721)
10	\$2,000	#1016 10/31/01	Family Member 4	BETTY JEFFERSON (FirstUSACC0168)
11	\$2,000	#1020 11/14/01	Family Member 4	BETTY JEFFERSON (Jeffco HB656)
12	\$340	#1019 11/15/01	Family Member 5	ANGELA COLEMAN (Checking Account CO901)
13	\$2,916	#1023 11/15/01	Family Member 3	ANGELA COLEMAN (Checking Account CO901)
14	\$500	#1026 11/15/01	Family Member 6	BETTY JEFFERSON (AdvantaCC0006)
15	\$704	#1022 12/03/01	Family Member 2	BETTY JEFFERSON (FirstUSACC0168)
16	\$1,800	#1039 12/11/01	Individual J	BETTY JEFFERSON (Jeffco HB656)

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
17	\$1,250	#1057 12/20/01	Individual H	BETTY JEFFERSON (MBNA4358)
18	\$1,333	#1059 12/20/01	Family Member 3	ANGELA COLEMAN (Checking Account CO901)
19	\$1,600	#1061 01/15/02	Individual H	BETTY JEFFERSON (DiscoverCC3721)
20	\$816.67	#1072 01/26/02	Individual H	ANGELA COLEMAN (Checking Account CO901)
21	\$1,000	#1071 01/30/02	Individual J	ANGELA COLEMAN (Savings Account HB6518)
22	\$300	#1077 02/03/02	Family Member 7	BETTY JEFFERSON (HBCC0088)
23	\$816.67	#1118 03/25/02	Individual H	BETTY JEFFERSON (MBNA4358)
24	\$1,000	#1119 03/25/02	Individual I	BETTY JEFFERSON (FirstCC0168)
25	\$800	#1136 04/15/02	Family Member 3	ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
26	\$1,000	#1052 05/03/02	Individual I	BETTY JEFFERSON (FirstUSACC0168)
27	\$1,000	#1144 05/15/02	Individual H	BETTY JEFFERSON (DiscoverCC3721)
28	\$2,066	#1177 06/28/02	Individual I	MOSE JEFFERSON (Enterprise Consultants LB726)
29	\$2,000	#1327 06/28/02	Family Member 7	BETTY JEFFERSON (Jefferson Consultants HB6942)

30-40. Beginning in or around September 2001 and continuing through in or around June 2002, the Enterprise caused to be written checks from the Care Unlimited Project Chance RB061 bank account associated with the 2001-2002 Louisiana Grant for Care Unlimited Project Chance RB061, to themselves, their companies, employees, personal remodeling contractors and family members, as follows:

30. Approximately \$39,585 to defendant **MOSE JEFFERSON**;

31. Approximately \$31,833 to Family Member 8;

32. Approximately \$25,276 to Brenda Jefferson Foster;

33. Approximately \$10,418 to defendant **MOSE JEFFERSON**'s handyman, Individual O, as compensation, in part, for work Individual O and others performed in the renovation of 3311 Annunciation Street, New Orleans, LA, a property owned by **RENEE GILL PRATT**.

a. As a result of this renovation work, **RENEE GILL PRATT** claimed a deduction on her 2002 Federal Tax Return of \$3,000.

34. Approximately \$8,608 directly to defendant **BETTY JEFFERSON**;

35. Approximately \$7,950 to Southwind;

36. Approximately \$2,400 to pay a worker who never heard of Care Unlimited to remodel defendant **BETTY JEFFERSON**'s personal residence at 936 Jackson Avenue;

37. Approximately \$4,150 to Individual J to remodel defendant **BETTY JEFFERSON**'s personal residence at 936 Jackson Avenue;

38. Approximately \$1,661 to Matco; and

39. Approximately \$625 to Jeffco.

40. The defendant **MOSE JEFFERSON** took additional checks written out of Project Chance RB061, which were made payable to Individual O, totaling approximately \$11,456, and deposited them into his personal checking account and Enterprise Consultants' checking account.

d. The 2001-2002 Louisiana Appropriation to Care Unlimited Bridge Program

1-26. In the regular Legislative session for the State of Louisiana in the year 2001, defendant **RENEE GILL PRATT**, the representative for House District 91, through the use of her position as a legislator, secured funding for the Enterprise's non-profit Care Unlimited Bridge Program of at least \$200,000.00 for the fiscal year 2001-2002. After the funds had been appropriated, members of the Enterprise, including **BETTY JEFFERSON**, **ANGELA COLEMAN**, and Brenda Jefferson Foster submitted paperwork and documentation to the State of Louisiana falsely promising that the funds would be used exclusively to provide a continuous academic program for students whose academic programs are disrupted because of pregnancy. Instead of using the funds as represented, the Enterprise directed \$143,941 of the 2001-2002 Appropriation for Care Unlimited Bridge Program to members of the Enterprise or its companies by writing checks out of Care Unlimited HB161 to the below listed straw payees, and ultimately personally benefitted the from the use of these checks as follows:

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
1	\$2,600	(not legible) 12/14/01	Family Member 3	BETTY JEFFERSON (Jefferson Consultants HB6942)

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
2	\$1,078	#1002 12/17/01	Individual K	BETTY JEFFERSON (CitiCC7485)
3	\$1,944	#1026 12/30/01	Family Member 3	BETTY JEFFERSON (DiscoverCC3721)
4	\$1,944	#1029 12/30/01	Individual K	ANGELA COLEMAN (Savings Account HB6518)
5	\$6,000	#1012 01/11/02 (Converted to Cashier Check	Family Member 4	BETTY JEFFERSON (Jeffco HB656)
6	\$7,500	#1013 01/11/02	Family Member 3	BETTY JEFFERSON (FirstCC0168)
7	\$1,296	#1022 01/11/02	Individual F	BETTY JEFFERSON (AdvantaCC0006)
8	\$2,500	#1025 01/11/02	Family Member 3	BETTY JEFFERSON (CitiCC7485)
9	\$ 884	#1042 01/11/02	Individual L	BETTY JEFFERSON (CitiCC7485)
10	\$ 760	#1052 02/28/02	Individual F	BETTY JEFFERSON (DiscoverCC3721)
11	\$1,025	#1053 02/28/02	Individual M	BETTY JEFFERSON (MBNACC4358)

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
12	\$ 635	#1074 03/15/02	Individual M	BETTY JEFFERSON (Jefferson Consultants HB6942)
13	\$2,500	#1060 03/20/02	Family Member 3	BETTY JEFFERSON (HBCC0088)
14	\$1,338	#1106 03/24/02	Family Member 2	BETTY JEFFERSON (MBNACC4358)
15	\$ 687	#1104 05/15/02	Individual M	BETTY JEFFERSON (CitiBankCC7485)
16	\$1,118	#1119 05/20/02	Family Member 2	BETTY JEFFERSON (HBCC0088)
17	\$ 960	#1062 06/09/02	Individual A	BETTY JEFFERSON (FirstCC0168)
18	\$2,000	#1135 06/20/02	Family Member 4	BETTY JEFFERSON (Jeffco HB656)
19	\$5,000	#1131 06/24/02 (Converted to cashier check)	Family Member 3	ANGELA COLEMAN (Savings Account HB6518)

20-26. Beginning on or about December 11, 2001 and continuing through November 26, 2002, the Enterprise wrote checks from the bank account associated with the 2001-2002 Appropriation to Care Unlimited Bridge Program (HB161), to themselves, their companies, employees, family members, and others as follows:

20. Approximately \$29,188 directly to defendant **BETTY JEFFERSON**;
21. Approximately \$19,598 to Brenda Jefferson Foster
22. Approximately \$4,000 to Southwind;
23. Approximately \$3,434 to Family Member 4's company;
24. Approximately \$2,650 to Jeffco;
25. Approximately \$1,810 to Matco; and
26. Approximately \$1,467 to Maximal Mortgage.

e. **The 2002 LSED Grant to Care Unlimited Project Chance**

1-5. Through the authority of her position as the Louisiana representative for House District 91, defendant **RENEE GILL PRATT**, secured funding for the Enterprise's non-profit Care Unlimited Project Chance of at least \$93,453.76 for the fiscal year 2002-2003 from the Louisiana Stadium and Exposition District ("LSED"). After **RENEE GILL PRATT** through the use of her position as a legislator had secured these funds, members of the Enterprise, including **BETTY JEFFERSON**, **ANGELA COLEMAN**, and Brenda Jefferson Foster submitted paperwork and documentation to the LSED, and auditors working on its behalf falsely promising that the funds would be used exclusively to teach basic building and painting skills to at risk youth males. Instead of using the funds as represented, the defendants directed approximately \$67,038.00 in grant funds to members of the Enterprise and others. From on or about September 11, 2002 to on or about August 6, 2003 the Enterprise misappropriated the donated funds, by using the Project Chance LB507 bank account as follows:

1. Defendant **MOSE JEFFERSON** caused approximately \$27,300 of the grant funds in Project Chance LB507 to be transferred to his personal Orleans Metro LB963, as described in Section A, to pay his handymen and to purchase supplies for his personal projects;

2. Defendant **MOSE JEFFERSON** used approximately \$23,438 of grant funds in Project Chance LB507 to pay his handymen for work on personal projects, unrelated to the purpose of the grant, including renovation work on property owned by defendant **MOSE JEFFERSON** or his associated for-profit companies and the personal residence of defendant **RENEE GILL PRATT**, located at 1718 Toledano Street, New Orleans, LA and 3311 Annunciation Street, New Orleans, LA;

3. Defendant **MOSE JEFFERSON** caused checks to be written totaling approximately \$7,800 in grant funds to Southwind;

4. Defendant **MOSE JEFFERSON** caused checks to be written totaling approximately \$6,300 in grant funds to Individual N, which defendant **MOSE JEFFERSON** deposited into his Enterprise Consultants bank account;

5. Defendant **MOSE JEFFERSON** caused checks to be written out of Project Chance LB507 totaling approximately \$2,200 in grant funds to Brenda Jefferson Foster.

f. The 2003-2004 Federal Grant to Care Unlimited Bridge Program

1-5. Through the efforts of the members of the Enterprise and others, on or about October 1, 2003 the United States Department of Education made a direct grant of \$99,350.00 to the Enterprise's Care Unlimited Bridge Program. In securing this funding, the Enterprise submitted paperwork and documentation to the United States Department of Education falsely promising that the federal funds would be used to provide educational support to pregnant teenagers. Instead of using the funds as represented, Enterprise directed \$60,358.00 of the 2003-2004 United States

Department of Education Grant for Care Unlimited Bridge Program to members of the Enterprise or its companies by writing checks out of Bridge Program BO865 to the below listed straw payees, and ultimately personally benefitted from the use of these checks as follows:

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
1	\$862.00	#1018 11/17/03	Individual A	BETTY JEFFERSON (MBNACC3356)
2	\$576.00	#1042 02/24/04	Individual B	ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
3	\$576.00	#1070 05/28/04	Individual B	BETTY JEFFERSON (FirstCC0168)
4	\$502.00	#1073 06/15/04	Individual A	ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
5	\$665.00	#1081 09/01/04	Individual A	ANGELA COLEMAN (Savings Account HB6518)

6-27. On or about the below listed dates, in the below listed amounts, and on other dates and amounts known and unknown to the grand jury, the Enterprise directed the 2003-2004 United States Department of Education Grant for Care Unlimited Bridge Program to Enterprise members **BETTY JEFFERSON** and **ANGELA COLEMAN** and or their associated companies by writing checks out of Bridge Program BO865 to the below listed family member straw payees:

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
6	\$916.00	#1007 11/05/03	Brenda Jefferson Foster	BETTY JEFFERSON (Jeffco HB656)
7	\$360.00	#1009 11/05/03	Family Member 2	ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
8	\$1,327.43	#10000 11/10/03	Brenda Jefferson Foster	ANGELA COLEMAN (Savings Account HB6518)
9	\$576.00	#1020 12/07/03	Family Member 2	ANGELA COLEMAN (Savings Account HB6518)
10	\$548.00	#1024 12/21/03	Family Member 2	BETTY JEFFERSON (Jeffco HB656)
11	\$260.00	#1028 12/21/03	Brenda Jefferson Foster	ANGELA COLEMAN (Matco HB234)
12	\$300.00	#1037 01/30/04	Brenda Jefferson Foster	ANGELA COLEMAN (A Plus HB967)
13	\$465.44	#10028 02/20/04	Brenda Jefferson Foster	ANGELA COLEMAN (A Plus HB967)
14	\$1,654.28	#10034 03/30/04	Brenda Jefferson Foster	BETTY JEFFERSON (A Plus HB967)
15	\$1,654.28	#10040 04/28/04	Brenda Jefferson Foster	ANGELA COLEMAN (A Plus HB967)

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
16	\$400.00	#1064 04/30/04	Family Member 2	ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
17	\$916.67	#1038 06/15/04	Brenda Jefferson Foster	ANGELA COLEMAN (A Plus HB967)
18	\$916.00	#1067 07/01/04	Brenda Jefferson Foster	BETTY JEFFERSON (Jefferson Consultants HB6942)
19	\$1,700.00	#1083 07/30/04	Brenda Jefferson Foster	BETTY JEFFERSON (Jefferson Consultants HB6942)
20	\$350.00	#1085 08/15/04	Family Member 2	ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
21	\$850.00	#1086 08/15/04	Brenda Jefferson Foster	BETTY JEFFERSON (Chase Mgt Loan #6219)
22	\$850.00	#1080 09/01/04	Brenda Jefferson Foster	BETTY JEFFERSON (Jefferson Consultants HB6942)
23	\$802.00	#1087 09/30/04	Family Member 2	ANGELA COLEMAN (Checking Account HB606)
24	\$850.00	#1088 10/01/04	Brenda Jefferson Foster	BETTY JEFFERSON (Jeffco HB656)
25	\$850.00	#1091 10/14/04	Brenda Jefferson Foster	BETTY JEFFERSON (Jeffco HB656)

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
26	\$850.00	#1092 10/15/04	Brenda Jefferson Foster	BETTY JEFFERSON (Jefferson Consultants HB6942)
27	\$850.00	#1093 11/30/04	Brenda Jefferson Foster	BETTY JEFFERSON (Jefferson Consultants HB6942)

28-32. Beginning on or about November 5, 2003 and continuing through December 31, 2004, the Enterprise wrote checks from the bank account associated with the 2003-2004 federal grant for Care Unlimited Bridge Program (BO865), to themselves, their companies, employees, personal remodeling contractors and family members, as follows:

28. Approximately \$5,100 to Jeffco, in addition to the already described concealed payments;

29. Approximately \$8,650 to Jefferson Consultants, in addition to the already described concealed payments;

30. Approximately \$1,119 to A Plus, in addition to the already described concealed payments;

31. Approximately \$8,799 to Matco; and

32. Approximately \$2,500 to Southwind.

g. The 2004-2005 Louisiana Grant to Care Unlimited Bridge Program

1-15. Through the efforts of the members of the Enterprise and others, in the course of the regular legislative session for the State of Louisiana in the year 2004, the Enterprise's Care Unlimited Bridge Program received a grant from the State of Louisiana for at least \$100,000.00.

After the funds had been appropriated, members of the Enterprise, including **BETTY JEFFERSON**, **ANGELA COLEMAN**, and Brenda Jefferson Foster submitted paperwork and documentation to the State of Louisiana falsely promising that the funds would be used exclusively to provide educational support services to pregnant teenagers. Instead of using the funds as represented, the Enterprise directed \$71,447.00 of the 2004-2005 Grant to Care Unlimited Bridge Program to members of the Enterprise or its companies by writing checks out of Bridge Program BO865 to the below listed straw payees, and ultimately personally benefitted from the use of these checks as follows:

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
1	\$855	#1108 02/15/05	Individual B	BETTY JEFFERSON (ChaseCC7749)
2	\$900	#1107 03/15/05	Individual F	BETTY JEFFERSON (Jefferson Consultants HB6942)
3	\$818	#1123 03/25/05	Individual B	ANGELA COLEMAN (Checking Account HB606)
4	\$827	#1130 03/25/05	Individual A	BETTY JEFFERSON (DiscoverCC3721)
5	\$1065	#1131 03/25/05	Individual F	BETTY JEFFERSON (Jeffco HB656)
6	\$1,107.75	#1134 04/15/05	Individual B	ANGELA COLEMAN (A Plus BO343)

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
7	\$954.00	#1144 05/30/05 (Converted to cashiers check)	Individual A	ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
8	\$2,000.00	#1141 06/07/05 (Converted to cashiers check)	Individual D	ANGELA COLEMAN (Checking account CO211)
9	\$882.00	#999996 06/07/05 (Converted to cashiers check)	Individual B	ANGELA COLEMAN (Matco HB234)
10	\$619	#1135 06/15/05	Individual E	BETTY JEFFERSON (BoACC3356)
11	\$630	#1145 06/15/05 (Converted to cashiers check)	Individual C	BETTY JEFFERSON (ChaseCC7749)
12	\$818.26	#1153 06/20/05	Individual B	ANGELA COLEMAN (Checking Account HB606)
13	\$906	#1156 06/20/05	Individual G	BETTY JEFFERSON (Jeffco HB656)
14	\$708.53	#1159 06/20/05	Individual F	ANGELA COLEMAN (Checking Account HB606)

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
15	\$540.43	#1150 07/15/05	Individual A	BETTY JEFFERSON (Jeffco HB656)

16-20. Beginning on or about February 3, 2005 and continuing through on or about June 30, 2005, the Enterprise caused to be written checks from the Bridge Program BO865 bank account associated with the 2004-2005 Louisiana Grant for Care Unlimited Bridge Program (BO865), to themselves, their companies, employees, personal remodeling contractors and family members, as follows:

16. Approximately \$9,800 to Jeffco, in addition to the already described concealed payments;

17. Approximately \$6,800 to Maximal Mortgage, which the defendant **BETTY JEFFERSON** then transferred \$3,000 to Jefferson Consultants and checks totaling approximately \$1,965 to herself;

18. Approximately \$1,858 to Matco.

19. Approximately \$14,902 to Brenda Jefferson Foster.

20. Approximately \$7,683 to Brenda Jefferson Foster, which however, **BETTY JEFFERSON** and **ANGELA COLEMAN** deposited into bank accounts under their control to pay their personal expenses.

21. Further, members of the Enterprise also submitted documentation and paperwork to the State of Louisiana indicating that Individual C would be hired to be the program coordinator, and confirmed such in follow up documents to the State, knowing that Individual C was not involved in the program, was not a teacher; and did in fact receive no funds from the grant; and,

22. On or about February 28, 2005, members of the Enterprise submitted a report to the State purportedly certified by Individual C that Individual C had provided certified teachers for 6-8 weeks to twenty-five pregnant teenage clients, knowing that Individual C did not certify the February 28, 2005 submission and did not work for the Care Unlimited Bridge Program; and,

23. On or about May 18, 2005, the defendants **BETTY JEFFERSON, ANGELA COLEMAN** and Brenda Jefferson Foster received from the State of Louisiana, by common carrier Federal Express, a check in the amount of \$25,000 dated March 13, 2005, representing the issuance of the third quarter funding for fiscal year 2004-2005 for the Care Unlimited Bridge Program.

h. The 2004-2005 Louisiana Appropriation to Orleans Metropolitan Housing & Community Development, Inc.

Through the efforts of the members of the Enterprise and others, in the course of the regular legislative session for the State of Louisiana in the year 2004, the Enterprise's Orleans Metropolitan received a line item appropriation from a member of the Louisiana House of Representatives for at least \$25,000.00 for the fiscal year 2004-2005. After the funds had been appropriated, members of the Enterprise, including **BETTY JEFFERSON, ANGELA COLEMAN**, and Brenda Jefferson Foster submitted paperwork and documentation to the State of Louisiana falsely promising that the funds would be used exclusively to "enhance the quality of life by removing harborage for vermin and pests, beautify [the] ... now dismal eyesore" of run down, overgrown lots in the Central City area of New Orleans. Instead of using the funds as represented, members of the Enterprise misappropriated the grant money, as follows:

1. On or about December 31, 2004, the defendant **MOSE JEFFERSON** caused to be transferred \$25,000 in Grant funds from an Orleans Metro Bank One account ending in 772

("BO772"), the account to which the original grant had been deposited, and to his personal Orleans Metro account, Orleans Metro LB963, described above in Section A.

2. From on or about January 3, 2005 to on or about July 5, 2005, the defendant **MOSE JEFFERSON** paid his handymen for work on his personal projects with the \$25,000 he had directed to his personal Orleans Metro bank account and did not use any of the Grant funds to purchase equipment to cut and clear overgrown lots in the Central City area, nor did his workers clear any overgrown lots.

i. The 2003-2004 HUD Payments to Greater St. Stephen Manor, Inc.

1-8. Through the efforts of the members of the Enterprise and others, from in and around 2003 to in and around 2004, the United States Office of Housing and Urban Development ("HUD"), provided funding to the Enterprise's Greater St. Stephen Manor. In securing this funding, the Enterprise submitted paperwork and documentation to HUD promising that the federal funds would be used to improve the Greater St. Stephen Manor and to provide housing assistance to qualifying elderly poor. Instead of using the funds exclusively as represented, members of the Enterprise including **BETTY JEFFERSON** and **ANGELA COLEMAN**, directed approximately \$9,320.00 in federal funds to members of the Enterprise and others, by using the Great St. Stephen Manor DSB170 bank account, and ultimately personally benefitted from the use of these checks as follows:

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
1	\$375	#1086 04/30/03	Individual B	ANGELA COLEMAN (Checking Account HB606)

Number	Amount	Check # Date	Payable to	Final Disposition or Deposited to
2	\$465	#1103 05/29/03	Individual B	ANGELA COLEMAN (Checking Account HB606)
3	\$2,528	#1203 04/02/04	Individual B	ANGELA COLEMAN (Savings Account HB6518)
4	\$460	#1104 06/30/03	Individual B	ANGELA COLEMAN (Checking Account HB606)
5	\$1,969	#1209 04/06/04	Family Member 7	BETTY JEFFERSON (HBCC0088)
6	\$455.50	#1210 04/20/04	Individual B	ANGELA COLEMAN (Savings Account HB6518)
7	\$168	#1221 08/30/04	Family Member 2	BETTY JEFFERSON (DiscoverCC3721)
8	\$2,900	#1229 09/27/04 (Converted to cashiers check)	Family Member 3	ANGELA COLEMAN (Savings Account HB6518)

j. The 2005 Louisiana Appropriation to Care Unlimited—post-Katrina Funding

1-8. Through the efforts of the members of the Enterprise and others, in the course of the regular legislative session for the State of Louisiana in the year 2005, the Enterprise’s non-profit Care Unlimited received an appropriation from the State of Louisiana for at least \$275,000.00, under the condition that this appropriation would be used exclusively for charitable purposes in service of the community in the Central City area of New Orleans.

Because of the damage inflicted as a result of Hurricane Katrina, in or around September of 2005, the Governor of the State of Louisiana, suspended all funding for discretionary grants to non-profits, such as Care Unlimited. Nevertheless, on or about February 13, 2006, the Enterprise submitted a written request to the State of Louisiana purporting that in the time immediately prior to Hurricane Katrina, services had been performed by employees of the Enterprise's non-profit Care Unlimited. Termed a request for reimbursement, Care Unlimited sought approximately \$37,928.28 purportedly to pay employees and contractors for services rendered prior to Hurricane Katrina. As a result of this written request on or about February 13, 2006, the State of Louisiana later mailed a payment of \$36,213.55 to the non-profits' accountant, Individual D, on Poydras Street, New Orleans on or about August 11, 2006. Members of the Enterprise requested an additional \$7,441.50 to "offer a disaster aid package to employees," which was denied by the State of Louisiana.

Instead of using the \$36,213.55 granted by the State of Louisiana as represented, members of the Enterprise misappropriated the funds by using the Care Unlimited bank account LB361 and took the following actions in the course of this misuse:

1. On or about August 17, 2006, members of the Enterprise caused the check from the State of Louisiana to be deposited into the Care Unlimited bank account LB361.

2. On or about August 18, 2006, Brenda Jefferson Foster sent a list of names to the accountant, Individual D, with an accompanying dollar amount beside each payee's name for the accountant to write checks out of the \$36,213.55. Members of the Enterprise then directly benefitted from the distribution of these checks by directing:

3. Approximately \$6,414 to Brenda Jefferson Foster;

4. Approximately \$2,600 to B.E.P.;

5. Approximately \$3,724 issued to Individual R, which checks were deposited into A-Plus;
6. Approximately \$1,050 to Jeffco;
7. Approximately \$872 to Family Member 2, which was deposited into A Plus; and
8. Approximately \$184 to Angela Howard, a/k/a defendant **ANGELA COLEMAN**, which was deposited into A Plus.

k. The *I Can Learn* Appropriation (May 2001 to January 2002)

In the regular Legislative session for the State of Louisiana in the year 2001, defendant **RENEE GILL PRATT**, the representative for House District 91, through the use of her position as a legislator, secured \$300,000.00 in funding for the purchase of *I Can Learn* software for two New Orleans schools with which she was affiliated: the Holy Ghost Catholic School (“Holy Ghost”) and Xavier University Preparatory Academy (“Xavier Prep”). JRL Enterprises was a company that developed the *I Can Learn* software, a computer-based learning system designed to teach mathematics to children. The following acts were also taken in the course of this appropriation:

1. On or about September 6, 2001, the State of Louisiana began to enter into a cooperative endeavor agreement with Holy Ghost, in which the State of Louisiana agreed to disburse \$100,000.00 to Holy Ghost under the condition that Holy Ghost would in turn purchase the *I Can Learn* software from JRL Enterprises.

2. On or about November 2, 2001, the State of Louisiana mailed to Holy Ghost the approved cooperative endeavor agreement, binding the school to the terms of said agreement.

3. On or about December 4, 2001, the State of Louisiana mailed a check for \$100,000.00 to Holy Ghost, as per the cooperative endeavor agreement.

4. On or about December 4, 2001, Holy Ghost mailed a check to JRL Enterprises, as the agreement provided, as payment for the *I Can Learn* software.

5. On or about September 1, 2001, the State of Louisiana began to enter into a cooperative endeavor agreement with Xavier Prep, in which the State of Louisiana agreed to disburse \$200,000.00 to Xavier Prep under the condition that Xavier Prep would in turn purchase the *I Can Learn* software from JRL Enterprises.

6. On or about November 2, 2001, the State of Louisiana mailed to Xavier Prep the approved cooperative endeavor agreement, binding the school to the terms of said agreement.

7. On or about December 4, 2001, the State of Louisiana mailed a check for \$200,000.00 to Xavier Prep, as per the cooperative endeavor agreement.

8. On or about December 11, 2001, Xavier Prep mailed a check to JRL Enterprises, as the agreement provided, as payment for the *I Can Learn* software.

9. On or about December 12, 2001, JRL Enterprises delivered payment of \$30,000.00 to defendant **MOSE JEFFERSON**, in exchange for his purported work as the “exclusive sales agent” for Holy Ghost and Xavier Prep:

- i. This \$30,000.00, which represented a 10% commission on the state-mandated sale of the *I Can Learn* software to Holy Ghost and Xavier Prep, was deposited into B.E.P. bank account LB521 on or about December 1, 2001.
- ii. On or about May 1, 2001, before defendant **RENEE GILL PRATT** had appropriated the \$300,000.00 to the two schools, defendant **MOSE JEFFERSON**

executed a written sales agent agreement with JRL Enterprises that authorized **MOSE JEFFERSON** to be the exclusive sales agent for *I Can Learn* for Holy Ghost and Xavier Prep.

10. On or about January 31, 2002, defendant **MOSE JEFFERSON**, via B.E.P. bank account LB521, paid defendant and **RENEE GILL PRATT**, \$3,500.00 by check, which money **RENEE GILL PRATT** deposited into her personal Liberty Bank account, LB532.

I. The 3313 South Saratoga St. Rental Payments (2000-2005)

In addition to the grant funds paid by the State of Louisiana to the Enterprise's non-profits, in the course of her official duties as the representative for House District 91 in the Louisiana State Legislature and later as the City Councilmember for District B for the City of New Orleans, defendant **RENEE GILL PRATT**, arranged for the State of Louisiana and later the City of New Orleans to pay for so-called "satellite" office space at 3313 South Saratoga St. , owned by defendant **MOSE JEFFERSON**. In the manner and means described below, the defendant **RENEE GILL PRATT** received a direct financial benefit as a result of having arranged the renting of the office space at 3313 South Saratoga St.:

1. On or about March 31, 2003, the Enterprise entity Southwind paid defendant **RENEE GILL PRATT** \$5,000.00 by a check written from Southwind account, LB447. The source of this money was rental income Southwind derived from rents paid by defendant **RENEE GILL PRATT**, using City of New Orleans funds, and from Enterprise non-profit Care Unlimited Project Chance, through money appropriated by defendant **RENEE GILL PRATT** through the LSED, as one of her last acts before leaving office as the State Representative for District 91 in or around May 6, 2002.

2. On or about March 30, 2005, the Enterprise entity Southwind paid defendant **RENEE GILL PRATT**'s dues and money owed to the Mardi Gras organization known as the "Krewe of Muses," a total amount paid by **MOSE JEFFERSON**, through Southwind, of \$1,250.00 The source of this money was rental income Southwind derived from rents paid by defendant **RENEE GILL PRATT**, using City of New Orleans funds, and from Enterprise non-profit Care Unlimited Project Chance, through money appropriated to the Enterprise's non-profits through the efforts of its members and others.

m. The Tax Assessor's Scheme (2000-2004)

In the course of her official duties as Tax Assessor for the 4th Municipal District of Orleans Parish, defendant **BETTY JEFFERSON**, misappropriated money designated by the State of Louisiana for the operation of her office by writing the following checks from her Tax Assessor's checking account HB4942, to the below listed straw payees and family members for the personal benefit of herself and defendant **ANGELA COLEMAN** as follows:

Act	Amount	Check # Date	Payable to	Final Disposition or Deposited to
1	\$300	#566 7/01/00	Family Member 3	BETTY JEFFERSON (Savings Account HB779)
2	\$750	#938 07/15/02	Family Member 3	BETTY JEFFERSON (AdvantaCC0006)
3	\$560	#1062 02/28/03	Individual B	ANGELA COLEMAN (Checking Account #606)
4	\$750	#1134 04/15/03	Individual B	ANGELA COLEMAN (Checking Account #606)
5	\$560	#1135 05/04/03	Individual B	ANGELA COLEMAN (Checking Account #606)

6	\$750	#1076 06/01/03	Family Member 3	BETTY JEFFERSON (Jefferson Consultants HB6942)
7	\$410	#1085 07/15/03	Individual B	BETTY JEFFERSON (Jefferson Consultants HB6942)
8	\$750	# 1178 09/15/03	Family Member 9	BETTY JEFFERSON (Jeffco HB656)
9	\$700	#1344 10/30/04	Family Member 2	BETTY JEFFERSON (Chase Mortgage219 : 1725 Valmont Street)
10	\$700	#1370 12/15/04	Family Member 2	BETTY JEFFERSON (Chase Mortgage 219: 1725 Valmont Street)
11	\$800	#1322 7/1/04	Family Member 2	BETTY JEFFERSON (Chase Mortgage 219: 1725 Valmont Street)

n. The Katrina Cars Donation (2005-2006)

From on or about September 14, 2005 through on or about July 6, 2006 to October 3, 2006, in the course of her official duties as the City Councilmember for District B, City of New Orleans, Louisiana, defendant **RENEE GILL PRATT** and other members of the Enterprise, including defendant **MOSE JEFFERSON**, misappropriated four (4) vehicles donated by DaimlerChrysler to the City of New Orleans for the purpose of assisting the City of New Orleans in the recovery from Hurricane Katrina, for her personal benefit and the benefit of others within the Enterprise. The following acts occurred in the course of defendant **RENEE GILL PRATT's** accruing a personal benefit not due her or her office:

1. Defendant **RENEE GILL PRATT**, on behalf of the City of New Orleans, ceremonially and formally accepted a donation of twenty (20) vehicles from automaker DaimlerChrysler on or about September 14, 2005. The vehicles had a market value totaling approximately \$588,388.00.

2. In accepting this donation from DaimlerChrysler, defendant **RENEE GILL PRATT** agreed that the vehicles would be used exclusively in the recovery effort. On behalf of the City of New Orleans, defendant **RENEE GILL PRATT** executed Part IV of IRS Form 8283 (Donee Acknowledgment of Noncash Charitable Contributions) for each donated vehicle, further acknowledging that the donee described in the IRS Form 8283 was the City of New Orleans.

3. Defendant **RENEE GILL PRATT**, in accepting the donation on behalf of the City of New Orleans, also executed additional paperwork that reflected the City of New Orleans' ownership of the 20 donated vehicles.

4. Defendants **RENEE GILL PRATT**, **MOSE JEFFERSON**, and other members of the Enterprise or its associates, immediately took actual possession of four (4) of the donated vehicles, including a 2005 Dodge Durango and three (3) 2006 Dodge Ram pickup trucks, and throughout the time of their actual possession did not use the vehicles in a manner consistent with their donation to the City of New Orleans.

5. From on or about September 14, 2005 through on or about July 6, 2006, defendant **RENEE GILL PRATT** kept the 2005 Dodge Durango within a gated driveway of her personal residence, and otherwise utilized the vehicle in a manner inconsistent with the purpose of the donation.

6. At the request of defendant **RENEE GILL PRATT**, title of four (4) donated vehicles was transferred from the City of New Orleans to the Enterprise non-profits Care Unlimited and Orleans Metro on or about April 19, 2006, as follows:

- a. 2005 Dodge Durango VIN# 1D4HB38NX5F624586 to Care Unlimited;
- b. 2006 Dodge Ram 1500 ("Ram 1") VIN# 1D7HU18N66J108094 to Care Unlimited;
- c. 2006 Dodge Ram 1500 ("Ram 2") VIN# 1D7HU18N46J100687 to Orleans Metro;
- d. 2006 Dodge Ram 1500 ("Ram 3") VIN# 1D7HU18N96J112768 to Orleans Metro.

7. On or about May 31, 2006, defendant **RENEE GILL PRATT** left office as the City Councilmember for District B, having lost an election to another candidate on or about May 20, 2006.

8. On or about June 12, 2006, defendant **RENEE GILL PRATT** began an application process for a bill consolidation loan with Liberty Bank & Trust in which she listed the 2005 "Chrysler Durango" [sic] as an asset.

9. In and around July 2006, the Louisiana Board of Ethics began an investigation into the circumstances surrounding the donation of the above-described vehicles to the City of New Orleans.

10. On or about October 3, 2006, defendant **RENEE GILL PRATT**, in an effort to further conceal her misuse of the donated vehicles, caused to be mailed statements to the Louisiana Board of Ethics regarding allegations of personal use and misappropriation of the donated vehicles in which she stated, "I did not use the vehicles for my personal business."

All in violation of Title 18, United States Code, Section 1962(d).

COUNTS 2-5

(Mail Fraud--2003-2004 Federal Grant to Care Unlimited Bridge Program)

1. **A.** The allegations contained in Count 1, Parts A, B and E are realleged and incorporated as if fully set forth herein.
- B.** On or about the dates listed below, in the Eastern District of Louisiana, defendants **BETTY JEFFERSON** and **ANGELA COLEMAN**, for the purpose of executing and attempting to execute the scheme and artifice to defraud the United States Department of Education in the 2003-2004 grant to Care Unlimited Bridge Program, that they had knowingly and willfully devised and intended to devise, as set forth in Count 1, Part E, did knowingly cause to be placed in the United States Mail and interstate commercial carriers, the matters and things listed below:

Count	Date Mailed	Origin	Recipient	Description
2	02/24/04	Defendant BETTY JEFFERSON , 3313 S. Saratoga, Ste 3, New Orleans, LA 70115	American Express, P.O. Box 650448, Dallas, TX 75265-0448	Care Unlimited Check #1042 from 2003-2004 federal Bridge Grant (BO865) payable to Individual B for \$576 for payment on defendants ANGELA COLEMAN and BETTY JEFFERSON credit card account
3	05/28/04	Defendant ANGELA COLEMAN , 3313 S. Saratoga, Ste. 3, New Orleans, LA 70115	Cardmember Service, P.O. 94014, Palatine, IL, 60094-4014	Care Unlimited Check #1070 from 2003-2004 federal Bridge Program (BO865) payable to Individual B for \$576 for payment on defendant BETTY JEFFERSON credit card account

Count	Date Mailed	Origin	Recipient	Description
4	06/15/04	Defendant ANGELA COLEMAN , 3313 S. Saratoga, Ste. 3, New Orleans, LA 70115	American Express, P.O. Box 360001, Ft. Lauderdale, FL 33336-0001	Care Unlimited Check #1073 from 2003-2004 federal Bridge Program (BO865) payable to Individual A for \$502 for payment on defendants ANGELA COLEMAN and BETTY JEFFERSON credit card account
5	08/15/04	Defendant BETTY JEFFERSON , Care Unlimited, 3313 S. Saratoga, Ste. 3, New Orleans, LA 70115	Chase Manhattan Mortgage Corporation, P.O. Box 830016, Baltimore, MD 21283-0016	Care Unlimited Check #1086 from 2003-2004 federal Bridge Program (BO865) payable to Brenda Jefferson Foster for \$850 for payment on defendant BETTY JEFFERSON's mortgage note

All in violation of Title 18, United States Code, Sections 1341, 1346, and 2.

COUNTS 6-9

(Mail Fraud–2004-2005 Louisiana Grant to Care Unlimited Bridge Program)

- A.** The allegations contained in Count 1, Parts A, B and E are realleged and incorporated as if fully set forth herein.
- B.** On or about the dates listed below, in the Eastern District of Louisiana, defendants **BETTY JEFFERSON** and **ANGELA COLEMAN**, for the purpose of executing and attempting to execute the scheme and artifice to defraud the State of Louisiana in the 2004-2005 grant to Care Unlimited Bridge Program, that they had knowingly and willfully devised and intended

to devise, as set forth in Count 1, Part E, did knowingly cause to be placed in the United States Mail and interstate, commercial carriers, the matters and things listed below:

Count	Date Mailed	Origin	Recipient	Description
6	09/06/04	Brenda Jefferson Foster Care Unlimited Bridge Program, 4122 Eve Street, New Orleans, LA 70125	Governor's Office of Urban Affairs & Development, P.O. Box 94004 Baton Rouge, LA 70804	Grant application to the State of Louisiana for Care Unlimited Bridge Program, fiscal year 2004-2005
7	03/23/05	Governor's Office of Urban Affairs & Development, P.O. Box 94004 Baton Rouge, LA 70804	Brenda Jefferson-Foster Care Unlimited Bridge Program, 4122 Eve Street, New Orleans, Louisiana 70125	\$50,000 check from State of Louisiana Department of Treasury -- 2nd Installment of Care Unlimited Bridge Program funding: 2004-2005
8	03/25/05	Defendant BETTY JEFFERSON , 3313 S. Saratoga, Ste 3, New Orleans, LA 70115	Discover Credit Card, P.O., Box 30395, Salt Lake City, UT 84130-0395	Care Unlimited Check #1130 from 2004-2005 state Bridge Program Grant (BO865) payable to Individual A for \$827 for payment on defendant BETTY JEFFERSON credit card account
9	05/18/05	State of Louisiana, Governor's Office, 150 Third Street, Seventh floor, Baton Rouge, LA 70801	Brenda Jefferson Foster Care Unlimited Bridge Program, 4122 Eve Street, New Orleans, Louisiana 70125	\$25,000 check from State of Louisiana Department of Treasury -- 3rd Installment of Care Unlimited Bridge Program funding: 2004-2005

All in violation of Title 18, United States Code, Sections 1341, 1346, and 2.

COUNT 10

(Mail Fraud–2004-2005 Louisiana Appropriation to Orleans Metro)

- A. The allegations contained in Count 1, Parts A, B and E are realleged and incorporated as if fully set forth herein.
- B. On or about November 4, 2004, in the Eastern District of Louisiana and elsewhere, defendant **MOSE JEFFERSON**, for the purpose of executing and attempting to execute the scheme and artifice to defraud the State of Louisiana in the 2004-2005 grant to Orleans Metropolitan Housing & Community Development, Inc., that they had knowingly and willfully devised and intended to devise, as set forth in Count 1, Part E, did knowingly cause to be placed in the United States Mail and interstate, commercial carriers, a check for \$75,000.00 made payable to “Orleans Metropolitan Housing” from the State of Louisiana Department of Treasury to the Executive Director of Orleans Metro at Post Office Box 56818, New Orleans, Louisiana, 70156; all in violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT 11

(Mail Fraud–post-Katrina funding to Care Unlimited)

- A. The allegations contained in Count 1, Parts A, B and E are realleged and incorporated as if fully set forth herein.
- B. On or about August 14, 2006, in the Eastern District of Louisiana and elsewhere, defendants **BETTY JEFFERSON, ANGELA COLEMAN, MOSE JEFFERSON**, and others, for the purpose of executing and attempting to execute the scheme and artifice to defraud the State of Louisiana in the 2006 Hurricane Katrina “makeup” fund, that they had knowingly and

willfully devised and intended to devise, as set forth in Count 1, Part E, did knowingly cause to be placed in the United States Mail and interstate commercial carriers, a check for \$36,213.55 from the State of Louisiana payable to Care Unlimited, Inc. c/o Individual D, 650 Poydras Street, New Orleans, Louisiana, 70130; all in violation of Title 18, United States Code, Sections 1341 and 1346.

COUNTS 12-14
(Honest Services Mail Fraud–Tax Assessor’s Office)

- A.** The allegations contained in Count 1, Parts A, B and E are realleged and incorporated as if fully set forth herein.

- B.** On or about the dates listed below, in the Eastern District of Louisiana, defendant **BETTY JEFFERSON**, for the purpose of executing and attempting to execute the scheme and artifice to defraud the State of Louisiana in the operation of the Tax Assessor’s Office for the 4th Municipal District, that they had knowingly and willfully devised and intended to devise, as set forth in Count 1, Part E, did knowingly cause to be placed in the United States Mail and interstate commercial carriers, the matters and things listed below:

Count	Date Mailed	Origin	Recipient	Description
12	07/01/04	ASSESSOR BETTY JEFFERSON 4th Municipal District, Rm 4E01, City Hall, Civic Center, New Orleans, LA 70112 Acct. HB4942	Chase Manhattan Mortgage Corp. PO Box 830016 Baltimore, MD 21283-0016	Tax Assessor Check #1322 from HB4942, \$800 payable to Family Member 2 to pay mortgage on 1725 Valmont Street (Loan # 1293486219; Betty L. Jefferson)
13	10/30/04	ASSESSOR BETTY JEFFERSON 4th Municipal District, Rm 4E01, City Hall, Civic Center, New Orleans, LA 70112 Acct. HB4942	Chase Home Finance PO Box 830016 Baltimore, MD 21283-0016	Tax Assessor Check #1344 from HB4942, \$700 payable to Family Member 2 to pay mortgage on 1725 Valmont Street (Loan # 1293486219; Betty L. Jefferson)
14	12/15/04	ASSESSOR BETTY JEFFERSON 4th Municipal District, Rm 4E01, City Hall, Civic Center, New Orleans, LA 70112 Acct. HB4942	Chase Home Finance PO Box 830016 Baltimore, MD 21283-0016	Tax Assessor Check #1370 from HB4942, \$700 payable to Family Member 2 to pay mortgage on 1725 Valmont Street (Loan # 1293486219; Betty L. Jefferson)

All in violation of Title 18, United States Code, Sections 1346 and 2.

COUNTS 15-24
(Aggravated Identity Theft)

A. The allegations contained in Count 1, Parts A and B are realleged and incorporated as if fully set forth herein.

B. On or about the dates set forth below, in the Eastern District of Louisiana, the below listed defendants, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, namely the name and signature of the below listed individuals, during and in relation to offenses under Title 18, United States Code, Section 1341, namely mail fraud, as set forth in Counts 2-9, an offense enumerated under Title 18, United States Code, Section 1028A(c)(5):

Count	Amount	Check # Date	Grant (bank account)	Payable to	Final Disposition or Deposited to
15	\$576.00	#1042 02/24/04	2003-2004 Bridge Program (BO865)	Individual B	Defendants ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
16	\$576.00	#1070 05/28/04	2003-2004 Bridge Program (BO865)	Individual B	Defendant BETTY JEFFERSON (FirstCC0168)
17	\$502.00	#1073 06/15/04	2003-2004 Bridge Program (BO865)	Individual A	Defendants ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)

Count	Amount	Check # Date	Grant (bank account)	Payable to	Final Disposition or Deposited to
18	\$665.00	#1081 09/01/04	2004-2005 Bridge Program (BO865)	Individual A	Defendant ANGELA COLEMAN (Savings Account HB#6518)
19	\$827	#1130 03/25/05	2004-2005 Bridge Program (BO865)	Individual A	BETTY JEFFERSON (DiscoverCC3721)
20	\$954	#1144 05/30/05 (Converted to cashiers check)	2004-2005 Bridge Program (BO865)	Individual A	Defendants ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)
21	\$882	#999996 06/07/05 (Converted to cashiers check)	2004-2005 Bridge Program (BO865)	Individual B	Defendant ANGELA COLEMAN (Matco HB234)
22	\$630	#1145 06/15/05	2004-2005 Bridge Program (BO865)	Individual C	Defendant BETTY JEFFERSON (Converted into cashiers check deposited to ChaseCC7749)
23	\$906	#1156 06/20/05	2004-2005 Bridge Program (BO865)	Individual G	Defendant BETTY JEFFERSON (Jeffco HB656)

Count	Amount	Check # Date	Grant (bank account)	Payable to	Final Disposition or Deposited to
24	\$708.53	#1159 06/20/05	2004-2005 Bridge Program (BO865)	Individual F	Defendant ANGELA COLEMAN (Checking Account HB606)

All in violation of Title 18, United States Code, Sections 1028A and 2.

MONEY LAUNDERING
COUNT 25

A. AT ALL TIMES MATERIAL HEREIN:

1. The allegations of Count 1, Parts A, B and E are realleged and incorporated as if fully set forth herein.
2. Specified unlawful activity includes mail fraud in violation of Title 18, United States Code, Section 1341 and 1346 involving mailings in furtherance of the schemes set forth in Counts 2-5.

THE OFFENSE

On or about April 14, 2005, in the Eastern District of Louisiana, and elsewhere, defendant **ANGELA COLEMAN** did knowingly and intentionally conduct a financial transaction affecting interstate commerce in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i), which transaction involved the proceeds of specified unlawful activities, namely, that is mail fraud as set forth in Counts 2-5, knowing that the transactions were designed in whole and in part to conceal and disguise the nature and source of the proceeds of said specified unlawful activity, and with the intent to promote the carrying on of the said specified unlawful activity when she deposited 2004-2005

Bridge Program check No. 1129 (BO865), payable to Individual C in the amount of \$1,355.00 into an A Plus checking account (BO343), then later on or about April 14, 2005 wrote A Plus check No. 1046 from the same A Plus checking account (BO343) to the order of Standard Mortgage for \$1,368.99, and, that while conducting and attempting to conduct such financial transactions, the defendant knew that the property involved in the above described financial transactions represented the proceeds of some form of unlawful activity; all in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

COUNT 26

A. AT ALL TIMES MATERIAL HEREIN:

1. The allegations of Count 1, Parts A, B and E are realleged and incorporated as if fully set forth herein.

2. Specified unlawful activity includes mail fraud in violation of Title 18, United States Code, Section 1341 and 1346 involving mailings in furtherance of the schemes set forth in Counts 2-5.

THE OFFENSE

On or about June 27, 2005, in the Eastern District of Louisiana, and elsewhere, defendant **BETTY JEFFERSON** did knowingly and intentionally conduct a financial transaction affecting interstate commerce in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i), which transaction involved the proceeds of specified unlawful activities, namely, that is mail fraud as set forth in Counts 2-5, knowing that the transactions were designed in whole and in part to conceal and disguise the nature and source of the proceeds of said specified unlawful activity, and with the intent to promote the carrying on of the said specified unlawful activity when she converted 2004-2005

Bridge Program check No. 1145 (BO865) payable to Individual C in the amount of \$630.00 into a cashier's check, which she then utilized in a subsequent transaction to pay down the credit card balance on her Chase Bank credit card (ChaseCC7749), and, that while conducting and attempting to conduct such financial transactions, the defendant knew that the property involved in the above described financial transactions represented the proceeds of some form of unlawful activity; all in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

COUNT 27
**(Conspiracy to Commit Money Laundering—
HUD Money to Greater St. Stephen Manor)**

A. AT ALL TIMES MATERIAL HEREIN:

1. The allegations of Count 1, Parts A, B and E are realleged and incorporated as if fully set forth herein.
2. Specified unlawful activity includes mail fraud in violation of Title 18, United States Code, Section 1341 and 1346 involving mailings in furtherance of the scheme set forth in Count 1, Section E.

B. CONSPIRACY:

Between a time unknown, but before January 1, 1998, and continuing until the present, in the Eastern District and elsewhere, **BETTY JEFFERSON, ANGELA COLEMAN**, and others, did, knowingly and intentionally combine, conspire, confederate and agree together and with each other, and with other persons known and unknown to the Grand Jury, to conduct financial transactions affecting interstate commerce in violation of Title 18, United States Code, Section 1956(a)(1)(A)(I), which transactions involved the proceeds of specified unlawful activities, namely, that is mail fraud as set forth in Count 1, Section E, knowing that the transactions were designed in whole and in part

to conceal and disguise the nature and source of the proceeds of said specified unlawful activity, and, that while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the below listed financial transactions represented the proceeds of some form of unlawful activity.

C. OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY:

1. On or about September 27, 2004, defendant **BETTY JEFFERSON** caused check number 1229 to be drawn from Greater St. Stephen Dryades Savings Bank Account 170 ("DSB 170"), made payable to Family Member 3, in the amount of approximately \$2,900.00.

2. Defendant **BETTY JEFFERSON** then converted check number 1229 into Dryades Savings Bank cashier's check number 15618, also for approximately \$2,900.00 and also in the name of Family Member 3.

3. On or about September 30, 2004, defendant **ANGELA COLEMAN** then deposited the Dryades Savings Bank cashier's check number 15618 into her personal Hibernia National Bank Savings Account 518.

All in violation of Title 18, United States Code, 1956(h).

COUNT 28
(False Statements by MOSE JEFFERSON)

A. The allegations contained in Count 1, Parts A and B of this indictment are hereby realleged and incorporated herein as if fully set forth herein.

B. On or about July 24, 2006, in the Eastern District of Louisiana, in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, the defendant, **MOSE JEFFERSON**, knowingly and willfully made a false, fictitious, and fraudulent material statement and representation, in that the defendant, **MOSE JEFFERSON**, stated that he received

no financial gain, no salary, and no property, from the defendant's controlled non-profit, Orleans Metro, when in truth and in fact, the defendant well-knew that he received both financial gain and real property from Orleans Metro; all in violation of Title 18, United States Code, Section 1001.

COUNT 29

A. The allegations contained in Count 1, Parts A and B of this indictment are hereby realleged and incorporated herein as if fully set forth herein.

B. On or about July 24, 2006, in the Eastern District of Louisiana, in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, the defendant, **MOSE JEFFERSON**, knowingly and willfully made a false, fictitious, and fraudulent material statement and representation, in that the defendant, **MOSE JEFFERSON**, stated that he had never held any check signing authority for the defendant's controlled non-profit, Orleans Metro, when in truth and in fact, the defendant well-knew that he did, in fact, have check signing authority for a bank account associated with Orleans Metro; all in violation of Title 18, United States Code, Section 1001.

COUNT 30

(Income Tax Evasion-Calendar Years 2001-2004)

For the calendar year 2001, in the Eastern District of Louisiana, the defendant, **BETTY JEFFERSON**, a resident of New Orleans, Louisiana, did willfully attempt to evade and defeat a large part of the income tax due and owing by her to the United States of America for the calendar year 2001, by concealing and attempting to conceal from the Internal Revenue Service the nature and extent of her income by intentionally not including on her personal tax return, the thousands of dollars she was obtaining from the United States Department of Education and the State of Louisiana

through non-profit Grants, wherein it was stated that her taxable income for the calendar year 2001 was the sum of \$51,119, and the amount of tax due and owing thereon was the sum of \$12,225, whereas, as she then and there well knew and believed, her taxable income for the calendar year 2001 was substantially in excess of \$51,119, and that upon said additional taxable income, a substantial additional tax was due and owing to the United States of America.

All in violation of Title 26, United States Code, Section 7201.

COUNT 31

For the calendar year 2002, in the Eastern District of Louisiana, the defendant, **BETTY JEFFERSON**, a resident of New Orleans, Louisiana, did willfully attempt to evade and defeat a large part of the income tax due and owing by her to the United States of America for the calendar year 2002, by concealing and attempting to conceal from the Internal Revenue Service the nature and extent of her income by intentionally not including on her personal tax return, the thousands of dollars she was stealing from the United States Department of Education and the State of Louisiana through non-profit Grants, wherein it was stated that her taxable income for the calendar year 2002 was the sum of \$57,708.00, and the amount of tax due and owing thereon was the sum of \$13,165.00, whereas, as she then and there well knew and believed, her taxable income for the calendar year 2002 was substantially in excess of \$57,708.00, and that upon said additional taxable income, a substantial additional tax was due and owing to the United States of America.

All in violation of Title 26, United States Code, Section 7201.

COUNT 32

For the calendar year 2003, in the Eastern District of Louisiana, the defendant, **BETTY JEFFERSON**, a resident of New Orleans, Louisiana, did willfully attempt to evade and defeat a

large part of the income tax due and owing by her to the United States of America for the calendar year 2003, by concealing and attempting to conceal from the Internal Revenue Service the nature and extent of her income by intentionally not including on her personal tax return, the thousands of dollars she was obtaining from the United States Departments of Education and Housing and Urban Development through non-profit Grants, wherein it was stated that her taxable income for the calendar year 2003 was the sum of \$54,198.00, and the amount of tax due and owing thereon was the sum of \$10,427.00, whereas, as she then and there well knew and believed, her taxable income for the calendar year 2003 was substantially in excess of \$54,198.00, and that upon said additional taxable income, a substantial additional tax was due and owing to the United States of America.

All in violation of Title 26, United States Code, Section 7201.

COUNT 33

For the calendar year 2004, in the Eastern District of Louisiana, the defendant, **BETTY JEFFERSON**, a resident of New Orleans, Louisiana, did willfully attempt to evade and defeat a large part of the income tax due and owing by her to the United States of America for the calendar year 2004, by concealing and attempting to conceal from the Internal Revenue Service the nature and extent of her income by intentionally not including on her personal tax return, the thousands of dollars she was obtaining from the United States Departments of Education and Housing and Urban Development through the non-profit Grants, wherein it was stated that her taxable income for the calendar year 2004 was the sum of \$53,534.00, and the amount of tax due and owing thereon was the sum of \$8,981.00, whereas, as she then and there well knew and believed, her taxable income

for the calendar year 2004 was substantially in excess of \$53,534.00, and that upon said additional taxable income, a substantial additional tax was due and owing to the United States of America.

All in violation of Title 26, United States Code, Section 7201.

COUNT 34
**(Conspiracy to Defraud the United States
Department of Treasury–Internal Revenue Service)**

A. The allegations as set forth in Count 1, Parts A and B; Counts 2-9, 11-27, and 30-33 are hereby realleged and incorporated herein as if fully set forth herein.

**B. CONSPIRACY TO DEFRAUD THE UNITED STATES DEPARTMENT OF
TREASURY–INTERNAL REVENUE SERVICE**

Beginning on or about January 1, 1999 and continuing until on or about April 15, 2006, in the Eastern District of Louisiana and elsewhere, the defendants **BETTY JEFFERSON, ANGELA COLEMAN** and others known and unknown to the grand jury, did knowingly and willfully combine, conspire, confederate, and agree together with themselves and others known and unknown to the grand jury to defraud the United States of America and the Department of Treasury–Internal Revenue Service (“IRS”), an agency thereof, by impeding, impairing, defeating, and obstructing the lawful governmental functions of the IRS in the ascertainment, evaluation, assessment, and collection of individual taxes, in violation of Title 18, United States Code, Section 371.

C. OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

1. On or about December 17, 2001, defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** opened Care Unlimited, Inc. bank account number 161 at Hibernia National Bank (HB161). **BETTY JEFFERSON** and **ANGELA COLEMAN** were the only individuals with signature authority.

2. On or about September 26, 2001, **BETTY JEFFERSON** and **ANGELA COLEMAN** opened Care Unlimited, Inc. bank account number 061 at Regions Bank (RB061). **BETTY JEFFERSON** and **ANGELA COLEMAN** were the only individuals with signature authority.

3. On or about May 23, 2003, **BETTY JEFFERSON** and **ANGELA COLEMAN** opened Maximal Home Mortgage, LLC bank account number 589 at Hibernia National Bank (HB589). **BETTY JEFFERSON** and **ANGELA COLEMAN** were the only individuals with signature authority.

4. On or about February 17, 2000, **BETTY JEFFERSON** opened “Assessor Betty Jefferson” bank account number 4942 at Hibernia National Bank (HB4942). Jefferson was the only individual with signature authority on the account.

5. During the years 1999 through 2005, **BETTY JEFFERSON** and **ANGELA COLEMAN** wrote and negotiated at least 198 checks payable to “straw payees” totaling at least \$219,468.29. These checks were written in a manner to disguise the nature of payment by making them appear to be payroll checks. The straw payees had no knowledge of the checks being written or that their identities were being used by **BETTY JEFFERSON** and **ANGELA COLEMAN**. The checks were then deposited into personal and business accounts controlled by **BETTY JEFFERSON** and **ANGELA COLEMAN**. Some of these checks were sent to pay down credit card liabilities belonging to **BETTY JEFFERSON** and **ANGELA COLEMAN**.

6. During the years 1999 through 2005, **BETTY JEFFERSON** wrote and negotiated at least 66 checks totaling \$138,123.16 payable in the names of business entities that they controlled. The checks were then deposited into the respective business accounts controlled by **BETTY**

JEFFERSON and **ANGELA COLEMAN**. These checks were written in a manner to disguise the nature of the payment by making them appear to be legitimate business expenses.

7. On or about October 7, 2003, **BETTY JEFFERSON** and **ANGELA COLEMAN** opened Care Unlimited Bridge Program bank account number 865 at Bank One (BO865). **BETTY JEFFERSON** and **ANGELA COLEMAN** were the only individuals with signature authority. This account received \$199,350 in funds from the State of Louisiana and the U.S. Department of Education. Neither **BETTY JEFFERSON** and **ANGELA COLEMAN** notified the CPA for Care Unlimited, Individual D, that this account existed or that the proceeds were received by Care Unlimited, Inc. Of the \$199,350 in grant proceeds received by Care Unlimited from the State of Louisiana and U.S. Department of Education, the majority of the funds were paid by **BETTY JEFFERSON** and **ANGELA COLEMAN** to business or personal accounts they controlled and benefitted from. These proceeds were not reported to the IRS.

8. On or about May 16, 2005, Care Unlimited's Form 990, Return of Organization Exempt from Income Tax, for the period ended June 30, 2004, was filed with the IRS. The return did not report the \$89,000 in gross receipts received from the State of Louisiana.

9. On or about October 23, 2000, **BETTY JEFFERSON's** 1999 U.S. Individual Income Tax Return was received at the IRS Memphis Service Center. This return did not report the \$42,166.46 in misappropriated funds. **BETTY JEFFERSON** did not inform her return preparer that she received additional income from the non-profit entities nor from her for-profit corporate entities.

10. On or about August 28, 2001, **BETTY JEFFERSON's** 2000 U.S. Individual Income Tax Return was received at the IRS Memphis Service Center. This return did not report the \$42,774.83 in misappropriated funds, and **BETTY JEFFERSON** signed the return under the penalty

of perjury before she filed it. **BETTY JEFFERSON** did not inform her return preparer that she received additional income from the non-profit entities nor from her for-profit corporate entities.

11. On or about December 9, 2002, **BETTY JEFFERSON's** 2001 U.S. Individual Income Tax Return was received at the IRS Memphis Service Center. This return did not report the \$47,260.79 in misappropriated funds. **BETTY JEFFERSON** did not inform her return preparer that she received additional income from the non-profit entities nor from her for-profit corporate entities.

12. On or about April 15, 2002, **ANGELA COLEMAN's** 2001 U.S. Individual Income Tax Return was received at the IRS Memphis Service Center. This return did not report the \$15,907.98 in misappropriated funds.

13. On or about March 8, 2004, **BETTY JEFFERSON's** 2002 U.S. Individual Income Tax Return was received at the IRS Austin Service Center. This return did not report the \$76,261.00 in misappropriated funds and Jefferson signed the return under the penalty of perjury before she filed it. **BETTY JEFFERSON** did not inform her return preparer that she received additional income from the non-profit entities nor from her for-profit corporate entities.

14. On or about April 15, 2003, **ANGELA COLEMAN's** 2002 U.S. Individual Income Tax Return was received at the Austin Service Center. This return did not report the \$30,307.01 in misappropriated funds. **ANGELA COLEMAN** did not inform her return preparer that she received additional income from any other source or business, nor did she mention Care Unlimited, Jeffco Services or Jefferson Consultants.

15. On a variety of dates between October 21, 2004 and April 15, 2006, **BETTY JEFFERSON** and **ANGELA COLEMAN's** 2003, 2004, and 2005 returns were received at the Austin Service Center. The returns did not report the misappropriated funds. Neither **BETTY**

JEFFERSON nor **ANGELA COLEMAN** informed the relevant return preparer that they received additional income from the non-profit entities nor the their for-profit corporate entities.

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

NOTICE OF RACKETEERING FORFEITURE

1. The allegations of Count 1 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, Section 1963.

2. As a result of the violation as alleged in Count 1, the defendants, **MOSE JEFFERSON, RENEE GILL PRATT, BETTY JEFFERSON, ANGELA COLEMAN**, shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 1963(a)(1), any interest they have acquired or maintained in violation of Title 18, United States Code, Section 1962, including, but not limited to, the following described properties:

Property currently recorded in the name of Enterprise Consultants, LLC and described as follows: That portion of ground, together with all the buildings and improvements therein and all of the rights, ways, privileges, servitudes, appurtenances and advantages thereunto belonging or in anywise appertaining, situated in the Fourth District of the City of New Orleans, State of Louisiana, in Square No. 304 (Old No. 254), bounded by Loyola Avenue, Washington Ave, Fourth and Saratoga Streets, which said lot of ground is designated on plan of E.L. Eostis, C.E. & S., dated July 9, 1943, a blue print copy whereof is annexed to act before Bernard Titche, H.P., dated July 27, 1943, as Lot X and according to which sketch said Lot X commences at a distance of sixty feet (60') from the corner of Loyola Avenue and Fourth Street and measures thence in the direction of Washington Avenue ninety-seven feet (97') front on Loyola Avenue, with a depth on the side line toward Washington Avenue of one hundred fifty feet (150'), said lot has a first depth on the side nearer Fourth Street of one hundred twenty feet (120'), thence it narrows on a line parallel to Loyola Avenue and extends in the direction of Washington Avenue forty feet (40'), with a second depth of thirty feet (30') on a line parallel to Fourth Street and extending in the direction of Saratoga Street, with a width on the rear line of fifty-seven feet (57'). All in accordance with a survey by F.G. Stewart, Surveyor, dated May 10, 1966, a copy of which is annexed to act before Edmond G. Miranne, N.P., dated May 18, 1966.

All as more fully shown on a plat of survey by Gilbert, Kelly & Couturie, Inc., Surveyors, dated June 4, 1984, a certified copy of which is annexed to an act before Frances B. Tharp, Notary Public, dated July 6, 1984. The improvements thereon bear Municipal Nos. 2712 and 2714-16 Loyola Avenue, New Orleans, Louisiana;

Property currently recorded in the name of B.E.P. Consulting Services, LLC and described as follows: A certain lot or portion of ground, together with all the buildings and improvements thereon and all of the rights, ways, privileges, servitudes, appurtenances and advantages thereunto belonging or in anywise appertaining, situated in the State of Louisiana, Parish of Orleans, in the Sixth District of the City of New Orleans, in Square No. 511, Plaisance, bounded by S. Saratoga, Toledano and Loyola (formerly Franklin) Streets and Louisiana Avenue designated as Lot S on the survey made by Gilbert, Kelly & Couturie, Inc., Surveying and Engineering, dated March of 1978, said Lot S commences at a distance of 50 feet from the corner of S. Saratoga and Toledano Streets, and measures thence 86 feet front on S. Saratoga Street the same in width in the rear, by a depth of 105 feet, between equal and parallel lines; said Lot S being composed of portions of Original Lots Nos. 14, 15, 16, 17, and 18. The improvements thereon bear municipal number 3311-13 S. Saratoga Street, New Orleans, Louisiana;

Property currently recorded in the names of Angela Howard Coleman, wife of/and Marvin Coleman and described as follows: That Condominium Parcel, designated as 1723 Valmont Street of Jeffco Condominiums, together with the undivided interest in all "Common Elements" of the Condominium appurtenant thereto, as established by Declaration of Condominium Regime dated 11/12/01, filed for record 11/16/01 in Orleans Parish, Louisiana, in COI #227669 (N.A. #01-51502). The Condominium is situated upon, and the Declaration relates to the following described property, to wit: One certain portion ground, together with all of the buildings and improvements thereon, and all of the rights, ways, privileges, servitudes, appurtenances and advantages thereunto belonging or in anywise appertaining, situated in the Sixth District of the City of New Orleans, Parish of Orleans, State of Louisiana, in Square No. 485, bounded by Danneel, Dryades, Dufossat and Valmont Streets and according to a plan of survey made by E.L. Eustis, Civil Engineers and Surveyors, dated 1/14/39, a blue print of which is annexed to an inventory in the Succession of Mrs. William B. Blooffield, taken by F.J. Puig, N.P., on 12/2/38, is designated by the Letter W. All as more fully shown on survey made by S.Z.S. Consultants dated 10/13/95. The improvements thereon bear municipal number 1723 Valmont Street, New Orleans, Louisiana; and

Property currently recorded in the name of Betty Jefferson and described as follows: That Condominium Parcel, designated as 1725 Valmont Street of the Jeffco Condominiums, together with the undivided interest in all "Common Elements" of the Condominium appurtenant thereto, as established by Declaration of Condominium Regime dated 11/12/01, filed for record 11/16/01 in Orleans Parish, Louisiana, in COI #227669 (N.A. #01-51502). The Condominium is situated upon, and the Declaration relates to the following described property, to wit: One certain portion ground, together with all of the buildings and improvements thereon, and all of the rights, ways, privileges, servitudes, appurtenances and advantages thereunto belonging or in anywise appertaining, situated in the Sixth District of the City of New Orleans, Parish of Orleans, State of Louisiana, in Square No. 485, bounded by Danneel, Dryades, Dufossat and Valmont Streets and according to a plan of survey made by E.L. Eustis, Civil Engineers and Surveyors, dated 1/14/39, a blue print of which is annexed to an inventory in the Succession of Mrs. William B. Bloomfield, taken by F.J. Puig, N.P., on 12/2/38, is designated by the Letter W. All as more fully shown on survey made by S.Z.S. Consultants dated 10/13/95. The improvements thereon bear the municipal number 1725 Valmont Street, New Orleans, Louisiana;

Property currently recorded in the name of Betty Jefferson and described as follows: One certain lot of ground, together with all the buildings and improvements thereon, and all of the rights, ways, privileges, servitudes, advantages, and appurtenances thereunto belonging or in anywise appertaining, situated in the Fourth District of the City of New Orleans, Louisiana, in Square No. 109, Lot No. 9 on a plan of survey made by J.J. Krebs & Sons, Inc., Civil Engineers and Surveyors, dated August, 17, 1965, a copy of which is annexed to an act passed before Jerome Mevunier, Notary Public, dated September 9, 1965, and made part thereof, and according to which said Lot No. 9 commences at a distance of thirty-one feet, eleven inches (31'11") from the intersection of Jackson Avenue and Constance Street and measures thence thirty-one feet, eleven inches (31'11") front on Jackson Avenue, the same width in the rear, by a depth between equal and parallel lines of one hundred twenty feet (120), all as more fully shown on a plat of survey by Gilbert, Kelly & Couturie, Inc., Surveyors, dated April 11, 1980, before Charles F. Barbera, Notary Public, dated May 19, 1980. The improvements thereon bear municipal number: 936 Jackson Avenue, New Orleans, Louisiana.

3. As a result of the violation as alleged in Count 1, the defendants, **MOSE JEFFERSON, RENEE GILL PRATT, BETTY JEFFERSON, ANGELA COLEMAN**, shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 1963(a)(2) any interest in, security of, claim against, and/or property and contractual rights affording them a source of influence over the enterprise which the defendants established, operated, controlled, conducted or participated in the conduct of, in violation of Title 18, United States Code, Section 1962, including, but not limited to, the property described in Paragraph 2 recorded in the name of B.E.P. Consulting Services, LLC, and bearing municipal number 3311-13 S. Saratoga Street, New Orleans, Louisiana.

4. As a result of the violation as alleged in Count 1, the defendants, **MOSE JEFFERSON, RENEE GILL PRATT, BETTY JEFFERSON, ANGELA COLEMAN**, shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 1963(a)(3) any property constituting, or derived from, any proceeds which they obtained directly and indirectly from racketeering activity in violation of Title 18, United States Code, Section 1962, including, but not limited to:

a. At least \$1,073,086.

5. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- 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 18, United States Code, Section 1963(m), 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, Section 1963.

NOTICE OF MAIL FRAUD FORFEITURE

1. The allegations of Counts 2 through 11 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 1341 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

2. As a result of the offenses alleged in Counts 2 through 11, defendants, **MOSE JEFFERSON, RENEE GILL PRATT, BETTY JEFFERSON and ANGELA COLEMAN**, 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, 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 1341.

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

- 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 1341 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

NOTICE OF MONEY LAUNDERING FORFEITURE

1. The allegations of Counts 26 and 27 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, Section 982.

2. As a result of the offense, alleged in Counts 26 and 27, defendants **MOSE JEFFERSON, RENEE GILL PRATT, BETTY JEFFERSON and ANGELA COLEMAN**, shall forfeit to the United States all property real or personal, involved in the aforesaid offenses and all property traceable to such property which was involved in the said violations of Title 18, United States Code, Section 1956(a)(1)(A)(i).

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

- 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 18, United States Code, Section 982(b)(1) to seek forfeiture of any other property of said defendants.

All in violation of Title 18, United States Code, Section 982.

A TRUE BILL:

FOREPERSON

JIM LETTEN
UNITED STATES ATTORNEY
Louisiana Bar Roll No. 8514

JAN MASELLI MANN
Assistant United States Attorney
Chief, Criminal Division
Louisiana Bar Roll No. 9020

DOROTHY MANNING TAYLOR
Assistant United States Attorney
Louisiana Bar Roll No. 12678

BRIAN P. MARCELLE
Assistant United States Attorney
Louisiana Bar Roll No. 25156

DANIEL P. FRIEL
Assistant United States Attorney
Massachusetts Bar Roll No. 660583

New Orleans, Louisiana
May 22, 2009