

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

**BILL OF INFORMATION FOR  
MAIL FRAUD**

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO:</b>	
<b>v.</b>	*	<b>SECTION:</b>	
<b>NOAH A THOMAS, JR.</b>	*	<b>VIOLATION:</b>	<b>18 U.S.C. § 1341</b>

The United States Attorney charges that:

**COUNT 1**

A. **At All Times Material Herein:**

1. Pilgrim Missionary Baptist Church (“PMBC”) was a church located at 2241 South Liberty, New Orleans, Louisiana, that sustained wind and water damage on or about August 29, 2005, as a result of Hurricane Katrina.
2. On or about August 29, 2005, and continuing until on or about October 1, 2006, the defendant, **NOAH A. THOMAS, JR.**, was the pastor of PMBC.
3. The damage to the PMBC house of worship exceeded the amount of money the congregation received from its insurance policies.

4. The Bush-Clinton Katrina Fund was established to provide assistance for rebuilding and recovery in Alabama, Louisiana, and Mississippi following Hurricane Katrina. In December 2005, Presidents George H. W. Bush and William J. Clinton allocated funds from the Bush-Clinton Katrina Fund for faith-based and religious organizations. The Bush-Clinton Katrina Fund sought applications from religious organizations to assist in rebuilding houses of worship and to cover costs for temporary relocation.
5. The United States Small Business Administration (“SBA”) was an agency and department of the federal government that provided financial assistance in the form of low-interest loans to individuals and organizations to rebuild properties destroyed by Hurricane Katrina. SBA loans were awarded to eligible recipients based on qualifying applications. Qualified borrowers initially received a \$10,000 disbursement, and were eligible to receive the remainder of the loan after certifying the first \$10,000 was used in accordance with the loan agreement.
6. PMBC submitted an application to the Bush-Clinton Katrina Fund and was awarded a \$35,000 grant to assist in the rebuilding of the house of worship.
7. PMBC submitted an application to the SBA for a disaster business loan in the amount of \$252,000 to assist in the rebuilding of the house of worship. SBA approved PMBC for a \$252,000 loan.

B. The Scheme and Artifice to Defraud:

1. From on or about August 29, 2005 and continuing through on or about October 1, 2006, in the Eastern District of Louisiana and elsewhere, the defendant, **NOAH A. THOMAS**,

**JR.**, did knowingly and willfully devise and intend to devise a scheme and artifice to defraud the PMBC, and for obtaining and attempting to obtain money and property from PMBC by means of false or fraudulent pretenses and representations by utilizing his position as Pastor of PMBC to falsely and fraudulently obtain and use and attempt to use funds granted to PMBC by the Bush-Clinton Katrina Fund and the SBA for repair of the hurricane-damaged church for his own personal benefit.

2. It was part of the scheme and artifice to defraud that the defendant, **NOAH A. THOMAS, JR.**, used his position as the pastor of PMBC to open a bank account at his personal bank, ASI Federal Credit Union, in the name of PMBC for which he was the only signatory so that the \$35,000 grant to PMBC from the Bush-Clinton Katrina Fund and the initial \$10,000 loan disbursement from the SBA could be deposited and used for his own personal benefit without the PMBC congregation's knowledge.

3. It was further part of the scheme and artifice to defraud that the defendant, **NOAH A. THOMAS, JR.**, falsely and fraudulently, directed the Bush-Clinton Katrina Fund to send the \$35,000 check payable to PMBC for the purpose of rebuilding the church, to his home address at 5813 Louis I Ave., Marrero, Louisiana 70072 in order to conceal the award of those funds and to illegally use the money for his own personal benefit;

4. It was further part of the scheme and artifice to defraud that the defendant, **NOAH A. THOMAS, JR.**, falsely and fraudulently, directed the SBA to electronically transfer the initial \$10,000 loan disbursement to PMBC for rebuilding the church to the bank account in PMBC's name that he opened and controlled at ASI Federal Credit Union in order to conceal the disbursement from the congregation and to illegally use the money for his own personal benefit;

C. The Offense:

On or about September 5, 2006, in the Eastern District of Louisiana and elsewhere, the defendant, **NOAH A. THOMAS, JR.**, for the purpose of executing and attempting to execute the scheme and artifice to defraud, and for obtaining money and property by means of false or fraudulent pretenses and representations, as set forth above, did knowingly and willfully cause to be delivered by Federal Express, a commercial interstate carrier, a check for \$35,000 from Thomas Rickman at the Bush-Clinton Katrina Fund, 1301 K Street N.W., Ste. 800 East, Washington, D.C. 20005, payable to PMBC, to the defendant, **NOAH A. THOMAS, JR.**, at his residence, 5813 Louis I Ave., Marrero, Louisiana 70072; all in violation of Title 18, United States Code, Section 1341.

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New Orleans, Louisiana  
March 13, 2008