

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

INDICTMENT FOR CONSPIRACY AND
THEFT OF FUNDS FROM A FEDERALLY-FUNDED PROGRAM

UNITED STATES OF AMERICA	*	CRIMINAL NO.	
v.	*	SECTION:	
MARGARE SEGURA	*	VIOLATION:	18 U.S.C. § 371
a/k/a Margare Lewis			18 U.S.C. § 2
LOLA DAVIS	* * *		18 U.S.C. § 666(a)(1)(A)

The Grand Jury charges that:

COUNT 1-Conspiracy

A. At All Times Material Herein:

1. The United States Department of Housing and Urban Development, an agency and department of the United States, awarded federally funded grants annually to state and local governments and other non-governmental organizations and agencies across the country to implement the Supportive Housing Program, a program designed to assist homeless individuals with free housing and lifeskills training.

2. Beginning at a time unknown, but no later than on or about July 1, 2006 and continuing to on or about June 30, 2007, Catholic Charities of the Archdiocese of New Orleans was an organization that received in excess of \$10,000 in a one year period from a federally

funded grant to implement the Supportive Housing program provided by the Department of Housing and Urban Development in the Eastern District of Louisiana.

3. Part of the Supportive Housing Program grant money awarded to Catholic Charities of the Archdiocese of New Orleans was used to pay landlords of an eligible housing unit a deposit and rent for a period of one to three months for a homeless individual or family.

4. In or around March 2006 and continuing until on or about July 20, 2007, in the Eastern District of Louisiana, the defendant, MARGARE SEGURA, was employed by the Catholic Charities of the Archdiocese of New Orleans as the case manager for the Supportive Housing Program. She was responsible for approving landlords and units for homeless tenants and authorizing Catholic Charities of the Archdiocese of New Orleans to pay directly those qualifying landlords from the Supportive Housing Program grant.

B. The Conspiracy:

From on or about July 1, 2006 until on or about June 29, 2007, in the Eastern District of Louisiana, the defendants, MARGARE SEGURA and LOLA DAVIS, and others known and unknown to the grand jury, did knowingly and willfully combine, conspire, and confederate and agree to knowingly and willfully steal and obtain by fraud and intentionally misapply funds worth at least \$5,000 owned by and under the care, custody, and control of the Catholic Charities of the Archdiocese of New Orleans, in violation of Title 18, United States Code, Sections 666(a)(1)(A).

C. Object of the Conspiracy:

1. It was the object of the conspiracy that the defendant, MARGARE SEGURA, would qualify and approve the defendant, LOLA DAVIS, and others known and unknown to the

Grand Jury, as landlords of units for homeless individuals for properties that they did not own and for tenants that were not homeless and did not qualify for the Supportive Housing Program. The defendant, MARGARE SEGURA, would have Catholic Charities of the Archdiocese of New Orleans pay the defendant, LOLA DAVIS, and other co-conspirators from the Supportive Housing Program grant. Upon receipt of the money from the Supportive Housing Program, the defendants, MARGARE SEGURA and LOLA DAVIS, and their co-conspirators would split the illegal proceeds.

D. Overt Acts:

In furtherance of the conspiracy and in order to effect the object thereof, the following acts, among others, were committed in the Eastern District of Louisiana, wherein the defendant, MARGARE SEGURA, requested Catholic Charities of the Archdiocese of New Orleans to issue the following checks from the Supportive Housing Program grant during the calendar year 2007 for the purpose of the defendants, MARGARE SEGURA and LOLA DAVIS, and their co-conspirators cashing said checks and splitting the fraudulently obtained proceeds:

Overt Acts	CHECK NO.	ISSUED TO	AMOUNT	DATE CHECK ISSUED	DATE CHECK CASHED
1	165680	D.K	\$2400	1/31/07	2/12/07
2	172757	D.K	\$2400	5/10/07	5/14/07
3	172878	D.K	\$812.91	5/11/07	5/15/07
4	175996	D.K	\$1000	6/22/07	6/26/07
5	175997	D.K	\$1200	6/22/07	6/26/07
6	177207	D.K	\$4400	6/29/07	7/17/07
7	149686	L.D.	\$2400	7/13/06	7/17/06

8	150952	L.D.	\$1200	7/28/06	8/9/06
9	153807	L.D.	\$1200	8/31/06	9/1/06
10	156016	L.D.	\$1654	9/28/06	9/29/06
11	157382	L.D.	\$800	10/18/06	10/26/06
12	170043	L.D.	\$1900	3/30/07	4/5/07
13	174254	L.D.	\$2400	5/30/07	6/1/07
14	175992	L.D.	\$1200	6/22/07	6/28/07
15	177195	L.D.	\$1200	6/29/07	7/17/07
16	156017	V.E.	\$1800	9/28/06	9/28/06
17	157384	V.E.	\$2000	10/18/06	10/23/06
18	161628	V.E.	\$1900	12/8/06	12/11/06
19	175993	V.E.	\$900	6/22/07	6/25/07
20	177199	V.E.	\$1000	6/29/07	7/12/07
21	175994	V.E.	\$950	6/22/07	6/25/07

All in violation of Title 18, United States Code, Sections 371 and 2.

COUNT 2

A. The allegations contained in Paragraph A of Count 1 of this Indictment, as set forth above, are realleged and incorporated by reference as though set forth in their entirety herein.

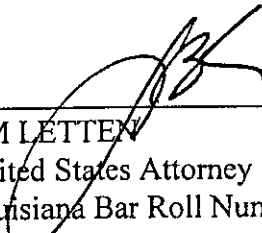
B. Theft of Program Funds:

From on or about July 1, 2006 until on or about June 30, 2007, in the Eastern District of Louisiana, the defendant, MARGARE SEGURA, did knowingly and willfully embezzle, steal and obtain by fraud and intentionally misapply funds worth at least \$5,000 owned by and under


the care, custody, and control of the Catholic Charities of Archdiocese of New Orleans Supportive Housing Program, all in violation of Title 18, United States Code, Section 666(a)(1)(A).

A TRUE BILL:

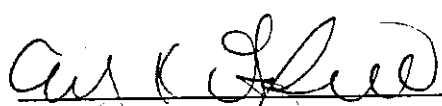
FOREPERSON



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New Orleans, Louisiana
June 19, 2008