

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**INDICTMENT FOR MAIL FRAUD**

UNITED STATES OF AMERICA                   \*           CRIMINAL NO.  
v.   \*           SECTION:  
DEBRA McGOWAN                           \*           VIOLATION:           18 U.S.C. § 1341  
   \*           \*           \*

The Grand Jury charges that:

**COUNTS 1-4**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. On or about August 29, 2005, Hurricane Katrina struck southeastern Louisiana and shortly thereafter a major disaster was declared. Similarly, a major disaster was declared in Louisiana as a result of Hurricane Rita, which made landfall on September 24, 2005. In response to these hurricanes and the damage inflicted upon the Southeastern Louisiana area, the American Red Cross (“Red Cross”) established assistance centers throughout the region in the late summer and early fall of 2005.

2. At these assistance centers, people affected by the storms were able to apply for a one-time only financial grant of up to \$1,565 from the Red Cross. In order to receive these funds, applicants needed to present identification to an Red Cross representative that indicated residence in an affected zone. Applicants were also required to attest and affirm that they had not received any additional financial assistance from the Red Cross at any other location.

3. Once approved, the Red Cross made these disaster assistance funds available in one of four ways: (1) A personal check made payable to the applicant, issued on-site, and cashed with the assistance of the Red Cross; (2) A Red Cross-issued "Discover" card, issued on-site, and activated via phone by the applicant; (3) A Red Cross-issued credit/debit/ATM card, issued on-site and activated via phone by the applicant; (4) A personal check authorized by the Red Cross, issued by "Paychex, Inc.," and mailed through the United States Postal Service to an address provided by the applicant.

4. Paychex, Inc., a Rochester, NY-based company that had volunteered its services to the Red Cross, processed personal checks to applicants as deemed appropriate and authorized by the Red Cross. These checks were processed and issued to applicants via the United States Postal Service.

5. The defendant, **DEBRA McGOWAN**, presented herself to Red Cross assistance centers on seven (7) occasions between on or about September 15, 2005 and on or about October 25, 2005. On each visit, she applied for financial assistance and indicated that she had not received any other financial assistance from the Red Cross. As a result of her actions on these 7 applications, **DEBRA McGOWAN**, received direct financial assistance from the Red Cross in one of the four manners described above, totaling \$10,655.00, of which \$9090.00 was fraudulently obtained.

**B. THE SCHEME TO DEFRAUD**

6. Beginning on or about September 15, 2005 and continuing through on or about October 25, 2005, in the Eastern District of Louisiana and elsewhere, the defendant, **DEBRA McGOWAN**, did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and to obtain money and property from the Red Cross, by means of false representations, pretenses, and promises.

**C. THE MAILINGS**

7. On or about the dates listed below in the Eastern District of Louisiana, the defendant, **DEBRA McGOWAN**, for the purpose of executing the scheme and artifice to defraud, as alleged in Paragraph B above, did knowingly cause to be delivered to her listed address of 102 Sylve Avenue, Hammond, Louisiana, through the United States mail, the following personal checks authorized by the Red Cross and issued by Paychex, Inc.:

<b>Count</b>	<b>Date of Application</b>	<b>Date of Mailing</b>	<b>Amount</b>	<b>Check Number</b>
1	10/6/2005	10/20/2005	\$1,565	1017014538
2	10/11/2005	10/18/2005	\$1,565	1019010419

<b>Count</b>	<b>Date of Application</b>	<b>Date of Mailing</b>	<b>Amount</b>	<b>Check Number</b>
3	10/13/2005	10/27/2005	\$1,565	1028002487

All in violation of Title 18, United States Code, Section 1341.

A TRUE BILL:

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FOREPERSON

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JIM LETTEN  
UNITED STATES ATTORNEY  
Louisiana Bar Roll No. 8517

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JAN MASELLI MANN  
First Assistant United States Attorney  
Louisiana Bar Roll No. 9020

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

New Orleans, Louisiana  
March 7, 2008