

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

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
GESELLE SAVOY	*	
	* * *	

FACTUAL BASIS

Should this matter have gone to trial, the Government would have proved beyond a reasonable doubt, through the introduction of competent testimony and admissible, tangible exhibits, the following facts to support the allegations charged by the United States Attorney in the Bill of Information now pending against the defendant **GESELLE SAVOY**.

The defendant, **GESELLE SAVOY**, has agreed to plead guilty as charged to Count One of the Bill of Information charging her with violating Title 18, United States Code, Section 371, by conspiring to violate Title 18, United States Code, Section 666(a)(1)(A) as follows:

From on or about February 11, 2007 through September 2, 2009, defendants **KIMBERLY M. WILLIAMS** and **GESELLE SAVOY**, together, did knowingly and wilfully combine, conspire, and agree to submit false and fraudulent testing and accountability instruction forms, batch sheets and payroll sheets to the JPPSS payroll office, in order to illegally obtain stipends and overtime payments for themselves and each other for services they were not qualified to perform and did not perform, in violation of Title 18, United States Code, Section 666(a)(1)(A).

An agent from the United States Department of Education, Office of Inspector General (“DOE-OIG”) would testify that the Jefferson Parish Public School System (JPPSS) is governed by the Jefferson Parish School Board, an independent legislative body, subject to control by the State of Louisiana for the purpose of administering public education in Jefferson Parish, Louisiana. The JPPSS received federal funds in excess of \$10,000 annually.

An employee of JPPSS would testify that **SAVOY** was first employed by JPPSS on August 17, 2000 as a Teaching Assistant. From January 25, 2007 until September 2, 2009, **SAVOY** worked as a Testing Technician in the Testing and Accountability Department of the Jefferson Parish Public School System (JPPSS). The defendant’s duties included entering supplemental pay in the JPPSS computer system for certified teachers who performed tutoring, testing and remediation under the JPPSS’ Louisiana Education Assessment Program (LEAP), Graduate Exit Examination (GEE) tutoring fund, Education Excellent (EE) Fund as well as a general fund. **GESELLE SAVOY** was not a certified teacher and was not qualified to perform tutoring, testing and remediation for JPPSS, and did not perform these services.

A Special Agent from the United States Secret Service would testify that he reviewed the supplemental payroll documents from JPPSS for the time period of September 1, 2006 through July 31, 2009 and determined that **GESELLE SAVOY** received 50 unauthorized payments from JPPSS totaling \$37,958.22. The first illegal payment **SAVOY** received was on February 11, 2007 and the last payment was on July 10, 2009. A copy of JPPSS payroll pay stubs for **SAVOY** would be offered as further evidence at trial.

On November 23, 2010, **SAVOY** was interviewed by Special Agents from the DOE-OIG and U.S. Secret Service. **SAVOY** told investigators that she was friends with **WILLIAMS** and began stealing money from JPPSS in 2007 when she gave her name and employee number to be added to the JPPSS payrolls **WILLIAMS** oversaw. **SAVOY** then started giving herself overtime pay from the testing budget she was responsible for overseeing. **SAVOY** stole money from JPPSS by adding additional unauthorized hours to payroll batch sheets.

SAVOY told investigators that in or about July 2008, **AMANDA JACKSON**, **SAVOY'S** cousin and an employee of JPPSS, telephoned **SAVOY** and said “ I see you are getting a lot of overtime, how are you getting overtime 2 to 3 times?” When **SAVOY** asked **AMANDA JACKSON**, “How do you know?” **AMANDA JACKSON** said “I still have access to the payroll system and JPPSS does not know.” **AMANDA JACKSON** told **SAVOY**, “I need some money and you are going to do for me what you do for yourself” and **AMANDA JACKSON** requested that she be included in the scheme to obtain unauthorized supplemental pay.

From on or about July 23, 2008 to on or about August 15, 2008, **AMANDA JACKSON** told **SAVOY** to provide unauthorized stipends and overtime payments to an employee named **TRACY WALKER**. **SAVOY** has never met or talked to **TRACY WALKER**. **AMANDA JACKSON** provided **SAVOY** with **WALKER'S** name and employee number.

On or about August 23, 2008, **SAVOY** entered three unauthorized stipend payments for summer remediation work for a total of \$7,920 in the name and employee number belonging to **TRACY WALKER**. On or about August 13, 2008, **SAVOY** entered two unauthorized stipend payments for student testing for a total of \$3,900 in the name and employee number belonging to

TRACY WALKER. SAVOY processed a total of 5 unauthorized supplemental payments to **WALKER** totaling \$11, 820. **SAVOY** told investigators that she believed **AMANDA JACKSON** and other individuals she was involved with were receiving money from **TRACY WALKER**.

Thereafter, **SAVOY** submitted fraudulent instruction forms, batch sheets and payroll sheets with the employee number belonging to defendant **AMANDA JACKSON**, so that **AMANDA JACKSON** would receive the following illegal stipends and unauthorized overtime pay:

DATE	AMOUNT
August 22, 2008 (placement testing)	\$ 1,100.00
August 28, 2008 (interval assessment)	\$ 1,625.00
September 26, 2008 (testing)	\$ 875.00
October 3, 2008(remediation)	\$ 1,000.00
January 9, 2009 (tutoring)	\$ 300.00
June 5, 2009 (testing)	\$ 99.00
June 19, 2009 (remediation)	\$ 1,950.00
June 26, 2009 (remediation & testing)	\$ 3,810.00
July 2, 2009 (remediation)	\$ 3,217.50
July 10, 2009 (remediation)	\$ 1,065.00
Total	\$15,041.50

SAVOY told investigators that she received a phone call from **DANAY JACKSON**, an employee of JPPSS, who stated that her mother, **AMANDA JACKSON**, told her about the embezzlement scheme and she needed money too and requested that she be included in the scheme to obtain unauthorized overtime payments. **SAVOY** asked **AMANDA JACKSON** if she told **DANAY JACKSON** about the embezzlement scheme and **AMANDA JACKSON** responded, “Yes, she is my daughter.”

Thereafter, **SAVOY** submitted fraudulent instruction forms, batch sheets and payroll sheets with the employee number belonging to defendant **DANAY JACKSON**, so that **DANAY JACKSON** would receive the following illegal stipends and unauthorized supplemental pay:

DATE	AMOUNT
February 6, 2009 (tutoring)	\$ 300.00
June 26, 2009 (remediation)	\$2,925.00
July 2, 2009 (remediation)	\$3,217.50
July 10, 2009 (remediation)	\$3,270.00
Total	\$9,712.50

An employee of JPPSS would testify that the five employees who received unauthorized supplemental pay as a part of this embezzlement scheme were **WILLIAMS, SAVOY, AMANDA JACKSON, DANAY JACKSON** and **TRACY WALKER** and the total loss to JPPSS was \$132,152.08.

Both the Government and the defendant, **GESELLE SAVOY**, do hereby stipulate and agree that the above facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the government would have proven these facts beyond a reasonable doubt at trial.

GESELLE SAVOY
Defendant

DATE

CYNTHIA CIMINO
Counsel for Defendant

DATE

JULIA K. EVANS
Assistant United States Attorney

DATE