

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

**UNITED STATES OF AMERICA** \* **CRIMINAL NO: 11-282**

v. \* **SECTION: "C"**

**RACHEL SAVAGE** \*

\* \* \*

**FACTUAL BASIS**

Should this matter proceed to trial, the government would prove the following beyond a reasonable doubt through the production of competent testimony and evidence:

On or about December 8, 2001, the residence of the defendant, **RACHEL SAVAGE**, located at 212 Terry Drive, Slidell, Louisiana, was completely destroyed by fire. At trial, witnesses who lived in the neighborhood of 212 Terry Drive would testify that after the fire, the remnants of the house were cleared from the property, and the lot was left vacant. Documents and testimony would be offered to show that from on or about December 8, 2001 until on or about August 29, 2005, the defendant, **RACHEL SAVAGE**, leased and lived in an apartment located at 1244 Harbor Drive, Apt. 211, Slidell, Louisiana.

On August 29, 2005, Hurricane Katrina made landfall in southeastern Louisiana causing widespread damage to the communities in the Eastern District of Louisiana, including Slidell,

Louisiana. Witnesses from the Federal Emergency Management Agency would testify and documents would be produced to show that on or about September 2, 2005, the defendant, **RACHEL SAVAGE**, applied to FEMA for monetary relief as a result of Hurricane Katrina and listed her primary residence and damaged property as 1244 Harbor Drive, Apt. 211, Slidell, Louisiana. The defendant, **RACHEL SAVAGE**, received approximately \$ 9,500.00 from FEMA.

At trial, an agent from the Department of Housing and Urban Development-Office of Inspector General would testify that the Department of Housing and Urban Development is an agency or department of the United States of America. Pursuant to an act of the Congress of the United States of America with the concurrence and agreement of the President of the United States, following Hurricanes Katrina and Rita in 2005 funds were appropriated to the Department of Housing and Urban Development for a Community Development Block Grant (CDBG) for Louisiana hurricane victims. The grant money was disbursed under a program known as the Louisiana Road Home Program (“LRHP”).

The United States Department of Housing and Urban Development prepared the rules and regulations governing the disbursement of grant money throughout the State of Louisiana. In order to be eligible for LRHP grant money, a person must have owned property that was damaged as a result of Hurricane Katrina or Rita, and the damaged property must have been the property owner’s primary residence on or about August 29, 2005. Persons seeking grant money from LRHP had to submit an application and affidavits verifying they met the aforementioned criteria in order to receive the grant money.

At trial, documents would be offered to show that the defendant, **RACHEL SAVAGE**,

submitted an application to receive a LRHP grant listing her primary residence as 212 Terry Drive, Slidell, Louisiana. The defendant, **RACHEL SAVAGE**, stated in the application that the property had been damaged by Hurricanes Katrina or Rita. Based on these representations and others, the defendant, **RACHEL SAVAGE**, was awarded \$104,935.00 for the loss of her home at 212 Terry Drive, Slidell, Louisiana. Prior to having the money wired into her bank account, the defendant, **RACHEL SAVAGE**, signed an affidavit on May 7, 2007, wherein she again represented that 212 Terry Drive had been her primary residence at the time of Hurricane Katrina and that it was destroyed by the Hurricane even though her home at 212 Terry Drive had been destroyed by fire and never rebuilt at the time of Hurricane Katrina. On June 14, 2007, the defendant, **RACHEL SAVAGE**, received a wire transfer of \$104,935.00 of federal funds from the LRHP into her bank account located in the Eastern District of Louisiana.

**READ AND APPROVED**

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COUNSEL FOR DEFENDANT

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RACHEL SAVAGE  
DEFENDANT

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