

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

| | | |
|---------------------------------|-----------|----------------------------|
| UNITED STATES OF AMERICA | * | CRIMINAL NO. 14-275 |
| v. | * | SECTION "N" |
| LAVERNE ROSE | * | |
| | * * * | |

FACTUAL BASIS

Should this matter have gone to trial, the government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the bill of information now pending against the defendant:

At all times relevant herein, the United States Social Security Administration (SSA) was an agency of the United States and was responsible for the administration of various programs, including a retirement benefits program. Walter Rose was the father of the defendant, **LAVERENE ROSE**. Walter Rose received SSA retirement benefits by way of monthly payments wired to a bank account that he held jointly with the defendant.


Prior to Walter Rose's death, the defendant **LAVERENE ROSE** was aware that Walter Rose was receiving monthly SSA retirement payments and that the payments should cease upon Walter Rose's death. Entitlement to the SSA payments terminated with Walter Rose's death on December 10, 1990. The defendant was aware of Walter Rose's death on December 10, 1990. The SSA did not learn of Walter Rose's death until in or about February 2014.

Beginning on or about December 10, 1990, in the Eastern District of Louisiana and elsewhere, the defendant, **LAVERENE ROSE**, obtained, withdrew and spent the aforementioned SSA payments. The defendant did this knowing that she was not entitled to the

payments. The defendant continued receiving and spending the aforementioned payments until on or about February 3, 2014, when the SSA ceased issuing the payments. By engaging in the above-described conduct, the defendant stole, purloined, and converted to her own use approximately \$282,403 in government funds to which she knew she was not entitled.

On June 14, 2014, agents of the SSA interviewed the defendant, **LAVERNE ROSE**. The defendant stated that, after Walter Rose's death, the SSA continued wiring Walter Rose's benefits to their jointly-held bank account. The defendant further stated that she spent all SSA payments that she obtained after Walter Rose's death. The defendant further stated that she did this knowing that the payments were government money, did not belong to her, and should have ceased when Walter Rose died.

APPROVED AND ACCEPTED:



SAMUEL J. SCILLITANI
Attorney for Defendant

2/18/15

Date



CHANDRA MENON
Assistant United States Attorney

2-18-15

Date



LAVERNE ROSE
Defendant

2/18/15

Date