

U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
FILED 4-21-2016
WILLIAM W. BLEVINS
CLERK

(BPA)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 15-305
VERSUS * SECTION: "I" (2)
MYRNA SHILOH *
* * *

FACTUAL BASIS

Should this matter have gone to trial, the Government would have proved, through the introduction of competent testimony and admissible tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant, **MYRNA SHILOH**. The Defendant has agreed to plead guilty as charged to Count 1 of the Indictment charging her with theft of public money in violation of Title 18, United States Code, Section 641. The Government will move the Court to dismiss Count 2 of the Indictment. To support its burden of proof the Government would have shown in trial the following:

The Social Security Administration was a department and agency of the Government of the United States which provided monthly checks to retired individuals until their death. Individual "A", grandmother of defendant, **MYRNA SHILOH**, retired from working and received monthly Social Security checks. Individual "A" died on May 16, 1998. Individual

“A’s” checks kept arriving at 3630 Freemont Street, New Orleans, Louisiana within the Eastern District of Louisiana after she died.

MYRNA SHILOH, when Individual “A’s” Social Security checks continued to arrive after her death, forged Individual “A’s” name on the reverse of the check, added her own signature, and deposited the checks into personal accounts controlled by her at three different banks.

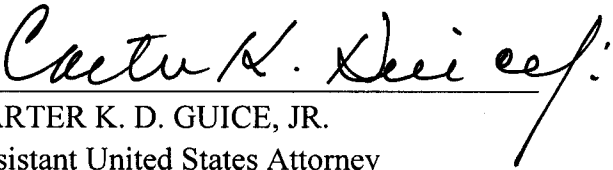
To make sure she could continue to steal Government money to which she was not entitled, **MYRNA SHILOH**, changed Individual “A’s” address after Hurricane Katrina with the Social Security Administration after defendant moved to Georgia in order to ensure that Individual “A’s” checks would be delivered to the defendant in Georgia.

MYRNA SHILOH, again changed her address with the Social Security Administration after defendant moved to back to Louisiana in order to ensure that Individual “A’s” checks would be delivered to the defendant in Louisiana.

From September 1999 to March of 2015, in the Eastern District of Louisiana and elsewhere, defendant, **MYRNA SHILOH**, in a continuing scheme, did knowingly, and willfully, embezzle, steal, purloin, and convert to her own use money of the United States Social Security Administration, a department and agency of the United States, to which she knew she was not entitled, having a value of approximately \$152,179.60, in violation of Title 18, United States Code, Section 641.

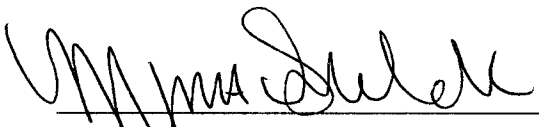
These facts would be proved with testimony of Special Agents of the Office of Inspector General of the Social Security Administration and witnesses from various financial institutions.

READ AND APPROVED:



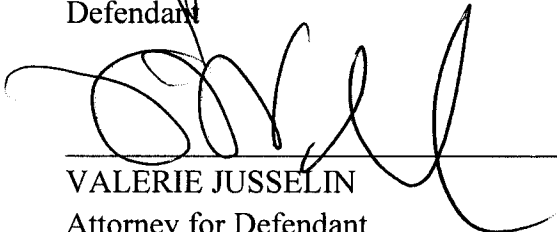
CARTER K. D. GUICE, JR.
Assistant United States Attorney
Louisiana Bar #16771

4-21-16
DATE



MYRNA SHILOH
Defendant

4/21/2016
DATE



VALERIE JUSELIN
Attorney for Defendant

4-21-16
DATE