

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.
2018 NOV -2 P 3:11
WILLIAM W. BLEVINS
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FELONY

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

**INDICTMENT FOR THEFT OF GOVERNMENT FUNDS
AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

v.

DANNY L. LETARD

* **CRIMINAL NO. 18 - 227**
* **SECTION: SECT. 1 MAG. 1**
* **VIOLATION: 18 U.S.C. § 641**

* * *

The Grand Jury charges that:

COUNT 1

THEFT OF GOVERNMENT FUNDS

A. AT ALL TIMES MATERIAL HEREIN:

1. The Social Security Administration ("SSA") was a government agency responsible for the management of the Social Security program as defined in the Social Security Act.

2. Social Security was a social insurance program that provided eligible applicants with retirement, disability, and survivor benefits.

Fee _____
Process _____
Dkid _____
CIRmDsp _____

3. The SSA operated the Disability Insurance Program (“DIP”).

4. Beginning in or about 1989, the defendant, **DANNY L. LETARD** (“**LETARD**”), filed for and later became eligible for SSA DIP benefits.

5. **LETARD** received monthly SSA disability benefits in the amount of approximately \$2,177.30, which were deposited into **LETARD**’s bank account.

6. **LETARD** formed a number of businesses including, but not limited to, Excavation/Dozer Company, Virginia Shop Site Cleaning Services, Virginia’s Job Site Cleaning, Virginia Cleaning Services, and R & D Dozer Excavation & Pipe Fabr.

7. **LETARD**’s businesses were registered in the names of **LETARD**’s family members rather than in the name of the defendant.

8. **LETARD**’s businesses performed demolition work and the cleaning of job sites according to occupational license applications filed with Tangipahoa Parish.

9. **LETARD** operated heavy construction equipment as part of his businesses.

B. THE OFFENSE:

Beginning in or about January 2007, and continuing until in or January 2018, in the Eastern District of Louisiana and elsewhere, the defendant, **DANNY L. LETARD**, did knowingly embezzle, steal, purloin, and convert to his use, money belonging to the United States and a department and agency thereof, namely the SSA, to which he knew he was not entitled, when he concealed his employment and earnings he received while he owned and operated numerous construction cleaning companies while, at the same time, he was paid approximately \$242,000.00 in SSA disability benefits; all in violation of Title 18, United States Code, Section 641.

NOTICE OF FORFEITURE

1. The allegations of Count 1 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offense alleged in Count 1, defendant, **DANNY L. LETARD**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 641.

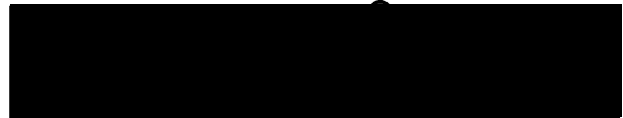
3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

A TRUE BILL:



PETER G. STRASSER
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "B. M. Klebba", written over a horizontal line.

BRIAN M. KLEBBA
Assistant United States Attorney

New Orleans, Louisiana
November 2, 2018