

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA \* CRIMINAL NO. 20-54  
v. \* SECTION: "A"  
TIFFANY WALLACE \*  
\* \* \*

FACTUAL BASIS

The defendant, **TIFFANY WALLACE** ("WALLACE"), has agreed to plead guilty as charged to the one-count Bill of Information charging her with theft of government funds, in violation of Title 18, United States Code, Section 641.

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

On March 13, 2016, a disaster was declared for certain parishes in Louisiana, including Tangipahoa Parish, in connection with severe storms and flooding, designated as FEMA-DR-4263. After the declaration of FEMA-DR-4263, **WALLACE** submitted an application to FEMA for disaster relief for transportation losses as a result of a 2007 GMC Acadia that was damaged by flood waters. Part of that application included a fraudulent invoice for estimated costs of repairs to **WALLACE**'s vehicle, from a fictitious automotive repair shop. The invoice included a \$13,935 estimated cost of repair to **WALLACE**'s vehicle. **WALLACE** submitted that fraudulent invoice to FEMA with the intent to cause FEMA to pay **WALLACE** in excess of \$1,000. FEMA subsequently sent **WALLACE** a disaster benefit award of \$6,000.

Fee \_\_\_\_\_  
Process \_\_\_\_\_  
X Dktd \_\_\_\_\_  
CtRmDep \_\_\_\_\_  
Doc. No \_\_\_\_\_

AUSA NDM  
Defendant FW  
Defense Counsel [Signature]

On August 14, 2016, a disaster was declared for certain parishes in Louisiana, including Tangipahoa Parish, in connection with severe storms and flooding, designated as FEMA-DR-4277. After the declaration of FEMA-DR-4277, **WALLACE** submitted an application to FEMA for disaster relief for transportation losses as a result of a 2007 GMC Acadia and a 2005 Toyota Camry that were damaged by flood waters, as well as for housing assistance based on her apartment experiencing water damage. Part of that application included a fraudulent invoice for estimated costs of repairs to **WALLACE**'s vehicle, from a fictitious automotive repair shop. The invoice included a \$13,368 estimated cost of repair to **WALLACE**'s two vehicles, and **WALLACE** submitted that fraudulent invoice to FEMA with the intent to cause FEMA to pay **WALLACE** in excess of \$1,000. FEMA subsequently sent **WALLACE** a disaster benefit award of \$11,902 for the two vehicles.

Following the declaration of disasters for FEMA-DR-4263 and FEMA-DR-4277, **WALLACE** aided others in the preparation and submission to FEMA of false and fraudulent documents to support requests for disaster assistance, with the intent to cause FEMA to send disaster relief funds to others. **WALLACE** received cash payments for her assistance in the creation of these false and fraudulent documents.

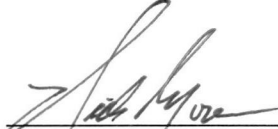
Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by **WALLACE**, and it is not a complete statement of all facts described by **WALLACE** to the government. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for his guilty plea. The limited purpose of this proffer is to demonstrate that


AUSA NDM  
Defendant JW  
Defense Counsel VM

there exists a sufficient legal basis for WALLACE's plea of guilty to the charged offense.

**READ AND AGREED:**

  
\_\_\_\_\_  
NICHOLAS D. MOSES  
Assistant United States Attorney

3/30/21  
Date

  
\_\_\_\_\_  
VALERIE JUSSÉLIN  
Attorney for Defendant

3-30-2021  
Date

  
\_\_\_\_\_  
TIFFANY WALLACE  
Defendant

3/30/2021  
Date