

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

UNITED STATES OF AMERICA	*	CRIMINAL NO. 08-205
v.	*	SECTION: "I" (4)
ARTAMIE DUMAS	*	VIOLATION: 18 U.S.C. §1341
	* * *	

**FACTUAL BASIS**

Should this matter have gone to trial, the Government would have proved beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible exhibits including the testimony of special agents of the Federal Bureau of Investigation ("FBI"), inspectors from the Postal Inspection Service, employees of the American Red Cross ("Red Cross") and others, the following facts to support the allegations charged by the United States Attorney in the Bill of Information now pending against the defendant, **ARTAMIE DUMAS**.

An employee of the Red Cross would testify that in the weeks and months after Hurricane Katrina, which struck southeastern Louisiana on August 29, 2005, the Red Cross maintained disaster recovery centers to assist victims of Hurricane Katrina. Through these recovery assistance efforts, the Red Cross provided financial assistance to residents displaced or otherwise affected by Hurricane Katrina and Hurricane Rita. People affected by the storms were able to apply for a one-time only

financial grant of up to \$1,565 from the Red Cross. In order to receive these funds, applicants needed to present identification to an Red Cross representative that indicated residence in an affected zone. Applicants were also required to swear and attest that they had not received any undisclosed additional American Red Cross financial assistance at any other Red Cross assistance location.

Paychex, Inc., a Rochester, NY-based company that had volunteered its services to the Red Cross, processed personal checks to applicants as deemed appropriate and authorized by the Red Cross. These checks were processed and issued to applicants via the United States Postal Service.

Competent testimony would be introduced that once approved, the Red Cross made these disaster assistance funds available in one of following ways: (1) A personal check made payable to the applicant, issued on-site, and cashed with the assistance of the Red Cross; (2) A Red Cross-issued "Discover" card, issued on-site, and activated via phone by the applicant; (3) A Red Cross-issued Client Assistance Card, issued on-site, and purchased by the Red Cross from private banking institutions; (4) A personal check authorized by the Red Cross, issued by Paychex, Inc.

Testimony by an employee of the Red Cross and admissible exhibits would be introduced to prove that the defendant, **ARTAMIE DUMAS**, presented herself to Red Cross assistance centers on eight (8) occasions between on or about September 18, 2005 and on or about October 25, 2005. On each visit, she applied for financial assistance and indicated that she had not received any other financial assistance from the Red Cross. As a result of her actions on these 8 applications, **ARTAMIE DUMAS** received direct financial assistance from the Red Cross totaling \$10,905.00 of which \$9,340.00 was obtained by fraud.

Competent testimony and admissible exhibits would be introduced to prove that one of the 8 occasions that **ARTAMIE DUMAS** applied for assistance was on or about October 5, 2005, when

the defendant applied for and received a personal check authorized by the Red Cross and issued through the United States Mail by Paychex. Further testimony by employees of the Red Cross would be introduced to prove that the defendant was required to attest and affirm that she had not received any other financial assistance at any other Red Cross assistance center. Exhibits, including the defendant's application from October 5, 2005, would be introduced to show that the defendant specifically attested and swore that she had not received any other financial assistance from the Red Cross, when she had, in fact, received such assistance on several occasions prior to October 5, 2005.

Testimony and exhibits would be presented to show that this check was mailed as a result of the defendant's application at a Red Cross assistance on October 10, 2005. An employee of Paychex would be called to testify as to the procedures and means by which the check, in the amount of \$1265.00 and numbered 1016005321, came to be sent to **ARTAMIE DUMAS**'s address of 189 Theresa Drive, Ponchatoula, Louisiana. Through this witness, certain documents and exhibits would be offered and introduced into evidence to prove that the defendant's fraudulent application and actions directly led to the mailing of the check.

READ AND APPROVED:

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Valerie Jusselin (Date)  
Counsel for Artamie Dumas \_\_\_/\_\_\_/\_\_\_

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DANIEL P. FRIEL (Date)  
Assistant U.S. Attorney \_\_\_/\_\_\_/\_\_\_

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ARTAMIE DUMAS (Date)  
Defendant \_\_\_/\_\_\_/\_\_\_