

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

INDICTMENT FOR CONSPIRACY AND
THEFT OF FEDERAL FUNDS

UNITED STATES OF AMERICA	*	CRIMINAL NO.	
v.	*	SECTION:	
TIWANA ALEXANDER	*	VIOLATIONS:	18 U.S.C. § 371 18 U.S.C. § 641
	*		
	*		
	*		

The Grand Jury charges that:

COUNT 1 – Conspiracy

A. AT ALL MATERIAL TIMES HEREIN:

1. The United States Department of Housing and Urban Development (“HUD”), an agency and department of the United States, awarded federally funded grants annually to state and local governments and other non-governmental organizations and agencies across the country to implement the Supportive Housing Program, a program designed to assist homeless individuals with free housing and life-skills training.

2. Beginning at a time unknown, prior to on or about July 1, 2006 and continuing through the present, the House of Ruth was an organization that received funding from a federal

grant to implement the Supportive Housing program provided by HUD in the Eastern District of Louisiana.

3. Part of the Supportive Housing Program grant money awarded to the House of Ruth was used to pay landlords of an eligible housing unit a deposit and rent for a period of one to three months for a homeless individual or family.

4. In or around March 2007 and continuing until on or about July 2008, in the Eastern District of Louisiana, Samantha Cornelius, was employed by the House of Ruth as a case manager for the Supportive Housing Program. She was responsible for approving landlords and units for homeless tenants and obtaining authorization from her supervisor at the House of Ruth to pay directly those qualifying landlords from the Supportive Housing Program grant.

5. Prior to July 2007 and continuing to the present day, the defendant, **TIWANA ALEXANDER**, was employed as a police officer by the New Orleans Police Department (“NOPD”) in the Fourth District, earning an income in excess of \$40,000 per year. During this time period, the defendant performed security details to supplement her NOPD salary.

6. From on or about November 2004 through on or about September of 2007, the defendant, **TIWANA ALEXANDER**, rented an apartment at Timber Ridge Apartments, New Orleans, LA.

7. On or about August 31, 2007, the defendant **TIWANA ALEXANDER** purchased a home with her sister.

8. At no time from June 1, 2007 through February of 2008 was the defendant, **TIWANA ALEXANDER**, homeless or unemployed.

B. THE CONSPIRACY:

On or about September 22, 2006, and continuing through July of 2008, in the Eastern District of Louisiana, the defendant, **TIWANA ALEXANDER**, Samantha Cornelius, and other known and unknown individuals, did knowingly and willfully combine, conspire, and confederate and agree to knowingly and willfully embezzle, steal, and convert to their own use money or property belonging to the United States, or any department or agency thereof, mainly the United States Department of Housing and Urban Development, with the intent to deprive the United States of the benefit and use of that money in excess of \$1,000; in violation of Title 18 United States Code, Section 641.

C. OVERT ACTS:

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Eastern District of Louisiana and elsewhere:

1. On or about September 22, 2006 and continuing through July of 2008, Samantha Cornelius and the defendant, **TIWANA ALEXANDER**, caused the House of Ruth to issue five checks, totaling \$3,600. These checks were written to false and/or fictitious landlords and were intended to assist the defendant, **TIWANA ALEXANDER**, with rental payments, and other expenses, even though the defendant, **TIWANA ALEXANDER**, and Samantha Cornelius well-knew that the defendant was not entitled to rental assistance from the House of Ruth.

2. On or around July 5, 2007, the defendant, **TIWANA ALEXANDER**, knowing that she was not entitled to any rental payments from the House of Ruth, paid and/or caused her rent to be paid with a House of Ruth check in the amount of \$475.00 and a personal check for the balance.

3. On or around August, 3, 2007, the defendant, **TIWANA ALEXANDER**, knowing that she was not entitled to any rental payments from the House of Ruth, paid and/or caused her rent to be paid with a House of Ruth check in the amount of \$425.00 and a personal check for the balance.

4. On or around November 2, 2007, the defendant, **TIWANA ALEXANDER**, knowing that she was not entitled to any payments from the House of Ruth, deposited and/or agreed to have a House of Ruth check deposited into her bank account in the amount of \$900.

5. On or around December 12, 2007, the defendant, **TIWANA ALEXANDER**, knowing that she was not entitled to any payments from the House of Ruth, deposited and/or agreed to have a House of Ruth check deposited into her bank account in the amount of \$900.

6. On or around January 22, 2008, the defendant, **TIWANA ALEXANDER**, knowing that she was not entitled to any payments from the House of Ruth, deposited and/or agreed to have a House of Ruth check deposited into her bank account in the amount of \$900.

7. In exchange for Samantha Cornelius's assistance obtaining money from the House of Ruth, the defendant, **TIWANA ALEXANDER**, gave a portion of the proceeds of the House of Ruth checks to Samantha Cornelius.

All in violation of Title 18, United States Code, Section 371.

COUNT 2 – Theft of Federal Funds

A. The allegations contained in Paragraphs A-C of Count 1 of this Indictment, as set forth above, are realleged and incorporated by reference as though set forth in their entirety herein.

B. THEFT OF FEDERAL FUNDS:

Beginning at a time unknown, but prior to June 1, 2007, and continuing through February 2008, in the Eastern District of Louisiana, the defendant, **TIWANA ALEXANDER**, did knowingly and willfully embezzle, steal, and convert to her own use, money in the amount of approximately \$3,600, belonging to the United States, mainly the United States Department of Housing and Urban Development, with the intent to deprive the United States of the benefit and use of that money.

All in violation of Title 18, United States Code, Sections 641 and 2.

NOTICE OF FORFEITURE

1. The allegations of Counts 1 and 2 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, 371 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

2. As a result of the offenses alleged in Counts 1 and 2, defendant, **TIWANA ALEXANDER**, 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, any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Sections 641 and 371.

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, 371 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

A TRUE BILL:

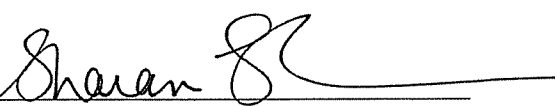
FOREPERSON



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SHARAN E. LIEBERMAN
Assistant United States Attorney

New Orleans, Louisiana
March 1, 2012