

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED  
2014 MAY 20 AM 8:52  
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ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

NO.

MARICELLA REED (01)  
ADRIAN BEVELLE (02)

**3-14-CR-199-D**

INDICTMENT

The Grand Jury charges:

Count One

Conspiracy to Commit Mail Fraud  
[Violation of 18 U.S.C. § 1349 (18 U.S.C. § 1341)]

Introduction

At all times relevant to the Indictment:

1. The defendant, **Maricella Reed**, was employed as a data specialist in the worker's compensation section of the Risk Management Department for the Dallas Independent School District (DISD), located in Dallas, Texas.
2. Twice a week, in the performance of her duties, **Reed** printed a list of checks to be issued to claimants in connection with worker's compensation claims. This list was referred to as the Pre-Check Register. **Reed** provided this Pre-Check Register, along with payment justification, to adjusters and to her supervisor for approval.
3. Once the Pre-Check Register was approved, **Reed** uploaded the information from the Pre-Check Register onto the computer system as a "CSV" file and sent the "CSV" file

to Accounts Payable for processing. Accounts Payable issued checks to the payees and sent the checks to the payees through the U.S. Mail.

4. After the payments were processed, Accounts Payable sent a list of all checks that had been issued back to the Risk Management Department. This list was referred to as the Final Payment Register. In the performance of her duties, **Reed** was responsible for reconciling the Final Payment Register with the Pre-Check Register to make sure all of the check payments were made and that the payment amounts were correct.

5. The defendant, **Adrian Bevelle**, was not an employee of DISD, was not a worker's compensation claimant, and was not entitled to any benefits from the DISD worker's compensation program.

#### The Conspiracy and Its Object

6. Beginning on or about May 7, 2009, and continuing until on or about May 9, 2011, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants, **Maricella Reed** and **Adrian Bevelle**, did intentionally and willfully combine, conspire, confederate, and agree with each other and with others, both known and unknown to the Grand Jury, to commit mail fraud, in violation of 18 U.S.C. § 1341, by knowingly devising a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, by depositing and causing to be deposited any matter or thing for delivery through the United States Postal Service and private and commercial interstate carriers, for the purpose of executing and attempting to execute a scheme and artifice to defraud.

Manner and Means of the Conspiracy

It was part of the scheme that:

7. **Reed** used her position as a worker's compensation data specialist at DISD to cause unauthorized payments to be issued to **Bevelle**. To do so, she altered the information on the CSV file that was sent to Accounts Payable, to include substituting **Bevelle's** name in place of legitimate claimants, and adding **Bevelle's** name and payment amounts to the list of legitimate claimants. She also created and submitted payment voucher forms for **Bevelle** in various amounts.

8. Based on the information provided by **Reed**, Accounts Payable issued checks to **Bevelle** and mailed the checks through the United States Postal Service to **Bevelle** at addresses in Dallas, Texas and Irving, Texas.

9. **Bevelle** received the DISD checks that had been mailed through the United States Postal Service, and subsequently endorsed and cashed checks at various locations in or near Dallas, Texas.

Overt Acts

In furtherance of the conspiracy and to effect the objects thereof, **Reed** and **Bevelle**, and others committed and caused to be committed the following overt acts, among others, in the Northern District of Texas, and elsewhere:

10. Between on or about May 6, 2009 and on or about August 31, 2009, in Dallas, Texas, **Reed** caused DISD to issue 21 checks to **Bevelle** and to mail said checks, via the

United States Postal Service, to **Bevelle** at an address on Jaynes Court in Irving, Texas.

The aforementioned checks totaled \$24,075.90.

11. On or about September 1, 2009, in Dallas, Texas, **Reed** changed the address for **Bevelle** in the DISD computer system to an address on Jonesboro Avenue in Dallas, Texas.

12. Between on or about September 3, 2009 and on or about October 12, 2009, in Dallas, Texas, **Reed** caused DISD to issue 4 checks to **Bevelle** and to mail said checks, via the United States Postal Service, to **Bevelle** at an address on Jonesboro Avenue in Dallas, Texas. The aforementioned checks totaled \$4,927.27.

13. On or about October 13, 2009, in Dallas, Texas, **Reed** changed the address for **Bevelle** in the DISD computer system to an address on Windsong Lane in Irving, Texas.

14. Between on or about October 26, 2009 and on or about December 3, 2009, in Dallas, Texas, **Reed** caused DISD to issue 8 checks to **Bevelle** and to mail said checks, via the United States Postal Service, to **Bevelle** at an address on Windsong Lane in Irving, Texas. The aforementioned checks totaled \$13,599.88.

15. On or about December 9, 2009, in Dallas, Texas, **Reed** changed the address for **Bevelle** in the Dallas ISD computer system to an address on Bradford Street in Irving, Texas.

16. Between on or about December 10, 2009 and on or about July 28, 2010, in Dallas, Texas, **Reed** caused DISD to issue 38 checks to **Bevelle** and to mail said checks, via the

United States Postal Service, to **Bevelle** at an address on Bradford Street in Irving, Texas.

The aforementioned checks totaled \$48,786.83.

17. On or about July 29, 2010, in Dallas, Texas, **Reed** changed the address for **Bevelle** in the DISD computer system to a Post Office box in Irving, Texas.

18. Between on or about August 2, 2010 and on or about May 2, 2011, in Dallas, Texas, **Reed** caused DISD to issue 50 checks to **Bevelle** and to mail said checks, via the United States Postal Service, to **Bevelle** at a Post Office Box in Irving, Texas. The aforementioned checks totaled \$71,373.47.

19. Between on or about May 11, 2009 and on or about May 6, 2011, **Bevelle** endorsed and cashed 117 DISD checks at PLS Check Cashers of Texas. **Bevelle's** account at PLS Check Cashers of Texas was set up using his Texas driver's license, ending in 7162, and included addresses on Jaynes Court in Irving, Texas and Bradford Street in Irving, Texas.

20. On or about May 18, 2009, **Bevelle** endorsed and cashed a DISD check at America's Cash Express.

21. On or about May 21, 2009, **Bevelle** endorsed and cashed a DISD check at Bank of America.

22. On or about February 1, 2011, **Reed** and **Bevelle** endorsed and cashed a DISD check at PLS Check Cashers of Texas.

In violation of 18 U.S.C. § 1349.

Forfeiture Notice


18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461(c)

Upon conviction of the offense alleged in Count One, and pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), the defendants, **Maricella Reed** and **Adrian Bevelle**, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

A TRUE BILL

  
FOREPERSON

SARAH R. SALDAÑA  
UNITED STATES ATTORNEY

  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

MARICELLA REED (1) **3-14CR-199-D**  
ADRIAN CASIDINE BEVELLE (2)

INDICTMENT

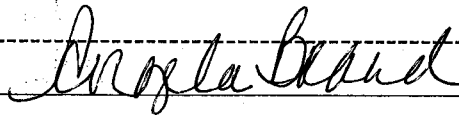
Conspiracy to Commit Mail Fraud  
18 U.S.C. § 1349 (18 U.S.C. § 1341)

Forfeiture Notice  
18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461(c)

1 Count

A true bill rendered

DALLAS

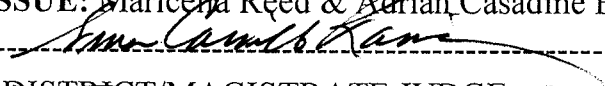


FOREPERSON

Filed in open court this \_\_\_\_\_ day of May, 2014

Clerk

WARRANT TO ISSUE: Maricella Reed & Adrian Casadine Bevelle



UNITED STATES DISTRICT/MAGISTRATE JUDGE

No Criminal matter pending