

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

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL DOCKET NO. 13-285</b>
<b>v.</b>	*	<b>SECTION: "F"</b>
<b>JABARI RAGAS</b>	*	<b>VIOLATION: 18 U.S.C. §1957 26 U.S.C. §7206(1)</b>
	*	
*	*	*

**FACTUAL BASIS**

If this case were to proceed to trial, the United States would prove beyond a reasonable doubt, through credible testimony and reliable evidence, the following facts:

Witnesses would testify that the defendant, **JABARI RAGAS**, was a resident of New Orleans, Louisiana, a location within the Eastern District of Louisiana.

Witnesses and records would prove that **JABARI RAGAS** was employed by Ameriprise Financial Services, Inc. ("Ameriprise") as a registered broker and investment adviser.

Ameriprise is a large financial services company headquartered in Minneapolis, Minnesota, which provides wealth management, asset management, and insurance to clients and has locations in the Eastern District of Louisiana.

Witnesses and records would prove that in early 2006, a client of **JABARI RAGAS** indicated to him that he wished to open a Simplified Employee Pension (“SEP”) Individual Retirement Account with Ameriprise to allow him to contribute towards his retirement.

Witnesses would testify and bank records would prove that the client, with the assistance of **JABARI RAGAS**, made a contribution to the account on February 10, 2006 in the amount of \$43,000, a contribution on April 19, 2007 in the amount of \$42,000, and a final contribution on October 16, 2009, in the amount of \$20,580.

Witnesses would testify that without authorization and unbeknownst to the client, **JABARI RAGAS** started transferring money from the client’s Ameriprise SEP account, into an account ending in X0686, that was controlled by **JABARI RAGAS**. Records would prove that on June 26, 2009, **JABARI RAGAS** used an interstate wire to transfer \$40,000 from the Ameriprise SEP account, to the personal bank account of **JABARI RAGAS** which ends in X0686. Witnesses would testify that the financial institution that received the funds from Ameriprise had the deposits insured by the Federal Deposit Insurance Corporation.

A witness would testify about a conversation with **JABARI RAGAS**, wherein the client had checked the account balance and inquired as to why the account was lower than it should have been. The client would testify that **JABARI RAGAS** falsely told the client that the funds had been transferred into an investment account of a different financial institution located in Texas. **JABARI RAGAS** was then asked by the client to supply him with written account statements showing the balance, account number, and institution name.

Witnesses would testify and records would be introduced to prove that **JABARI RAGAS** then supplied the client with a fraudulent account statement for an account that did not exist, along with a fraudulent balance. The client would testify that in August 2010, after being

questioned by the client, **JABARI RAGAS** admitted to the client in a telephone call that he did not invest the money, that the transfers were unauthorized, but that he should be able to tell Ameriprise about what had occurred so that he could get his money back.

Records would prove that the defendant, **JABARI RAGAS**, did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, when he deposited criminally derived property, which exceeded \$10,000 into a bank account controlled by **JABARI RAGAS**, ending in X6585. Specifically, witnesses would testify that the funds were derived from the proceeds of a specified unlawful activity, that is, wire fraud in violation of Title 18, United States Code, Section 1343. Witnesses would testify that **JABARI RAGAS** took the funds from the client's Ameriprise SEP account without authorization, transferred them to an account he controlled ending in X0686, then later obtained a cashier's check for \$20,000 from that account, and then deposited it into a different personal account, ending in X6585. Records would also prove that the financial institution ending in X6585 also had its deposits insured by the Federal Deposit Insurance Corporation. Evidence would prove that the below transaction details the money laundering transaction:

COUNT	BANK ACCOUNT FUNDS WHERE TAKEN FROM	AMOUNT	BANK ACCOUNT WHERE FUNDS THEN DEPOSITED	DATE
1	Ragas Account X0686	\$20,000 Cashier's Check payable to Ragas	Ragas Account X6565	06/29/09

Witnesses would testify that on or about October 12, 2008, in the Eastern District of Louisiana, the defendant **JABARI RAGAS**, did willfully make and subscribe a 2007 United States Individual Income Tax Return, Form 1040 which was verified by a written declaration

that it was made under the penalties of perjury and was filed with the Internal Revenue Service (an agency of the United States Department of Treasury), which said income tax return defendant **JABARI RAGAS** did not believe to be true and correct as to every material matter in that defendant **JABARI RAGAS** did not report approximately \$288,000 of income.

Evidence and records would prove that during the calendar year 2007, **JABARI RAGAS**, had and received taxable income in the amount of \$347,212 as opposed to the taxable income he stated on his return as \$45,724. The additional unreported taxable income resulted in an additional \$90,540 that was due and owing to the United States of America.

Records would prove that **JABARI RAGAS** had previously filed tax returns in the past and knew of his responsibility to accurately report income. **JABARI RAGAS** signed this 2007 tax return, under the penalty of perjury, knowing that it contained a false accounting of his taxable income for the 2007 tax year.

In summary, all of the evidence introduced at trial would establish the elements of the offenses charged in the bill of information and prove the defendant's guilt beyond a reasonable doubt.

**READ AND APPROVED:**

\_\_\_\_\_  
JABARI RAGAS      DATE  
Defendant

\_\_\_\_\_  
JON MAESTRI      DATE  
Assistant U.S. Attorney

\_\_\_\_\_  
ROGER JORDAN      DATE  
Counsel for Defendant