

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

**UNITED STATES OF AMERICA**

**v.**

**CHARLOTTE TROXLER**

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**CRIMINAL NO: 10-281**

**SECTION: "F"(1)**

**VIOLATION: 18 U.S.C. § 1341**

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**FACTUAL BASIS**

If this matter would have gone to trial the government would have introduced the following through relevant and competent evident and testimony beyond a reasonable doubt:

That the defendant **CHARLOTTE TROXLER**, was a resident of Louisiana within the jurisdiction of the Eastern District of Louisiana and was employed with Tom Benson d/b/a Benson Properties; Benson Football L.L.C.; Bensco of Louisiana, L.L.C. (hereinafter referred to as Benson); Leson Chevrolet Company (hereinafter referred to as Leson); Ray Brandt Automobile Dealership (hereinafter referred to as Ray Brandt) at all pertinent times related to the allegations contained in the Bill of Information.

That the defendant **CHARLOTTE TROXLER** held the position of Financial Assistant to the owner of Benson. The defendant was employed by Benson from on or about 1985 through on or about March 2006.

That the defendant, **CHARLOTTE TROXLER**, held the position of Financial Controller at Leson. The defendant was employed by Leson from on or about August 2009 through on or about November 2009.

That the defendant, **CHARLOTTE TROXLER**, held the position of Financial Controller at Ray Brandt. The defendant was employed by Ray Brandt from on or about November 2008 through on or about July 2009.

That the defendant, **CHARLOTTE TROXLER**, supplied a special skill and held a position of trust for each employer referred to above: Benson; Leson; Ray Brandt.

That First American Bank, Capital One Bank, Hibernia Bank (now Capital One Bank) were all financial institutions located in the Eastern District of Louisiana and elsewhere and deposits of each financial institution were insured by the Federal Deposit Insurance Corporation at all pertinent periods of time contained in the Bill of Information.

The government would introduce competent testimony and documentary evidence that beginning at a time unknown, but on or about 2003, and continuing through on or about November 2009, the defendant, **CHARLOTTE TROXLER**, abused her position of trust at Benson, Leson and Ray Brandt by stealing checks belonging to Benson, Leson and Ray Brandt. The defendant's conduct resulted in a loss of approximately \$1,066,038.45 to Benson, Leson and Ray Brandt.

The government would further show that the defendant, **CHARLOTTE TROXLER**, created unauthorized payees and then deposited the stolen funds into accounts, including First American Bank, by misrepresenting her authority.

The government would further show that the defendant, **CHARLOTTE TROXLER**, attempted to conceal her theft from Benson, Leson and Ray Brandt by falsely altering information contained in Benson, Leson and Ray Brandt's financial accounts to make it appear to be legitimate

payments.

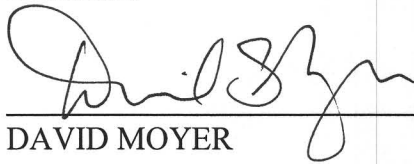
The government would further show the defendant, **CHARLOTTE TROXLER**, by misrepresenting her authority by creating unauthorized payees and forging endorsements on stolen checks and then deposited those stolen checks into bank accounts controlled by her at First American Bank she subjected First American Bank to risk of civil liability and financial loss.



CHARLOTTE TROXLER  
Defendant

9/23/2010

DATE



DAVID MOYER  
Counsel for Defendant

9/23/2010

DATE



JAMES R. MANN  
Assistant United States Attorney

9-23-2010

DATE