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U.S. DISTRICT COURT  
EAST DISTRICT OF LA

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WILLIAM W. BLEVINS  
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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

BILL OF INFORMATION FOR WIRE FRAUD AND NOTICE OF FORFEITURE

UNITED STATES OF AMERICA

\*

CRIMINAL NO.:

**15-235**

v.

\*

SECTION:

**SECT. A MAG. 3**

WAYNE WILLIAMS

\*

VIOLATION: 18 U.S.C. § 1343

\* \* \*

The United States Attorney charges that:

COUNTS 1 - 2

A. AT ALL TIMES MATERIAL HEREIN:

1. The defendant, **WAYNE WILLIAMS**, was employed by ADT Security between in or about June 2010 and in or about October 2011.

2. The defendant, **WAYNE WILLIAMS**, was employed by Protection One between in or about October 2011 and in or about March 2012.

3. ADT Security and Protection One are in the business of selling security systems and services to customers. As part of his employment, **WAYNE WILLIAMS** was responsible

for selling these security systems and services, and also for negotiating and signing customer contracts on behalf of ADT Security and Protection One. **WAYNE WILLIAMS** was compensated by his employers through commissions received on contracts he negotiated.

**B. THE SCHEME:**

Beginning in or about June 2010 and continuing until in or about June 2012, in the Eastern District of Louisiana and elsewhere, the defendant, **WAYNE WILLIAMS**, did unlawfully, willfully and knowingly devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, as set forth more fully below, well knowing at the time that the pretenses, representations and promises would be and were false when made. The object of this fraudulent scheme was to obtain approximately \$75,930.71 in commissions by submitting fraudulent contracts to ADT Security and Protection One.

It was part of the scheme and artifice to defraud that the defendant, **WAYNE WILLIAMS**, forged a customer's signature on a \$466,046.18 ADT Security equipment and installation services contract. Without ADT Security's knowledge, the defendant secretly executed a separate contract with the customer in which only \$109,148.93 was charged. The defendant received approximately \$73,576.72 in commissions from ADT Security as a result of the fraudulent \$466,046.18 contract.

It was further part of the scheme and artifice to defraud that the defendant, **WAYNE WILLIAMS**, forged a purported customer's signature on an \$80,240.48 Protection One equipment and installation services contract. The defendant received approximately \$2,353.99 in commissions from Protection One as a result of this fraudulent contract.

**C. THE WIRE COMMUNICATIONS:**

On or about the dates specified in each count below, in the Eastern District of Louisiana and elsewhere, the defendant, **WAYNE WILLIAMS**, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money and property, did knowingly transmit and cause to be transmitted, by means of wire communications in interstate commerce, certain writings, signs, signals, pictures and sounds, as more particularly described below:

<b>COUNT</b>	<b>DATE</b>	<b>DESCRIPTION OF WIRE COMMUNICATION</b>
<b>1</b>	August 9, 2011	Scanned fraudulent ADT Security contract transmitted from Louisiana to North Carolina through the Internet.
<b>2</b>	January 25, 2012	Scanned fraudulent Protection One contract transmitted from Louisiana to Kansas through the Internet.

All in violation of Title 18, United States Code, Section 1343.

**NOTICE OF FORFEITURE**

1. The allegations of Counts 1 and 2 of this Bill of Information 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 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 1 and 2, defendant, **WAYNE WILLIAMS**, 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(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1343.

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 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

KENNETH ALLEN POLITE, JR.  
UNITED STATES ATTORNEY

  
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G. DALL KAMMER  
Assistant United States Attorney

New Orleans, Louisiana  
October 1, 2015