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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

BILL OF INFORMATION FOR WIRE FRAUD

UNITED STATES OF AMERICA \*

CRIMINAL DOCKET NO. **16-54**

VERSUS \*

SECTION: **SECT. B MAG. 1**

CLARK PELLEGRIN \*

VIOLATIONS: 18 U.S.C. § 1343

a/k/a David James

18 U.S.C. § 2

a/k/a Alan Reed \*

a/k/a John Allen

\* \* \*

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. On about February 26, 2010, **CLARK PELLEGRIN (PELLEGRIN)** opened Regions Bank personal checking account under the name Clark James Pellegrin, Jr. (Regions Acct. XXX350). On about April 8, 2010, **PELLEGRIN** closed the account.

2. On about April 28, 2010, **CLARK PELLEGRIN** incorporated James, Clark & Associates, LLC (JC&A) with the State of Louisiana. **PELLEGRIN** was listed as the Agent and Officer. While operating JC&A, **PELLEGRIN** used the name "Alan Reed."

3. On or about May 7, 2010, **PELLEGRIN** opened Gulf Coast Bank & Trust operating/checking account under the name JC&A (GCB&T JC&A Operating xxx818) and Gulf Coast Bank & Trust trust/checking account under the name JC&A (GCB&T JC&A Trust xxx826). On about July 1, 2010, the accounts were closed.

4. On or about June 3, 2010, **PELLEGRIN** opened Gulf Coast Bank & Trust personal checking account under the name James Clark Pellegrin, Jr. (GCB&T Personal xxx330). On June 29, 2010, **PELLEGRIN** closed the account.

5. On June 29, 2010, **PELLEGRIN** opened OMNI Bank personal checking account under Clark James Pellegrin, Jr. (OMNI Personal xxx553). On September 10, 2010, OMNI closed the account.

6. On June 29, 2010, **PELLEGRIN** opened OMNI Bank trust/checking account under the name JC&A. (OMNI JC&A Trust xxx528). On October 8, 2010, the account was closed.

7. On June 29, 2010, **PELLEGRIN** opened OMNI Bank operating/checking account under the name JC&A. (OMNI JC&A Operating xxx536). On August 24, 2010, the account was closed.

8. On or about August 10, 2010, **PELLEGRIN** opened Capital One operating/checking account under the name JC&A (Cap.One JC&A Operating xxx336). On January 12, 2011, the account was closed.

9. On or about September 27, 2010, **PELLEGRIN** opened Hancock Bank operating/checking account under the names JC&A (Hancock JC&A Operating xxx936) and Hancock Bank trust/checking account under the name JC&A (Hancock JC&A Trust xxx010).

On May 4, 2010, Hancock JC&A Operating xxx936 was closed. On June 1, 2011, Hancock JC&A Trust xxx010 was closed.

10. On about March 16, 2011, **PELLEGRIN** registered Corporate Associates as a debt collection business in Terrebonne Parish, Louisiana. When representing Corporate Associates, **PELLEGRIN** used the name "John Allen."

11. On March 17, 2011, **PELLEGRIN** opened two accounts at Coastal Commerce operating/checking account under the name Clark Pellegrin Jr. d/b/a Corporate Associates (Coastal Corporate Associates Operating xxx611) and Coastal Commerce escrow/checking account under the name Clark Pellegrin Jr. d/b/a Corporate Associates (Coastal Corporate Associates Escrow xxx629). The accounts were closed by the bank in April 2011.

12. From at least May 10, 2012, until about February 7, 2013, **PELLEGRIN** operated Superior Associates Group (Superior Associates) as a sole proprietorship in Thibodaux, Louisiana. While operating Superior Associates, **PELLEGRIN** used the name "Alan Reed."

13. On May 10, 2012, **PELLEGRIN** opened Whitney Bank business checking account under the name Clark James Pellegrin, Jr. d/b/a as Superior Associates Group (Whitney Superior Associates xxx440). On August 19, 2012, the bank closed the account with a negative balance.

14. **PELLEGRIN** was the sole signatory on the bank accounts listed above.

**B. THE SCHEME TO DEFRAUD:**

15. From on or about February 26, 2010, and continuing through December 11, 2013, in the Eastern District of Louisiana and elsewhere, **CLARK JAMES PELLEGRIN, JR.** did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and to obtain money and/or property by means of false pretenses, promises and representations by

persuading debtors to pay him, personally and through his companies, monies owed to companies and creditors in return for negotiating a settlement of the debt below the original amount and, instead of paying the creditor, took the funds for his personal benefit.

16. It was part of the scheme and artifice to defraud the **PELLEGRIN**, through his operation of JC&A, Corporate Associates, and Superior Associates Group, marketed himself as a debt collector and solicited companies with outstanding debt.

17. It was further part of the scheme and artifice to defraud that **PELLEGRIN** frequently opened bank accounts at different banks under different corporate and business names because he was defrauding the banks by writing NSF checks to creditors and when the creditor received the checks, the funds in the account were depleted or the account had been closed by **PELLEGRIN** or the bank.

18. It was further part of the scheme and artifice to defraud that by creating different corporate entities, **PELLEGRIN** was able to open new business accounts at banks and disguise his previous fraudulent activities at other banks under different corporate and business names.

19. It was further a part of the scheme and artifice to defraud that, although **PELLEGRIN** claimed that he would remit funds collected from debtors to the creditors of those debtors, **PELLEGRIN** deposited the money into his accounts and did not remit the funds to the rightful owner.

20. It was further part of the scheme and artifice to defraud that **PELLEGRIN** alone maintained bank accounts for which only he had signature authority in order to negotiate payments debtors paid to him on behalf of creditors with whom **PELLEGRIN** had formal and informal collection agreements or often no collection agreement at all.

21. It was further part of the scheme and artifice to defraud that **PELLEGRIN** negotiated with debtors about debts which **PELLEGRIN** had no authority with creditors to negotiate.

22. It was further part of the scheme and artifice to defraud that between about February 2, 2010, and February 7, 2013, **PELLEGRIN** made collections from debtors on behalf of twenty-three (23) different creditors in the approximate amount of \$243,980, which funds he converted to his own use, instead of paying the creditors.

**C. WIRE IN FURTHERANCE OF THE SCHEME AND ARTIFICE TO DEFRAUD:**

23. On or about April 13, 2011, in the Eastern District of Louisiana and elsewhere, **PELLEGRIN** negotiated Check No. 148 drawn on the account of a debtor of Pennock, a creditor for whom **PELLEGRIN** collected debts, in the amount of \$250, from the Susquehanna Bank in Conshohocken, PA, payable to and endorsed by Corporate Associates, by depositing the check into Coastal Corporate Associates Escrow xxx629 thereby causing an interstate communication to a financial institution outside of the State of Louisiana.

All in violation of Title 18, United States Code, Sections 1343 and 2.

**NOTICE OF WIRE FRAUD FORFEITURE**

1. The allegations of Count 1 of this Bill of Information are re-alleged 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 offense alleged in Count 1, the defendant, **CLARK J. PELLEGRIN, JR.**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 1343 and 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, including but not limited to:

- a. At least \$243,980 in United States Currency and all interest and proceeds traceable thereto.
- b. The government specifically provides notice of its intent to seek a personal money judgment against the defendant in the amount of the fraudulently-obtained proceeds.

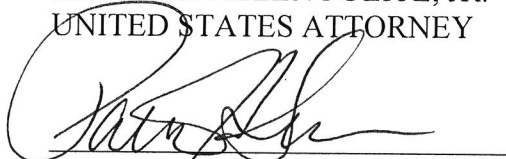
3. If any of the above described property, as a result of any act or omission of the defendant:

- 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



PATRICE HARRIS SULLIVAN  
Assistant United States Attorney  
Louisiana Bar Roll No. 14987

New Orleans, Louisiana  
April 5, 2016

