

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.

2019 MAY 10 P 1:20
WILLIAM W. BLEVINS
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR CONSPIRACY TO
COMMIT IDENTITY THEFT AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

*

CRIMINAL NO.:

v.

*

SECTION:

ARNOLD TREVELL WILLIAMS

*

VIOLATION: 18 U.S.C. § 371

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* * *

The United States Attorney charges that:

COUNT 1

(Conspiracy to Commit Identity Theft)

A. AT ALL TIMES MATERIAL HEREIN

1. Defendant **ARNOLD TREVELL WILLIAMS** ("WILLIAMS") was a resident of Jefferson Parish, which is within the Eastern District of Louisiana.

2. A "means of identification" is any name or number that could be used, alone or in conjunction with any other information, to identify a specific individual, including a name, address, Social Security number, and date of birth.

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B. THE CONSPIRACY

Beginning at a time unknown to the Grand Jury, and continuing through May 1, 2017, within the Eastern District of Louisiana and elsewhere, defendant **WILLIAMS** and others, both known and unknown to the Grand Jury, unlawfully, voluntarily, intentionally, and knowingly did conspire, combine, confederate, and agree together and with each other to commit offenses against the United States, to wit: identity theft, in violation of Title 18, United States Code, Section 1028(a)(7).

C. MANNER AND MEANS

Among the manner and means by which defendant **WILLIAMS** and his co-conspirators carried out the conspiracy were the following:

1. Members of the conspiracy, and other co-conspirators, known and unknown, would and did obtain the means of identification of individuals, including names, dates of birth, addresses, and Social Security numbers.
2. Members of the conspiracy, and other co-conspirators, known and unknown, would and did use the means of identification of others to create false identification documents, including driver's licenses.
3. Members of the conspiracy, and other co-conspirators, known and unknown, would and did exchange money with his co-conspirators in exchange for individuals' names, Social Security numbers, and birthdates.
4. Members of the conspiracy, and other co-conspirators, known and unknown, would and did use the means of identification of others and false identification documents to apply for loans to purchase vehicles.

5. Members of the conspiracy would and did communicate with others co-conspirators about the purchase of vehicles.

D. OVERT ACTS

In furtherance of the conspiracy, and to effect the objects thereof, members of the conspiracy and others known and unknown to the Grand Jury, committed or caused to be committed the overt acts below, among others, within the Eastern District of Louisiana and elsewhere:

1. On or about April 2, 2017, defendant **WILLIAMS** and Co-conspirator A communicated by text message and telephone calls about the purchase of vehicles.

2. On or about May 8, 2017, defendant **WILLIAMS** and Co-conspirator A communicated by text message and telephone calls about the creation of false identification documents. Co-conspirator A and defendant **WILLIAMS** exchanged photographs on this date of a State of Louisiana driver's license image and a photograph to be superimposed over it.

3. On or about May 11, 2017, Co-conspirator A, aided and abetted by others, created a fraudulent means of identification, to wit: a State of Louisiana driver's license using the name and birthdate of T.B., an actual person, and transferred it to **WILLIAMS**.

4. On or about May 11, 2017, defendant **WILLIAMS**, and others caused to be used, in interstate commerce, the unauthorized means of identification, to wit: the name, birthdate and Social Security number of T.B., for the purposes of buying a 2014 BMW 7 series motor vehicle in the name of T.B. in the amount of approximately \$44,994.10.

All in violation of Title 18, United States Code, Section 371.

NOTICE OF FRAUD FORFEITURE

1. The allegations of Count 1 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 371 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 Count 1, defendant, **ARNOLD TREVELL 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 a violation of Title 18, United States Code, Section 371.

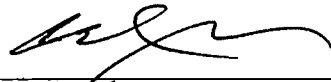
3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

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

PETER G. STRASSER
UNITED STATES ATTORNEY



EDWARD J. RIVERA
Assistant United States Attorney

New Orleans, Louisiana
May 10, 2019