

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

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CAROL L. MICHEL cc
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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 DOCKET NO.

21-49

v.

*

SECTION:

SECT. 1 MAG. 5

CHRISTY BARTHOLOMEW

*

VIOLATION: 18 U.S.C. § 1343

* * *

The United States Attorney charges that:

COUNT 1

(18 U.S.C. § 1343 – Wire Fraud)

A. AT ALL TIMES MATERIAL HEREIN:

1. The defendant, **CHRISTY BARTHOLOMEW** (“**BARTHOLOMEW**”), was employed in St. Tammany Parish and Jefferson Parish, Louisiana.
2. Company A maintained its operational headquarters in Slidell, Louisiana.
3. From on or about March 2016 through October 2019, Company A employed **BARTHOLOMEW** as the financial controller, and in her capacity as financial controller, **BARTHOLOMEW** had access to Company A’s American Express business credit card and other financial information.

___ Fee _____
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4. American Express was a company headquartered in New York, New York, that issued business credit cards to customers. American Express had servers for wire transactions located in Phoenix, Arizona.

5. Amazon was an internet retailer headquartered in Seattle, Washington.

6. Company B maintained its operational headquarters in Kenner, Louisiana.

7. From on or about November 2019 through February 2020, Company B employed **BARTHOLOMEW** as the office manager, and in her capacity as office manager, **BARTHOLOMEW** had access to Company B's JPMorgan Chase, N.A. ("JPMorgan") business credit card and other financial information.

8. JPMorgan was a bank headquartered in New York, New York, that issued business credit cards to customers. JPMorgan had servers for wire transactions located in Illinois and Delaware.

9. Plastiq was a company headquartered San Francisco, California, that converted credit card payments to payments to vendors who did not otherwise accept credit card payments. Plastiq had servers for wire transactions located in Santa Clara, California.

B. THE SCHEME TO DEFRAUD:

It was part of the scheme and artifice to defraud that beginning on or about March 2016, and continuing until in or about October 2019, **BARTHOLOMEW** used Company A's credit cards and manipulated their accounting software in order to commit approximately \$357,734.94 in fraudulent transactions by means of false and fraudulent promises, pretenses, and representations.

It was further part of the scheme and artifice to defraud that **BARTHOLOMEW** used an American Express business credit card issued to Company A to make purchases from Amazon for her own personal use.

It was further part of the scheme and artifice to defraud that **BARTHOLOMEW** concealed the Amazon purchases for her benefit from Company A.

C. THE WIRE FRAUD:

On or about December 22, 2017, in the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTY BARTHOLOMEW**, for the purpose of executing and attempting to execute the scheme and artifice to defraud as described in Parts A and B of Count 1, did knowingly and willfully cause to be transmitted by means of a wire communication in interstate and foreign commerce, between Slidell, Louisiana, and Phoenix, Arizona, certain writings, signs, signals, and sounds; that is, the defendant, without authorization, accessed Company A's American Express business credit card account by means of a wire communication and directed American Express to transfer funds to Amazon for the purchase a Visa Gift Card.

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

COUNT 2

(18 U.S.C. § 1343 – Wire Fraud)

A. AT ALL TIMES MATERIAL HEREIN:

The allegations contained in Paragraph A of Count 1 are hereby re-alleged and incorporated as though fully set forth herein.

B. THE SCHEME TO DEFRAUD:

It was part of the scheme and artifice to defraud that beginning on or about November 2019, and continuing until in or about February 2020, **BARTHOLOMEW** used credit cards in the name of Company B and its employees, and used unauthorized Company B credit cards issued

in her name to commit approximately \$300,753.93 in fraudulent transactions by means of false and fraudulent promises, pretenses, and representations.

It was further part of the scheme and artifice to defraud that **BARTHOLOMEW** used a JPMorgan Bank credit card fraudulently issued to a Company B employee to send approximately \$21,000.00 to Plastiq in order to make a vehicle purchase from Courtesy Ford in Hattiesburg, Mississippi, for her own personal use.

It was further part of the scheme and artifice to defraud that **BARTHOLOMEW** concealed the Plastiq transaction for her benefit from Company B.

C. THE WIRE FRAUD:

On or about January 23, 2020, in the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTY BARTHOLOMEW**, for the purpose of executing and attempting to execute the scheme and artifice to defraud as described in Parts A and B of Count 2, did knowingly and willfully cause to be transmitted by means of a wire communication in interstate and foreign commerce, between Kenner, Louisiana, Illinois, Delaware and California, certain writings, signs, signals, and sounds; that is, the defendant, without authorization, caused funds from a JPMorgan Chase credit card issued to a Company B employee to be transmitted by means of a wire communication to Plastiq in the amount of approximately \$21,000.00.

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

NOTICE OF FRAUD FORFEITURE

1. The allegations of Counts 1 and 2 of this Bill of Information are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

2. As a result of the offenses alleged in Counts 1 and 2, the defendant, **CHRISTY BARTHOLOMEW**, shall forfeit to the United States pursuant to Title 18, United States Code,

Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property real or personal which constitutes or is derived from proceeds traceable to said offenses.

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;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

DUANE A. EVANS
UNITED STATES ATTORNEY



EDWARD J. RIVERA
Assistant United States Attorney

New Orleans, Louisiana
April 14, 2021