

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

JAN -7 A 10 12

CAROL L. MICHEL
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION
FOR BANK FRAUD**

UNITED STATES OF AMERICA

*

CRIMINAL NO.

22-1

v.

*

SECTION:

SECT. TMAG.5

RODNEY ROUSSELL

*

VIOLATION: 18 U.S.C. § 1344(2)

* * *

The United States Attorney charges that:

COUNT 1

A. AT ALL MATERIAL TIMES HEREIN:

1. Company A maintained its operational headquarters in New Orleans, Louisiana.
2. On or about August 1, 2017, the defendant, **RODNEY ROUSSELL** ("**ROUSSELL**") began working for Company A.
3. Company A maintained account [REDACTED] at JP Morgan Chase Bank ("Chase Bank"). Company A electronically paid **ROUSSELL** from account [REDACTED]. As Company A's employee, **ROUSSELL** did not have access to Company A's Chase Bank account, and was not authorized to make payments of any kind using funds from the Chase Bank account.

X Fee USA
Process
X Dkt'd
Clerk/Dep
Doc. No.

4. **ROUSSELL** maintained business credit card [REDACTED] in the name of “Rodney J. Roussell, MC & Associates Management,” at Chase Bank [REDACTED].

5. Chase Bank was a financial institution whose accounts were insured by the Federal Deposit Insurance Corporation (“FDIC”) with branches in New Orleans, Louisiana.

B. THE SCHEME AND ARTIFICE TO DEFRAUD:

1. It was part of the scheme and artifice to defraud that beginning in or about April 2018, and continuing until in or about June 2018, **ROUSSELL** obtained approximately \$213,372.05 from Company A’s Chase Bank account by means of false and fraudulent promises, representations, and pretenses.

2. It was further part of the scheme and artifice to defraud that **ROUSSELL** utilized Chase Bank’s web portal and mobile banking app to transfer money from Company A’s account [REDACTED] to pay the balance of his Card [REDACTED].

C. THE BANK FRAUD:

From in or about April 2018, to in or about June 2018, in the Eastern District of Louisiana and elsewhere, the defendant, **RODNEY ROUSSELL**, knowingly executed, and attempted to execute, the scheme and artifice to defraud as described in Part B, to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of Chase Bank, by means of false and fraudulent pretenses, representations, and promises, when **ROUSSELL** transferred approximately \$213,372.05 from Company A’s Chase account to pay his credit card balances.

All in violation of Title 18, United States Code, Section 1344(2).

NOTICE OF FORFEITURE

1. The allegations of Count 1 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 offense alleged in Count 1, defendant, **RODNEY ROUSSELL**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(2)(A), any property constituting or derived from, proceeds obtained, directly or indirectly, as a result of such violation.

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, 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

A handwritten signature in black ink, appearing to read 'B. Klebba', written over a horizontal line.

BRIAN M. KLEBBA
K. PAIGE O'HALE
Assistant United States Attorneys

New Orleans, Louisiana
January 7, 2022