

U.S. DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA  
2022 APR 19 P 3:36  
CAROL L. HUGHES

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

BILL OF INFORMATION FOR WIRE FRAUD

**22-00068**

UNITED STATES OF AMERICA

\*

CRIMINAL NO.:

v.

\*

SECTION:

**SECT. RMAG. 1**

KATIE LAROCHE

\*

VIOLATION: 18 U.S.C. § 1343

\* \* \*

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. The defendant, **KATIE LAROCHE** (“**LAROCHE**”), resided in or around New Orleans, Louisiana, which is in the Eastern District of Louisiana.
2. **LAROCHE** was a financial manager, who handled financial transactions for her clients.
3. From on or about February 5, 2015, continuing through the time of this Bill of Information, **LAROCHE** did business through Capital City Consulting Firm, an entity she created, owned, and operated.

Fee \_\_\_\_\_  
 Process \_\_\_\_\_  
 Dktd \_\_\_\_\_  
 \_\_\_\_\_ CtRmDep \_\_\_\_\_  
 \_\_\_\_\_ Doc.No. \_\_\_\_\_

4. Victim 1 was a client of **LAROCHE**, who resided in or around New Orleans, Louisiana, which is in the Eastern District of Louisiana.

5. **LAROCHE** and Victim 1 entered into an agreement through which **LAROCHE** and Capital City Consulting Firm were responsible for bookkeeping, accounting, and other financial duties for Victim 1 and Victim 1's businesses. In that agreement, Victim 1 agreed to pay **LAROCHE** fees of approximately \$1,000 per month through Capital City Consulting Firm.

6. Victim 1 maintained personal and business bank accounts at JPMorgan Chase Bank. **LAROCHE** had signature authority and access to Victim 1's bank accounts. Transactions in those accounts caused wire communications to be transmitted in interstate commerce.

7. **LAROCHE** maintained her own personal bank account at JPMorgan Chase Bank.

**B. THE SCHEME AND ARTIFICE TO DEFRAUD:**

Beginning on or about February 5, 2015, and continuing until at least March 25, 2021, in the Eastern District of Louisiana and elsewhere, the defendant, **KATIE LAROCHE**, did knowingly devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, by using cash withdrawals, wire transfers, and checks to withdraw funds for **LAROCHE**'s own use from bank accounts owned by Victim 1 and Victim 1's businesses, while misleading Victim 1 and others by stating that the withdrawn funds were for Victim 1's tax payments or business expenses.

**C. MANNER AND MEANS:**

It was part of the scheme and artifice to defraud that **KATIE LAROCHE** made cash withdrawals from Victim 1's bank accounts and made notations on the withdrawal slips falsely indicating that the withdrawal was being used to pay Victim 1's federal taxes, when in fact **LAROCHE** used the funds for her own benefit.

It was further a part of the scheme and artifice to defraud that when Victim 1 asked **LAROCHE** about the status of Victim 1's tax obligations and payments, **LAROCHE** lied to Victim 1 to hide her scheme to defraud Victim 1.

It was further a part of the scheme and artifice to defraud that **LAROCHE** transferred funds from Victim 1's bank accounts to **LAROCHE**'s own bank accounts, and the amounts of those transfers far exceeded the \$1,000 monthly fees specified in **LAROCHE**'s agreement with Victim 1.

It was further a part of the scheme and artifice to defraud that during the course of **LAROCHE**'s employment by Victim 1, **LAROCHE** embezzled at least \$233,363.53 from Victim 1's bank accounts for **LAROCHE**'s own personal use by engaging in at least 130 transactions in the above-described manner.

**D. THE OFFENSE:**

On or about December 20, 2016, in the Eastern District of Louisiana and elsewhere, the defendant, **KATIE LAROCHE**, for the purpose of executing and attempting to execute the scheme and artifice to defraud set forth above, did transmit and cause to be transmitted, by means of wire communications in interstate commerce, certain writings, signs, signals, pictures and sounds, to wit: a withdrawal of approximately \$1,550 from Victim 1's account with the notation "IRS Payment Past Due Bal Money Order," in violation of Title 18, United States Code, Section 1343.

**NOTICE OF FORFEITURE**

1. The allegations of Count 1 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 Count 1, the defendant, **KATIE LAROCHE**, 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.

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New Orleans, Louisiana  
April 19, 2022