

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.
2018 AUG -3 P 1:41
WILLIAM W. BLEVINS
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR CONSPIRACY TO COMMIT
MAIL FRAUD, WIRE FRAUD, AND NOTICE OF FORFEITURE**

18 - 168

UNITED STATES OF AMERICA

*

CRIMINAL DOCKET NO.

v.

*

SECTION:

SECT. E MAG. 4

ALEX SAUNDERS

*

VIOLATION: 18 U.S.C. § 371

* * *

The United States Attorney charges that:

COUNT 1

(18 U.S.C. §371 - Conspiracy to commit mail fraud and wire fraud)

A. AT ALL TIMES MATERIAL HEREIN

1. The defendant, **ALEX SAUNDERS** (“SAUNDERS”), was a Jamaican national, residing in the Eastern District of Louisiana and attending Southern University of New Orleans on an athletic scholarship.

2. Indicted co-conspirator Debra Krom (“Krom”) was a United States citizen, residing in Wylie, Texas.

3. Indicted co-conspirator Andre Bowyer (“Bowyer”) was a Jamaican citizen, residing

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in Jamaica. Bowyer, and others known and unknown to the United States Attorney, participated in the operation of a Jamaican lottery scam.

4. As part of the lottery scam based in Jamaica, Bowyer recruited individuals such as **SAUNDERS** and Krom, both of whom resided in the United States, to open bank accounts in the United States.

5. Bowyer directed **SAUNDERS**, Krom, and others known and unknown to the United States Attorney, to open or use these accounts for the purpose of depositing money from victims of the lottery scam and sending the money to one of Bowyer's bank accounts in Jamaica.

6. **SAUNDERS** maintained bank accounts in New Orleans, Louisiana, at Capital One, N.A. ending in 7947 and JPMorgan Chase ending in 0398.

7. Krom maintained bank accounts in or near Wylie, Texas, at Capital One, N.A. ending in 8634, 2336, and 0123, JPMorgan Chase ending in 5228, and Bank of America ending in 3750.

8. Bowyer maintained bank accounts in Jamaica at the National Commercial Bank ending in 9321, Jamaica National Building Society ending in 0613, and Bank of Nova Scotia ending in 0316.

9. D.U. was an older individual, approximately 63 years old, residing in Doland, South Dakota.

10. J.C. was an elderly individual, approximately 83 years old, residing in Tuscon, Arizona.

11. V.L. was an elderly individual, approximately 83 years old, residing in Fort Walton Beach, Florida.

B. THE SCHEME TO DEFRAUD

It was part of the scheme and artifice to defraud that, beginning at a time unknown but prior to August 2013, and continuing to in or around December 2015, Andre Bowyer, and co-conspirators known and unknown to the United States Attorney, with knowledge of the lottery scam, employed false representations and promises in order to fool elderly persons and persons suffering from diminished mental capacities into sending funds via United States mail, private mail carrier, or through an electronic transfer to SAUNDERS, Krom and other co-conspirators known and unknown to the United States Attorney, living in the United States. After receiving victims' funds through United States mail, private mail carrier, or through an electronic transfer, SAUNDERS, Krom, and other co-conspirators known and unknown to the United States Attorney, with knowledge that the money they received was obtained through false and fraudulent pretenses, did knowingly and intentionally transfer the stolen money to one of Bowyer's bank accounts in Jamaica.

C. THE CONSPIRACY

Beginning at a time unknown but prior to in or around August 2013, and continuing to in or around December 2015, in the Eastern District of Louisiana and elsewhere, the defendant, SAUNDERS, Krom, Bowyer, and others known and unknown to the United States Attorney, did knowingly and willfully combine, conspire, confederate, and agree:

1. To devise a scheme or artifice to defraud and obtain money by means of false or fraudulent pretenses, representations, or promises, in that SAUNDERS, Krom, and Bowyer, together with others, and for the purpose of executing the scheme and artifice to defraud as set forth in Section B, did knowingly cause elderly victims and victims with diminished mental

capacities to send money by United States mail and/or private or commercial carrier to SAUNDERS, Krom, and other co-conspirators known and unknown to the United States Attorney, in violation of Title 18, United States Code, Section 1341; and

2. To devise a scheme or artifice to defraud and obtain money by means of false or fraudulent pretenses, representations, or promises, in that SAUNDERS, Krom, and Bowyer, together with others and for the purpose of executing the scheme and artifice to defraud as set forth in Section B, did knowingly cause elderly victims and victims with diminished mental capacities to send money by means of wire in interstate or foreign commerce, any writings, signs, signals, pictures or sounds for the purpose of executing such scheme or artifice to defraud, in violation of Title 18, United States Code, Section 1343.

D. OVERT ACTS

In furtherance of the conspiracy and to further the objectives of the conspiracy, the defendant, SAUNDERS, Bowyer, Krom, and others known and unknown to the United States Attorney, committed the following overt acts:

Victim D.U.

1. On or about February 18, 2014, an unknown Jamaican co-conspirator phoned victim D.U. and told him that D.U. had won the Publisher's Clearing House ("PCH") sweepstakes but would need to pay taxes on the money in order to redeem the winnings.

2. Based on this information, on or about February 18, 2014, victim D.U. wired approximately \$25,000 from D.U.'s Wells Fargo bank account in Doland, South Dakota, to Krom's Chase bank account ending in 5228.

3. On or about February 20, 2014, Krom wired approximately \$25,235 to Bowyer's bank account at Bank of Nova Scotia, ending in 0316.

Victim J.C.

4. At a time unknown, but prior to November 22, 2014, J.C. received a phone call from an unknown number telling J.C. that J.C. had won a sweepstakes and needed to withdraw approximately \$9,000 from J.C.'s JPMorgan Chase account and electronically transfer it to SAUNDERS's JPMorgan Chase account in order to claim the winnings.

5. On or about November 24, 2014, approximately \$9,000 posted to SAUNDERS's JPMorgan Chase account in New Orleans, Louisiana, ending in 0398. On that same date, SAUNDERS initiated an international wire transfer of approximately \$8,060 to Bowyer's National Commercial Bank in Jamaica, ending in 9231.

Victim V.L.

6. At a time unknown, but prior to on or about March 30, 2015, Bowyer instructed SAUNDERS that victim V.L. would be sending approximately \$3,500 in United States currency to SAUNDERS's address in New Orleans, Louisiana.

7. On or about March 30, 2015, an unknown individual calling from a Jamaican area code, instructed V.L. to mail United States currency through the United States mail containing a check payable to cash for approximately \$3,500 to SAUNDERS's address, in New Orleans, Louisiana. The caller informed victim V.L. that V.L. had won the PCH sweepstakes and had to pay this amount to claim the winnings. Acting upon these instructions, V.L. mailed a check payable to cash for approximately \$3,500 to SAUNDERS's address, in New Orleans, Louisiana.

8. On or about March 31, 2015, **SAUNDERS** received the package from V.L., containing approximately \$3,500 in cash.

9. On or about March 31, 2015, **SAUNDERS** deposited approximately \$5,700 into a Capital One, N.A. checking account ending in 7947. The \$5,700 included the \$3,500 from V.L. as well as other cash deposits.

10. On or about April 1, 2015, **SAUNDERS** initiated an international wire transfer of approximately \$5,700 to a Jamaican National Building Society bank account in Jamaica ending in 0613, belonging to Bowyer.

11. At a time unknown, but prior to on or about April 3, 2015, an unknown individual calling from a Jamaican area code, informed victim V.L. that V.L. had to send additional money to A.S. to claim the PCH winnings. On or about April 6, 2015, V.L. sent approximately \$6,000 in United States currency to **SAUNDERS**'s address in New Orleans, Louisiana, via United States mail.

12. On or about April 9, 2015, **SAUNDERS** deposited approximately \$3,880 in cash into his Capital One Bank account ending in 7947.

13. On or about April 9, 2015, **SAUNDERS** initiated an international wire transfer of approximately \$5,540 to a Jamaican National Building Society bank account in Jamaica ending in 0613, belonging to Bowyer.

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

NOTICE OF 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, 1341, 1343 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, **ALEX SAUNDERS**, 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 violations of Title 18, United States Code, Sections 371, 1341 and 1343.

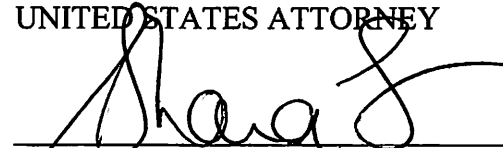
3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- 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 1341, 1343 and 981(a)(1)(C),
made applicable through Title 28, United States Code, Section 2461(c).

DUANE A. EVANS
UNITED STATES ATTORNEY



SHARAN E. LIEBERMAN
Assistant United States Attorney

New Orleans, Louisiana
August 3, 2018

No. _____

United States District Court

FOR THE

EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

vs.

ALEX SAUNDERS

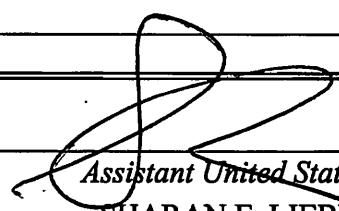
BILL OF INFORMATION
FOR CONSPIRACY TO COMMIT
MAIL FRAUD AND WIRE FRAUD

Violation(s): 18 U.S.C. § 371

Filed _____, 20 18

_____, Clerk.

By _____, Deputy



Assistant United States Attorney

SHARAN E. LIEBERMAN

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: INFORMATION INDICTMENT

Matter Sealed: Juvenile Other than Juvenile
 Pre-Indictment Plea Superseding Defendant Added
 Indictment Charges/Counts Added
 Information

Name of District Court, and/or Judge/Magistrate Location (City)
 UNITED STATES DISTRICT COURT EASTERN
 DISTRICT OF LOUISIANA Divisional Office

Name and Office of Person Furnishing Information on THIS FORM D. Mitchum
 U.S. Atty Other U.S. Agency
 Phone No. (504) 680-3034
 Name of Asst. U.S. Attorney (if assigned) Sharan E. Lieberman

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
SA Travis Patterson, United States Secret Service

person is awaiting trial in another Federal or State Court (give name of court)

this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:
 U.S. Atty Defense

this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.

MAG. JUDGE CASE NO.

Place of offense Orleans Parish County

CASE NO. 18-168
 USA vs. SECT. E MAG. 4
 Defendant: Alex Saunders
 Address: Harahan, LA 70123

Interpreter Required Dialect: _____

Birth Date 1993 Male Female Alien (if applicable)

Social Security Number xxx-xx-n/a

DEFENDANT

Issue: Warrant Summons

Location Status:
 Arrest Date _____ or Date Transferred to Federal Custody _____

Currently in Federal Custody
 Currently in State Custody
 Writ Required
 Currently on bond
 Fugitive

Defense Counsel (if any): Wayne Mancuso
 FPD CJA RET'D
 Appointed on Target Letter

This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 1 (for this defendant only)

Offense Level (1, 3, 4)	Title & Section/ (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Count(s)
4	18 USC § 371	Conspiracy to commit mail fraud	1

NO MAGISTRATE PAPERS WERE FOUND

For

NAME: ALEX SAUNDERS

Initials: PLH