

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**UNITED STATES OF AMERICA**

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**CRIMINAL NO. 15-94****v.**

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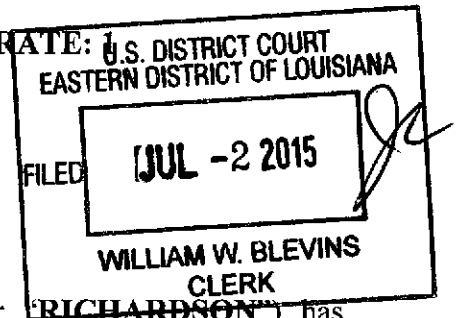
**SECTION: "A"****THADDEUS RICHARDSON**

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**MAGISTRATE: U.S. DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

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**FACTUAL BASIS**



The defendant, **THADDEUS RICHARDSON**, (hereinafter "**RICHARDSON**") has indicated that he intends to plead guilty as charged to all of the counts in the indictment pending against him, including Count One, that is, conspiracy to defraud the United States and to commit theft of public money and mail fraud, in violation of 18 U.S.C. § 371; Counts Ten through Sixteen, that is, theft of public money, in violation of 18 U.S.C. § 641; and conspiracy to commit money laundering, mail fraud and theft of public money, in violation of Title 18, United States Code, Section 1956(h).

This Factual Basis does not attempt to set forth all of the facts known to the United States at this time. The limited purpose of this Factual Basis is to demonstrate that there exists a sufficient legal basis for **RICHARDSON**'s guilty plea. By their signatures below, the parties expressly agree that there is a factual basis for the guilty plea that the defendant will tender. The parties also agree that this Factual Basis may, but need not, be used by the United States Probation Office and the Court in determining the applicable advisory guideline range under the United States Sentencing Guidelines or the appropriate sentence under 18 U.S.C. § 3553(a).

The United States and **RICHARDSON** do hereby stipulate and agree that the allegations in the indictment and the following facts are true and correct and that, should this matter have

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

proceeded to trial, the government would have proven them beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible and documentary exhibits.

At all times material to the indictment, defendant **RICHARDSON** resided in Tangipahoa Parish, which is within the Eastern District of Louisiana.

At all times material to the indictment, the Internal Revenue Service ("IRS") was an agency of the United States Department of the Treasury responsible for administering the tax laws of the United States and collecting taxes owed to the United States.

At all times material to the indictment, a "means of identification" was any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, including a name, signature, Social Security number, or date of birth.

At all times material to the indictment, a check casher was a person that accepted checks in return for currency or a combination of currency and other monetary instruments, in an amount greater than \$1,000 for any person on any day in one or more transactions.

Beginning in approximately 2010 and continuing through at least ~~April 10, 2015~~, in the Eastern District of Louisiana and elsewhere, defendants COREY LEWIS, ANGELA CHANEY, **RICHARDSON**, CEDRICK MITCHELL, CRAIG LEWIS, BRAD LEWIS, MARTIN JACKSON, SR. and others, unlawfully, voluntarily, intentionally, and knowingly did conspire, combine, confederate, and agree together and with each other:

- a. to defraud the United States for the purpose of impeding, impairing, obstructing, and defeating the lawful government functions of the IRS in the ascertainment, computation, assessment, and collection of federal income taxes;
- b. to commit offenses against the United States, to wit, mail fraud, in violation of Title 18, United States Code, Sections 1341 and theft of public money, in violation of Title 18, United States Code, Section 641; and

- c. to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity that is, mail fraud, in violation of Title 18, United States Code, Sections 1341, and theft of public money, in violation of Title 18, United States Code, Section 641, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

Members of the conspiracy, including COREY LEWIS, ANGELA CHANEY, CEDRICK MITCHELL, CRAIG LEWIS, and BRAD LEWIS, filed false federal income tax returns using the means of identification of other individuals. These false returns claimed large refunds, which members of the conspiracy directed be sent in the form of U.S. Treasury checks via U.S. Mail to addresses in the Eastern District of Louisiana.

It was further part of the conspiracy that COREY LEWIS, ANGELA CHANEY, CEDRICK MITCHELL, CRAIG LEWIS, and BRAD LEWIS converted fraudulently-obtained income tax refund checks into cash, including by presenting them to check cashers who they knew would not ask for proof of the payees' identity and who would accept false, fictitious, and fraudulent forms of identification purported to belong to the payee.

Defendants **RICHARDSON** and MARTIN JACKSON, SR. deposited and caused to be deposited fraudulently-obtained U.S. Treasury checks into bank accounts under their control, and

then provided proceeds of fraudulently obtained tax refunds to their co-conspirators in cash, while retaining a portion of the proceeds for themselves.

Defendants COREY LEWIS, ANGELA CHANEY, CEDRICK MITCHELL, CRAIG LEWIS, BRAD LEWIS, and others conducted financial transactions involving funds derived from fraudulent income tax refunds, including by negotiating checks provided to them by defendants **RICHARDSON** and MARTIN JACKSON, SR.

Regions Bank ("Regions") was a financial institution with banking locations within the Eastern District of Louisiana, the deposits of which were insured by the Federal Deposit Insurance Corporation. Defendant **RICHARDSON** owned and controlled Regions bank account #\*\*\*7571, which was opened on or about August 13, 2010, into which he deposited fraudulently-obtained and falsely-endorsed Treasury checks.

On or about the dates listed below, **RICHARDSON** caused money of the United States, to wit, a federal income tax refund as described below, to be deposited into bank accounts under his control, which money he knew he was not entitled to receive:

<b>Date</b>	<b>Taxpayer</b>	<b>Method of Payment</b>	<b>Amount</b>
03/15/2011	C.M.	Treasury check #***1907	\$3138.09
04/05/2011	C.M.	Treasury check #***8309	\$1757.36
10/19/2011	K.R.	Treasury check #***4321	\$3450.00
11/07/2011	K.R.	Treasury check #***2292	\$3438.37
12/28/2011	K.R.	Treasury check #***2222	\$3443.00
01/04/2012	L.H.	Treasury check #***1057	\$5446.32
01/09/2012	L.H.	Treasury check #***1056	\$5061.39

On or about the dates listed below, defendant **RICHARDSON** conducted, among others, the following financial transactions:

<b>Date</b>	<b>Description of Transaction</b>
03/16/2011	Defendant <b>THADDEUS RICHARDSON</b> wrote business check #1209 in the amount of \$4500.00 payable to CRAIG LEWIS.
03/28/2011	Defendant <b>THADDEUS RICHARDSON</b> wrote business check #1226 in the amount of \$3200.00 payable to BRAD LEWIS.


04/04/2011	Defendant <b>THADDEUS RICHARDSON</b> wrote business check #1229 in the amount of \$5375.00 payable to CRAIG LEWIS.
04/19/2011	Defendant <b>THADDEUS RICHARDSON</b> wrote business check #1252 in the amount of \$4821.00 payable to ANGELA CHANEY.
05/05/2011	Defendant <b>THADDEUS RICHARDSON</b> wrote business check #1281 in the amount of \$2900.00 payable to CRAIG LEWIS.
05/09/2011	Defendant <b>THADDEUS RICHARDSON</b> wrote business check #1289 in the amount of \$5401.00 payable to CEDRICK MITCHELL.
06/02/2011	Defendant <b>THADDEUS RICHARDSON</b> wrote business check #1315 in the amount of \$6900.00 payable to CRAIG LEWIS.
10/19/2011	Defendant <b>THADDEUS RICHARDSON</b> wrote business check #1489 in the amount of \$2594.00 payable to COREY LEWIS.
11/07/2011	Defendant <b>THADDEUS RICHARDSON</b> wrote business check #1514 in the amount of \$2684.00 payable to COREY LEWIS.
01/04/2012	Defendant <b>THADDEUS RICHARDSON</b> wrote business check #1685 in the amount of \$5040.00 payable to CEDRICK MITCHELL.

Various records, including income tax returns, IRS filing records, bank records, audio and video recordings, and documents and tangible objects would be introduced at trial to prove the facts as set forth above. In addition, the testimony of employees and agents of the Internal Revenue Service, and other competent witnesses would be introduced at trial to prove the facts set forth above.


**APPROVED AND AGREED TO:**

  
 DALL KAMMER  
 Assistant United States Attorney

7/2/15  
 Date

  
 JOSEPH P. RASPANTI  
 Bar Roll No.  
 Attorneys for Defendant Jackson

7-2-15  
 Date

  
 THADDEUS RICHARDSON  
 Defendant

7-2-15  
 Date