

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

UNITED STATES OF AMERICA * **CRIMINAL NO. 15-085**

v. * **SECTION: J**

DELORES TROUILLET *

* * *

FACTUAL BASIS

The defendant, **DELORES TROUILLET**, (hereinafter, the “defendant” or “**TROUILLET**”), has agreed to plead guilty as charged to the Bill of Information now pending against her, charging her with wire fraud, in violation of Title 18, United States Code, Sections 1343 and 2. Both the Government and the defendant, **DELORES TROUILLET**, do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crimes to which the defendant is pleading guilty. The Government and the defendant further stipulate that the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant:

The Government would show that Company A was a carpet, flooring, and drapery sales and installation company headquartered in Gretna, Louisiana, within the Eastern District of

Louisiana. Company A maintained several bank accounts at JPMorgan Chase Bank, NA (“Chase”), including accounts numbered XXXXXX349 (“Operating Account”) and XXXXXX593 (“Payroll Account”).

Evidence, including admissible documents and testimony, would be introduced to establish that in about February 1999, and continuing until in or about February 2014, **TROUILLET** was employed at Company A. **TROUILLET** was responsible for, among other things, providing bookkeeping services for Company A. Among **TROUILLET’S** duties and responsibilities was overseeing Company A’s finances and accounts, including reconciling accounts payables and receivables. **TROUILLET** had access to Company A’s bank accounts, including the ability to conduct wire transfers from Company A’s bank accounts.

The Government would introduce documentary evidence, as well as the testimony of United States Secret Service Special Agent Joshua Kocher and Jefferson Parish Sheriff’s Office Detective Steven Trapani, that beginning not later than about 2006, and continuing through about February 2014, **TROUILLET** embezzled approximately \$208,082.03 from Company A, without Company A’s knowledge or authorization, in addition to receiving her regular salary. **TROUILLET** embezzled funds in five different ways.

First, **TROUILLET** generated checks in Company A’s name and drawn on Company A’s bank accounts, to pay her personal expenses without Company A’s authorization or knowledge. To obtain the requisite number of signatures on checks, **TROUILLET** would contact the assistant book keeper for Company A, who had signature authority on all business accounts and ask her to sign blank checks that would be used to pay vendors. **TROUILLET** would then use the checks for her own personal gain and manipulate the books to show the vendor had been paid.

To disguise her fraudulent conduct, **TROUILLET** turned off the “return check” feature at Chase so that checks made out to her would not be returned to Company A. **TROUILLET** also altered how the checks were coded in Company A’s internal record keeping system to avoid detection. To make the payments appear legitimate, **TROUILLET** listed in Company A’s internal records checks she made out to herself and deposited into her personal bank account as being made payable to entities with whom Company A engaged in business or frequently paid funds, such as “State Farm Insurance” and “IRS.”

TROUILLET used the unauthorized funds to pay personal bills and expenses she incurred. Specifically, **TROUILLET** used Company A’s funds to repay her personal expenses by causing approximately thirty-one (31) separate checks to be issued from Company A’s checking accounts between November 2005 and February 2014. Documents and exhibits would be offered and introduced into evidence to prove that the **TROUILLET’S** actions directly led to the issuance of the checks. In total, **TROUILLET** embezzled approximately \$127,942.15 in this manner.

Competent testimony and admissible exhibits would be introduced to prove that one of the occasions that **DELORES TROUILLET** took, without authorization, money from the checking account of Company A and applied it to her own use occurred on or about April 12, 2013, when, in the Eastern District of Louisiana, the defendant made check number 40946 from Company A’s Chase checking account payable to “ASI Lloyds,” in the amount of approximately \$2,841.00, for the purpose of paying **TROUILLET’S** homeowner’s insurance premium, without Company A’s knowledge or authorization. **TROUILLET** then caused the check to be sent to the bill payment center of ASI Lloyds, outside of the State of Louisiana, via United States Mail.

Second, the Government would introduce documentary evidence, as well as the testimony of United States Secret Service Special Agent Joshua Kocher, that **TROUILLET** paid for daily personal expenses and items using Company A's corporate American Express credit cards ("credit card"), with card numbers XXXXXXXXXXXX51021, XXXXXXXXXXXX51047, XXXXXXXXXXXX54009, and XXXXXXXXXXXX51013, and a Chase business debit card ("debit cards") without Company A's knowledge or authorization. Specifically, between about October 30, 2007, and January 22, 2014, **TROUILLET** used the credit cards approximately 303 times and the debit card approximately 12 times to pay for personal expenses at retailers such as Target, Walgreens, and Best Buy, among others. She also made numerous purchases via the Internet for such personal items as airline tickets aboard Continental Airlines (\$960.09 on October 22, 2010), tickets to live music concerts (\$1,671.63 on July 16, 2011, to "Vivid Seats" to see Lady Gaga), and tickets to live theater performances (\$1,275.84 on September 30, 2012, to see Mary Poppins) using the credit cards and debit card. To disguise her conduct, **TROUILLET** would download via the Internet an electronic copy of the monthly credit card statement, load it into a spreadsheet program, and remove her unauthorized items. **TROUILLET** would then provide the spreadsheet detailing the credit card purchases—absent her unauthorized purchases—to her supervisor to approve and code to Company A's general ledger. In total, **TROUILLET** embezzled approximately \$56,794.38 in this manner between not later than October 2007 and January 2014.

The Government would further establish, through the testimony of representatives of American Express, that each unauthorized use of Company A's credit card, including those detailed above, caused certain writings, signs, signals, and sounds to be sent from their respective points of use within the Eastern District of Louisiana to a data center outside the state of

Louisiana, authorizing the defendant, **DELORES TROUILLET**, to obtain money and property without the knowledge or authorization of Company A.

Third, the Government would introduce documentary evidence, as well as the testimony of Special Agent Joshua Kocher, that **TROUILLET** added money to her biweekly payroll in excess of her agreed upon salary, without Company A's knowledge or authorization on a regular basis between January 2006 and February 2014. In total, **TROUILLET** embezzled approximately \$18,376.54 in this manner between about January 2006 and February 2014.

Fourth, the Government would introduce documentary evidence, as well as the testimony of representatives of Company A and Special Agent Joshua Kocher, that **TROUILLET** caused payments to be made from Company A's bank account on a regular basis to pay her personal cellular phone bill at AT&T without Company A's authorization or knowledge. Specifically, **TROUILLET** arranged for her personal cellular phone bill to be deducted directly from Company A's bank account approximately twenty-nine (29) times between May 2012 and March 2013. In total, **TROUILLET** embezzled approximately \$2,634.60 in this manner.

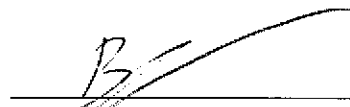
Fifth, the Government would introduce documentary evidence, as well as the testimony of representatives of Company A and Special Agent Joshua Kocher, that **TROUILLET** did not deduct her personal portion of her regular health insurance payments from her salary. **TROUILLET** did this without Company A's knowledge or authorization. **TROUILLET** did not deduct her portion of her health insurance costs from her salary on approximately fourteen (14) times between November 20, 2012, and February 2, 2014. In total, **TROUILLET** embezzle approximately \$2,334.36 in this manner.

The above facts come from an investigation conducted by, and would be proven at trial

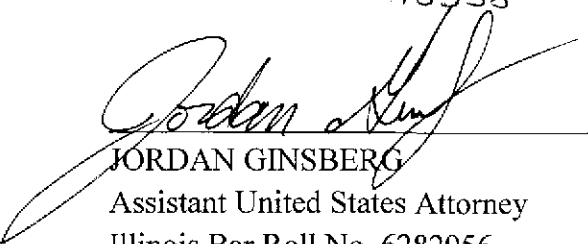
by credible testimony from, Special Agents from the United States Secret Service, Detectives with the Jefferson Parish Sheriff's Office, representatives of Company A, employees of Chase Bank, American Express, and AT&T, business records from Chase Bank, American Express, and AT&T, documents and tangible exhibits in the custody of the United States Secret Service and the Jefferson Parish Sheriff's Office, and the statements of the defendant, **DELORES TROUILLET**.



DELORES TROUILLET
Defendant



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