

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

BILL OF INFORMATION FOR FORGERY

UNITED STATES OF AMERICA \* CRIMINAL DOCKET NO.  
v. \* SECTION:  
NICOLE NICHOLAS \* VIOLATION: 18 U.S.C. § 513(a)  
\* \* \*

The United States Attorney charges:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. Private school "A" is located in Mandeville, Louisiana and provides educational instruction from preschool through grade school.
2. Company "A" designs and manufactures turbine starters and starting systems, as well as performs ring gear conversions and rotary screw air compressor applications in the industrial and commercial machinery industry.
3. Company "A" had bank accounts at J.P. Morgan Chase Bank. J.P. Morgan Chase & Co. is a legal entity headquartered in New York, New York and provides services to customers and clients under the Chase and J.P. Morgan brands. Chase operates in interstate commerce by providing services such as online banking, ATM, credit cards, and retail checking

to customers, the deposits of which are insured by the Federal Deposit Insurance Company.

4. The defendant, **NICOLE NICHOLAS**, (hereinafter referred to as **NICHOLAS**) was employed by Company "A" from 1999 until June 22, 2010. **NICHOLAS** was in charge of the accounting, banking and finances, including the accounts payable, of the business conducted by Company "A."

**B. THE FORGERY:**

On or about May 22, 2009, in the Eastern District of Louisiana, defendant **NICOLE NICHOLAS** did knowingly and intentionally possess a counterfeit security of an organization, as listed below, with the intent to deceive another person or organization:

CHECK	PAYEE	DRAWEE BANK	AMOUNT	ACCOUNT HOLDER
#15451	PRIVATE SCHOOL "A"	CHASE	\$3,398.09	COMPANY "A"

All in violation of Title 18, United States Code, Section 513(a).

## NOTICE OF FORFEITURE

1. The allegations contained in Count 1 of this Bill of Information are hereby re-alleged 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 513 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offense alleged in Count 1, the defendant, **NICHOLAS**, shall forfeit to the United States pursuant to 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, Section 513.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this notice of forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or sold 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;

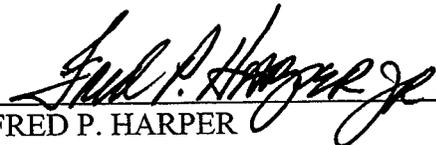
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

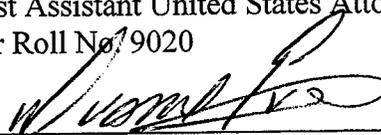
All in violation of Title 18, United States Code, Section 982.



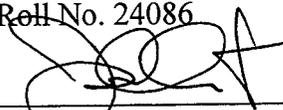
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New Orleans, Louisiana  
June 13, 2013