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EAST DISTRICT OF LA

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

BILL OF INFORMATION FOR MONEY LAUNDERING AND MAKING
AND SUBSCRIBING A FALSE FEDERAL INCOME TAX RETURN

UNITED STATES OF AMERICA

v.

JABARI RAGAS

*

CRIMINAL NO.

13-285

*

SECTION:

SECT. 1 MAG. 4

*

VIOLATION: 18 U.S.C. §1957

26 U.S.C. §7206(1)

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The United States Attorney charges that:

COUNT 1
MONEY LAUNDERING

A. AT ALL TIMES MATERIAL HEREIN:

1. The defendant, **JABARI RAGAS**, was a resident of New Orleans, Louisiana, a location within the Eastern District of Louisiana.
2. **JABARI RAGAS** was employed by Ameriprise Financial Services, Inc. ("Ameriprise") as a registered broker and investment adviser.

3. Ameriprise is a large financial services company headquartered in Minneapolis, Minnesota, which provides wealth management, asset management, and insurance to clients and has locations in the Eastern District of Louisiana.
 4. In early 2006, a client of **JABARI RAGAS** indicated to him that he wished to open a Simplified Employee Pension (“SEP”) account to allow him to contribute towards his retirement.
 5. The client made a contribution to the account on February 10, 2006 in the amount of \$43,000, a contribution on April 19, 2007 in the amount of \$42,000, and a final contribution on October 16, 2009, in the amount of \$20,580.
 6. Without authorization and unbeknownst to the client, **JABARI RAGAS** began moving money from the Ameriprise SEP account, into an account ending in X0686 that was controlled by him. On June 26, 2009, **JABARI RAGAS** used an interstate wire to transfer \$40,000 from this Ameriprise SEP account to his personal bank account ending in X0686.
 7. The financial institution that received the funds from Ameriprise had its deposits insured by the Federal Deposit Insurance Corporation.
 8. The client later checked the account balance and inquired as to why the account was lower than it should have been. **JABARI RAGAS** falsely told the client that the funds had been transferred to an investment account of a different financial institution located in Texas. **JABARI RAGAS** was then asked by the client to supply him with written account statements showing the balance, account number, and institution name.
 9. **JABARI RAGAS** then supplied the client with a fraudulent account statement for an account that did not exist, along with a fraudulent balance.
- B.** On or about the below-listed date, in the Eastern District of Louisiana and elsewhere, the defendant, **JABARI RAGAS**, did knowingly engage and attempt to engage in a monetary

transaction affecting interstate commerce, with the deposits of criminally derived property, that is, the below-listed transaction involving **JABARI RAGAS**, which exceeded \$10,000 into a bank account controlled by **JABARI RAGAS**, said funds being derived from the proceeds of a specified unlawful activity, that is, wire fraud in violation of Title 18, United States Code, Section 1343.

COUNT	BANK ACCOUNT FUNDS WERE TAKEN FROM	AMOUNT	BANK ACCOUNT WHERE FUNDS THEN DEPOSITED	DATE
1	Ragas Account X0686	\$20,000 Cashier's Check payable to Ragas	Ragas Account X6565	06/29/09

COUNT 2 (Tax Year 2007)

MAKING AND SUBSCRIBING A FALSE FEDERAL INCOME TAX RETURN

On or about the 12th day of October, 2008, in the Eastern District of Louisiana, the defendant, **JABARI RAGAS**, a resident of New Orleans, Louisiana, did willfully make and subscribe a 2007 U.S. Individual Income Tax Return (Form 1040), which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which said income tax return the defendant **JABARI RAGAS** did not believe to be true and correct as to every material matter in that the defendant **JABARI RAGAS** did not report approximately \$288,000 in income; in violation of Title 26, United States Code, Section 7206(1).

NOTICE OF MONEY LAUNDERING 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 982 and 1957.

2. As a result of the offenses, alleged in Count 1, the defendant, **JABARI RAGAS**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 982, all property real or personal, involved in the aforesaid offenses and all property traceable to such property, in violation of Title 18, United States Code, Section 1957:

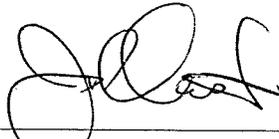
3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant(s):

- 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 18, United States Code, Section 982(b)(1) to seek forfeiture of any other property of said defendant.

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

KENNETH ALLEN POLITE, JR.
UNITED STATES ATTORNEY



JON MAESTRI
Assistant United States Attorney
Louisiana Bar Roll No. 24838

New Orleans, Louisiana
December 20, 2013