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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

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BILL OF INFORMATION FOR
MAIL FRAUD AND WIRE FRAUD

15-97

UNITED STATES OF AMERICA	*	**CRIMINAL ACTION NO.**
v.	*	**SECTION: SECT. N MAG 4**
HOWARD GREGOR	*	**VIOLATIONS: 18 U.S.C. § 1341** **18 U.S.C. § 1343**

* * *

The United States Attorney charges that:

COUNT 1: MAIL FRAUD

A. AT ALL MATERIAL TIMES HEREIN:

1. From on or about November 3, 2008 through on or about April 19, 2013, **HOWARD GREGOR** ("**GREGOR**") worked at Company A as an Account Manager.

2. Company A creates modular plastic belting products and conveying technologies used for general food processing and packaging. Company A conducts business nationwide, but has its headquarters in Harahan, Louisiana, within the Eastern District of Louisiana.

3. Although Company A is based in Harahan, many of its Account Managers live out-of-state. While **GREGOR** worked at Company A, he lived in Bakersfield, California and Attica, Ohio.

4. Because the Account Managers, including **GREGOR,** travelled frequently for business, Company A reimbursed its Account Managers for out-of-pocket business related expenses. Company A's reimbursement policy required **GREGOR** to submit his expenses via email, facsimile, or first-class mail through the expense account reporting system.

5. While employed at Company A, **GREGOR** submitted his travel expense reports and underlying documentation such as receipts, invoices, and bills by email or by mail. He submitted these expense reports for the purpose of causing Company A to transfer money into his possession.

6. In addition to reimbursing its employees for business travel expenses, Company A also issued its Account Managers, including **GREGOR**, a corporate American Express credit card. Company A allowed its authorized employees to use the card for non-cash business expenses, including airfare.

7. During the time **GREGOR** worked for Company A, he submitted fake and fraudulent travel expenses, with falsified supporting invoices via first class mail and through electronic means to Company A and for reimbursement of costs that he did not actually incur. In total, **GREGOR** submitted approximately $284,258 of false and fictitious expenses.

8. Additionally, **GREGOR** used his American Express corporate credit card to charge approximately $9,714 of non-business related expenses to Company A.

B. THE SCHEME TO DEFRAUD:

Beginning on or about November 3, 2008 and continuing through on or about April 19, 2013, in the Eastern District of Louisiana and elsewhere, the defendant, **GREGOR**, did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and to obtain money and property from Company A, by means of false and fraudulent representations, pretenses and promises. Specifically, **GREGOR** devised a scheme of submitting false and fraudulent requests for reimbursement based upon fictitious receipts and fabricated documentation. To execute the scheme he would create false invoices and lie on his travel expense reports to create supporting documentation for non-existent travel expenses. He would then submit the fraudulent travel expense reports to Company A, causing Company A to reimburse him for expenses that he did not actually incur.

C. USE OF THE MAIL:

On numerous occasions from on or about November 3, 2008 through on or about April 19, 2013, in the Eastern District of Louisiana and elsewhere, the defendant **GREGOR**, for the purpose of executing and attempting to execute the scheme and artifice to defraud as described in Parts A and B, did knowingly and willfully cause to be delivered to Company A in Harahan, LA 70123, in the Eastern District of Louisiana, false and fictitious claims for travel reimbursement that he did not actually incur and these requests for travel reimbursement via United States Postal Service; all in violation of Title 18, United States Code, Section 1341.

COUNT 2: WIRE FRAUD

A. The allegations set forth in Part A of Count 1 are hereby incorporated and realleged herein.

B. THE SCHEME TO DEFRAUD:

Beginning on or about November 3, 2008 and continuing through on or about April 19, 2013, in the Eastern District of Louisiana and elsewhere, the defendant, **GREGOR**, did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and to obtain money and property from Company A, by means of false and fraudulent representations, pretenses and promises. Specifically, **GREGOR** devised a scheme of submitting false and fraudulent requests for reimbursement based upon fictitious receipts and fabricated documentation. To execute the scheme, he would create false invoices and lie on his travel expense reports to create supporting documentation for non-existent travel expenses. He would then submit the fraudulent travel expense reports to Company A, causing Company A to reimburse him for expenses that he did not actually incur.

C. USE OF THE WIRE:

On numerous occasions between on or about November 3, 2008 through on or about April 19, 2013, in the Eastern District of Louisiana and elsewhere, the defendant, **GREGOR**, for the purpose of executing and attempting to execute the scheme and artifice to defraud as described in Parts A and B of Count 2, did knowingly and willfully cause to be transmitted in interstate commerce certain writings, signs, signals, and sounds by means of wire communications when the defendant, **GREGOR**, used his personal email account to obtain property, goods, services, and money, which caused a signal, sign, writing, and sound to be transmitted to a data center from Indiana or Ohio, to Harahan, Louisiana allowing the defendant,

GREGOR, to receive the property, goods, services, and money that he was not entitled to receive compensation for; all in violation of Title 18, United States Code, Section 1343.

NOTICE OF FORFEITURE

1. The allegations of Counts 1 and 2 of this Bill of Information are 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 1341 and 1343.

2. As a result of the offenses, alleged in Counts 1 and 2, the defendant, **HOWARD GREGOR**, shall forfeit to the United States all property real or personal, constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of mail fraud, in violation of Title 18, United States Code, Section 1341, and wire fraud, in violation of Title 18, United States Code, Section 1343; all in violation of Title 18, United States Code, Section 982.

3. If any of the property described above as being 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 18, United States Code, Section 982(b)(1) and 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 982.

KENNETH ALLEN POLITE, JR.
United States Attorney

SHARAN E. LIEBERMAN
Assistant United States Attorney

New Orleans, Louisiana
April 15, 2015

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