

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

**UNITED STATES OF AMERICA**

\*

**CRIMINAL NO. 15-94**

**v.**

\*

**SECTION: "A"**

**CRAIG LEWIS**

\*

**MAGISTRATE: 1**

\* \* \*

**FACTUAL BASIS**

The defendant, **CRAIG LEWIS**, (hereinafter "**LEWIS**") has agreed to plead guilty as charged to Count One, that is, conspiracy to defraud the United States and to commit mail fraud and theft of public money, in violation of Title 18, United States Code, Section 371.

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 **LEWIS**'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 pursuant to the plea agreement. 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 defendant agrees not to object to any fact set forth below being used by the Court or the United States Probation Office to determine the applicable advisory guideline range or the appropriate sentence under 18 U.S.C. § 3553(a). The parties' agreement does not preclude either party from hereafter presenting the Court with additional facts which do not contradict facts to which the parties have agreed not to object and which are relevant to the Court's guideline computations, to the 18 U.S.C. § 3553 factors, or to the Court's overall sentencing decision.

The United States and **LEWIS** 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 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 **LEWIS** 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.

Baton Rouge Telco Federal Credit Union (“BR Telco”) was a financial institution with banking locations within the Eastern District of Louisiana, the deposits of which were insured by the National Credit Union Administration. Defendant **LEWIS** owned and controlled BR Telco bank account #\*\*\*3465, which was opened on or about March 10, 2010.

Beginning in approximately 2002 and continuing through at least April 10, 2015, in the Eastern District of Louisiana and elsewhere, defendants COREY LEWIS, ANGELA CHANEY, THADDEUS 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; and
- b. to commit offenses against the United States, to wit, mail fraud, in violation of Title 18, United States Code, Section 1341, and theft of public money, in violation of Title 18, United States Code, Section 641.

Defendant **LEWIS** and others devised and intended to devise a scheme to defraud and to obtain money and property by means of false pretenses, promises, and representations. It was part of the scheme to defraud that defendant **LEWIS** and others would and did obtain the means of identification of individuals, including their names and Social Security numbers.

It was further part of the scheme to defraud that defendant **LEWIS**, COREY LEWIS, ANGELA CHANEY, BRAD LEWIS, CEDRICK MITCHELL, and others would and did use these means of identification to prepare and file false federal income tax returns that fraudulently claimed large refunds.

It was further part of the scheme to defraud that defendant **LEWIS**, COREY LEWIS, ANGELA CHANEY, BRAD LEWIS, CEDRICK MITCHELL, and others would and did direct that refunds anticipated from false federal income tax returns be paid via U.S. Treasury check and mailed to addresses in Louisiana.

It was further part of the scheme to defraud that defendant **LEWIS** and others would and did cause Post Office Boxes to be opened and used to receive fraudulent tax refund checks. Defendant **LEWIS** opened Post Office Box 935, in Natalbany, LA, on or about January 19, 2010, and later caused it to be used in furtherance of the conspiracy.

It was further part of the scheme to defraud that **LEWIS** and others would and did falsely endorse, and cause to be falsely endorsed, fraudulently obtained U.S. Treasury checks.

It was further part of the scheme to defraud that **LEWIS**, COREY LEWIS, ANGELA CHANEY, BRAD LEWIS, CEDRICK MITCHELL, THADDEUS RICHARDSON, MARTIN JACKSON, SR. and others would and did cause fraudulently obtained U.S. Treasury checks to be converted to cash, including by depositing the checks into bank accounts; withdrawing the funds in cash; and writing checks payable to cash or to other members of the conspiracy.

Defendant **LEWIS** brought, and caused to be brought, fraudulently obtained tax refund checks to defendant THADDEUS RICHARDSON. Defendant THADDEUS RICHARDSON agreed with defendant **LEWIS** and others to convert the fraudulent tax refund checks into cash, less a fee that he charged for cashing the checks. The fees were typically negotiated at each transaction and represented a portion of the checks' face value. Defendant THADDEUS RICHARDSON provided defendant **LEWIS** with his portion of the fraud proceeds in cash or in the form of business checks drawn on RICHARDSON's business bank account, which defendant **LEWIS** then cashed or caused to be deposited into BR Telco bank account #\*\*\*3465.

It was further part of the scheme to defraud that **LEWIS**, COREY LEWIS, ANGELA CHANEY, BRAD LEWIS, CEDRICK MITCHELL, and others would and did conduct financial transactions involving funds derived from fraudulent income tax refunds, including by negotiating checks provided to them by defendant THADDEUS RICHARDSON.

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


<b>Date of Transaction</b>	<b>Description of Transaction</b>
03/16/2011	Defendant THADDEUS RICHARDSON wrote business check #1209 in the amount of \$4500.00 payable to CRAIG LEWIS.
03/16/2011	Defendant <b>CRAIG LEWIS</b> deposited business check #1209 in the amount of \$4500.00 payable to CRAIG LEWIS into BRTelco Acct#***3465.
04/04/2011	Defendant THADDEUS RICHARDSON wrote business check #1229 in the amount of \$5375.00 payable to CRAIG LEWIS.

04/05/2011	Defendant <b>CRAIG LEWIS</b> deposited business check #1229 in the amount of \$5375.00 payable to CRAIG LEWIS into BRTelco Acct#***3465.
05/05/2011	Defendant THADDEUS RICHARDSON wrote business check #1281 in the amount of \$2900.00 payable to CRAIG LEWIS.
05/10/2011	Defendant <b>CRAIG LEWIS</b> deposited business check #1281 in the amount of \$2900.00 payable to CRAIG LEWIS into BRTelco Acct#***3465.

The parties agree to recommend to the Court that the loss amount attributable to **LEWIS's** participation in Count One, based on the information known to the Government as of June 4, 2015, is greater than \$40,000 and less than \$80,000. There are no other agreements among the parties regarding sentencing factors in this case.

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:**

  
 \_\_\_\_\_  
 G. DALL KAMMER  
 Assistant United States Attorney

6/23/15  
 \_\_\_\_\_  
 Date

\_\_\_\_\_  
 GEORGE CHANEY, JR., Esq.  
 Bar Roll No.  
 Attorney for Defendant LEWIS

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 CRAIG LEWIS  
 Defendant

\_\_\_\_\_  
 Date