

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**INDICTMENT FOR MAIL FRAUD, AGGRAVATED IDENTITY THEFT,
AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA * CRIMINAL NO.
v. * SECTION:
RAVEN HUGHES * VIOLATIONS: 18 U.S.C. § 1028A
* 18 U.S.C. § 1341
* 18 U.S.C. § 2

* * *

The Grand Jury charges that:

COUNTS 1-4
(18 U.S.C. § 1341 – Mail Fraud)

A. AT ALL TIMES MATERIAL HEREIN:

1. The defendant, **RAVEN HUGHES** (hereinafter “**HUGHES**”), resided within the Eastern District of Louisiana. Beginning not later than June 1, 2012, **HUGHES** owned a residence located at 47274 Casey Road, Hammond, Louisiana 70401, within the Eastern District of Louisiana.

2. The Internal Revenue Service (“IRS”) was an agency of the United States Department of the Treasury that was responsible for enforcing and administering the tax laws of the United States, collecting taxes owed to the United States, and refunding to tax payers any

amounts paid in excess of the tax owed to the United States. The United States Department of the Treasury is a department of the United States. Federal tax refund payments issued by the Department of the Treasury, either in the form of checks or direct deposits, constitute “money” and “a thing of value” of the Department of the Treasury.

3. American Express was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

4. Baton Rouge Telco Federal Credit Union (BC Telco) was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

5. Regions Bank was a financial institution, the deposits of which were insured by the National Credit Union Administration.

6. **HUGHES** opened and maintained signature authority over the following bank accounts (collectively, “**HUGHES’S** bank accounts”):

Financial Institution	Name on Account	Account Number(s)
American Express	Raven Hughes	XXX-XXX697-1 XXX-XXX778-3
BC Telco FCU	Raven Hughes	XXXX250
Regions Bank	Raven Hughes	XXXXXX886

7. Not later than June 1, 2012, **HUGHES** resided at 47274 Casey Road, Hammond, Louisiana 70401, within the Eastern District of Louisiana.

8. **HUGHES** opened and received mail from the United States Postal Service at not fewer than four locations: (1) a UPS Store Box (Box 149) located in Hammond, Louisiana, within the Eastern District of Louisiana, on about January 11, 2011, (2) United States Post Office Box 705, located in Pine Grove, Louisiana, on about April 16, 2012, (3) United States Post

Office Box 48, located in Natalbany, Louisiana, within the Eastern District of Louisiana, on about June 1, 2012, and (4) **HUGHES'S** residence, 47274 Casey Road, Hammond, Louisiana 70401.

B. THE SCHEME TO DEFRAUD:

1. Beginning at a time unknown, and continuing until in or about March 2014, in the Eastern District of Louisiana and elsewhere, the defendant, **RAVEN HUGHES**, devised and intended to devise, a scheme and artifice to the Internal Revenue Service and the United States Department of the Treasury and obtain money and funds of the Internal Revenue Service and the United States Department of the Treasury by means of false and fraudulent promises, pretenses, and representations.

2. It was part of the scheme and artifice to defraud that beginning in about October 2009, **HUGHES** obtained the personal identification information, including the name and social security number, of not fewer than 103 individuals without their knowledge or consent and caused federal income tax returns to be filed in those individuals' names without their knowledge. Each tax return filed with the IRS indicated that a refund was due and that the refund should be transmitted either via check to **HUGHES** at one of her Post Office Boxes (Box 705 in Pine Grove, Louisiana, Box 48 in Natalbany, Louisiana, UPS Store Box 149 in Hammond, Louisiana), via check to **HUGHES'S** residence at 47274 Casey Road, Hammond, Louisiana 70401, or electronically into one of **HUGHES'S** bank accounts.

3. It was further part of the scheme and artifice to defraud that United States Post Office Box, Box 705, located in Pine Grove, Louisiana, was the home address listed on at least thirty-nine (39) federal income tax returns filed in calendar years 2011 and 2012 in the names of approximately twenty-five (25) different individuals without their knowledge or authorization.

These tax returns claimed at least approximately \$170,657 in refunds between tax year 2008 and tax year 2011, of which at least approximately \$45,672 was sent to **HUGHES** either via electronic deposit into one of **HUGHES'S** bank accounts or via check sent to Post Office Box 705.

4. It was further part of the scheme and artifice to defraud that United States Post Office Box 48, located in Natalbany, Louisiana, was the home address listed on at least thirty-five (35) federal income tax returns filed in calendar year 2012 in the names of approximately twenty-five (25) different individuals without their knowledge or authorization. The total tax refund amount claimed was at least \$149,065 in tax years 2010 and 2011.

5. It was further part of the scheme and artifice to defraud that Box 149, located at the UPS Store in Hammond, Louisiana, was the home address listed on at least sixty-six (66) federal income tax returns filed in calendar years 2011 and 2012 in the names of approximately forty-four (44) different individuals without their knowledge or authorization. The total tax refund amount claimed was at least \$293,462, of which at least \$16,378 was sent to **HUGHES** in the form of checks sent by United States Mail to Box 149.

6. It was further part of the scheme and artifice to defraud that **HUGHES'S** residence, 47274 Casey Road, Hammond, Louisiana 70401, was the home address listed on at least eight (8) federal income tax returns filed in calendar years 2012 and 2014 in the names of approximately eight (8) different individuals without their knowledge or authorization. The total tax refund amount claimed was at least \$32,970, of which at least \$8,938 was sent to **HUGHES** either via electronic deposit or via check sent by United States Mail to 47274 Casey Road, Hammond, Louisiana 70401.

7. It was further part of the scheme and artifice to defraud that in total, **HUGHES** submitted and caused to be submitted not fewer than 148 federal income tax returns in calendar years 2011, 2012 and 2014 in the names of approximately 103 different individuals without their knowledge or authorization. As a result of the conduct described above, between at least 2009 and 2012 the total tax refund amount claimed from these federal income tax returns was at least \$646,154, of which **HUGHES** received approximately \$199,050 from the Department of the Treasury via check sent by United States Mail to one of **HUGHES'S** Post Office Boxes (Box 705 in Pine Grove, Louisiana, Box 48 in Natalbany, Louisiana, and UPS Store Box 149 in Hammond, Louisiana) or to **HUGHES'S** residence at 47274 Casey Road, Hammond, Louisiana 70401, or electronically via wire into **HUGHES'S** bank accounts.

C. THE MAILINGS:

On or about each date listed below, in the Eastern District of Louisiana, and elsewhere, the defendant, **RAVEN HUGHES**, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud and to obtain money, funds and property by means of false and fraudulent pretenses, representations and promises and attempting to do so, did knowingly cause to be delivered by the United States Mail, according to the directions thereon, an envelope containing a federal income tax refund check to a United States Post Office Box opened, rented, and maintained by the defendant, **RAVEN HUGHES**, that are identified by the claimed taxpayer's initials, location to which the check was mailed, and the amount of the refund check:

Count	Date	Location	Taxpayer	Amount
1	June 29, 2012	UPS Store Box 149, Hammond Louisiana	D.B.	\$1,000.00

2	July 13, 2012	P.O. Box 48, Natalbany, Louisiana	H.B.	\$1,000.00
3	July 27, 2012	P.O. Box 48, Natalbany, Louisiana	T.W.	\$4,450.00
4	August 31, 2012	UPS Store Box 149, Hammond Louisiana	M.H.	\$4,450.00

All in violation of Title 18 United States Code, Sections 1341 and 2.

COUNTS 5-8

(18 U.S.C. § 1028A – Aggravated Identity Theft)

A. AT ALL TIMES MATERIAL HEREIN:

The allegations in Parts A, B, and C of Count 1 are incorporated as though fully set forth herein.

B. THE OFFENSE OF AGGRRAVATED IDENTITY THEFT:

On or about each of the dates listed below, in the Eastern District of Louisiana, and elsewhere, the defendant **RAVEN HUGHES**, did knowingly transfer, possess, and use, without lawful authority, the means of identification of another person during and in relation to the offense in this Indictment described as a Related Count, to wit: mail fraud, in violation of Title 18, United States Code, Section 1341, knowing that the means of identification belong to another actual person, identified by the initials listed below:

Count	Date	Related Count	Individual
5	June 29, 2012	One	D.B.
6	July 13, 2012	Two	H.B.
7	July 27, 2012	Three	T.W.
8	August 31, 2012	Four	M.H.

All in violation of Title 18 United States Code, Section 1028A.

NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 4 of this Indictment 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 1341 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

2. As a result of the offenses alleged in Counts 1 through 4, the defendant, **RAVEN HUGHES**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 1341 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461, any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1341.

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 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;

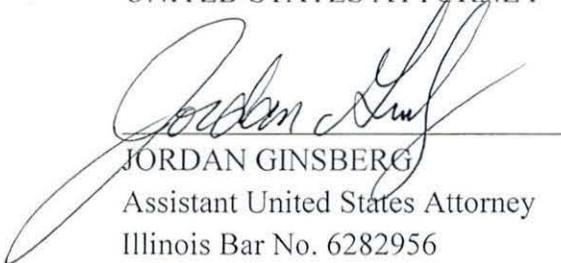
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 1341 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

A TRUE BILL:

FOREPERSON

KENNETH ALLEN POLITE, JR.
UNITED STATES ATTORNEY



JORDAN GINSBERG
Assistant United States Attorney
Illinois Bar No. 6282956

New Orleans, Louisiana
June 26, 2015