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U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

BILL OF INFORMATION FOR BANK LARCENY

UNITED STATES OF AMERICA

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CRIMINAL NO. **15-301**

VERSUS

*

SECTION: **SECT. E MAG. 3**

JACQUELINE RAY

*

VIOLATIONS: 18 U.S.C. § 2
18 U.S.C. § 2113(b)

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* * *

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. The Ochsner Clinic Federal Credit Union ("OCFCU") was an institution located in Jefferson Parish, in the Eastern District of Louisiana. The deposits of OCFCU were insured by the National Credit Union Administration (NCUA).

2. **JACQUELINE RAY** was the credit union manager and had been employed there for nearly thirty years.

3. The defendant, **JACQUELINE RAY**, was directly responsible and heavily involved in the OCFCU bookkeeping and accounting functions.

4. The defendant, **JACQUELINE RAY**, did on occasion take the daily OCFCU deposit to and obtain cash for the OCFCU vault from a local bank.

5. The defendant, **JACQUELINE RAY**, had unfettered access to teller work stations and logins to perform transactions within the data processing system.

B. THE OFFENSE:

Beginning in or around 2007 and continuing to on or about May 31, 2013, in the Eastern District of Louisiana, the defendant, **JACQUELINE RAY**, did take and carry away with the intent to steal and purloin an amount of money exceeding One Million dollars belonging to and under the care, custody and control of the OCFCU, a credit union whose deposits were then insured by the National Credit Union Administration.

1. FICTITIOUS LOANS

It was further a part of the taking and carrying away that the defendant, **JACQUELINE RAY**, created numerous fictitious loans on the books of OCFCU.

It was further a part of the taking and carrying away that approximately 149 (one hundred forty-nine) fictitious loans were created in approximately 71 (seventy-one) fictitious member accounts. An OCFCU member could have more than one loan. Nearly all of the member accounts had two fictitious loans.

It was further a part of the taking and carrying away that no loan documentation existed on any of the fictitious loans. These fictitious accounts were all coded in the OCFCU data processing system so that no statement of account would be generated, thus hiding the defendant, **JACQUELINE RAY's**, fraudulent scheme.

It was further a part of the taking and carrying away that the proceeds from the fictitious loan would be stolen from the OCFCU in the form of a check drawn on the OCFCU and made payable to either the fictitious member, the OCFCU or an auto dealership.

It was further a part of the taking and carrying away that despite the payee information included on these checks, the defendant, **JACQUELINE RAY**, simply deposited the checks in the OCFCU bank account, at the local bank the OCFCU official checks were drawn upon.

It was further a part of the taking and carrying away that defendant, **JACQUELINE RAY**, credited the deposits made with the fictitious and fraudulent loan proceeds into her share account at OCFCU or into share accounts maintained in the name of family members.

It was further a part of the taking and carrying away that fraudulent monies resulting from fictitious loans were controlled and used by defendant, **JACQUELINE RAY**, and not the family members in whose names the accounts were opened.

It was further a part of the taking and carrying away that the defendant, **JACQUELINE RAY**, withdrew large amounts of money from the various OCFCU accounts into which she had deposited the fraudulent proceeds from the fictitious loans.

2. FICTITIOUS DEPOSITS

It was further a part of the taking and carrying away that defendant, **JACQUELINE RAY**, stole money from OCFCU by creating fictitious deposits. Legitimate deposits by customers of OCFCU into their accounts were initially recorded into a general ledger account of OCFCU. The OCFCU did not physically receive the deposits. Rather, they were deposited into a local bank.

It was further a part of the taking and carrying away that once the credit was received from the local bank for the deposit, the amount was recorded in the general ledger. Defendant,

JACQUELINE RAY, having daily control over these transactions, was able to use it to remove cash from the OCFCU.

It was further part of the taking and carrying away that defendant, **JACQUELINE RAY** created false and fraudulent deposits into the local bank. However, when defendant **JACQUELINE RAY**, created a false deposit, OCFCU never received credit, as no items were actually deposited.

It was further part of the taking and carrying away that defendant, **JACQUELINE RAY**, used these fraudulent false deposits to credit her account or accounts in other's names she controlled. Defendant, **JACQUELINE RAY**, immediately removed the cash that these false and fraudulent credits created.

It was further part of the taking and carrying away that to hide and conceal defendant, **JACQUELINE RAY's**, fraudulent acts, at the end of the month when accounts were reconciled, defendant **JACQUELINE RAY**, made certain fraudulent deposits appear as "deposits in transit;" all in violation of Title 18, United States Code, Sections 2113(b) and 2.

NOTICE OF 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 2113 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, defendant, **JACQUELINE RAY**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 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 a violation of Title 18, United States Code, Section 2113.

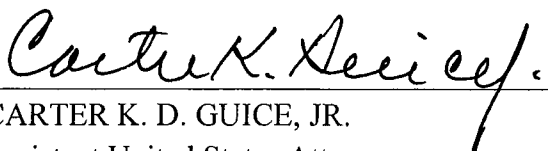
3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- 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 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 2113 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

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New Orleans, Louisiana
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