

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**INDICTMENT FOR CONSPIRACY, THEFT OF FEDERAL
FUNDS, AGGRAVATED IDENTITY THEFT, AND NOTICE OF FORFEITURE**

UNITED STATES	*	CRIMINAL ACTION NO.
VERSUS	*	SECTION:
DOMINIEL TRINETTE JONES	*	VIOLATION: 18 U.S.C. § 371
	*	18 U.S.C. § 641
	*	18 U.S.C. § 1028A
	*	18 U.S.C. § 2
	*	*

The Grand Jury charges that:

COUNT 1
(18 U.S.C. § 371, Conspiracy to Steal Federal Funds)

A. AT ALL MATERIAL TIMES HEREIN:

1. The United States Department of Treasury (the "Treasury") was an agency or department of the United States, charged with issuing tax refunds to taxpayers for overpayments in their federal tax obligations.

2. The Treasury issued tax refunds to taxpayers by mailing United States Treasury checks through the United States Postal Service.

3. Treasury and tax refund checks are United States Treasury checks, which

constitute money or property of the United States.

4. Woodforest National Bank was a financial institution insured by the Federal Deposit Insurance Company.

5. S.H. was a taxpayer who was owed a refund for the 2011 tax year. On or about September 4, 2014, the Treasury issued a refund check to S.H. for the 2011 tax year, and mailed it to S.H. via the United States Postal Service. S.H. requested the tax refund, but never received the check.

6. S.V. and J.V. were taxpayers who were married, and were owed a refund for the 2010 tax year. On or about September 5, 2014, the Treasury issued a refund check to S.V. for the 2010 tax year in the amount of \$33,754.64 and mailed it to S.V. via the United States Postal Service. S.V.'s spouse, J.V., requested the refund check on her husband's behalf, when amending her tax return for the 2010 tax year, but never received the refund check.

B. THE CONSPIRACY:

Beginning at a time unknown, but on or prior to September 11, 2014 and continuing to the present, in the Eastern District of Louisiana and elsewhere, the defendant, **DOMINIEL TRINETTE JONES ("JONES")**, and others known and unknown to the Grand Jury, willfully and knowingly did combine, conspire, confederate, and agree to steal, purloin, and knowingly convert to her use or the use of another any money, property or thing of value of the United States or of any department or agency thereof, to wit: two U.S. Treasury checks, (1) payable to S.V. and J.V. the amount of \$33,754.64, and (2) payable S.H., in the amount of \$25,476.

C. **OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY:**

1. On or before September 11, 2014, the defendant, **DOMINIEL TRINETTE JONES** acquired a United States Treasury check payable to S.H. for the tax year 2011, in the amount of \$25,476.00.
2. On or before September 22, 2014, the defendant, **DOMINIEL TRINETTE JONES**, acquired a United States Treasury check payable to S.V. and J.V., in the amount of \$33,754.64.
3. At a time unknown, but on or prior to September 11, 2014, the defendant, **DOMINIEL TRINETTE JONES**, obtained a false Georgia driver's license in the name of S.H., a real person, but bearing the likeness of the defendant, **JONES**.
4. At a time unknown, but on or prior to September 11, 2014, the defendant, **JONES**, obtained another false Georgia driver's license in the name of J.V., a real person and the wife of S.V., which bore the likeness of the defendant, **JONES**.
5. At a time unknown, but on or prior to September 11, 2014, co-conspirator-1, obtained a false Georgia driver's license in the name of S.V., which bore the likeness of coconspirator-1.
6. On or about September 11, 2014, using the fake driver's license bearing the name S.H., the defendant, **JONES**, opened a bank account at Woodforest National Bank located in Covington, LA, in the name of S.H.
7. On or about September 11, 2014, the defendant, **JONES** deposited the Treasury check, payable to S.H. in the amount of \$25,476.00 at a different branch in Gulfport, MS and **JONES** received \$5,000 back in cash.
8. On or about September 13, 2014, the defendant, **JONES**, and an unidentified

male, coconspirator-1, opened an account at Woodforest National Bank located in La Place, LA, in the name of S.V. and J.V. **JONES** and coconspirator-1 presented fraudulent Georgia driver's licenses in the names of S.V. and J.V. to open the account.

9. On or about September 13, 2014, the defendant, **JONES**, and coconspirator-1 used the United States Treasury check payable to S.V. and J.V., in the amount of \$33,754.64, as the initial deposit to open the account at Woodforest National Bank in LaPlace, LA.

10. On or about September 15, 2014, the defendant, **JONES**, withdrew \$4,985.00 via counter check from S.V. and J.V.'s account at Woodforest National Bank, located in Tuscaloosa, AL.

11. On or about September 22, 2014, the defendant, **JONES**, traveled to the Woodforest National Bank, located at 1901 Tchoupitoulas Street, New Orleans, LA, and withdrew \$10,000 from the account bearing the name S.H. and using the driver's license bearing the name of S.H., but the likeness of the defendant, **JONES**.

All in violation of Title 18, United States Code, Section 371.

COUNTS 2 and 3
(18 U.S.C. § 641, Theft of Federal Funds)

A. AT ALL MATERIAL TIMES HEREIN:

1. The paragraphs in Sections A and C of Count 1 are hereby reincorporated and realleged herein.

2. On or about the following dates, in the Eastern District of Louisiana and elsewhere, the defendant, **DOMINIEL TRINETTE JONES**, willfully and knowingly did steal, purloin, and convert to her own use United States Treasury checks, which were property of the United States, to wit:

Count	Theft date	Method	Amount	Account	Location
2	9/13/2014	Deposit of U.S. Treasury check payable to S.V. and J.V.	\$33,754.64	Woodforest National Bank, account number ending with 8675, belonging to S.V. and J.V.	La Place, LA
3	9/22/2014	Withdrawal of U.S. Treasury check proceeds payable to S.H.	\$10,000	Woodforest National Bank, account number ending with 1960, belonging to S.H.	New Orleans, LA

All in violation of Title 18, United States Code, Sections 641 and 2.

COUNTS 4 and 5
(18 U.S.C. § 1028A, Aggravated Identity Theft)

A. AT ALL MATERIAL TIMES HEREIN:

1. The paragraphs in Sections A and C of Count 1 are hereby reincorporated and realleged herein.

2. On or about the following dates, in the Eastern District of Louisiana and elsewhere, the defendant, **DOMINIEL TRINETTE JONES**, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit a violation of Title 18, United States Code, Section 641, theft of federal funds, knowing that the means of identification belonged to another actual person:

Count	Date	Description	Means of identification	Location
4	9/13/2014	Defendant used a false driver's license to steal a U.S. Treasury Check that did not belong to her	False driver's license bearing the name of J.V.	La Place, LA
5	9/22/2014	Defendant used a false driver's license to withdraw funds from a bank account containing proceeds of a U.S. Treasury Check that did not belong to her	False driver's license bearing the name of S.H.	New Orleans, LA

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 3 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 371, 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 1 through 3, defendant, **DOMINIEL TRINETTE JONES**, 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 violations of Title 18, United States Code, Sections 371 and 641.

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

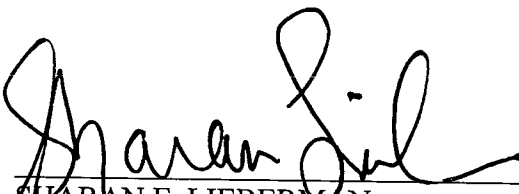
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot 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 defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 371, 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON



SHARAN E. LIEBERMAN
ASSISTANT UNITED STATES ATTORNEY

New Orleans, Louisiana
December 18, 2015