

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

UNITED STATES OF AMERICA	*	CRIMINAL NO. 15-169
v.	*	SECTION: C
RAVEN HUGHES	*	
	* * *	

FACTUAL BASIS

Should this matter proceed to trial, both the Government and the defendant, **RAVEN HUGHES** (hereinafter “Defendant” or “**HUGHES**”) do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crimes to which the defendant is pleading guilty. Specifically, **HUGHES** has agreed to plead guilty to Counts Four and Eight of the Indictment now pending against her, charging **HUGHES** with mail fraud, in violation of Title 18, United States Code, Section 1341 (Count 4) and Title 18, United States Code, Section 1028A (Count 8), respectively. The Government and the defendant further stipulate that the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Bill of Information now pending against the defendant:

Introduction and Background

Testimonial and documentary evidence would be admitted to prove that 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,

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either in the form of checks or direct deposits, constitute “money” and “a thing of value” of the Department of the Treasury.

Testimonial and documentary evidence would be admitted to prove that American Express, Baton Rouge Telco Federal Credit Union (BC Telco), and Regions Bank were each financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.

Testimonial and documentary evidence would be admitted to show that **HUGHES** opened on the following dates 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

Testimonial and documentary evidence, including utility records, would be admitted to show that, 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.

Testimonial and documentary evidence, including records from the United States Postal Service, would be admitted to show that **HUGHES** opened and received mail from the United States Postal Service at Box 149 at the UPS Store located in Hammond, Louisiana, within the Eastern District of Louisiana, on January 11, 2011, United States Post Office Box 705, located in

Pine Grove, Louisiana, on April 16, 2012, and United States Post Office Box 48, located in Natalbany, Louisiana, within the Eastern District of Louisiana, on June 1, 2012.

Mail Fraud

Documentary evidence and eyewitness testimony would be introduced to prove that, beginning in about October 2009, **HUGHES** obtained the personal identification information, including the name, home address, date of birth, 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 in the form of a 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, UPS Store Box 149 in Hammond, Louisiana) or to **HUGHES'S** residence at 47274 Casey Road, Hammond, Louisiana 70401, or electronically via wire into one of **HUGHES'S** bank accounts.

Post Office Box 705, Pine Grove, Louisiana

Documentary evidence, including records from the Department of the Treasury, would establish 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. As a result of these federal income tax returns, **HUGHES** received approximately \$45,672 in federal income tax refunds either via electronic deposit into one of **HUGHES'S** bank accounts or via check sent by United States Mail to Post Office Box 705.

Post Office Box 48, Natalbany, Louisiana

Documentary evidence, including records from the Department of the Treasury, would establish 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.

UPS Store Box 149, Hammond, Louisiana

Documentary evidence, including records from the Department of the Treasury, would establish 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. As a result of these federal income tax returns, **HUGHES** received approximately \$16,378 in income tax return refunds in the form of checks sent by United States Mail to Box 149.

For example, on about August 31, 2012, **HUGHES** caused a federal income tax refund check in the amount of approximately \$4,450, check number 38813660, made payable to M.H., to be sent via United States Mail to Box 149, located at the UPS Store in Hammond, Louisiana, within the Eastern District of Louisiana. The Government would further establish that **HUGHES** caused the federal income tax refund to be sent to Box 149 by causing a tax year 2010 federal income tax return in M.H.'s name to be submitted via United States Mail to the Internal Revenue Service on about August 4, 2012, which claimed a refund in the amount of \$4,450, knowing that M.H. had not authorized the submission of such tax return, was unaware of the tax return, and had no knowledge that a refund had issued. In submitting the tax return in M.H.'s name, and in relation to the offense of mail fraud that resulted from the submission of the tax

return and subsequent receipt of a federal income tax refund check in M.H.'s name (as described *supra.*), **HUGHES** knowingly possessed and used, without lawful authority, the means of identification of M.H.

47274 Casey Road, Hammond, Louisiana 70401


Documentary evidence, including records from the Department of the Treasury, would establish that 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. As a result of these federal income tax returns, **HUGHES** received approximately \$8,938 in federal income tax refunds either via electronic deposit into one of **HUGHES'S** bank accounts or via check sent by United States Mail to 47274 Casey Road, Hammond, Louisiana 70401.

Additionally, the Government would introduce tangible evidence and eyewitness testimony, including bank records and records in the custody of the IRS, to establish 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 **HUGHES** received a total of 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.

The above facts come from an investigation conducted by special agents with the Internal Revenue Service – Criminal Investigations, testimony from eyewitnesses, individuals in whose name federal income tax returns were filed, and documents, including financial records provided to the Internal Revenue Service – Criminal Investigations during the course of the above-described investigation.

APPROVED AND ACCEPTED:



RAVEN HUGHES
Defendant

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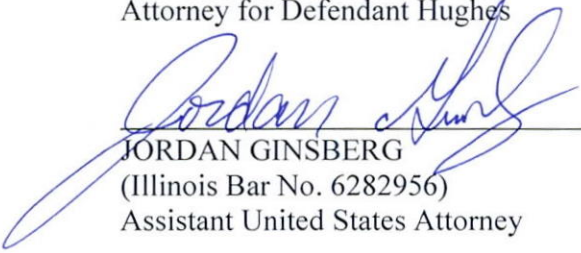
Date



ROBERT C. STERN, ESQ.
(Louisiana Bar No. 2474)
Attorney for Defendant Hughes

2-2-16

Date



JORDAN GINSBERG
(Illinois Bar No. 6282956)
Assistant United States Attorney

2-2-16

Date

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