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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**BILL OF INFORMATION FOR CONSPIRACY TO COMMIT MAIL FRAUD,  
WIREFRAUD, AND NOTICE OF FORFEITURE**

**18-30**

UNITED STATES OF AMERICA

\*

CRIMINAL DOCKET NO.

v.

\*

SECTION: **SECT. R MAG. 3**

DEBRA KROM

\*

VIOLATIONS: 18 U.S.C. § 371  
18 U.S.C. § 2

\* \* \*

The United States Attorney charges that:

**COUNT 1**

(18 U.S.C. §371 - Conspiracy to commit mail fraud and wire fraud)

**A. AT ALL TIMES MATERIAL HEREIN**

1. The defendant, **DEBRA KROM** (“**KROM**”), was a United States citizen, residing in Wylie, Texas.
2. Unindicted co-conspirator A.S. was a Jamaican national, residing in the Eastern District of Louisiana and attending Southern University of New Orleans on an athletic scholarship.
3. Indicted co-conspirator Andre Bowyer (“Bowyer”), was a Jamaican citizen, residing in Jamaica. Bowyer and others known and unknown to the United States Attorney, participated in the operation of a lottery scam.

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4. As part of the lottery scam based in Jamaica, Bowyer recruited individuals such as A.S. and **KROM**, who resided in the United States, to open bank accounts in the United States.

5. Bowyer directed A.S., **KROM**, and others known and unknown to the United States Attorney, to open or use these accounts for the purpose of depositing money from victims of the lottery scam and sending the money to one of Bowyer's bank accounts in Jamaica.

6. A.S. maintained bank accounts in New Orleans, Louisiana, at Capital One, N.A. ending in 7947 and JPMorgan Chase ending in 0398.

7. **KROM** maintained bank accounts in or near Wylie, Texas, at Capital One, N.A. ending in 8634, 2336, and 0123, JPMorgan Chase ending in 5228, and Bank of America ending in 3750.

8. Bowyer maintained bank accounts in Jamaica at the National Commercial Bank ending in 9321, Jamaica National Building Society ending in 0613, and Bank of Nova Scotia ending in 0316.

9. D.U., approximately 63 years old, resided in Doland, South Dakota.

10. J.C., approximately 83 years old, resided in Tuscon, Arizona.

11. V.L., approximately 83 years old, resided in Berlin, New Hampshire.

12. R.R., approximately 82 years old, resided in Shirley, Arkansas.

13. A.A., approximately 74 years old, resided in Fort Walton Beach, Florida.

**B. THE SCHEME TO DEFRAUD**

It was part of the scheme and artifice to defraud that, beginning at a time unknown but prior to August 2013, and continuing to in or around December 2015, Andre Bowyer and co-conspirators known and unknown to the United States Attorney, with knowledge of the "Jamaican

lottery” scam employed false representations and promises in order to fool elderly persons and persons suffering from diminished mental capacities into sending funds via United States mail, private mail carrier, or through an electronic transfer to A.S., **KROM**, and other co-conspirators known and unknown to the United States Attorney, living in the United States. After receiving victims’ funds through United States mail, private mail carrier, or through an electronic transfer, A.S., **KROM**, and other co-conspirators known and unknown to the United States Attorney, with knowledge that the money they received was obtained through false and fraudulent pretenses, did knowingly and intentionally transfer the stolen money to one of Bowyer’s bank accounts in Jamaica.

C. **THE CONSPIRACY**

Beginning at a time unknown but prior to in or around August 2013, and continuing to in or around December 2015, in the Eastern District of Louisiana and elsewhere, the defendant, **KROM**, A.S., Bowyer, and others known and unknown to the United States Attorney, did knowingly and willfully combine, conspire, and agree:

1. To devise a scheme or artifice to defraud and obtain money by means of false or fraudulent pretenses, representations, or promises, in that A.S., **KROM**, Bowyer, together with others, and for the purpose of executing the scheme and artifice to defraud as set forth in Section B, did knowingly cause elderly victims and victims with diminished mental capacities to send money by United States mail and/or private or commercial carrier to A.S., **KROM**, and other co-conspirators known and unknown to the United States Attorney, in violation of Title 18, United States Code, Section 1341; and

2. To devise a scheme or artifice to defraud and obtain money by means of false or fraudulent pretenses, representations, or promises, in that A.S., **KROM**, and Bowyer, together with others and for the purpose of executing the scheme and artifice to defraud as set forth in Section B, did knowingly cause elderly victims and victims with diminished mental capacities to send money by means of wire in interstate or foreign commerce, any writings, signs, signals, pictures or sounds for the purpose of executing such scheme or artifice to defraud, in violation of Title 18, United States Code, Section 1343.

**D. OVERT ACTS**

In furtherance of the conspiracy and to further the objectives of the conspiracy, the defendant, **DEBRA KROM**, Bowyer, A.S., and others known and unknown to the United States Attorney, committed the following overt acts, among others:

*Victim D.U.*

1. On or about February 18, 2014, an unknown Jamaican co-conspirator phoned victim D.U. and told him that he had won the Publisher's Clearing House ("PCH") sweepstakes but would need to pay taxes on the money in order to redeem the winnings.

2. Based on this information, on or about February 18, 2014, victim D.U. wired approximately \$25,000 from D.U.'s Wells Fargo bank account in Doland, South Dakota, to **KROM'S** Chase bank account ending in 5228.

3. On or about February 20, 2014, **KROM** initiated an international wire transfer of approximately \$25,235 to Bowyer's bank account at Bank of Nova Scotia, ending in 0316.

*Victim J.C.*

4. At a time unknown, but prior to November 22, 2014, J.C. received a phone call from an unknown number telling J.C. that J.C. had won a sweepstakes and needed to withdraw approximately \$9,000 from her JPMorgan Chase account and electronically transfer it to A.S.'s JPMorgan Chase account in order to claim the winnings.

5. On or about November 24, 2014, approximately \$9,000 was posted to A.S.'s JPMorgan Chase account in New Orleans, Louisiana, ending in 0398. On that same date, A.S. initiated an international wire transfer of approximately \$8,060 to Bowyer's National Commercial Bank in Jamaica, ending in 9231.

*Victim V.L.*

6. At a time unknown, but prior to on or about March 30, 2015, Bowyer instructed A.S. that victim V.L. would be sending approximately \$3,500 in United States currency to A.S.'s address in New Orleans, Louisiana.

7. On or about March 30, 2015, an unknown individual calling from a Jamaican area code, instructed V.L. to mail United States currency through the United States mail containing a check payable to cash for approximately \$3,500 to A.S.'s address, in New Orleans, Louisiana. The caller informed victim V.L. that V.L. had won the PCH sweepstakes and had to pay this amount to claim the winnings. Acting upon these instructions, V.L. mailed a check payable to cash for \$3,500 to A.S.'s address, in New Orleans, Louisiana.

8. On or about March 31, 2015, A.S. received the package from V.L. containing approximately \$3,500 in cash.

9. On or about March 31, 2015, A.S. deposited approximately \$5,700 into a Capital One, N.A. checking account ending in 7947.

10. On or about April 1, 2015, A.S. initiated an international wire transfer of approximately \$5,700 to a Jamaican National Building Society bank account in Jamaica ending in 0613, belonging to Bowyer.

11. At a time unknown, but prior to on or about April 3, 2015, an unknown individual calling from a Jamaican area code, informed victim V.L. that V.L. had to send additional money to A.S. to claim the PCH winnings. On or about April 6, 2015, V.L. sent approximately \$6,000 in United States currency to A.S.'s address in New Orleans, Louisiana, via United States mail.

12. On or about April 9, 2015, A.S. deposited approximately \$3,880 in cash into his Capital One Bank account ending in 7947.

13. On or about April 9, 2015, A.S. initiated an international wire transfer of approximately \$5,540 to a Jamaican National Building Society bank account in Jamaica ending in 0613, belonging to Bowyer.

***Victim R.R.***

14. At a time unknown but prior to on or about October 20, 2015, an unknown co-conspirator calling from a number with a Jamaican area code called victim R.R. and told R.R. that he had won the PCH sweepstakes. In order to claim the winnings, the caller told R.R. to send payments in the form of money orders to **KROM'S** address in Wylie, Texas.

15. On or about October 20, 2015, victim R.R. purchased four money orders payable to "**DEBRA KROM**" valued at approximately \$3,500. R.R. then went to the post office in Clinton,

Arkansas, and paid approximately \$19.99 to send the money via the United States Mail “Priority Mail Express 1-Day” to **KROM’S** address in Wylie, Texas.

16. On or about October 22, 2015, **KROM** deposited the money orders into her Capital One, N.A., account ending in 8634.

17. On or about October 26, 2016, **KROM** initiated an international wire transfer of approximately \$4,500, including the amount she deposited belonging to R.R. to Bowyer’s Jamaican National Building Account ending in 0613.

18. On or about October 23, 2015, victim R.R. purchased a cashier’s check for approximately \$7,450. R.R. did this after receiving a call from an unknown caller advising R.R. that R.R. needed to make additional payments to claim the PCH sweepstakes money.

19. The unknown caller instructed R.R. to make the cashier’s check payable to “**DEBRA KROM**” and to mail it to her address in Wylie, Texas.

20. On or about October 23, 2015, victim R.R. went to a United States Post Office located in Clinton, Arkansas, and sent the cashier’s check for approximately \$7,450, payable to “**DEBRA KROM**” to **KROM’S** address in Wylie, Texas via “Priority Mail Express 1-day.” R.R. paid \$19.99 in postage.

21. On or about October 26, 2016, **KROM** deposited the cashier’s check for approximately \$7,450 in her Capital One, N.A. bank account ending in 8634.

22. On or about October 27, 2015, **KROM** initiated an international wire transfer of approximately \$7,350 to Bowyer’s Jamaican National Building Society bank account, ending in 0613, in Jamaica.

*Victim A.A.*

23. At a time unknown but on or before November 4, 2015, an unknown members of the conspiracy called victim A.A. and instructed A.A. to mail approximately \$8,500 to **KROM**. A.A. agreed to mail the funds to **KROM** because the unknown caller with a Jamaican area code number told A.A. that A.A. had won the Publisher's Clearinghouse sweepstakes and that A.A. needed to make a series of payments to the Federal Deposit Insurance Company (FDIC) prior to claiming the winnings.

24. At a time unknown but on or before November 4, 2015, Bowyer instructed **KROM** to watch for a package from victim A.A.

25. On or about November 4, 2015, A.A. visited the United States Post Office, located in Berlin, New Hampshire, and purchased nine money orders totaling approximately \$8,500.

26. On or about November 4, 2015, A.A. went a UPS store in Berlin, New Hampshire, and sent the money orders to **KROM** at **KROM'S** address in Wylie, Texas. Victim A.A. specified that the package required "early a.m. delivery." A.A. spent a total of approximately \$124.00 to send the money orders to **KROM** via UPS.

27. On or about November 6, 2015, **KROM** deposited A.A.'s money orders totaling approximately \$8,500.00 into **KROM'S** Capital One, N.A. account number ending in 8634.

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

#### **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 371, 1341, 1343 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, **DEBRA KROM**, 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, 1341, and 1343.

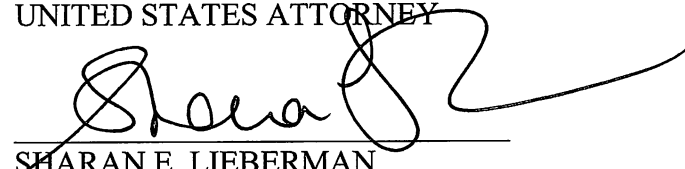
3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- 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, 1341, 1343 and 981(a)(1)(C),  
made applicable through Title 28, United States Code, Section 2461(c).

DUANE A. EVANS  
UNITED STATES ATTORNEY



SHARAN E. LIEBERMAN  
Assistant United States Attorney

New Orleans, Louisiana  
February 8, 2018

No. \_\_\_\_\_

**United States District Court**

FOR THE

EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

vs.

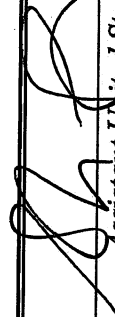
DEBRA KROM

BILL OF INFORMATION  
FOR CONSPIRACY TO COMMIT  
MAIL FRAUD AND WIRE FRAUD

Violation(s): 18 U.S.C. § 371

Filed \_\_\_\_\_, 20 18 \_\_\_\_\_, Clerk.

By \_\_\_\_\_, Deputy

  
Assistant United States Attorney  
SHARAN E. LIEBERMAN