

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LA. gk

2018 JUN 29 P 12:50

WILLIAM W. BLEVINS  
CLERK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**INDICTMENT FOR  
ACCESS DEVICE FRAUD AND AGGRAVATED IDENTITY THEFT**

UNITED STATES OF AMERICA

v.

KEYIRA GABLE

CRIMINAL NO.

SECTION:

VIOLATIONS:

18 U.S.C. § 1028A  
18 U.S.C. § 1029(a)(2)  
18 U.S.C. § 1029(b)(1)  
18 U.S.C. § 1029(c)(1)(A)(i)

\* \* \*

The Grand Jury charges that:

**COUNT 1**  
**(Attempted Access Device Fraud)**

On or about June 3, 2017, in the Eastern District of Louisiana, and elsewhere, the defendant, **KEYIRA GABLE**, did knowingly and with the intent to defraud, attempt to use and traffic in an unauthorized access device, specifically by attempting to use stolen credit and debit card account numbers to purchase items and obtain fraudulent refunds from stores during any one-year period, the aggregate value of which was greater than \$1,000.00, in a manner affecting

X Fec USA  
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interstate commerce; all in violation of Title 18, United States Code, Sections 1029(a)(2), (b)(1), and (c)(1)(A)(i).

**COUNT 2**  
**(Aggravated Identity Theft)**

On or about June 3, 2017, in the Eastern District of Louisiana, and elsewhere, the defendant, **KEYIRA GABLE**, did knowingly transfer, possess, and use the means of identification of another person without lawful authority, namely an identification card of A.P., during and in relation to attempted access device fraud, a violation of Title 18, United States Code, Sections 1029(a)(2) and (b)(1), knowing that the means of identification belonged to an actual person; all in violation of Title 18, United States Code, Section 1028A.

**NOTICE OF ACCESS DEVICE FRAUD FORFEITURE**

1. The allegation of Count 1 of this Indictment is 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 982(a)(2)(B) and 1029(c)(1)(C).

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 1029 set forth in Count 1 of this Indictment, the defendant, **KEYIRA GABLE**, shall forfeit to the United States of America:

- a. pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation;
- b. pursuant to Title 18, United States Code, Section 1029(c)(1)(C), any personal property used or intended to be used to commit the offense;

3. If any of the property described above, 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 party;
- 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 divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1029(c)(2) and Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1029(c)(1)(C).

A TRUE BILL:



DUANE A. EVANS  
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'Matthew R. Payne', written over a horizontal line.

MATTHEW R. PAYNE  
La. Bar Roll No. 32631  
Assistant United States Attorney

New Orleans, Louisiana  
June 29, 2018

FORM OBD-34

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

**UNITED STATES DISTRICT COURT**

\_\_\_\_\_  
Eastern District of Louisiana  
Criminal Division

**THE UNITED STATES OF AMERICA**

vs.

**KEYIRA GABLE**

**INDICTMENT**

**FOR**

**ACCESS DEVICE FRAUD AND  
AGGRAVATED IDENTITY THEFT**

**VIOLATIONS: 18 U.S.C. § 1028A  
18 U.S.C. § 1029(a)(2)  
18 U.S.C. § 1029(b)(1)  
18 U.S.C. § 1029(c)(1)(A)(i)**



\_\_\_\_\_  
Prosecutor

Filed in open court this \_\_\_\_\_ day of \_\_\_\_\_ A.D. 2018.

\_\_\_\_\_  
Clerk

Bail, \$ \_\_\_\_\_

\_\_\_\_\_  
*Matthew R. Payne*

**MATTHEW R. PAYNE**  
Assistant United States Attorney