

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO. 18-129
v.	*	SECTION: "J" (2)
VINCENTIA ROQUES	*	VIOLATION: 18 U.S.C. § 1029(a)(2)
	*	
	*	
	*	

FACTUAL BASIS

Should this matter have proceeded to trial, the United States would have proven, through the introduction of competent testimony and admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the Bill of Information.¹

The defendant, VINCENTIA ROQUES ("ROQUES"), has agreed to plead guilty as charged to the Bill of Information charging her with one count of access device fraud, in violation of Title 18, United States Code, Section 1029(a)(2).

COUNT 1 – Access Device Fraud

General Background

Between 2012 and 2014, VINCENTIA ROQUES ("ROQUES"), worked part-time as a bookkeeper and office manager for several businesses located within the Eastern District of Louisiana.² As the bookkeeper, ROQUES gained access to passwords and account numbers related to accessing bank accounts associated with each business. ROQUES also obtained direct access to financial account information and identifiers that permitted her to conduct financial

¹ This proffer of evidence is not intended to constitute a complete statement of facts known to the United States. The limited purpose of this factual basis is to demonstrate a sufficient legal basis for ROQUES' plea of guilty to the charged offense.

² Businessperson A, Businessperson B, and Businessperson C.

transactions with the money and credit accounts belonging to her employers.

At the same time ROQUES performed bookkeeping and office management services for the businesses located in the Eastern District of Louisiana, she also maintained and controlled personal bank accounts at a financial institution (Ally Bank) located outside the State of Louisiana.

Scheme to Defraud

Beginning in 2012 and continuing through 2014, in the Eastern District of Louisiana and elsewhere, ROQUES knowingly and with the intent to defraud, used multiple access devices to access financial accounts belonging to others and to conduct unauthorized financial transactions that defrauded Businessperson A, Businessperson B, and Businessperson C of company and personal funds.

It was part of the scheme to defraud that ROQUES gained access to company and personal financial accounts. ROQUES also accessed and used an electronic accounting payment system under the guise of conducting legitimate financial transactions on behalf of the businesses that employed her. During the scheme, ROQUES transferred stolen company monies to her personal bank accounts and conducted unauthorized credit and debit card transactions. ROQUES' criminal conduct involved interstate commerce, in that the unauthorized money transfers and unauthorized credit and debit card purchases of things of value (worth more than \$1,000) travelled in and affected interstate commerce between August 31, 2012 and August 31, 2013.³

³ By example: on or about, November 9, 2012, ROQUES fraudulently used an access device belonging to Businessperson A to purchase a \$581.20 airline ticket from New Orleans, Louisiana to New York City, New York; on or about December 24, 2012, ROQUES fraudulently used an access device to convert and divert approximately \$1,065.53 in monetary funds, belonging to Businessperson B, to her own personal bank account located outside of the State of Louisiana; on or about August 14, 2013, ROQUES fraudulently used an access device to convert and divert

Scope of the Offense

From 2012 through 2014, ROQUES conducted unauthorized financial account transactions and stole money from Businessperson A, Businessperson B, and Businessperson C. During the course of the criminal activity described above, the defendant defrauded her employers (Businesspersons A, B, and C) of approximately \$ 71,546.87.⁴

In summary, all of the evidence introduced at trial would have established the elements of the offense and proven the defendant's guilt beyond a reasonable doubt.

READ AND APPROVED:


RICHARD R. PICKENS, II
Assistant United States Attorney

9/20/18
Date


MATTHEW S. CHESTER
Counsel for the Defendant

9/20/18
Date


VINCENTIA ROQUES
Defendant

9/20/18
Date

approximately \$788.92 in monetary funds, belonging to Businessperson B, to her own personal bank account located outside of the State of Louisiana; on or about May 1, 2013, ROQUES fraudulently used an access device to convert and divert approximately \$299.50 in monetary funds, belonging to Businessperson C, to her own personal bank account located outside of the State of Louisiana.

⁴ During each of the years incorporated herein (2012-2014), the defendant used the unauthorized access devices to defraud her victim employers of well over \$1,000 during each one year period.