

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.
2018 OCT 31 A 11:46
WILLIAM W. BLEVINS
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

BILL OF INFORMATION FOR AGGRAVATED IDENTITY THEFT

UNITED STATES OF AMERICA

*

CRIMINAL NO.

18 - 223

v.

*

SECTION:

SECT. J MAG. 5

DANIEL TANASE

*

VIOLATIONS: 18 U.S.C. § 1028A

GABRIELLA TEKSE

*

18 U.S.C. § 2

* * *

The United States Attorney charges that:

COUNT 1
(Aggravated Identity Theft)

A. AT ALL TIMES MATERIAL HEREIN:

1. The defendants, **DANIEL TANASE** and **GABRIELLA TEKSE**, are Hungarian nationals who were present within the United States.

2. The term "access device" means any card, plate, code, account number, electronic serial number, personal identification number, or other means of account access that can be used, alone or in conjunction with another access device, to obtain money, goods, services, or any other thing of value, or that can be used to initiate a transfer of funds (other than a transfer originated solely by paper instrument).

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3. The term “counterfeit access device” means any access device that is counterfeit, fictitious, altered, or forged, or an identifiable component of an access device or a counterfeit access device.

4. The term “unauthorized access device” means any access device that was lost, stolen, expired, revoked, canceled, or obtained with intent to defraud.

5. The term “produce” means design, alter, authenticate, duplicate, or assemble.

6. The term “traffic” means to transfer, or otherwise dispose of, to another, or obtain control of with intent to transfer or dispose of.

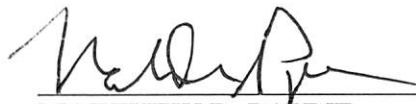
7. A “means of identification” is any name or number that could be used, alone or in conjunction with any other information, to identify a specific individual, including a name, credit card number, and date of birth.

B. THE OFFENSE OF AGGRAVATED IDENTITY THEFT

On or about June 19, 2018, in the Eastern District of Louisiana, and elsewhere, the defendants, **DANIEL TANASE** and **GABRIELLA TEKSE**, did knowingly transfer, possess, and use the means of identification of another person, specifically a debit card ending in 4155, without lawful authority, during and in relation to conspiracy to commit access device fraud, in violation of Title 18, United States Code, Sections 1029(a)(1) and 1029(b)(2), knowing that the

means of identification belonged to an actual person, namely Victim A, all in violation of Title 18, United States Code, Sections 1028A and 2.

PETER G. STRASSER
UNITED STATES ATTORNEY

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

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

New Orleans, Louisiana
October 31, 2018