

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LA  
2018 DEC 14 P 2:3  
WILLIAM W. BLEVINS  
CLERK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**SECOND SUPERSEDING INDICTMENT FOR CONSPIRACY, ACCESS DEVICE  
FRAUD, AGGRAVATED IDENTITY THEFT, AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

\*

CRIMINAL NO. 18-143

v.

\*

SECTION: "M"(4)

LAKISHA WILLIAMS

\*

VIOLATIONS:

BRITTANY WHITE

\*

18 U.S.C. § 1028A

KEYIRA GABLE

\*

18 U.S.C. § 1029(a)(2)

TAMIKA STEVENS

\*

18 U.S.C. § 1029(a)(3)

JEFFERY JOSEPH

\*

18 U.S.C. § 1029(a)(4)

18 U.S.C. § 1029(b)(1)

18 U.S.C. § 1029(b)(2)

18 U.S.C. § 1029(c)(1)(A)(i)

18 U.S.C. § 1029(c)(1)(A)(ii)

18 U.S.C. § 2

\* \* \*

The Grand Jury charges that:

**COUNT 1**

**(Conspiracy to Commit Access Device Fraud)**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. The defendants, **LAKISHA WILLIAMS, BRITTANY WHITE, KEYIRA GABLE, TAMIKA STEVENS, and JEFFERY JOSEPH** are United States citizens.

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,

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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).

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 “device-making equipment” means any equipment, mechanism, or impression designed or primarily used for making an access device or a counterfeit access device.

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

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

8. 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 CONSPIRACY**

Beginning at a time unknown to the Grand Jury, but at least on or about March 19, 2015, and continuing through on or about December 14, 2018, in the Eastern District of Louisiana, and elsewhere, the defendants, **LAKISHA WILLIAMS, BRITTANY WHITE, KEYIRA GABLE, TAMIKA STEVENS,** and **JEFFERY JOSEPH,** together with others, both known and unknown to the Grand Jury, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree, in a manner affecting interstate commerce, and with the intent to defraud, to use and

traffic in unauthorized access devices, and by such conduct, obtain anything of value worth \$1,000.00 or more within any one-year period, in violation of Title 18, United States Code, Section 1029(a)(2) and 1029(c)(1)(A)(i).

**C. MANNER AND MEANS**

Among the manner and means by which the defendants and their co-conspirators carried out the conspiracy were the following:

1. It was part of the conspiracy that co-conspirators obtained unauthorized access devices, specifically bank account information that belonged to others, including but not limited to, credit card numbers and debit card numbers.

2. It was further part of the conspiracy that co-conspirators possessed counterfeit and unauthorized access devices, including altered gift and prepaid cards.

3. It was further part of the conspiracy that co-conspirators would and did distribute counterfeit and unauthorized access devices among themselves.

4. It was further part of the conspiracy that co-conspirators would and did possess, use, and distribute device-making equipment.

5. It was further part of the conspiracy that co-conspirators encoded the misappropriated bank account information onto cards in order to use them to purchase goods and services.

6. It was further part of the conspiracy that co-conspirators would and did use and attempt to use counterfeit and unauthorized access devices to purchase goods.

7. It was further part of the conspiracy that co-conspirators would seek to make fraudulent chargebacks, i.e., they would seek to return goods that were purchased with an unauthorized access device in order to have the value of the purchased goods credited to their own

bank accounts.

**D. OVERT ACTS**

In furtherance of the conspiracy, and to effect the objects thereof, members of the conspiracy and others known and unknown to the Grand Jury, committed or caused to be committed the overt acts below, among others, within the Eastern District of Louisiana and elsewhere:

1. On or about March 19, 2015, **LAKISHA WILLIAMS** and **TAMIKA STEVENS** fraudulently used false identification and stolen bank account information to attempt to purchase more than \$10,865.22 in appliances from Barto Appliances in Metairie, Louisiana.
2. On or about March 20, 2015, **LAKISHA WILLIAMS** and **TAMIKA STEVENS** possessed more than fifteen unauthorized and counterfeit access devices as they attempted to pick up appliances previously purchased from Barto Appliances in Metairie, Louisiana.
3. On or about March 17, 2016, **LAKISHA WILLIAMS** obtained a credit of approximately \$2,202.18 to her bank account as a result of a fraudulent chargeback from JCPenney in Covington, Louisiana.
4. On or about March 23, 2016, **KEYIRA GABLE** obtained a credit of approximately \$2,310.93 to her bank account as a result of a fraudulent chargeback from JCPenney in Metairie, Louisiana.
5. On or about March 26, 2016, **KEYIRA GABLE** obtained a credit of approximately \$3,017.80 to her bank account as a result of a fraudulent chargeback from JCPenney in Lafayette, Louisiana.
6. On or about April 9, 2016, **LAKISHA WILLIAMS** obtained a credit of approximately \$1,352.88 to her bank account as a result of a fraudulent chargeback from JCPenney

in Mobile, Alabama.

7. On or about April 13, 2016, **LAKISHA WILLIAMS** obtained a credit of approximately \$2,898.49 to her bank account as a result of a fraudulent chargeback from JCPenney in Hammond, Louisiana.

8. On or about April 15, 2016, **LAKISHA WILLIAMS** obtained a credit of approximately \$2,330.58 to her bank account as a result of a fraudulent chargeback from JCPenney in McComb, Mississippi.

9. On or about April 20, 2016, **LAKISHA WILLIAMS** obtained a credit of approximately \$5,127.08 to her bank account as a result of a fraudulent chargeback from JCPenney in Lake Charles, Louisiana.

10. On or about April 21, 2016, **LAKISHA WILLIAMS** obtained a credit of approximately \$3,354.99 to her bank account as a result of a fraudulent chargeback from JCPenney in Houma, Louisiana.

11. On or about April 25, 2016, **KEYIRA GABLE** obtained a credit of approximately \$4,495.60 to her bank account as a result of a fraudulent chargeback from JCPenney in Metairie, Louisiana.

12. On or about April 30, 2016, **LAKISHA WILLIAMS** obtained a credit of approximately \$3,365.99 to her bank account as a result of a fraudulent chargeback from JCPenney in Slidell, Louisiana.

13. On or about May 24, 2016, **KEYIRA GABLE** obtained a credit of approximately \$3,090.61 to her bank account as a result of a fraudulent chargeback from JCPenney in Metairie, Louisiana.

14. On or about May 24, 2017, **LAKISHA WILLIAMS** and **KEYIRA GABLE** fraudulently used stolen bank account information to purchase approximately \$637.03 in goods from Matherne's Supermarket in LaPlace, Louisiana.

15. On or about June 3, 2017, **KEYIRA GABLE** used false identification and stolen bank account information in an attempt to make a fraudulent chargeback of approximately \$4,518.48 at Kay Jewelers in Slidell, Louisiana.

16. On or about September 1, 2018, **LAKISHA WILLIAMS** and **BRITTANY WHITE** used stolen bank account information in an attempt to make a fraudulent chargeback of approximately \$304.91 at Sally's Beauty Supply in Gulfport, Mississippi.

17. On or about September 11, 2018, **LAKISHA WILLIAMS** fraudulently used stolen bank account information to purchase approximately \$1,402.57 in goods at Walmart stores in Mobile, Alabama.

18. On or about September 13, 2018, **LAKISHA WILLIAMS** used stolen bank account information to make a fraudulent chargeback of approximately \$708.68 at Walmart in Metairie, Louisiana.

19. On or about September 17, 2018, **LAKISHA WILLIAMS** and **BRITTANY WHITE** possessed counterfeit and unauthorized credit and debit cards, encoders, false identification, and a Smith & Wesson handgun.

20. On or about October 18, 2018, **JEFFERY JOSEPH** fraudulently used stolen bank account information to purchase approximately \$1,714.79 in goods at a Bed Bath & Beyond store in Auburn, Washington.

21. On or about November 14, 2018, **JEFFERY JOSEPH** fraudulently used a false identity and a stolen social security number ending in 5526 to open a Verizon phone account in

Baton Rouge, Louisiana.

22. On or about December 10, 2018, **JEFFERY JOSEPH** possessed false identification, counterfeit and unauthorized credit and debit cards, an embosser, label makers, blank cards, and approximately \$17,378.00 in cash.

All in violation of Title 18, United States Code, Section 1029(b)(2).

**COUNT 2**  
**(Attempted Access Device Fraud)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations in Section A of Count 1 are incorporated as though fully set forth herein.

**B. THE OFFENSE OF ACCESS DEVICE FRAUD**

On or about March 19, 2015, in the Eastern District of Louisiana, and elsewhere, the defendants, **LAKISHA WILLIAMS** and **TAMIKA STEVENS**, did knowingly and with the intent to defraud, attempt to use and traffic in unauthorized access devices, specifically stolen credit and debit card account numbers, and by such conduct, from on or about January 1, 2015, and ending on or about December 31, 2015, attempted to purchase items and obtain fraudulent refunds, the aggregate value of which was \$1,000.00 or greater, in a manner affecting interstate commerce; all in violation of Title 18, United States Code, Sections 1029(a)(2), (b)(1), (c)(1)(A)(i), and 2.

**COUNT 3**  
**(Aggravated Identity Theft)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations in Section A of Count 1 are incorporated as though fully set forth herein.

**B. THE OFFENSE OF AGGRAVATED IDENTITY THEFT**

On or about March 19, 2015, in the Eastern District of Louisiana, and elsewhere, the defendants, **LAKISHA WILLIAMS** and **TAMIKA STEVENS**, did knowingly transfer, possess,

and use the means of identification of another person, without lawful authority, during and in relation to conspiracy to commit access device fraud and attempted access device fraud, in violation of Title 18, United States Code, Sections 1029(a)(2), 1029(b)(1), and 1029(b)(2), knowing that the means of identification belonged to an actual person, namely C.M. and R.S., in violation of Title 18, United States Code, Sections 1028A and 2.

**COUNT 4**  
**(Access Device Fraud)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations in Section A of Count 1 are incorporated as though fully set forth herein.

**B. THE OFFENSE OF ACCESS DEVICE FRAUD**

On or about March 20, 2015, in the Eastern District of Louisiana, and elsewhere, the defendants, **LAKISHA WILLIAMS** and **TAMIKA STEVENS**, did knowingly and with intent to defraud, possess fifteen or more counterfeit and unauthorized access devices, and by such conduct affect interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(3), (c)(1)(A)(i), and 2.

**COUNT 5**  
**(Attempted Access Device Fraud)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations in Section A of Count 1 are incorporated as though fully set forth herein.

**B. THE OFFENSE OF 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 unauthorized access devices, specifically stolen credit and debit card account numbers, and by such conduct, from on or about January 1, 2017, and ending on or about December 31,



2017, attempted to purchase items and obtain fraudulent refunds, the aggregate value of which was \$1,000.00 or greater, in a manner affecting interstate commerce; all in violation of Title 18, United States Code, Sections 1029(a)(2), (b)(1), and (c)(1)(A)(i).

**COUNT 6**  
**(Aggravated Identity Theft)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations in Section A of Count 1 are incorporated as though fully set forth herein.

**B. THE OFFENSE OF 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, during and in relation to conspiracy to commit access device fraud and attempted access device fraud, in violation of Title 18, United States Code, Sections 1029(a)(2), 1029(b)(1), and 1029(b)(2), knowing that the means of identification belonged to an actual person, namely A.P., in violation of Title 18, United States Code, Sections 1028A and 2.

**COUNT 7**  
**(Access Device Fraud)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations in Section A of Count 1 are incorporated as though fully set forth herein.

**B. THE OFFENSE OF ACCESS DEVICE FRAUD**

On or about September 13, 2018, in the Eastern District of Louisiana, and elsewhere, the defendant, **LAKISHA WILLIAMS**, did knowingly and with the intent to defraud, use and traffic in unauthorized access devices, specifically stolen credit and debit card account numbers, and by such conduct, from on or about September 18, 2017, and ending on or about September 17, 2018, purchased items and obtained fraudulent refunds, the aggregate value of which was \$1,000.00 or

greater, in a manner affecting interstate commerce; all in violation of Title 18, United States Code, Sections 1029(a)(2) and (c)(1)(A)(i).

**COUNT 8**  
**(Aggravated Identity Theft)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations in Section A of Count 1 are incorporated as though fully set forth herein.

**B. THE OFFENSE OF AGGRAVATED IDENTITY THEFT**

On or about September 13, 2018, in the Eastern District of Louisiana, and elsewhere, the defendant, **LAKISHA WILLIAMS**, did knowingly transfer, possess, and use the means of identification of another person, without lawful authority, during and in relation to conspiracy to commit access device fraud and access device fraud, in violation of Title 18, United States Code, Sections 1029(a)(2) and 1029(b)(2), knowing that the means of identification belonged to an actual person, namely the owners of credit and debit card accounts ending in 1858, 8175, 0496, 7246, and 0564, in violation of Title 18, United States Code, Sections 1028A and 2.

**COUNT 9**  
**(Access Device Fraud)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations in Section A of Count 1 are incorporated as though fully set forth herein.

**B. THE OFFENSE OF ACCESS DEVICE FRAUD**

On or about September 17, 2018, in the Eastern District of Louisiana, and elsewhere, the defendants, **LAKISHA WILLIAMS** and **BRITTANY WHITE**, did knowingly and with intent to defraud possess fifteen or more counterfeit and unauthorized access devices, and by such conduct affect interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(3), (c)(1)(A)(i), and 2.

**COUNT 10**  
**(Access Device Fraud)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations in Section A of Count 1 are incorporated as though fully set forth herein.

**B. THE OFFENSE OF ACCESS DEVICE FRAUD**

On or about September 17, 2018, in the Eastern District of Louisiana, and elsewhere, the defendants, **LAKISHA WILLIAMS** and **BRITTANY WHITE**, did knowingly and with the intent to defraud, traffic in, possess, and have control and custody over device-making equipment, and by such conduct affect interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(4), (c)(1)(A)(ii), and 2.

**COUNT 11**  
**(Access Device Fraud)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations in Section A of Count 1 are incorporated as though fully set forth herein.

**B. THE OFFENSE OF ACCESS DEVICE FRAUD**

On or about October 18, 2018, in the Eastern District of Louisiana, and elsewhere, the defendant, **JEFFERY JOSEPH**, did knowingly and with the intent to defraud, use and traffic in unauthorized access devices, specifically stolen credit and debit card account numbers, and by such conduct; from on or about December 11, 2017, and ending on or about December 10, 2018, purchased items and obtained fraudulent refunds, the aggregate value of which was \$1,000.00 or greater, in a manner affecting interstate commerce; all in violation of Title 18, United States Code, Sections 1029(a)(2) and (c)(1)(A)(i).

**COUNT 12**  
**(Aggravated Identity Theft)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations in Section A of Count 1 are incorporated as though fully set forth herein.

**B. THE OFFENSE OF AGGRAVATED IDENTITY THEFT**

On or about November 14, 2018, in the Eastern District of Louisiana, and elsewhere, the defendant, **JEFFERY JOSEPH**, did knowingly transfer, possess, and use the means of identification of another person, without lawful authority, during and in relation to conspiracy to commit access device fraud and access device fraud, in violation of Title 18, United States Code, Sections 1029(a)(2) and 1029(b)(2), knowing that the means of identification belonged to an actual person, namely the owner of a social security number ending in 5526, in violation of Title 18, United States Code, Section 1028A.

**COUNT 13**  
**(Access Device Fraud)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations in Section A of Count 1 are incorporated as though fully set forth herein.

**B. THE OFFENSE OF ACCESS DEVICE FRAUD**

On or about December 10, 2018, in the Eastern District of Louisiana, and elsewhere, the defendant, **JEFFERY JOSEPH**, did knowingly, and with intent to defraud, possess fifteen or more counterfeit and unauthorized access devices, and by such conduct affect interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(3) and (c)(1)(A)(i).

**COUNT 14**  
**(Access Device Fraud)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations in Section A of Count 1 are incorporated as though fully set forth herein.

**B. THE OFFENSE OF ACCESS DEVICE FRAUD**

On or about December 10, 2018, in the Eastern District of Louisiana, and elsewhere, the defendant, **JEFFERY JOSEPH**, did knowingly and with the intent to defraud, traffic in, possess, and have control and custody over device-making equipment, and by such conduct affect interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(4) and (c)(1)(A)(ii).

**NOTICE OF ACCESS DEVICE FRAUD FORFEITURE**

1. The allegations of Counts 1, 2, 4, 5, 7, 9, 10, 11, 13, and 14 of this Second Superseding Indictment 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 982(a)(2)(B) and 1029(c)(1)(C).

2. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1029 set forth in Counts 1, 2, 4, 5, 7, 9, 10, 11, 13, and 14 of this Second Superseding Indictment, the defendants, **LAKISHA WILLIAMS, BRITTANY WHITE, KEYIRA GABLE, TAMIKA STEVENS**, and **JEFFERY JOSEPH** 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 violations;
- 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 offenses;

3. If any of the property described above, as a result of any act or omission of the defendants:

- 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).

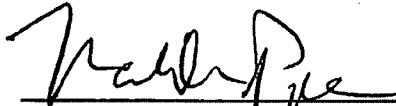
All pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1029(c)(1)(C).

A TRUE BILL:

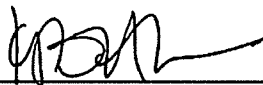


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