

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**


UNITED STATES OF AMERICA * **CRIMINAL NO. 19-88**
v. * **SECTION: "E"**
ARNOLD TREVELL WILLIAMS *

* * *

FACTUAL BASIS

The defendant, **ARNOLD TREVELL WILLIAMS** (hereinafter, the “defendant” or “**WILLIAMS**”), has agreed to plead guilty as charged to Count One, that is, conspiracy to commit identity theft, in violation of Title 18, United States Code, Section 371, of the Bill of Information currently pending against him. This Factual Basis does not attempt to set forth all of the facts known to the United States at this time. The limited purpose of this Factual Basis is to demonstrate that there exists a sufficient legal basis for **WILLIAMS**’ guilty plea. The United States and **WILLIAMS** do hereby stipulate and agree that the allegations in the Bill of Information and the following facts are true and correct and that, should this matter have proceeded to trial, the government would have proven them beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible and documentary exhibits.

At all times material herein, the parties agree that 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, address, Social Security number, and date of birth. The parties further agree that **WILLIAMS** was at all times material herein a resident of New Orleans, Louisiana.

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Defendant A.T.W.
Defense Counsel CA

This matter was investigated by the U.S. Secret Service (USSS) in New Orleans and the Jefferson Parish Sheriff's Office (JPSO). At the end of 2017, JPSO detectives received information from an arrestee in an ongoing identity theft matter. The arrestee told detectives that a person, later identified as Ryan Clark (Clark), provided him with what turned out to be a fake Louisiana driver's license in order to purchase a vehicle in the name of an identity theft victim. On September 25, 2017, JPSO detectives located Clark. Clark was arrested and transported to the JPSO Detective Bureau for processing and interview.

Concurrent with the arrest, JPSO obtained a search warrant for Clark's apartment. Within the residence, several documents were located with identity theft victims' personal identifiable information (PII). JPSO detectives then obtained a search warrant for Clark's vehicle. Within the vehicle, several documents were located that contained PII of subjects other than Clark.

Clark was then interviewed by JPSO detectives along with a USSS agent. After being *Mirandized*, Clark confessed and advised that he was charging persons approximately \$4,000 in order to provide them with a fraudulent driver's license/identity card along with a Social Security number to match the name that could then be used to purchase an automobile. Clark admitted that he conspired with others to obtain stolen PII from real individuals, which Clark would then use to fabricate Louisiana driver's licenses. Clark identified six different automobiles that had been purchased using stolen identities, including a vehicle bought by **WILLIAMS**.

In the transaction at issue, documents and testimony would show that on or about April 2, 2017, **WILLIAMS** and Clark communicated by text message and telephone calls about the purchase of vehicles. On or about May 8, 2017, **WILLIAMS** and Clark communicated by text message and telephone calls about the creation of false identification documents. Clark and **WILLIAMS** exchanged photographs on this date of a State of Louisiana driver's license image

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and a photograph to be superimposed over it. On or about May 11, 2017, Clark, aided and abetted by others, created a fraudulent means of identification, to wit: a State of Louisiana driver's license using the name and birthdate of T.B., an actual person, and transferred it to **WILLIAMS**. **WILLIAMS** knowingly and willfully paid Clark a sum of money for the fraudulent Louisiana driver's license and T.B.'s PII.

On or about May 11, 2017, **WILLIAMS** caused to be used, in interstate commerce, the unauthorized means of identification at issue, to wit: a State of Louisiana driver's license using the name and birthdate of T.B., along with T.B.'s Social Security number, for the purposes of buying a 2014 BMW 7 series motor vehicle. The said BMW was bought in the name of T.B. for approximately \$44,994.10 from Matt Bowers Nissan, which is located within the Eastern District of Louisiana. In making the purchase, **WILLIAMS** signed all Matt Bowers Nissan paperwork in connection with the purchase in the name of T.B., and he used T.B.'s date of birth and Social Security number to apply for a loan in order to purchase the said BMW. After the sale of the 2014 BMW 7 series motor vehicle, **WILLIAMS** took possession of the said BMW with the Louisiana motor vehicle registration in the name of T.B. Finally, **WILLIAMS** made no payments of any kind to the BMW lien holder, which resulted in the BMW being reported as stolen.

Evidence, including text messages, phone records, photographs, bank records, records from Matt Bowers Nissan and other documents and tangible objects would be introduced at trial to prove the facts as set forth above. In addition, the testimony of employees and agents of the USSS and JPSO, and other competent witnesses would be introduced at trial to prove the facts set forth above.


APPROVED AND AGREED TO:



EDWARD J. RIVERA
Assistant United States Attorney

7/23/19

Date



GLEN A. WOODS, ESQ.
Attorney for Defendant

7/23/19

Date



ARNOLD TREVELL WILLIAMS
Defendant

7-23-19

Date