

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

2019 JUL 19 P 1:12

WILLIAM J. JENNIS CC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

INDICTMENT FOR WIRE FRAUD, AGGRAVATED
IDENTITY THEFT, AND NOTICE OF FORFEITURE

UNITED STATES OF AMERICA

*

CRIMINAL DOCKET NO.

19-141

v.

*

SECTION:

SECT. EMAG. 5

RACHEL E. LIPPS

*

VIOLATIONS: 18 U.S.C. § 1343

18 U.S.C. § 1028A

*

* * *

The Grand Jury charges that:

A. AT ALL TIMES MATERIAL HEREIN:

1. Defendant, **RACHEL E. LIPPS** ("LIPPS"), resided in Slidell, Louisiana, which is within the Eastern District of Louisiana.

2. Business A was a Louisiana corporation specializing in repossessions and collections. Business A was domiciled in Slidell, Louisiana.

3. On or about January of 2013 to October 2017, **LIPPS** served as a part-time bookkeeper for Business A and was entrusted with the daily accounting and bill payments for Business A.

___ Fee _____
___ Process _____
 Dktd _____
___ CtRmDep _____
___ Doc. No. _____

4. LIPPS's job functions included accessing and utilizing both QuickBooks Enterprise and Online software to issue payroll checks and pay vendors behalf of Business A.
5. LIPPS normally did not have signatory authority to endorse either payroll or vendor checks on behalf of Business A except for a brief time period in early 2014.
6. Business A used QuickBooks Online software for its bookkeeping system before switching to QuickBooks Enterprise software in 2016.
7. Business A maintained a financial account with J.P. Morgan Chase Bank, N.A. ("Chase Bank") bearing No. XXXXX8596.
8. Chase Bank is a national bank headquartered in Manhattan, New York and maintains branches in the Eastern District of Louisiana.
9. All check images received by Chase Bank either from a branch location, ATM, mobile app, computer, or other method were transmitted to computer servers located in Michigan, Illinois, or Delaware.
10. Resource Bank ("Res Bank") is a Louisiana corporation domiciled in Covington, Louisiana.
11. Res Bank issued a daily Cash Letter that contained all financial items collected on a business day with the exception of FISC Exchange items. FISC Exchange items were items that were processed from other FISC member banks and Chase Bank is not an FISC member bank.
12. All check images received by Res Bank either from a branch location, ATM, mobile app, computer, or other method were transmitted to computer servers located at the Federal Reserve Bank in Atlanta, Georgia.

13. On or about February 24, 2014, **LIPPS** opened a joint Res Bank EOY Expenses account XXX2303 (“Res Bank 2303”).

14. On or about September 30, 2013 to January 27, 2016, **LIPPS** maintained a MasterCard credit card account with the United Services Automobile Association (“USAA”) XXXXXXXXXXXXX3662 (“USAA 3662”).

15. On or about October 2, 2015, **LIPPS** established with the Acceptance Loan Company, Inc. (“Acceptance Loan”) account number XXXXXXXXX8407 (Acceptance Loan 8407”).

16. On or about January 20, 2016, **LIPPS** established with Target Card Services (“Target”) account number XXXXXXXXXXXXX0449 (“Target 0449”).

17. On a date unknown but on or before November 24, 2015, **LIPPS** established with Chase Auto Finance (“Chase Auto”) account number XXXXXXXXXXXX2309 (“Chase Auto Finance 2309”).

18. A “means of identification” was any name or number that could be used, alone or in conjunction with any other information, to identify a specific individual, including a name, Social Security number, and date of birth.

B. THE SCHEME:

19. From on or about January 2013 and continuing to on or about October 2017, in the Eastern District of Louisiana and elsewhere, the defendant **RACHEL E. LIPPS**, devised and intended to devise a scheme to defraud Business A, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

C. THE MANNER AND MEANS:

20. The manner and means by which LIPPS sought to accomplish the object and purpose of the scheme and artifice to defraud included, among other things, the following:

21. LIPPS converted to her own use, without authority, funds belonging to Business A by withdrawing funds held in Business A's Chase Bank account to accounts controlled by LIPPS, to include credit card payments, vehicle payments, and other personal expenses.

22. LIPPS failed to report business reimbursements from Chase Bank for repossessions to hide missing money.

23. LIPPS mislabeled check entries within QuickBooks to further conceal her embezzlement of Business A's funds.

24. LIPPS fraudulently withdrew money from Business A's Chase Bank account no. XXXXX8596 and deposited it into Res Bank 2303.

25. LIPPS fraudulently made payments directly to USAA 3662 and used Business A checks to do so.

26. LIPPS fraudulently made payments directly to Chase Auto 2309 and used Business A checks to do so.

27. LIPPS fraudulently made payments directly to Acceptance Loan 8407 and used Business A checks to do so.

28. LIPPS fraudulently made payments directly to Target 0449 and used Business A checks to do so.

29. LIPPS took her employee file without permission from Business A and deleted her time clock entries.

D. THE OFFENSE:

30. On or about the dates and approximate amounts listed below, in the Eastern District of Louisiana and elsewhere, the defendant, **RACHEL E. LIPPS**, for the purpose of executing the scheme and artifice to defraud set forth in Part B, caused to be transmitted by means of a wire communication in interstate commerce the writings, signs, signals, pictures, and sounds described below:

COUNT	PAYEE	CHECK NUMBER	AMOUNT	DEPOSITED INTO ACCOUNT NO.	CHECK POST DATE
1	Rachel E. Lipps	1129	\$1,129.48	Res Bank 2303	08/20/14
2	Rachel E. Lipps	1222	\$1,411.75	Res Bank 2303	12/12/14
3	Rachel E. Lipps	1130	\$861.80	Res Bank 2303	08/29/14
4	Rachel E. Lipps	1213	\$966.50	Res Bank 2303	12/03/14
5	Rachel E. Lipps	1241	\$860.00	Res Bank 2303	09/11/14
6	Rachel E. Lipps	1131	\$383.90	Res Bank 2303	08/20/14
7	Rachel E. Lipps	1235	\$933.00	Res Bank 2303	09/22/14
8	Rachel E. Lipps	1142	\$699.00	Res Bank 2303	09/22/14
9	Rachel E. Lipps	1223	\$674.50	Res Bank 2857	12/12/14
10	Rachel E. Lipps	163496	\$1,125.00	Res Bank 2303	10/06/14
11	USAA	164740	\$2,065.00	USAA 3662	02/02/15
12	Chase Bank	172283	\$1,199.20	Chase Auto Finance 2309	12/04/15
13	USAA	164744	\$1,535.45	USAA 3662	02/02/15

COUNT	PAYEE	CHECK NUMBER	AMOUNT	DEPOSITED INTO ACCOUNT NO.	CHECK POST DATE
14	USAA	164742	\$2,315.00	USAA 3662	02/02/15
15	USAA	164743	\$3,195.00	USAA 3662	02/02/15
16	USAA	166423	\$1,750.00	USAA 3662	03/26/15
17	USAA	166424	\$1,925.00	USAA 3662	03/26/15
18	USAA	166986	\$2,565.00	USAA 3662	04/13/15
19	USAA	166990	\$1,890.00	USAA 3662	04/13/15
20	USAA	166950	\$1,975.00	USAA 3662	06/22/15
21	USAA	168461	\$3,980.00	USAA 3662	06/22/15
22	Rachel Lipps	1870	\$1,789.50	Res Bank 2303	02/01/16
23	Acceptance Loan Company	176430	\$1,107.60	Acceptance Loan 8407	06/01/16
24	Rachel Lipps	176435	\$1,372.90	Res Bank 2303	06/03/16
25	Acceptance Loan Company	177225	\$1,600.00	Acceptance Loan 8407	07/20/16
26	Target (Wells Fargo Bank)	178162	\$1,260.28	Target 0449	08/29/16
27	Chase Auto Finance	180452	\$1,399.65	Chase Auto Finance 2309	11/21/16
28	Target (Wells Fargo Bank)	2006	\$1,699.08	Target 0449	01/30/17
29	Chase Bank	19990	\$1,798.80	Chase Auto Finance 2309	05/22/17

COUNT	PAYEE	CHECK NUMBER	AMOUNT	DEPOSITED INTO ACCOUNT NO.	CHECK POST DATE
30	Chase	201334	\$1,031.84	Chase Auto Finance 2309	07/11/17
31	Target (Wells Fargo Bank)	20894	\$948.96	Target 0449	06/28/17
32	Acceptance Loan Company	201338	\$1,476.80	Acceptance Loan 8407	07/11/17
33	Target (Wells Fargo Bank)	202716	\$1,462.89	Target 0449	10/02/17

All in violation of Title 18, United States Code, Section 1343.

COUNT 34
(Aggravated Identity Theft)

1. On or about July 22, 2014, within the Eastern District of Louisiana and elsewhere, the defendant, **RACHEL E. LIPPS**, did knowingly transfer, possess, and use without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c)(5), to wit, wire fraud (18 U.S.C. § 1343) as alleged in Count 3 of this Indictment, knowing that the means of identification belonged to an actual person, T.D.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 34 are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

2. As a result of the offenses alleged in Counts 1 through 33, the defendant, **RACHEL E. LIPPS**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property real or personal which constitutes or is derived from proceeds traceable to said offenses.

3. If any of the above-described property, 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 person;
- c. has been placed beyond 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 shall, pursuant to Title 21, United States Code, Section 853(p), seek forfeiture of any other property of the defendant up to the value of the above-described property.



PETER G. STRASSER
UNITED STATES ATTORNEY

A handwritten signature in cursive script, appearing to read "Duane A. Evans".

DUANE A. EVANS
Assistant United States Attorney
Bar. Roll No. 24086

New Orleans, Louisiana
July 19, 2019