

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.

2019 JUL 18 P 1:03

WILLIAM W. BLEVINS
CLERK

**SEALED
FELONY**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR WIRE FRAUD, MAKING FALSE
STATEMENTS TO FEDERAL AGENTS, AND NOTICE OF FORFEITURE

UNITED STATES OF AMERICA

v.

CHARLES J. WILLIAMS, JR.

*
*
*
*
*

CRIMINAL NO.

19-140

SECTION:

SECT. 1 MAG. 4

VIOLATIONS: 18 U.S.C. § 1343

18 U.S.C. § 1001(a)(2)

* * *

The Grand Jury charges that:

COUNTS 1-22
(Wire Fraud)

A. AT ALL TIMES MATERIAL HEREIN:

1. St. Luke's Episcopal Church ("St. Luke's") was located at 1222 North Dorgenois Street in New Orleans, Louisiana.
2. In or about January 2017, the defendant, **CHARLES J. WILLIAMS, JR.** ("WILLIAMS"), was elected Senior Warden of St. Luke's.
3. In his role as Senior Warden, **WILLIAMS** was responsible for paying all of St. Luke's bills, including insurance, salaries, and utilities.
4. St. Luke's raised money for the church through parishioner donations.

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

5. Donations to St. Luke's should have been deposited into one of St. Luke's bank accounts.

6. **WILLIAMS** was an authorized signatory on St. Luke's accounts.

7. Chase Bank ("Chase") was the U.S. consumer banking business of JP Morgan Chase & Co., a global financial services firm with operations worldwide.

8. Chase utilized a network of computers connected to computer servers located in the State of Delaware. Chase deposits and withdrawals resulted in electronic wire communications from the corresponding branch to Chase computer servers in Delaware. Updated Chase account information, including balances, were transmitted from Chase servers in Delaware through Chase's network.

9. Chase operated branches throughout the Eastern District of Louisiana, including locations at 4400 General De Gaulle Drive, New Orleans ("General De Gaulle Branch"); 3540 Williams Boulevard, Kenner ("Williams Branch"); 1425 North Broad Street, New Orleans ("N. Broad Branch"); 5660 Read Boulevard, New Orleans ("Read Branch"); and 201 and 2200 Saint Charles Avenue, New Orleans ("201 St. Charles Branch") and ("2200 St. Charles Branch").

10. St. Luke's had at least four Chase accounts, including an investment account ending in x8919, a savings account ending in x8664, an "Operating Account" ending in x1224, and a "Supply's (sic)" account ending in x1257 (hereinafter "supply account").

11. Chase debit cards ending in x2340 and x0774 were issued for the St. Luke's supply account. Chase debit card ending in x2340 was issued in the name of S. L., the St. Luke's office secretary. Chase debit card ending in x0774 was issued to **WILLIAMS** in or around October 2017.

12. In or about January 2017, **WILLIAMS**, as the chief operating officer of the Ferdinand Group, doing business as (“DBA”) “Go Pizza! (hereinafter “pizza business” or “Go Pizza”), signed a lease agreement with the Esplanade Mall to operate a restaurant within the mall.

13. **WILLIAMS** maintained a Chase account for his business under the name, “The Ferdinand Group, L.L.C.,” DBA Go Pizza, with the addresses 3746 Pin Oak Avenue, New Orleans, Louisiana 70131; 1401 W. Esplanade Avenue #830, Kenner, Louisiana 70065; and 3127 Somerset Drive New Orleans, Louisiana 70131, with an account number ending in x2929.

14. **WILLIAMS** maintained a second Chase account for his business under the name “The Ferdinand Group, L.L.C.” with the address 3127 Somerset Drive, New Orleans, Louisiana, 70131, with an account number ending in x9620. Chase issued debit card ending in x8691 on or about March 16, 2017, to “The Ferdinand Group, L.L.C.” and “Charles J. Williams,” reissued on September 17, 2017, and activated on October 5, 2017.

15. **WILLIAMS** maintained a third Chase account under the name Charles J. Williams Jr. with the address 3127 Somerset Drive, New Orleans, Louisiana, 70131, with an account number ending in x3036.

B. THE SCHEME TO DEFRAUD:

Beginning in or about January 2017, and continuing to on or about August 29, 2018, in the Eastern District of Louisiana and elsewhere, the defendant, **CHARLES J. WILLIAMS, JR.**, did knowingly devise and intend to devise a scheme and artifice to defraud St. Luke’s by embezzling approximately \$89,000.00 from St. Luke’s in his capacity as Senior Warden.

It was further part of the scheme and artifice to defraud that, shortly after **WILLIAMS** became the Senior Warden at St. Luke’s, he took over the finances of the church and reduced or

eliminated other church members' access to church finances in order to conceal his embezzlement scheme.

It was further part of the scheme and artifice to defraud that **WILLIAMS** did not share church bank statements with other church members in an effort to conceal his embezzlement of church funds.

It was further part of the scheme and artifice to defraud that **WILLIAMS** used S. L.'s Chase debit card ending in x2340, which was linked to St. Luke's supply account x1257, in order to conceal his identity from Chase and to embezzle church funds.

It was further part of the scheme and artifice to defraud that **WILLIAMS** later obtained, in his name, Chase debit card ending in x0774 which was linked to a St. Luke's account in order to embezzle church funds.

It was further part of the scheme and artifice to defraud that **WILLIAMS** made cash withdrawals from St. Luke's accounts in order to misappropriate church funds and conceal the amount of money he was embezzling from St. Luke's.

It was further part of the scheme and artifice to defraud that, after making cash withdrawals from St. Luke's accounts, **WILLIAMS** sometimes subsequently deposited the cash via two or more deposits into **WILLIAMS** personal and/or business accounts, to conceal the amount and source of funds he was embezzling from St. Luke's.

It was further part of the scheme and artifice to defraud that **WILLIAMS** used church funds for personal expenses related to his pizza business.

It was further part of the scheme and artifice to defraud that, on or about August 29, 2018, **WILLIAMS** lied to special agents with the Federal Bureau of Investigation ("FBI") in an effort to conceal his embezzlement of funds from St. Luke's.

C. THE OFFENSE:

On or about the dates, at the approximate times, and in the approximate amounts listed below, in the Eastern District of Louisiana and elsewhere, the defendant, **CHARLES J. WILLIAMS, JR.**, 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 and foreign commerce the writings, signs, signals, pictures, and sounds described below:

COUNT	DATE	DESCRIPTION OF USE OF WIRE
1	June 08, 2017	At 11:43 AM, WILLIAMS transferred \$800 from St. Luke's savings account x8664 into St. Luke's supply account x1257. At 1:06 PM, WILLIAMS used debit card x2340 to make an \$800 ATM cash withdrawal from St. Luke's supply account x1257 at the N. Broad Branch. At 1:17 PM, WILLIAMS made a \$600 ATM cash deposit into his personal business account x2929.
2	June 09, 2017	At 10:19 AM, WILLIAMS transferred \$800 from St. Luke's savings account x8664 into St. Luke's supply account x1257. At 11:42 AM, WILLIAMS used debit card x2340 to make an \$800 ATM cash withdrawal from St. Luke's supply account x1257 at the Williams Branch. At 11:47 AM, WILLIAMS made a \$580 ATM cash deposit into his personal business account x2929.
3	June 23, 2017	At 10:34 AM, WILLIAMS transferred \$800 from St. Luke's savings account x8664 into St. Luke's supply account x1257. At 10:42 AM, WILLIAMS used debit card x2340 to make an \$800 ATM cash withdrawal from St. Luke's supply account x1257 at the N. Broad Branch. At 10:43 AM, WILLIAMS made an \$800 ATM cash deposit into his personal business account x2929.
4	July 10, 2017	At 12:08 PM, WILLIAMS transferred \$800 from St. Luke's savings account x8664 into St. Luke's supply account x1257. At 5:28 PM, WILLIAMS used debit card x2340 to make an \$800 ATM cash withdrawal from St. Luke's supply account x1257 at the General De Gaulle Branch. At 5:30 PM, WILLIAMS made a \$760 ATM cash deposit into his personal business account x2929.

COUNT	DATE	DESCRIPTION OF USE OF WIRE
5	July 20, 2017	At 4:23 PM, WILLIAMS transferred \$1,600 from St. Luke's savings account x8664 into St. Luke's supply account x1257. At 8:25 PM, WILLIAMS used debit card x2340 to make an \$800 ATM cash withdrawal from St. Luke's supply account x1257 at the General De Gaulle Branch. At 8:27 PM, WILLIAMS made a \$700 ATM cash deposit into his personal business account x2929.
6	August 09, 2017	At 9:45 AM, WILLIAMS transferred \$500 from St. Luke's savings account x8664 to St. Luke's supply account x1257. At 10:00 AM, WILLIAMS used debit card x2340 to make a \$500 ATM cash withdrawal from St. Luke's supply account x1257 at the Williams Branch. At 10:22 AM, WILLIAMS used \$400 of said funds to purchase a \$400 Postal Money Order, Serial No. 23709081262, which WILLIAMS gave to the Esplanade Mall as repayment of his business's debt for a sign.
7	August 30, 2017	At 10:45 AM, WILLIAMS transferred \$400 from St. Luke's operating account x1224 into St. Luke's supply account x1257. At 10:46 AM, WILLIAMS made another transfer of \$400 from St. Luke's savings account x8664 into St. Luke's supply account x1257. At 1:01 PM, WILLIAMS used debit card x2340 to make an \$800 ATM cash withdrawal from St. Luke's supply account x1257 at the N. Broad Branch. At 1:02 PM, WILLIAMS made a \$600 ATM cash deposit into his personal business account x2929.
8	September 13, 2017	At 10:50 AM, WILLIAMS transferred \$700 from St. Luke's savings account x8664 into St. Luke's supply account x1257. At 11:06 AM, WILLIAMS used debit card x2340 to make a \$700 ATM cash withdrawal from St. Luke's supply account x1257 at the N. Broad Branch. At 11:08 AM, WILLIAMS made a \$700 ATM cash deposit into his personal business account x2929.
9	September 26, 2017	At 9:48 AM, WILLIAMS transferred \$400 from St. Luke's savings account x8664 into St. Luke's supply account x1257. At 12:43 AM, WILLIAMS deposited \$947 in donations into St. Luke's operating account x1224 at the N. Broad Branch. One minute later, at 12:44 AM, WILLIAMS withdrew \$400 in cash at the teller counter from St. Luke's supply account x1257. At 1:05 PM, WILLIAMS made a \$400 ATM cash deposit into his personal business account x2929.
10	October 02, 2017	At 12:48 PM, WILLIAMS transferred \$1,000 from St. Luke's operating account x1224 into St. Luke's supply account x1257. At 3:49 PM, WILLIAMS withdrew \$1,000 in cash at the teller counter at the N. Broad Branch from St. Luke's supply account x1257. At 3:51 PM, WILLIAMS made an \$800 ATM cash deposit into his personal business account x2929.

COUNT	DATE	DESCRIPTION OF USE OF WIRE
11	October 03, 2017	At 10:38 AM, WILLIAMS transferred \$1,500 from St. Luke's operating account x1224 into St. Luke's savings account x8664. At 10:38 AM, there was a subsequent transfer of \$1,500 from St. Luke's savings account x8664 into St. Luke's supply account x1257. At 10:45 AM, WILLIAMS withdrew \$1,500 in cash at the teller counter at the Williams Branch from St. Luke's supply account x1257. At 10:47 AM, WILLIAMS made an \$800 ATM cash deposit into his personal business account x2929.
12	October 03, 2017	At 1:10 PM, WILLIAMS transferred \$900 from St. Luke's operating account x1224 into St. Luke's supply account x1257. At 1:16 PM, WILLIAMS withdrew \$900 in cash at the teller counter at the Read Branch from St. Luke's supply account x1257. At 1:19 PM, WILLIAMS made a \$900 ATM cash deposit into his personal business account x2929.
13	January 26, 2018	At 2:28 PM, WILLIAMS transferred \$800 from St. Luke's operating account x1224 into St. Luke's supply account x1257. At 4:50 PM, WILLIAMS used debit card x0774, to make an \$800 ATM cash withdrawal from St. Luke's supply account x1257 at the 2200 St. Charles Branch. At 4:52 PM, WILLIAMS made a \$300 ATM cash deposit into his personal business account x2929 and at 4:53 PM, WILLIAMS made a \$100 ATM cash deposit into his personal account x3063.
14	January 29, 2018	At 1:42 PM, WILLIAMS transferred \$900 from St. Luke's operating account x1224 into St. Luke's supply account x1257. At 6:15 PM, WILLIAMS used debit card x0774, to make an \$800 ATM cash withdrawal from St. Luke's supply account x1257 at the General De Gaulle Branch. WILLIAMS then made three deposits totaling \$800 into his personal business accounts. At 6:17 PM, WILLIAMS made a \$400 ATM cash deposit into account x2929; at 6:19 PM, WILLIAMS made a \$160 ATM cash deposit into account x9620; and at 6:20 PM, WILLIAMS made a \$240 ATM cash deposit into account x9620.
15	February 06, 2018	At 9:29 AM, WILLIAMS transferred \$800 from St. Luke's operating account x1224 into St. Luke's supply account x1257. At 10:02 AM, WILLIAMS used debit card x0774, to make an \$800 ATM cash withdrawal from St. Luke's supply account x1257 at the 2200 St. Charles Branch. At 10:04 AM, WILLIAMS made a \$500 ATM cash deposit into his personal business account x2929.

COUNT	DATE	DESCRIPTION OF USE OF WIRE
16	February 15, 2018	At 5:57 PM, WILLIAMS used debit card x0774, to make a \$300 ATM cash withdrawal from St. Luke's supply account x1257 at the General De Gaulle Branch. At 5:58 PM, WILLIAMS made a \$200 ATM cash deposit into his personal business account x2929; and at 5:59 PM, WILLIAMS made another \$100 ATM cash deposit into his personal business account x9620.
17	February 21, 2018	At 10:02 AM, WILLIAMS withdrew \$2,900 in cash at the teller counter from St. Luke's account x1224 at the 2200 St. Charles Branch. WILLIAMS then used \$2,500 of said funds at the 2200 St. Charles Branch to obtain Chase cashier's check No. 9405327701 payable to the Esplanade Mall on behalf of his personal business.
18	February 22, 2018	At 10:22 AM, WILLIAMS transferred \$200 from St. Luke's operating account x1224 into St. Luke's supply account x1257. At 11:27 AM, WILLIAMS used debit card x0774, to make a \$200 ATM cash withdrawal from St. Luke's supply account x1257 at the Williams Branch. At 11:28 AM, WILLIAMS made a \$200 ATM cash deposit into his personal business account x9620.
19	March 01, 2018	At 4:13 PM, WILLIAMS withdrew \$3,500 in cash from St. Luke's account x1224 at the 201 St. Charles Branch teller counter. At 4:17 PM, WILLIAMS made a \$2,500 ATM cash deposit into his personal business account x9620; and at 4:18 PM, WILLIAMS made a \$1,000 ATM cash deposit into his personal business account x2929.
20	March 27, 2018	At 3:42 PM, WILLIAMS transferred \$800 from St. Luke's operating account x1224 into St. Luke's supply account x1257. At 6:33 PM, WILLIAMS used debit card x0774, to make an \$800 ATM cash withdrawal from St. Luke's supply account x1257 at the General De Gaulle Branch. At 6:34 PM, WILLIAMS made a \$700 ATM cash deposit into his personal business account x2929.
21	March 28, 2018	At 10:12 AM, WILLIAMS used debit card x0774, to make a \$300 ATM cash withdrawal from St. Luke's supply account x1257 at the 2200 St. Charles Branch. At 10:14 AM, WILLIAMS made a \$300 ATM cash deposit into his personal business account x2929.
22	March 28, 2018	At 10:17 AM, WILLIAMS transferred \$700 from St. Luke's operating account x1224 into St. Luke's supply account x1257. At 10:18 AM, WILLIAMS used debit card x0774, to make a \$700 ATM cash withdrawal from St. Luke's supply account x1257 at the 2200 St. Charles Branch. At 10:20 AM, WILLIAMS made a \$600 ATM cash deposit into his personal business account x2929.

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

COUNT 23

(Making False Statements to Federal Agents)

A. AT ALL TIMES MATERIAL HEREIN:

The allegations contained in Parts A and B of Counts 1-22 are hereby re-alleged and incorporated herein by reference.

B. THE OFFENSE:

On or about August 29, 2018, in the Eastern District of Louisiana, defendant **CHARLES J. WILLIAMS, JR.**, did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, when he denied to special agents with the FBI that he used cash withdrawn from a St. Luke's account to fund a \$2,500 Chase cashier check No. 9405327701, dated February 21, 2018, with Remitter: St. Luke's Episcopal Church/Operating Account. Instead, **WILLIAMS** claimed the \$2,500 had come from his personal account. The statements and representations were false because **WILLIAMS** then and there knew that on or about February 21, 2018, he had withdrawn approximately \$2,900 from St. Luke's operating account x1224 and then used approximately \$2,500 of those funds to purchase the above-described cashier's check made payable to the Esplanade Mall for the benefit of **WILLIAMS'** pizza restaurant. Furthermore, **WILLIAMS** then made two subsequent deposits totaling \$392, which was the remainder of the cash, less the \$8 bank processing fee, into his personal business account ending in x9620.

In violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 24

(Making False Statements to Federal Agents)

A. AT ALL TIMES MATERIAL HEREIN:

The allegations contained in Parts A and B of Counts 1-22 are hereby re-alleged and incorporated herein by reference.

B. THE OFFENSE:

On or about August 29, 2018, in the Eastern District of Louisiana, defendant **CHARLES J. WILLIAMS, JR.**, did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, when he told special agents with the FBI that he invested St. Luke's money in a company called S.A. The statements and representations were false because **WILLIAMS** then and there knew that he had not invested St. Luke's money with S.A.

In violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 25

(Making False Statements to Federal Agents)

A. AT ALL TIMES MATERIAL HEREIN:

The allegations contained in Parts A and B of Counts 1-22 are hereby re-alleged and incorporated herein by reference.

B. THE OFFENSE:

On or about August 29, 2018, in the Eastern District of Louisiana, defendant **CHARLES J. WILLIAMS, JR.**, did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, when he told special agents with the FBI he never used St. Luke's money for personal use or for his businesses. The statements and representations were false

because **WILLIAMS** then and there knew that he had used St. Luke's funds for personal and business use. Specifically, **WILLIAMS** knew he had used St. Luke's funds to purchase a postal money order on or about August 9, 2017, to repay a business debt. Furthermore, **WILLIAMS** knew he had withdrawn St. Luke's funds and subsequently deposited much of those funds into his personal account ending in x3063 and business accounts ending in x2929 and x9620.

In violation of Title 18, United States Code, Section 1001(a)(2).

NOTICE OF WIRE FRAUD FORFEITURE

1. The allegations of Counts 1-22 of this 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 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 1-22, defendant, **CHARLES J. WILLIAMS, JR.**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1343.

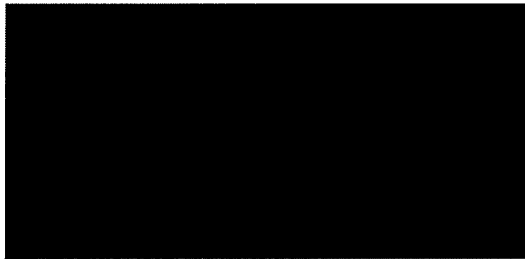
3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- 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 the jurisdiction of the Court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).



PETER G. STRASSER
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "B. Klebba", written over a horizontal line.

BRIAN M. KLEBBA
Assistant United States Attorney

New Orleans, Louisiana
July 18, 2019