

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA *2/88*
2019 AUG -9 A 11:37
WILLIAM W. BLEVINS
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR VIOLATIONS OF THE FEDERAL
CONTROLLED SUBSTANCES ACT AND WIRE FRAUD**

UNITED STATES OF AMERICA

v.

JORDY ROBERTSON

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CRIMINAL NO. **19-00153**
SECTION: **SECT.D MAG.1**
VIOLATIONS: 21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 846
18 U.S.C. § 1343

The United States Attorney charges that:

COUNT 1
**(Conspiracy to Distribute and Possess with the
Intent to Distribute a Quantity of Cocaine Hydrochloride)**

Beginning on a date unknown, but sometime prior to May 2, 2017, and continuing to on or about January 31, 2019, in the Eastern District of Louisiana and elsewhere, the defendant, **JORDY ROBERTSON**, did knowingly and intentionally combine, conspire, confederate, and agree with persons known and unknown, to distribute and possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine hydrochloride, a Schedule II

☒ Fee _____
☒ Process _____
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____ CtRmDep _____
____ Doc. No. _____

narcotic controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.

COUNT 2
(Wire Fraud)

A. AT ALL TIMES MATERIAL HEREIN:

1. The defendant, **JORDY ROBERTSON** (“**ROBERTSON**”), resided in or around Reserve, Louisiana, which was in the Eastern District of Louisiana.

2. **ROBERTSON**’s son (“Juvenile-1”) had significant medical issues, which required multiple organ transplants and lengthy inpatient hospital stays.

Medical Billing Records for Juvenile-1

3. Juvenile-1 was a Medicaid beneficiary, with a history of frequent and significant medical expenses related to various medical treatments from January 2, 2013 to August 16, 2018, at a local hospital. All of Juvenile-1’s medical treatments between May 28, 2015 to January 11, 2019, were paid for by Medicaid or were adjusted by the treating hospital. No expenses for medical treatments were incurred by Juvenile-1, and **ROBERTSON** did not pay for any of Juvenile-1’s medical expenses.

4. In or around late 2015, Juvenile-1 met players from the New Orleans Saints, a football team in the National Football League, who met Juvenile-1 while Juvenile-1 was in the hospital. Juvenile-1 developed friendships with several players and employees of the New Orleans Saints, who embraced Juvenile-1 as a “super fan” of the franchise.

5. In or around 2016, Juvenile-1 was the subject of media coverage, both in the Louisiana and national news media, stemming from his connection with the New Orleans Saints. That media coverage included Juvenile-1’s medical condition.

6. On or about July 12, 2017, ESPN presented Juvenile-1 with the Jimmy V ESPY Award for Perseverance. **ROBERTSON** accompanied Juvenile-1 on stage to accept the award.

GoFundMe

7. GoFundMe was an online fundraising platform. GoFundMe allowed users to request donation-based crowdfunding, in which the person running the fundraiser could solicit donations without any obligation to repay the donors or give them anything in return.

8. GoFundMe's online platform was run through web servers. GoFundMe did not have any web servers in Louisiana.

9. GoFundMe directed donors' payments to its payment processor, WePay. WePay processed the funds that donors sent to GoFundMe and then sent them to the bank accounts designated by whoever is running the GoFundMe campaign. WePay processed those payments through wire transfers, outside of the state of Louisiana.

10. On or about October 18, 2016, **ROBERTSON** created a GoFundMe campaign, entitled "Help [Juvenile-1]." The campaign solicited donations from individuals and organizations.

11. At the start of the GoFundMe campaign, **ROBERTSON** caused the GoFundMe website to state that the GoFundMe campaign was established to help pay for Juvenile-1's medical expenses related to his liver disease. It stated that "Any donation you could provide will all go towards [Juvenile-1's nickname]'s medical bills and make his current fight go as strong as possible."

12. A New-Orleans-based individual ("Victim-1") helped **ROBERTSON** set up the GoFundMe campaign. On or about October 19, 2016, Victim-1 made the first donation to the campaign, which Victim-1 submitted through GoFundMe's online platform, while Victim-1 was located in the New Orleans area, within the Eastern District of Louisiana.

13. On or about May 31, 2017, another individual, Victim-2, donated approximately \$8,390, through GoFundMe's online platform.

14. Between October 19, 2016 and March 12, 2019, the GoFundMe campaign received approximately 927 donations totaling approximately \$46,346.

15. Juvenile-1's medical expenses were paid by Medicaid or adjusted by the hospital. **ROBERTSON** did not pay for any of Juvenile-1's medical expenses.

It Takes Lives to Save Lives, LLC

16. On or about November 17, 2016, **ROBERTSON** established a Louisiana limited liability corporation named It Takes Lives to Save Lives LLC ("It Takes Lives").

17. **ROBERTSON** was the manager and officer of It Takes Lives. It Takes Lives operated a website, ittakeslivesetosavelives.com, which described the company as a charity accepting donations to raise awareness for pediatric organ transplants. It Takes Lives was not a nonprofit organization under Section 501(c)(3) of the Internal Revenue Code.

18. **ROBERTSON** originally claimed on the GoFundMe website that "Any donation you could provide will all go towards [Juvenile-1's] medical bills and make his current fight go as strong as possible." **ROBERTSON** later claimed on the GoFundMe website that the GoFundMe campaign was intended to raise awareness regarding organ transplants for children, through It Takes Lives. The description said, "Through our foundation – It Takes Lives to Save Lives – we help educate others on the importance of becoming an organ donor and also help families who are going through hard times while they wait for a transplant. ... Your donations would give other kids the opportunity to live beyond their youth because our organization will keep spreading the word to help people."

Louisiana Federal Credit Union

19. **ROBERTSON** maintained an account at the Louisiana Federal Credit Union (“LFCU”). The account holder for that account was **ROBERTSON** in his individual capacity.

20. Any out-of-state wires or transfers to a LFCU account passed through a server in Plano, Texas, and the funds were then deposited to the **ROBERTSON**’s LFCU account. Every time the LFCU account received a wire or transfer from out of state, a server in Plano, Texas sent an electronic communication to LFCU, which is located in LaPlace, Louisiana.

Regions Bank

21. **ROBERTSON** maintained an account at Regions Bank (“Regions”), in the name of It Takes Lives. **ROBERTSON** was the sole signatory for the account.

22. **ROBERTSON** used the Regions account to deposit checks that donors wrote to It Takes Lives.

23. Regions maintained its servers in Alabama. Every time that **ROBERTSON** deposited or withdrew funds to or from the It Takes Lives account while he was in the New Orleans area, it caused an electronic communication to be issued from the New Orleans area to the Regions servers in Birmingham, Alabama, after which the check was electronically transmitted to the Federal Reserve Bank of Atlanta for processing.

B. THE SCHEME TO DEFRAUD

Beginning in or about October 17, 2016 and continuing until in or about January 31, 2019, in the Eastern District of Louisiana and elsewhere, the defendant, **JORDY ROBERTSON**, did knowingly devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, by soliciting funds and causing funds to be transferred to bank accounts under **ROBERTSON**’s

control, by soliciting and receiving money that he used to unlawfully enrich himself, while misleading the donors of that money by stating that it would be used for Juvenile-1's medical expenses or to raise awareness about organ donation.

It was further a part of the scheme and artifice to defraud that:

ROBERTSON caused materially false and misleading statements to be posted on GoFundMe's website, and made materially false and misleading statements to donors, in furtherance of his scheme to solicit donations.

ROBERTSON solicited and received funds from donors to his GoFundMe campaign, while falsely stating to those donors that the funds would be used to pay Juvenile-1's medical expenses or to raise awareness about organ donation.

ROBERTSON solicited and received funds by check from individual donors to It Takes Lives, while falsely stating to those donors that the funds would be used to pay Juvenile-1's medical expenses or to raise awareness about organ donation.

ROBERTSON caused funds donated to It Takes Lives via GoFundMe to be transferred from WePay to his personal bank account at LFCU.

ROBERTSON set up the GoFundMe campaign to direct all payments from WePay to his LFCU account.

ROBERTSON caused funds from checks written by donors to be transferred from the donors' banks to **ROBERTSON**'s account at Regions Bank.

ROBERTSON utilized the donated funds to purchase household goods, groceries, and other personal items. **ROBERTSON** also utilized money donated to It Takes Lives to withdraw large quantities of cash at casinos in the New Orleans metropolitan area.

C. THE OFFENSE:

On or about the dates and in the approximate amounts specified in each wiring below, in the Eastern District of Louisiana and elsewhere, the defendant, **ROBERTSON**, for the purpose of executing and attempting to execute the scheme and artifice to defraud set forth in Part B above, did transmit and cause to be transmitted, by means of wire communications in interstate commerce, certain writings, signs, signals, pictures and sounds, as more particularly described below:

Wiring	Date	Description of Wire Communication
1	11/21/2016	A communication between Ohio, Texas, and Louisiana, concerning a wire transfer of \$5,993.21
2	2/14/2017	A communication between Alabama and Louisiana, concerning a wire transfer of \$20,000
3	5/31/2017	A communication between Ohio, Texas, and Louisiana, concerning a wire transfer of \$8,390
4	6/1/2017	A communication between Ohio, Texas, and Louisiana, concerning a wire transfer of \$7,726.89
5	6/5/2017	A communication between Ohio, Texas, and Louisiana, concerning a wire transfer of \$1,000
6	7/13/2017	A communication between Ohio, Texas, and Louisiana, concerning a wire transfer of \$5,000
7	7/14/2017	A communication between Ohio, Texas, and Louisiana, concerning a wire transfer of \$5,801.49
8	8/14/2017	A communication between Alabama and Louisiana, concerning a wire transfer of \$25,000

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

NOTICE OF FORFEITURE

1. The allegations of Counts 1 and 2 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 offense alleged in Count 1, the defendant, **JORDY ROBERTSON**, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting or derived from any proceeds obtained directly or indirectly as the

result of said offense, and any property used or intended to be used in any manner or part to commit or to facilitate the commission of said offense.

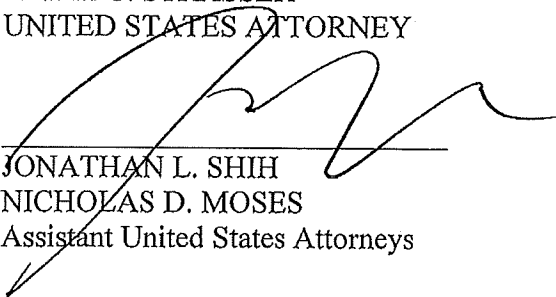
3. As a result of the offense alleged in Count 2, the defendant, **JORDY ROBERTSON**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property real or personal which constitutes or is derived from proceeds traceable to said offense.

4. 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



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New Orleans, Louisiana
August 9, 2019