

FILED *JS*
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA
2019 AUG 30 P 2:36
WILLIAM W. BLEVINS
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

INDICTMENT FOR CONSPIRACY
TO COMMIT WIRE FRAUD, CONSPIRACY TO
COMMIT MONEY LAUNDERING, AND NOTICE OF FORFEITURE

UNITED STATES OF AMERICA

* CRIMINAL NO.

19 - 183

v.

* SECTION:

SECT. H MAG. 1

SONOVAH JUDITH HILLMAN

* VIOLATIONS: 18 U.S.C. § 2

18 U.S.C. § 1343

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18 U.S.C. § 1349

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18 U.S.C. § 1956(a)(1)(B)(i)

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18 U.S.C. § 1956(h)

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The Grand Jury charges that:

COUNT 1

(18 U.S.C. § 1349 – Conspiracy to Commit Wire Fraud)

A. AT ALL TIMES MATERIAL HEREIN:

1. The defendant, SONOVAH JUDITH HILLMAN (“HILLMAN”) was a resident of Hercules, California, and resided at 290 Coronado Street, Hercules, California 94547.

2. Company A was a floating crane and stevedore company headquartered in Convent, Louisiana, within the Eastern District of Louisiana.

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3. Company B was a marine shipping company that specialized in international cargo transportation whose national headquarters was located in Houston, Texas.

4. Bank of America, N.A. ("Bank of America") was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

5. Company B maintained multiple bank accounts, including a checking account at Bank of America.

6. **HILLMAN** maintained a business checking account at Bank of America bearing account number XXXXXXXX6451 in the name of "Sonovah Judith Hillman Sole Prop, DBA Hillman Promotions."

7. **HILLMAN's** business checking account at Bank of America bearing account number XXXXXXXX6451 began the month of May 2017 with a negative balance.

8. During the month of May 2017, **HILLMAN's** business checking account at Bank of America bearing account number XXXXXXXX6451 received deposits and credits totaling approximately \$93,645.85 and had withdrawals and other debits totaling approximately \$93,315.43.

9. A "money mule" is a person recruited to open a bank account, or use an already open bank account, under her control for the purpose of receiving money illegally acquired and then transfer some or all of the funds, often through electronic means, on behalf of others. A money mule is typically allowed to keep a percentage of the funds deposited into her account as a payment.

10. The term "business email compromise" ("BEC") refers to a sophisticated fraud often targeting businesses involved in wire-transfer services. A BEC is accomplished by compromising and/or mimicking ("spoofing") legitimate business email accounts, often through

social engineering or computer intrusion techniques. Perpetrators of BEC fraud then use the email access to cause the target company, or individuals involved in legitimate business transactions with the target company, to conduct unauthorized transfers of funds to money mules' bank accounts.

B. THE CONSPIRACY:

11. Beginning at a time unknown, but not later than May 10, 2017, and continuing through not earlier than on or about May 22, 2017, in the Eastern District of Louisiana and elsewhere, the defendant, **SONOVAH JUDITH HILLMAN**, and others known and unknown to the Grand Jury, did willfully and knowingly combine, conspire, confederate, and agree together and with each other to execute, and attempt to execute, a scheme and artifice to defraud and to obtain money, funds, and property by means of false and fraudulent pretenses, representations and promises and did transmit and cause to be transmitted by means of wire communication in interstate commerce certain writings, signs, signals and sounds, in violation of Title 18, United States Code, Section 1343.

C. PURPOSE OF THE CONSPIRACY:

12. The purpose of the conspiracy was for **HILLMAN**, and others known and unknown to the Grand Jury, to enrich themselves unjustly by conducting a BEC on Company A and thereafter deceive customers of Company A, including Company B, into sending money owed to Company A to bank accounts under their custody and control, for their future personal use, by making it appear as though they were representatives of, and acting on behalf of, Company A.

D. MANNER AND MEANS:

In furtherance of the conspiracy, and to effect the objects of the conspiracy, the following acts, among others, were committed in the Eastern District of Louisiana and elsewhere:

13. Individuals unknown to the Grand Jury utilized a BEC scheme to obtain access without authorization to the email accounts of one or more employees of Company A for the purpose of obtaining private data, including usernames, passwords, bank account information, and the content of email accounts.

14. After gaining access to an email account of a Company A employee, the individual(s) unknown to the Grand Jury arranged to have emails sent to and from the account forwarded to a separate email account under their control.

15. Thereafter, co-conspirators known and unknown to the Grand Jury registered a domain name similar to Company A's domain (for example, "Conpany A" instead of "Company A") and, pretending to be representatives of Company A, sent emails to Company A's customers, including Company B. The false emails stated that there had been an audit of Company A's bank accounts, and Company A's customers should remit funds owed to Victim A to a new bank account.

16. On about May 10, 2017, one or more co-conspirators known and unknown to the Grand Jury, purporting to be employees of Company A, contacted one of Company A's customers (Company B) via email as part of the above-described scam.

17. On or about May 11, 2017, one or more co-conspirators known and unknown to the Grand Jury, purporting to be employees of Company A contacted a representative of Company B via email and instructed that Company B should remit the funds owed to Company A, approximately \$92,007.85, to the Bank of America account number XXXXX6451 belonging to **HILLMAN**. The instruction stated that the name of the beneficiary affiliated with the account was "Hillman Pro-[Company A]."

18. **HILLMAN** acted as a money mule in the above-described BEC scheme victimizing Company A and Company B.

19. Specifically, on or about May 15, 2017, Company B sent the amount owed to Company A via wire signal, approximately \$92,007.85, from its Bank of America bank account to **HILLMAN'S** Bank of America account number XXXXX6451. Company B believed that it was paying, and intended to pay, Company A, by causing the funds to transfer.

20. On or about May 15, 2017, **HILLMAN** caused a funds transfer in the amount of approximately \$2,500 from her Bank of America account bearing number XXXXX6451 to a Bank of America account bearing number XXXXX0340.

21. On or about May 15, 2017, **HILLMAN** utilized a debit card drawn on her Bank of America account bearing number XXXXX6451 to reserve and pay for a Disney Cruise Lines cruise for four individuals, including her, her daughter, and two other people, in the amount of approximately \$4,404.12.

22. On or about May 16, 2017, **HILLMAN** caused two cash withdrawals out of the Bank of America account bearing number XXXXX6451 in the amount of approximately \$10,000 each.

23. On or about May 16, 2016, **HILLMAN** caused a wire transfer in the amount of approximately \$33,125.00 from her Bank of America account bearing number XXXXX6451 to a Delta Community Credit Union (Atlanta, Georgia) account in the name of Person 1 bearing number XXXXXX6548.

24. On or about May 17, 2017, **HILLMAN** caused a funds transfer in the amount of approximately \$2,600 from her Bank of America account bearing number XXXXX6451 to a Bank of America account bearing number XXXXX0340.

25. On or about May 17, 2017, **HILLMAN** caused a cash withdrawal out of the Bank of America account bearing number XXXXX6451 in the amount of approximately \$21,000.

26. On or about May 19, 2017, **HILLMAN** utilized a debit card drawn on her Bank of America account bearing number XXXXX6451 to reserve and pay for two tickets, for her and her daughter, to fly aboard Spirit Airlines from Dallas-Fort Worth, Texas, to Oakland, California, in the amount of approximately \$651.78.

27. On or about May 19, 2017, **HILLMAN** utilized a debit card drawn on her Bank of America account bearing number XXXXX6451 to reserve and pay for two tickets, for her and her daughter, to fly aboard Spirit Airlines from Oakland, California, to Chicago, Illinois, in the amount of approximately \$335.58.

28. Between on or about May 18, 2017, and May 20, 2017, a total of approximately \$33,000 was withdrawn in a series of four (4) transactions from Delta Community Credit Union (Atlanta, Georgia) account in the name of Person 1 bearing number XXXXXX6548.

All in violation of Title 18, United States Code, Section 1349.

COUNT 2

(18 U.S.C. § 1956(h) – Conspiracy to Commit Money Laundering)

A. AT ALL TIMES MATERIAL HEREIN:

The allegations of Parts A and D of Count 1 are hereby realleged and incorporated herein in their entirety by reference.

B. THE CRIME:

Beginning at a time unknown, but not later than May 10, 2017, and continuing until at least May 22, 2017, in the Eastern District of Louisiana, and elsewhere, the defendant, **SONOVAH JUDITH HILLMAN**, did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to conduct and attempt to conduct financial

transactions—to wit, bank deposits, withdrawals, and transfers—knowing that the property involved in such transactions represented the proceeds of some form of unlawful activity and which, in fact, involved the proceeds of a specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds of such specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

NOTICE OF FRAUD FORFEITURE

1. The allegations of Count 1 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 Count 1, the Defendant, **SONOVAH JUDITH HILLMAN**, 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, Sections 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 Defendants 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).

NOTICE OF MONEY LAUNDERING FORFEITURE

1. The allegations of Count 2 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, Section 982.

2. As a result of the offenses, alleged in Count 2, the Defendant, **SONOVAH JUDITH HILLMAN**, shall forfeit to the United States all property real or personal, involved in the aforesaid offenses and all property traceable to such property which was involved in the said violations of Title 18, United States Code, Sections 1956(h), 1956(a)(1)(B)(i) and 982.

3. If any of the property described above as being 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;

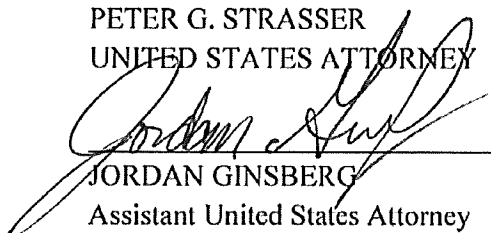
it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1) to seek forfeiture of any other property of said Defendants up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 982.

A TRUE BILL:

[REDACTED]

PETER G. STRASSER
UNITED STATES ATTORNEY


JORDAN GINSBERG
Assistant United States Attorney
Illinois Bar No. 6282956

New Orleans, Louisiana
August 30, 2019