

U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
FILED 12-18-2019
WILLIAM W. BLEVINS
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 19-140
v. * SECTION: "I"
CHARLES J. WILLIAMS, JR. *
*
* * *

FACTUAL BASIS

Should this matter have proceeded to trial, the Government would have proven, through the introduction of competent testimony and admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant.

The case against **CHARLES J. WILLIAMS, JR.** ("**WILLIAMS**") began as a result of a complaint to U.S. Attorney's Office from St. Luke's Episcopal Church ("**St. Luke's**") located at 1222 North Dorgenois Street in New Orleans. In January 2017, the defendant was elected Senior Warden of St. Luke's. In his role as Senior Warden, **WILLIAMS** was responsible for paying all of St. Luke's bills including insurance, salaries, and utilities. **WILLIAMS** took over the finances of the church and reduced or eliminated other church members' access to church finances shortly after becoming the Senior Warden at St. Luke's. **WILLIAMS** did not share church bank statements with other church members in an effort to conceal his embezzlement of church funds and he transferred church funds from one bank account to another account before withdrawing the funds. During his tenure, **WILLIAMS** embezzled approximately \$89,000.00 from St. Luke's in his capacity as Senior Warden. **WILLIAMS** used some of the stolen money to support his pizza restaurant located in the Esplanade Mall.

AUSA BK
Defendant CTJ
Defense Counsel GVG

Chase Bank (“Chase”) was the U.S. consumer banking business of JP Morgan Chase & Co., a global financial services firm with operations worldwide. 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. Chase transactions, deposits and withdrawals, implicate the Demand Deposit Account (“DDA”). The DDA is located on mainframe computer servers located in the State of Delaware. All of **WILLIAMS**’ Chase transactions caused electronic transmissions of information to the DDA system in Delaware. Once processed by the DDA, the updated account information was available and transmitted throughout the Chase computer network. Updated Chase account information including balances were transmitted from Chase servers in Delaware through Chase’s network. Chase operated branches throughout the Eastern District of Louisiana including locations on General De Gaulle Drive, New Orleans; Williams Boulevard, Kenner; North Broad Street, New Orleans; Read Boulevard, New Orleans; and Saint Charles Avenue, New Orleans.

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 account number x1224, and a “Supply’s (sic)” account ending in account number x1257. A Chase debit card ending in account number was issued for the St. Luke’s Supply’s account. Chase debit card ending in x2340 was issued in the name of S.L., a church office secretary. A third Chase debit card ending in x0774 was issued to **WILLIAMS** in or around October 2017.

In or about January 2017, **WILLIAMS**, as the CEO of the Ferdinand Group, doing business as (“DBA”) “Go Pizza!,” signed a lease agreement with the Esplanade Mall to operate a restaurant within the mall. **WILLIAMS** maintained a Chase account for his business under the

name, "The Ferdinand Group, L.L.C.," with the address 1401 W. Esplanade Avenue #330, Kenner, Louisiana 70065, with an account number ending in x2929. **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. **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.

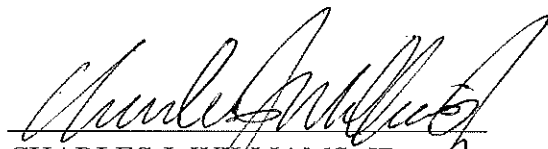
On June 23, 2017, at approximately 10:34 A.M., **WILLIAMS** transferred, without permission, \$800.00 from St. Luke's savings account x8664 into St. Luke's supply account x1257. At 10:42 A.M., **WILLIAMS** used debit card x2340 to make an \$800.00 ATM cash withdrawal from St. Luke's supply account x1257 at the N. Broad Branch. At 10:43 A.M., **WILLIAMS** made an \$800.00 ATM cash deposit into his personal business account x2929. **WILLIAMS** concealed the withdrawal of the \$800.00 from St. Luke's. Further, **WILLIAMS** did not have authorization from St. Luke's to use church funds for his personal business. Lastly, **WILLIAMS**, knowing he did not have permission from St. Luke's, concealed the nature of this transaction by limiting St. Luke's access to the church's bank statements.

The Government would prove **WILLIAMS'** misrepresentations were made through his acts of concealment. For example, **WILLIAMS** concealed his embezzlement from St. Luke's when he withdrew money from St. Luke's accounts because **WILLIAMS** did not have authorization and because he denied church members access to the bank statements. The Government would call witnesses from St. Luke's to testify that **WILLIAMS** withdrew this money without their knowledge or permission. In addition, St. Luke's did not have a financial

obligation to Go Pizza! and, therefore, any use of church funds by **WILLIAMS** for the benefit of Go Pizza! was improper and done so without the knowledge of church officials.

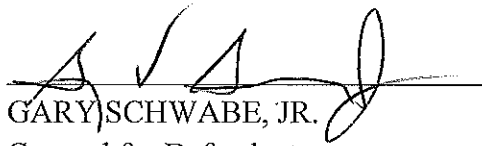
WILLIAMS also lied to the agents when he told them he had invested St. Luke's money with a company called Space Angels. Lastly, he lied when he claimed he had not used any of St. Luke's money for his business or for personal use. The FBI's investigation determined that all of these assertions were in fact false.

Various records and testimonial evidence, including testimony from representatives of the Federal Bureau of Investigation, St. Luke's Episcopal Church, Chase Bank, and other witnesses, would be called at trial to establish the facts set forth above.



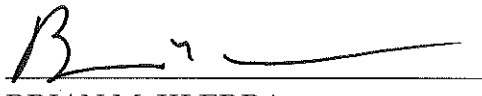
CHARLES J. WILLIAMS, JR.
Defendant

12.18.19
DATE



GARY SCHWABE, JR.
Counsel for Defendant

12-18-19
DATE



BRIAN M. KLEBBA
Assistant United States Attorney

12/18/19
DATE