

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO. 18-143</b>
<b>v.</b>	*	<b>SECTION: "M"</b>
<b>JEFFERY JOSEPH</b>	*	

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**FACTUAL BASIS**

Defendant **JEFFERY JOSEPH** ("**JOSEPH**") intends to enter a plea of guilty in this case. Should this matter proceed to trial, the United States would prove beyond a reasonable doubt, through credible testimony and reliable evidence, the following facts. Unless stated otherwise, the following acts occurred within the jurisdiction of the Eastern District of Louisiana.

Special Agents with the U.S. Secret Service, along with detectives with the Jefferson Parish Sheriff's Office (JPSO) and New Orleans Police Department (NOPD), and other members of the Louisiana Financial Crimes Task Force, have been investigating access device fraud and identity theft committed by **JOSEPH**, Lakisha Williams, Brittany White, Keyira Gable, Tamika Stevens, Antoine Narcisse, Markita Robertson and others. Agents learned that these individuals would work together to produce and use credit and debit cards with unauthorized or counterfeit information in order to fraudulently obtain goods and services. These individuals would then fraudulently return these goods (a fraudulent "chargeback") to stores in order to have the return value be credited to their own bank accounts.

**A. Historical Evidence of Travel and Fraudulent Chargebacks.**

In order to investigate the scope of this scheme, agents reviewed subpoenaed bank records for Williams, White, **JOSEPH**, Gable, and others. Their bank accounts showed that they would

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occasionally receive credits to their bank accounts for the return of merchandise at stores. However, agents could not find the earlier corresponding debit for the purchase. Based on their training and experience, agents suspected that this was further evidence that these co-conspirators were using stolen card information to make purchases, but then using their own card information to chargeback.

Agents obtained Capital One Bank records for **JOSEPH**'s bank account. The records show a pattern of chargebacks received from **JOSEPH** with no coordinating purchase. From June 7, 2016 through March 8, 2018, this account received \$105,942.83 in chargebacks. Several of these chargebacks occurred at stores located in the Eastern District of Louisiana, most recently on January 8, 2018, in Gretna, Louisiana. Not all of the chargebacks occurred in Louisiana, however. Other stores where chargebacks were issued were located in Florida, Tennessee, Ohio, Massachusetts, Colorado, Oregon and others. Stores from which **JOSEPH** received chargebacks include JCPenney, T.J.Maxx, Ross, Kay Jewelers, Zales, and others.

Agents subpoenaed records from JCPenney, T.J.Maxx, Zales and other stores that appeared on the bank statements for **JOSEPH**, Williams, White, Gable and others. Agents were able to find the corresponding purchases for the chargebacks that were credited to the conspirators' bank accounts. Those purchases were made using credit/debit card numbers that did not belong to the conspirators. Agents also noted that some of these fraudulent purchases were made in locations outside of Louisiana, which prompted agents to obtain flight records for the alleged conspirators. Using this information, agents were able to reconstruct the historical evidence of travel and fraudulent chargebacks. The evidence established that **JOSEPH**, Williams, White, and others would use bank account information that was either stolen from individuals who live in the New Orleans area, or they would obtain stolen bank account information over the internet from

individuals in foreign countries. These foreign banks include Westpac Bank (Australia), China Merchants Bank (China), Toronto-Dominion Bank (Canada), and others. The evidence regarding **JOSEPH's** flights included the following:

- Fraudulent Purchases in Nashville, TN Area in August 2016:
  - On August 12, 2016, Williams and **JOSEPH** flew together on Southwest Airlines from New Orleans to Nashville, TN. On August 13 and 14, 2016, three purchases totaling \$18,851.85 were conducted at JCPenney stores in Franklin, TN, and Murfreesboro, TN, using card accounts from Westpac Bank, Toronto-Dominion Bank, and Chinese Merchants Bank. Williams and **JOSEPH** then flew back together to New Orleans on a 7:45 p.m. flight on August 14, 2016.
  - On August 19, 2016, Williams and **JOSEPH** flew together on Southwest Airlines from New Orleans to St. Louis, MO. On August 19, 2016, White's bank account received a credit of \$6,063.67 for a chargeback performed at the JCPenney in Des Peres, MO (approximately 17 miles west of St. Louis). On August 20, 2016, Williams' bank account received a credit of \$3,490.53 for a chargeback performed at a JCPenney in St. Louis, MO. These chargebacks corresponded to purchases made at JC Penney stores in Tennessee on August 13 and 14, 2016. Williams and **JOSEPH** each flew back to New Orleans on August 21, 2016.
  - On September 29, 2016, **JOSEPH's** Capital One bank account received a credit of \$5,807.13 for a chargeback performed at a JCPenney in Mary

Esther, FL (near Destin). The chargeback corresponded to one of the purchases in Tennessee on August 13 and 14, 2016.

- Fraudulent Purchase in Richmond, VA in September 2016:

- On September 12, 2016, Williams and **JOSEPH** flew on Southwest Airlines from New Orleans to Richmond, VA. On September 14, 2016, a \$4,216.13 purchase was made using an American Express account that did not belong to Williams or **JOSEPH** at a JCPenney in Woodbridge, VA (approximately 80 miles north of Richmond). **JOSEPH** and Williams then flew back to New Orleans together on September 16, 2016.
- On September 20, 2016, Williams and **JOSEPH** flew on Southwest Airlines from New Orleans to Charlotte, NC. On September 21, 2016, White's Regions Bank account received a credit for \$4,216.13 for a chargeback performed at a JCPenney in Concord, NC. Williams flew back to New Orleans on September 24, 2016, and **JOSEPH** flew back the following day.

- Fraudulent Purchases in Concord, NC in September 2016:

- During the above-described trip in North Carolina, several purchases were also made. On September 21, 2016, a purchase for \$4,433.78 was made using a Toronto-Dominion bank account at the JCPenney in Concord, NC. Later on September 21, 2016, a purchase for \$5,749.00 was made using a China Merchants Bank card at the JCPenney in Matthews, NC. Williams then flew back to New Orleans on September 24, 2016, and **JOSEPH** flew back the following day.

- On October 4, 2016, Williams received a credit for \$1,606.10 to her Discover card and purchased a diamond ring for \$4,142.99 via a chargeback performed at JCPenney in McComb, MS. This chargeback corresponded to the purchase in Matthews, NC.
- On October 5, 2016, Williams and **JOSEPH** flew together on Southwest Airlines to Milwaukee, WI. Williams then received a chargeback for \$4,142.59 to her Discover card account at the JCPenney in Vernon Hills, IL (approximately 65 miles south of Milwaukee).
- On November 4, 2016, Williams and **JOSEPH** flew Southwest Airlines together to Columbus, OH. On November 5, 2016, Williams received a credit for \$4,433.78 to her Citibank account for a chargeback performed at JCPenney in Columbus, OH. This chargeback corresponded to the purchase in Concord, NC. Williams, **JOSEPH**, and White flew back on Southwest Airlines to New Orleans on November 7, 2016.

Agents also determined that **JOSEPH** took flights with Narcisse and Robertson. The pattern of flights was consistent with credit card fraud activity. Based on search warrant evidence from electronic devices, agents determined that **JOSEPH** often directed Narcisse and Robertson on how to commit credit card fraud. Among the flights **JOSEPH** took with Narcisse and Robertson were:

- On December 20, 2016, **JOSEPH** and Robertson flew on Southwest Airlines from New Orleans to Orlando, Florida on the same flight. Their tickets were booked together.

- On January 14, 2017, **JOSEPH** and Robertson flew on American Airlines from Minneapolis to New Orleans on the same flight. Their tickets were booked together.
- On January 27, 2017, **JOSEPH**, Robertson, and Narcisse flew on Southwest Airlines from Portland, Oregon, to New Orleans on the same flight. All three tickets were booked together.
- On February 15, 2017, **JOSEPH** and Narcisse flew on Southwest Airlines from New Orleans to Milwaukee, Wisconsin on the same flight. Their tickets were booked together.
- On March 3, 2017: **JOSEPH** and Narcisse flew on American Airlines from New Orleans to Cincinnati, Ohio on the same flight. Their tickets were booked together.
- On March 13, 2017, **JOSEPH** and Narcisse flew on Southwest Airlines from Cleveland, Ohio, to New Orleans on the same flight. Their tickets were booked together.
- On September 16, 2017, **JOSEPH** and Robertson flew on Southwest Airlines from New Orleans to Baltimore, Maryland on the same flight. They returned on the same flight on September 19, 2017. Their tickets were booked together.
- On December 20, 2017, **JOSEPH** and Robertson flew on Southwest Airlines from New Orleans to Columbus, Ohio on the same flight. They returned on the same flight on December 23, 2017. Their tickets were booked together.
- On January 20, 2018, **JOSEPH** and Robertson flew on Southwest Airlines from New Orleans to Boston, Massachusetts on the same flight. Their tickets were

booked together.

- On February 7, 2018, **JOSEPH** and Robertson flew from New Orleans to Seattle, Washington on the same flight. They returned on the same flight on February 10, 2018. Their tickets were booked together.

**B. Arrest of JOSEPH and Antoine Narcisse in Minnetonka, MN, on June 10, 2017.**

During a trip to Minnesota, both **JOSEPH** and Narcisse were arrested together at a Minnetonka mall on charges related to access device fraud. On June 10, 2017, officers received information from a Macy's loss prevention officer at the mall that a man (later identified as **JOSEPH**) had purchased four Apple watches at a Macy's using a card that had to be punched in after it could not be swiped. **JOSEPH** also presented an out-of-state ID. The total purchase was \$1,712.11. Based on officers' training and experience, this purchase was consistent with possible credit card fraud.

Officers reported to the area to perform surveillance. One officer observed **JOSEPH** inside a Michael Kors store at the mall carrying a Macy's bag. While that surveillance was occurring, another report of possible fraud was received from another mall store, Buckle (a high-end denim store).

Officers reported to the Buckle store where they spoke to a store clerk. The clerk reported that a man (later identified as Narcisse) had come in the store, selected multiple jeans in different sizes, did not try them on, but instead brought them directly to the clerk to purchase. The total value was \$1,061.77. Narcisse attempted to use a card that could not be swiped. Narcisse did not provide ID but said he was from out of town. He tried to have the clerk punch in the card number, but the clerk refused pursuant to store policy. Narcisse left without any items.

Meanwhile, officers at the Michael Kors store continued to observe **JOSEPH** shopping. Officers returned to the Michael Kors where **JOSEPH** was still shopping. The detective entered Michael Kors and stood behind **JOSEPH** as **JOSEPH** was attempting to purchase three of their most expensive watches for \$1,544.77. The detective heard **JOSEPH**'s card be declined as it was swiped through the reader. The employee then took **JOSEPH**'s card and ID and manually punched it in. After **JOSEPH** left, the detective spoke to the clerk who advised that **JOSEPH** presented an out-of-state ID in the name of "Shawn Ford" that matched the credit card. The photo on the ID matched **JOSEPH**.

Officers observed **JOSEPH** leave the mall to go to a vehicle. He stopped between a white SUV and white sedan, and then kept walking. Moments later, Narcisse left the mall and headed towards parking. Officers saw Narcisse go to a white SUV, reach under the vehicle, get back up, and then go to a white Toyota Camry and open the door. Officers approached and questioned Narcisse, who said he was there with his friend "Jeff." Officers saw a Kay Jewelers bag. Narcisse provided officers with a receipt for \$6,604.84 and the credit card he used for the purchase. Officers asked if any other cards were in the car, and Narcisse gave them four additional credit cards.

While an officer detained Narcisse, officers ran the cards at the mall substation. All five credit cards had Narcisse's name on them, but only one contained an account number on the magnetic stripe.

Officers likewise detained **JOSEPH** after an officer observed **JOSEPH** in the parking lot with bags. **JOSEPH** had walked to the south side of the Nordstrom's store and sat behind a large transformer. An officer approached and asked where the items in the bags came from. **JOSEPH** said he bought them all. The officer asked **JOSEPH** to identify himself and asked him how he



purchased the items. **JOSEPH** refused to ID himself or state how he bought the items. The officer placed **JOSEPH** in handcuffs for failure to ID himself. **JOSEPH** then identified himself as "Shawn Ford."

Officers searched the Camry and found a backpack in the right rear passenger seat. Officers searched the bag and found a stack of 12 credit cards wrapped with a rubber band, a wallet with Louisiana ID for "Jeffery Joseph," five credit cards with **JOSEPH**'s name, a Louisiana ID with a false name, Spirit Airlines tickets for **JOSEPH** and Narcisse showing arrival June 10, 2017, and two hotel keycards for the same room at a W Hotel in Minneapolis.

During a search incident to arrest of **JOSEPH**, officers found a Arizona driver's license for "Shawn Ford," which corresponded to the name on the cards that **JOSEPH** had used to purchase items fraudulently.

Officers determined that the stolen bank information mostly came from foreign banks, which is consistent with these conspirators' modus operandi. However, two of the card numbers came from individuals who lived in the Minneapolis area. Officers contacted the two local victims who confirmed that they did not permit the defendants to use their credit card information.

Officers determined that the attempted total loss amount was \$10,950.36. Both Narcisse and **JOSEPH** were subsequently charged in Minnesota state court with identity theft. They pleaded guilty and received three years of probation.

**C. JOSEPH'S Social Media and Move to Palmyra Street Address in New Orleans.**

Between October and November 2018, agents took steps to further investigate the criminal activity of **JOSEPH**. Through information received from witnesses and from other sources, agents learned that **JOSEPH** uses Instagram account "jay.dolla.sign". Agents reviewed the

publicly-available photos on the “jay.dolla.sign” account. Agents observed the following photos on this account that were posted between July and October 2018:

- On or about July 7, 2018, a photo of **JOSEPH** was posted that was tagged in New Orleans, Louisiana, showing him sitting on the hood of a gray Mercedes with the caption “I’m living proof that crime do pay.”
- On or about September 23, 2018, a photo of **JOSEPH** was posted that was tagged at “Compound Night Club (ATL)” (a known reference to Atlanta, Georgia), with the caption “Stand up nigga, only ducking indictments.” Lakisha Williams had been arrested on September 17, 2018 – only six days earlier. Furthermore, **JOSEPH**’s probation officer confirmed that **JOSEPH** was not permitted to travel outside Louisiana without permission, and his probation officer stated that she did not give him permission to travel anywhere outside Louisiana.
- On or about October 26, 2018, a photo of **JOSEPH** was posted that was tagged in Philadelphia, Pennsylvania, in which he is holding a Louis Vuitton travel bag apparently outside an airport. Again, **JOSEPH**’s probation officer confirmed that she did not give him permission to travel anywhere outside of Louisiana.

On October 31, 2018, agents performed surveillance on **JOSEPH**. Agents observed **JOSEPH** outside of the residence that was identified by his probation officer, 1027 Lamanche St., New Orleans, LA 70117. Agents saw **JOSEPH** get into the driver’s seat of a gray 2017 Mercedes GLC, with Louisiana license plate 897BYX, and depart. This vehicle matched the car pictured on **JOSEPH**’s Instagram account. Agents followed **JOSEPH** to a U-Haul storage facility on Tulane Avenue in New Orleans. Agents observed **JOSEPH** remain at the facility for approximately 45

minutes. Later, on October 31st, another photo was posted on the “jay.dolla.sign” Instagram account, showing **JOSEPH** loading a U-Haul truck.

On November 6, 2018, USSS agents conducting surveillance on **JOSEPH** observed him drive the same gray Mercedes SUV to a residence located on Palmyra Street, New Orleans, LA. Agents observed him enter the residence. Later that day, agents observed **JOSEPH** walking around the residence with employees from AT&T in order to set up a satellite dish. Agents learned that **JOSEPH** had moved to an apartment on Palmyra Street, but he did not notify his probation officer of the change of address. Furthermore, **JOSEPH** used the alias “Dwayne Jones” to rent the Palmyra Street property.

**D. Purchase Using Stolen Credit Card Information in Auburn, WA, in October 2018.**

As discussed more fully below, agents observed **JOSEPH** drive from New Orleans to Baton Rouge, LA, on November 27, 2018. While in Baton Rouge, **JOSEPH** returned approximately \$230.00 of items to a Bed Bath & Beyond store. The next day, agents spoke with a manager at the store who confirmed that **JOSEPH** returned \$230.00 in items. **JOSEPH** provided the name “Joshua Sims” for the return.

According to the store’s loss prevention officers, the items that **JOSEPH** returned in Baton Rouge were originally purchased on October 18, 2018, at the Bed Bath & Beyond located in Auburn, Washington. The purchase amount was \$1,714.79, and paid for using a MasterCard number ending in 7625. Agents determined that this card number corresponded to Westpac Bank in Australia. The use of bank account numbers from foreign banks, including specifically Westpac Bank, is consistent with fraudulent cards used by other members of this conspiracy. Westpac Bank confirmed that this transaction was reported as fraudulent.

Bed Bath & Beyond loss-prevention managers further informed agents that another set of sheets that was purchased in the same transaction in Auburn, WA, was returned on October 24, 2018 to the Bed Bath & Beyond located in Metairie, LA. The bed sheets were returned for \$218.39 under the name "Dwayne Jones."

On November 29, 2018, agents spoke with another Bed Bath & Beyond asset loss-prevention manager assigned to the Seattle/Utah region. Agents requested that he obtain the surveillance video footage of the original purchase of items on October 18, 2018. That footage from the Auburn, WA, store showed **JOSEPH** making the original purchase with the Westpac card.

As noted below, on December 10, 2018, agents executed a search warrant at **JOSEPH**'s Palmyra Street apartment in New Orleans. Agents found a fake ID with **JOSEPH**'s picture in the name "Dwayne Jones." Also, agents found Bed Bath & Beyond sheets in the original packaging with a UPC symbol corresponding to items purchased in Auburn, Washington.

**E. Fraudulent Use of Stolen Social Security Number in November 2018.**

On or about November 14, 2018, USSS agents conducting surveillance on **JOSEPH** saw him depart New Orleans area and drive towards Baton Rouge. Agents observed **JOSEPH** enter a Verizon Wireless store, located at 7089 Siegen Lane, Baton Rouge, Louisiana 70809. **JOSEPH** later exited and drove away.

After **JOSEPH** left the store, agents spoke to the store's general manager. The manager conducted a search of Verizon's internal system for that date. He stated that they did not have a record of an account in **JOSEPH**'s name. However, an employee remembered selling a phone and phone plan to someone fitting **JOSEPH**'s description. The employee stated he remembered **JOSEPH** because he had presented an I.D. card from another state. The employee stated that he

thought it was a North Carolina identification. After seeing the out-of-state I.D., the employee notified his supervisor, who approved the transaction. The employee told agents that the I.D. photo matched **JOSEPH**. The manager could not give any more information and referred agents to Verizon's Security Assistance Team (VSAT). Agents determined that, after purchasing the phone at the Verizon store, **JOSEPH** stopped at a Home Depot, and then he returned to his residence at on Palmyra Street in New Orleans.

Agents contacted VSAT to request information on any accounts opened at the store on November 14, 2018, between the hours of 4:45 PM and 5:45 PM, the period of time when **JOSEPH** was in the store. VSAT responded with documentation of the purchase along with surveillance video. The video showed **JOSEPH** purchasing a phone and opening an account at approximately 5:20 PM. Verizon records showed that **JOSEPH** was the only customer to open an account at this store between 4:45 PM and 5:45 PM on November 14, 2018. **JOSEPH** used the alias "Joshua Sims" to open the account. **JOSEPH** also used a social security number ending in 5526 to open the account. Verizon confirmed that a social security number is necessary because Verizon conducts a credit check before a customer can open a Verizon account.

Agents submitted a request to the Social Security Administration (SSA) to verify whether the names Jeffery Joseph or Joshua Sims matched with social security number ending in 5526. The SSA notified agents that neither Jeffery Joseph nor Joshua Sims corresponded to this social security number. The SSA further stated that the social security number ending in 5526 belonged to a female minor who was born in 2009. Based on agents' training and experience, stolen social security numbers of minors are used by fraudsters because minors generally do not have a bad credit history and they do not check their credit. Agents subsequently spoke to both parents of this

female minor by telephone. Both parents confirmed that they did not give anyone permission to use their minor child's social security number.

**F. Arrest of JOSEPH, Markita Robertson, and Antoine Narcisse in Franklin, TN, on December 8, 2018.**

On December 8, 2018, JOSEPH, Robertson, and Narcisse were arrested at a mall in Franklin, Tennessee, on charges relating to credit card fraud. According to the Franklin Police Department, officers were performing routine surveillance at a mall that had reported instances of credit card fraud. Officers first saw Narcisse attempting to buy \$1,000 worth of perfume using a credit card that would not scan. Narcisse then asked the store cashier to manually key in the credit card number. The cashier refused, and Narcisse left the store. Officers were aware that this method is a common means of committing credit card fraud wherein perpetrators use embossers to emboss a stolen credit card number on the front of the card. When a cashier cannot swipe the card, the perpetrator then instructs him/her to manually key in the stolen number on the front of the card.

Officers saw Narcisse then go into a Macy's store. Narcisse tried to buy \$4,800 worth in watches using a card that would not scan. Narcisse again told the cashier to key in the number. The transaction was not completed, however, and Narcisse left without the merchandise. Officers observed Narcisse then met with another male (later identified as JOSEPH). Narcisse and JOSEPH walked out and entered a Hyundai Tucson. A female, later identified as Robertson, also got into the car.




Officers observed them drive to a Dillard's store at the mall. Robertson got out of the car and entered the store. Officers saw her then attempt to purchase several high-end purses at the Dillard's store using a credit card. The credit card she was using was declined because the

magnetic strip was unreadable. Robertson then walked to customer service, where a cashier then manually keyed in Robertson's card. Robertson left with the purchased items.

Officers meanwhile were performing surveillance on the Hyundai Tucson SUV and decided to make an investigatory stop of the suspects in the vehicle, later determined to be **JOSEPH** and Narcisse. As officers approached, the driver failed to stop and rammed one of the police vehicles while fleeing. The driver of the vehicle, later identified as **JOSEPH**, then exited the vehicle and fled on foot. Officers arrested **JOSEPH** after a foot chase. Officers arrested another male and female who were in the vehicle. Officers found numerous credit cards on the three individuals that belonged to various financial institutions. Officers learned that one of these institutions is Westpac Bank, the same Australian bank that issued the card numbers that had been used without authorization by these co-conspirators previously.

**JOSEPH** initially refused to give his true identity to police at the time of arrest. He identified himself only as "John Doe." He only gave his correct identity after booking. Narcisse was arrested in the vehicle that **JOSEPH** had driven in flight. Also in the vehicle, officers found two cell phones in the center console and approximately \$20,500.00 worth of merchandise that had been reported as purchased fraudulently.

After the traffic stop and arrest of **JOSEPH** and Narcisse, agents went back to the mall to locate Robertson. She was found inside the mall near exterior doors, appearing to be waiting to be picked up. She was observed talking on a cell phone and she was still in possession of items that she had purchased. Officers approached her and asked her to identify herself. She refused to provide her identity to officers. Based upon officers' observations thus far and Robertson's refusal to provide her identity, officers arrested her and seized her phone pursuant to a search incident to arrest.

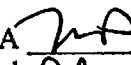
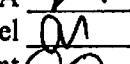

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Defendant 

During a search incident to arrest, officers found that **JOSEPH** and Narcisse were in possession of Loews Vanderbilt Hotel keys. This hotel is located in Nashville, which is located near Franklin. Officers contacted the Loews hotel. Hotel personnel reported that one room was rented in Narcisse's name, and the other was rented in the name of "Joshua Sims," a known alias of **JOSEPH**. The hotel's director of security reported that, after the arrest, Narcisse and **JOSEPH** did not return to the hotel and did not pay their bill. Accordingly, hotel security entered their rooms and seized the property as abandoned. From the room rented to "Joshua Sims," hotel security seized a laptop along with a card encoder and credit cards. Loews security then handed over these items to the Franklin Police Department, who provided them to U.S. Secret Service agents.

USSS agents obtained federal search warrants for the phones seized in the vehicle where **JOSEPH** and Narcisse were arrested, the computer seized from Nashville Lowes Hotel, and the phone seized from Robertson. Also, Narcisse gave officers consent to search his phone. Agents have found text messages and other communications that confirm that **JOSEPH**, Narcisse, and Robertson communicated among themselves regarding where to use stolen credit card information. Agents also found stolen or counterfeit credit card information.

**G. Search Warrant at JOSEPH's Residence in New Orleans on December 10, 2018.**

On December 10, 2018, Hon. Joseph C. Wilkinson, Jr. signed an arrest warrant for **JOSEPH**, as well as search warrants for **JOSEPH**'s vehicle and **JOSEPH**'s residence at 4534 Palmyra St., New Orleans. Agents executed the warrant on the same day. During the search of **JOSEPH**'s apartment, agents found items that are consistent with a conspiracy to commit access device fraud. Agents found a false identification card in name of "Dwayne Jones" with a photograph of **JOSEPH**. Agents also found approximately 45 credit and debit cards. These

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 Defense Counsel   
 Defendant 



cards were in the names of Jeffrey Joseph, Dwayne Jones, Joshua Sims, Markita Robertson, Antoine Narcisse, and others. Agents ran all the cards and found that only three correctly corresponded to the name on the card. The rest of the cards were fake Visa cards with a rear magnetic stripe that had been intentionally damaged so that it could not be read by a machine. The front embossed number corresponded to card numbers from Westpac Bank (Australia), Central European International Bank (Hungary), Bank of America, Regions Bank, Chase Bank, Capital One Bank, and PNC Bank.

Agents also recovered an embosser, three label-makers (for putting CVV number on back), and blank Vanilla Visa cards. Based on agents' training and experience, these items are commonly used together to make false and fraudulent credit or debit cards.

Agents also seized \$17,378.00 in cash and various luxury items. Many of these items still had the tags on them, suggesting that these were items that had been purchased and would be returned later. For example, agents found three North Face coats that were all identical with tags still on. They located three suits in a Dillard's bag, and all with the tags still on them. Agents found a pair of \$1200 shoes with a receipt. They located jewelry, such as Gucci watches and a Rolex watch. Agents located bed sheets from Bed Bath & Beyond that were in the original packaging with a UPC code that corresponded with items purchased in Auburn, Washington, a location where agents had learned **JOSEPH** had traveled to make fraudulent purchases. Agents also seized numerous receipts that had the name and card number blacked out on them, which suggested to agents that **JOSEPH** intended to use them to make returns. Agents also seized receipts, many of which had the name and card number blacked out.

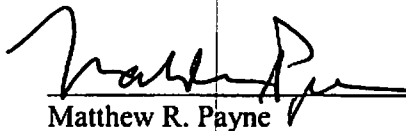
Agents obtained search warrants for electronic devices seized from **JOSEPH** and recovered additional credit card numbers that did not belong to **JOSEPH**. Agents subpoenaed

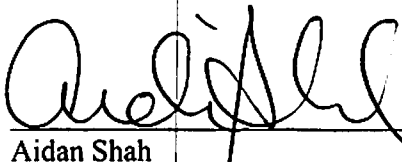
bank records for these customers in order to obtain debit card balances and credit card limits in order to determine the intended loss amounts. Agents learned that the total debit card balances and credit card limits for the stolen accounts totaled approximately \$300,000.00.

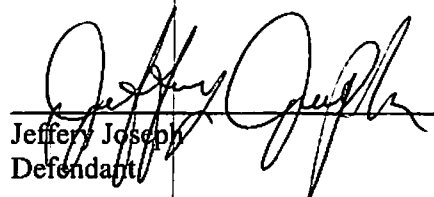
In the course of this investigation, agents determined that **JOSEPH** is responsible for and intended loss amount between \$250,000.00 and \$550,000.00 based on his own conduct and the reasonably foreseeable conduct of his co-conspirators.

Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by **JOSEPH**, and it is not a complete statement of all facts described by **JOSEPH** to the government. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for his guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for **JOSEPH's** plea of guilty to the charged offenses.

 2/20/2020  
Matthew R. Payne Date  
K. Paige O'Hale  
Assistant United States Attorneys

 2/17/2020  
Aidan Shah Date  
Counsel for Jeffery Joseph

 02/17/2020  
Jeffery Joseph Date  
Defendant