

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 21-49

v. * SECTION: "I"

CHRISTY BARTHOLOMEW *

* * *

FACTUAL BASIS

The defendant, **CHRISTY BARTHOLOMEW**, (hereinafter, the "defendant" or "**BARTHOLOMEW**"), has agreed to plead guilty as charged to the Bill of Information now pending against her, charging her with two counts of wire fraud, in violation of Title 18, United States Code, Section 1343. Both the Government and the defendant, **BARTHOLOMEW**, do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crimes to which the defendant is pleading guilty. The Government and the defendant further stipulate that the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Bill of Information now pending against the defendant:

Count One - Company A Wire Fraud and Relevant Conduct

The Government would show that on October 10, 2019, a Homeland Security Investigations, New Orleans (HSI NO) agent, a St Tammany Parish Sheriff's Office (STPSO) Detective and STPSO Sergeant interviewed the business partners for Company A.

During the interview, the Company A owners explained how one of their employees, **BARTHOLOMEW**, used the business' credit card to make fraudulent and unauthorized

purchases on Amazon.com. **BARTHOLOMEW** also created an email address to resemble the business email address.

During her employment with Company A, **BARTHOLOMEW** was the business financial controller and had access to all of the business' financial records, the ability to write checks, the use of the business American Express credit card for business purposes, full access to the business' QuickBooks software and the ability to submit payroll.

The Company A owners had confronted **BARTHOLOMEW** about the unauthorized use of the business credit card, to which she admitted in person and then later via a telephone conversation with one of the business partners, which he/she recorded.

The unauthorized credit cards purchases are as follows: 2017 - First purchase occurred on November 17, 2017 and the final purchase on December 27, 2017 (39 purchases totaling \$7,640.83). In 2018, the first purchase occurred on January 1, 2018 and the final purchase on December 28, 2018 (568 purchases totaling \$139,254.26). In 2019, the first purchase occurred on January 1, 2019 and the final purchase on October 5, 2019 (450 purchases totaling \$87,717.75).

BARTHOLOMEW utilized the Company A business American Express via the internet to purchase household items, clothing, electronics, vehicle/boat parts and accessories; to name a few items. Additionally, she purchased Visa and Mastercard gift/credit cards. In some instances, she utilized the American Express card solely, others a combination of the American Express card and previously purchased gift cards and on occasion, gift cards only, to finalize Amazon purchases. Total Amazon purchases with only the American Express card (Minus Visa/Mastercard gift cards) were:

Date	Amount
2017	\$5,110.48
2018	\$92,606.13
2019	\$63,008.63

Total Amazon purchases by **BARTHOLOMEW** utilizing the American Express cards and gift cards for 2017, 2018 and 2019 were \$234,612.84. Total Amazon purchases for 2017, 2018 and 2019 utilizing only the American Express cards were \$160,725.24.

BARTHOLOMEW also committed payroll theft while with Company A. For 2018 and 2019, **BARTHOLOMEW** claimed additional hours for Paid Time Off (PTO), but neglected to deduct those hours from the regular 80-hour 2 week pay period. **BARTHOLOMEW** would receive anywhere from 8-12 additional hours per pay period. The amounts are as follows:

Date	Additional Hours	Amount
2018	160 additional hours	\$3,923.20
2019	192 additional hours	\$4,800.00

For the purposes of relevant conduct, **BARTHOLOMEW** also manipulated Company A's QuickBooks program to pay herself for fraudulent debts. **BARTHOLOMEW** altered 3 subcontractors in Company A's QuickBooks program and conducted wire transfers to her personal bank account. **BARTHOLOMEW** created C.C., which closely resembled the actual subcontractor; she also created A.C., which closely resembles the actual sub-contractor; and she also created C.C. (different company), which closely resembles the actual sub-contractor. QuickBooks

contains an audit function and shows where **BARTHOLOMEW** would log into the program and manipulate the subcontractor accounts and add her personal banking information. **BARTHOLOMEW** conducted 43 wire transfers to her personal bank account, which totaled \$114,398.90.

BARTHOLOMEW also used Company A's American Express credit card to create a number of PayPal accounts. **BARTHOLOMEW** has/had a total of 17 PayPal accounts that were opened at various times - 16 personal accounts (13 opened in 2019) and 1 business account (converted from a personal account in January of 2019). **BARTHOLOMEW** would request money from various names via the business account. She would then log into one of the personal accounts, change the name to match the requested name and make payment with one of the Visa or Mastercard gift cards purchased with the Company A American Express card. **BARTHOLOMEW** would do several money requests and payment and would then conduct a transfer of funds from PayPal to her personal bank account. She made requests from January 2019 through September 2019 (63 PayPal requests) with a total send of \$11,198.00. She received (minus fees): \$10,854.36.

With regard to count one, on December 22, 2017, **BARTHOLOMEW** used the company A American Express card to buy a \$100 Visa Gift Card (plus \$5.95 Purchase Fee) from Amazon. The Company A IP address is based out of Slidell, LA, and the American Express server is located in Phoenix, AZ. In sum, the total fraud **BARTHOLOMEW** committed while at Company A was \$357,734.94, while the restitution figure is \$283,847.34.

Count Two - Company B Wire Fraud and Relevant Conduct

After being fired by Company A, **BARTHOLOMEW** started working for Company B in Kenner, LA, in November 2019. In February of 2020, Company B discovered numerous fraudulent charges on multiple Company B JPMorgan Chase ("JPMorgan") credit cards. Company B also discovered that **BARTHOLOMEW** opened a Discover credit card in her name and under Company B.

A review of the Company B's JPMorgan credit cards revealed a recent charge at Hattiesburg Cycles for \$21,548. Company B discovered that **BARTHOLOMEW** purchased a 2020 Can-Am side by side ATV by utilizing the JPMorgan credit card as well as the Discover credit card. \$11,900 was also charged to the Discover card for a total fraudulent purchase of \$33,448.00.

BARTHOLOMEW conducted fraudulent purchases on four Company B JPMorgan credit cards, one fraudulently assigned to herself and the other three assigned to other Company B employees. The fraudulent charges were made from December of 2019 through February of 2020:

Credit Card	Account Number	Assigned to	Amount
Chase	Card ending [REDACTED]	S.B.	\$12,888.66
Chase	Card ending [REDACTED]	BARTHOLOMEW	\$73,930.23
Chase	Card ending [REDACTED]	D.A.	\$18,870.57

BARTHOLOMEW also applied for and opened a Discover credit card in her name and Company B. **BARTHOLOMEW** made fraudulent purchases with the Discover credit card and

made payments to the card from the Company B Gulf Coast Bank and Trust banking account. The total fraudulent purchases on the Discover credit card was \$42,922.40.¹

On January 24, 2020, **BARTHOLOMEW** also made a payment to her Affirm account from the Company B Gulf Coast Bank and Trust account in the amount of \$3,878.15.

During the investigation, it was also determined that **BARTHOLOMEW** wrote herself three checks from Company B's Gulf Coast Bank and Trust account and deposited them into her personal Regions Bank account. The total amount was \$17,301.83.

Date	Check Number	Payable to	Amount
12/10/2019	██████	Cash	\$6,826.83
01/02/2020	██████	Cash	\$5,475.00
02/06/2020	██████	Cash	\$5,000.00

During the investigation, it was also determined that **BARTHOLOMEW** made three payments from Company B's Gulf Coast Bank and Trust account to her personal Discover credit card and a payment to the Internal Revenue Service (IRS). The total amount was \$6,082.03.

Date	Check Number
01/23/2020	\$3,817.83
01/28/2020	\$1,021.39 (Tax Payment)
02/20/2020	\$450.40
02/21/2020	\$1,813.80

During the investigation, it was also determined that **BARTHOLOMEW** utilized Plastiq to purchase a new Ford F150 truck and a new Ford Mustang. Plastiq is a third-party processor that

¹ Discover reversed \$35,125.55 in charges made by **BARTHOLOMEW** back to the Company B owner due to the fraudulent nature of the purchases.

allows individuals to make payments on a credit card to businesses that do not accept credit cards. Plastiq charges 2.5% on each transaction and the recipient will receive payment by check, wire transfer or Automated Clearing House (ACH) bank transfer. A review of the transactions conducted by **BARTHOLOMEW** revealed she utilized Plastiq on seven (7) different occasions

Date	Amount	Account
1/13/2020	\$19,500	Company B JPMC CC ending in [REDACTED] (BARTHOLOMEW 's CC)
1/15/2020	\$6,000	Discover CC ending in [REDACTED] (Fraudulent CC)
1/23/2020	\$6,000	Discover CC ending in [REDACTED]
1/24/2020	\$21,000	Company B JPMC CC ending in [REDACTED] (Lemoine's assigned CC)
1/27/2020	\$6,000	Company B JPMC CC ending in [REDACTED]
2/6/2020	\$11,600	Discover CC ending in [REDACTED]
2/7/2020	\$9,000	Company B JPMC CC ending in [REDACTED]

A total of \$81,257.50 (including applicable fees) of fraudulent transactions were conducted through Plastiq by **BARTHOLOMEW**. In sum, the total fraud **BARTHOLOMEW** committed while at Company B was \$300,753.93, while the restitution figure is \$187,713.35.

Count two is predicated on **BARTHOLOMEW** using the Company B JPMorgan credit card issued to employee D.L. to wire \$21,000 to Plastiq on January 23, 2020, for the purchase of a car from Courtesy Ford in Hattiesburg, Mississippi. JPMorgan's servers are located in Illinois and Delaware. Plastiq is based in San Francisco, CA, and their server is located in Santa Clara.

The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from, Special Agents from Homeland Security Investigations, New Orleans

(HSI NO), officers from the St Tammany Parish Sheriff's Office (STPSO), representatives and employees of Company A and Company B, and through business records from Company A and Company B, documents and tangible exhibits in the custody of HIS NO, and the admissions of the defendant, **BARTHOLOMEW**.

READ AND APPROVED:



CHRISTY BARTHOLOMEW Date
Defendant



EDWARD J. RIVERA Date
Assistant United States Attorney



J. GARRISON JORDAN Date
Attorney for Defendant