

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

*

CRIMINAL NO. 20-141

v.

*

SECTION: R

JOSHUA HOCKLESS

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* * *

FACTUAL BASIS

The defendant, **JOSHUA HOCKLESS (HOCKLESS)** has indicated that he intends to plead guilty as charged in Count One of the Bill of Information against him, that is, bank fraud, in violation of 18 U.S.C. § 1344.

The United States and defendant **HOCKLESS** do hereby stipulate and agree that the following facts are true and correct and that, should this matter have proceeded to trial, the government would have proven them beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible and documentary exhibits. This Factual Basis does not attempt to set forth all the facts known to the United States at this time. The limited purpose of this Factual Basis is to demonstrate that there exists a sufficient legal basis for defendant **HOCKLESS's** guilty plea.

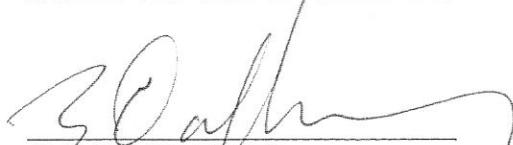
During the times relevant herein, **HOCKLESS** was an Army Sergeant in the Headquarters Company, 377th Theater Sustainment Command, Naval Air Station Joint Reserve Base in Belle Chasse. **HOCKLESS** had a bank account at the United Services Automobile Association Federal Savings Bank (USAA) and learned that USAA allowed service members to withdraw deposits before the funds formally cleared the issuing bank. Knowing this, **HOCKLESS** opened bank accounts at third-party banks with minimal funding, made online wire transfers from those banks to USAA, and withdrew the deposits from USAA before it detected that there were insufficient

funds in the issuing bank account. **HOCKLESS** obtained approximately \$36,119.47 as a result of these fraudulent transfers between his accounts.

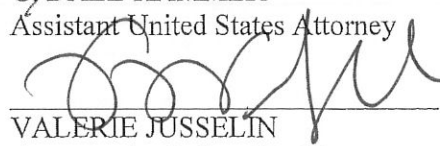
HOCKLESS then asked other enlisted personnel to open USAA and third-party bank accounts, and give him their online banking passwords. **HOCKLESS** used these passwords to make similar fraudulent transfers to their USAA accounts and instructed them when to withdraw the cash to split with **HOCKLESS**. These transfers resulted in approximately \$102,739.74 being fraudulently withdrawn from USAA – approximately half of which (\$51,369.57) was received by **HOCKLESS**.

The government would call witnesses from USAA and the third-party banks, Special Agents of Army CID, forensic accountants, and the above described enlisted personnel who have agreed to testify against **HOCKLESS**. The government would also introduce the records of the third-party banks and USAA.

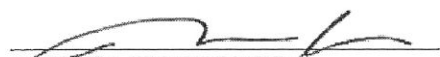
APPROVED AND AGREED TO:



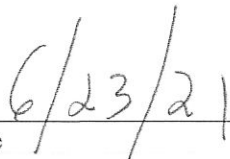
G. DALL KAMMER
Assistant United States Attorney



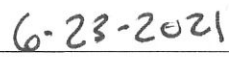
VALERIE JUSELIN
Attorney for Joshua Hockless



JOSHUA HOCKLESS
Defendant



Date



Date

June 23 2021

Date