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U.S. DISTRICT COURT  
EASTERN DISTRICT OF LA.

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CAROL L. MICHEL  
CLERK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

BILL OF INFORMATION FOR  
CONSPIRACY TO COMMIT MAIL FRAUD

UNITED STATES OF AMERICA

\* CRIMINAL NO.

**21-115**

v.

\* SECTION:

**SECT.HMAG.2**

DONMONICK MARTIN

\* VIOLATION: 18 U.S.C. § 371

a/k/a "Dommonick Martin"

18 U.S.C. § 1341

\*

\* \* \*

The United States Attorney charges that:

COUNT 1

**A. AT ALL TIMES MATERIAL HEREIN:**

1. Defendant **DONMONICK MARTIN** a/k/a "Dommonick Martin" ("MARTIN") resided in Chalmette, Louisiana.

2. American Airlines ("American") was a commercial airline headquartered in Fort Worth, Texas.

3. Alaska Airlines ("Alaska") was a commercial airline headquartered in SeaTac, Washington.

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4. Southwest Airlines (“Southwest”) was a commercial airline headquartered in Dallas, Texas.

5. JetBlue Airways (“JetBlue”) was a commercial airline headquartered in New York, New York.

6. Louis Armstrong International Airport (“MSY”) was located in Kenner, Louisiana.

**B. THE CONSPIRACY:**

Beginning at a time unknown but not later than in or around October 2019, and continuing until in or around March 2020, in the Eastern District of Louisiana and elsewhere, **DONMONICK MARTIN, a/k/a “Dommonick Martin,”** P.J., and others known and unknown to the United States Attorney, willfully and knowingly did combine, conspire, confederate, and agree to devise a scheme and artifice to defraud and to obtain money and property from commercial airlines by means of materially false and fraudulent pretenses, representations, and promises, and willfully cause mail matter to be delivered by the United States Postal Service for the purpose of executing or attempting to execute the Scheme and Artifice to Defraud set forth below, in violation of Title 18, United States Code, Section 1341.

**C. SCHEME AND ARTIFICE TO DEFRAUD:**

1. It was part of the scheme and artifice to defraud that P.J. submitted and caused to be submitted over 180 claims to commercial airlines, including but not limited to American, Alaska, Southwest, and JetBlue, requesting reimbursement for luggage that P.J. falsely alleged had been lost.

2. It was further part of the scheme and artifice to defraud that P.J. would take domestic flights on commercial airlines that were booked under false or fictitious identities and then would make a false claim for reimbursement for lost baggage.

3. It was further part of the scheme and artifice to defraud that P.J. would cause the commercial airlines to mail reimbursement checks via the United States Postal Service (“USPS”) to compensate P.J. for his false claims for lost luggage.

4. It was further part of the scheme and artifice to defraud that, to evade detection, P.J. would use addresses of his friends and associates to receive the reimbursement checks from commercial airlines by USPS.

5. It was further part of the scheme and artifice to defraud that **MARTIN** agreed to allow P.J. to use **MARTIN**’s home address to receive the mail in furtherance of P.J.’s scheme.

6. It was further part of the scheme and artifice to defraud that **MARTIN** received mail containing reimbursement checks on behalf of P.J. on approximately three occasions.

7. It was further part of the scheme and artifice to defraud that **MARTIN** allowed P.J. to use **MARTIN**’s PayPal account to receive reimbursement funds from JetBlue that P.J. obtained in response to a fraudulent claim for reimbursement for baggage.

8. It was further part of the scheme and artifice to defraud that, on or about January 30, 2020, **MARTIN** went into MSY and falsely claimed to American Airlines that his name was Z.D. and that he had lost his baggage on a flight.

**D. OVERT ACTS:**

1. On a date unknown but not later than in or around October 2019, **MARTIN** agreed to allow P.J. to use **MARTIN**’s home address to receive mail addressed to fictitious names from commercial airlines.

2. On or about September 3, 2019, P.J. flew from MSY to Dallas Fort Worth International Airport (“DFW”) in Texas on American flight number 2257 under the fictitious

identity G.W. and then falsely reported that his baggage for American flight number 2257 was delayed or lost.

3. On or about September 9, 2019, P.J. filled out an American Passenger Property Questionnaire form stating that the value of the lost items was \$3,900 and signed the name G.W.

4. On or about October 16, 2019, American mailed an envelope via USPS from 1 Skyview Drive, Fort Worth, Texas 76115 to G.W., at **MARTIN's** home address, [REDACTED] [REDACTED], Chalmett(sic), St. Bernard Parrish(sic), LA 70043, containing check number [REDACTED] in the amount of approximately \$3,500.00 in reimbursement for the fraudulent G.W. claim.

5. On or about October 25, 2019, P.J. endorsed and cashed check number [REDACTED] from American.

6. On or about January 30, 2020, P.J. flew from Chicago O'Hare International Airport ("ORD") to MSY on American flight number 3460 under the fictitious identity Z.D.

7. On or about January 31, 2020, **MARTIN** agreed to make a false claim for lost baggage under the fictitious identity Z.D.

8. On or about January 31, 2020, **MARTIN** went into MSY and falsely reported to American personnel that his name was Z.D. and that his bag for American flight 3460 was delayed or lost.

9. On or about February 19, 2020, P.J. filled out an American Passenger Property Questionnaire form stating that the value of the lost items was \$3,975.00 and signed the name Z.D.

10. On or about March 19, 2020, P.J. caused a box containing approximately 22 fraudulent driver's licenses bearing his photograph and numerous different names to be sent via DHL Express from Kowloon, Hong Kong to **MARTIN's** address at [REDACTED] [REDACTED], Chalmette, Louisiana.

All in violation of Title 18, United States Code, Section 371.

**NOTICE OF FORFEITURE**

1. The allegation of Count 1 of this Bill of Information is incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.


2. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), upon conviction of conspiracy to violate Title 18, United States Code, Section 1341 (mail fraud), in violation of Title 18, United States Code, Section 371, the defendant, **DONMONICK MARTIN a/k/a “Dommonick Martin,”** shall forfeit to the United States of America any property real or personal, that constitutes or is derived from proceeds traceable to said offenses, including but not limited to any property or proceeds stated-above.

3. If any of the above-described property, 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;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

DUANE A. EVANS  
UNITED STATES ATTORNEY

A handwritten signature in cursive script, appearing to read "Maria M. Carboni", is written over a horizontal line.

MARIA M. CARBONI  
Assistant United States Attorney

New Orleans, Louisiana  
September 23, 2021