

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

UNITED STATES OF AMERICA * **CRIMINAL NO. 22-01**

V. * SECTION: "T"

RODNEY ROUSSELL *

* * *

FACTUAL BASIS

The defendant, **RODNEY ROUSSELL** (“**ROUSSELL**”), has agreed to plead guilty as charged to the Bill of Information now pending against him charging him with Bank Fraud, in violation of Title 18, United States Code, Section 1344. Both the Government and **ROUSSELL** do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crimes to which **ROUSSELL** is pleading guilty. The Government and **ROUSSELL** 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.

The Government would show that beginning on or around August 1, 2017, **ROUSSELL** began working for Company A through a work re-entry program for persons with criminal records. Company A maintained its operational headquarters in New Orleans, Louisiana. As part of this re-entry program, Company A paid **ROUSSELL** wage and incentive payments for remaining employed for a certain length of time. Company A also provided **ROUSSELL** with rental assistance for housing, which was paid to leasor “MC and Associates.” **ROUSSELL** did not

AUSA BK
Defendant RJR
Defense Counsel SHS

disclose to Company A that he was the President and Registered Agent for MC & Associates Management, Inc.

At all times material herein, Company A maintained business checking account [REDACTED] at JPMorgan Chase Bank ("Chase Bank"). Company A's salary payments to ROUSSELL and to "MC and Associates" were made electronically drawn on checking account [REDACTED] which contained Company A's account number and routing number for account [REDACTED]. The Government would further show that at all material times herein, Chase Bank was a federally insured financial institution doing business in New Orleans, Louisiana.

As a re-entry program employee for Company A, ROUSSELL did not have access to Company A's checking account [REDACTED] and was not authorized to make payments of any kind using funds in checking account [REDACTED]. In or about 2019, Company A reviewed its Chase Bank records and discovered that an unauthorized person had used checking account [REDACTED] to make payments on a non-Company A Chase Bank credit card ending in [REDACTED] [REDACTED] Chase Bank records for Card [REDACTED] show that the accountholder at all material times was "Rodney J. Roussell, MC & Associates Management, [REDACTED] [REDACTED], Louisiana 70341-5815." Card [REDACTED] was also used for personal expenditures with companies such as Amazon, Costco, and Sam's Club. Business records from Amazon, Costco, and Sam's Club confirmed that ROUSSELL was the cardholder and authorized user for Card [REDACTED]

From in or around April 2018 through in or around June 2018, ROUSSELL utilized Chase Bank's web portal and mobile banking app to transfer money from Company A's checking account [REDACTED] to pay the balance of his Card [REDACTED] eighteen (18) times as follows:

Or on About	Transaction Amount
April 6, 2018	\$14,766.61
April 16, 2018	\$12,612.53
April 27, 2018	\$14,015.37
May 7, 2018	\$14,500.00
May 11, 2018	\$12,460.19
May 15, 2018	\$12,609.05
May 17, 2018	\$6,767.06
May 21, 2018	\$9,009.77
May 25, 2018	\$15,588.40
May 28, 2018	\$12,733.32
May 31, 2018	\$15,445.65
June 1, 2018	\$8,231.00
June 7, 2018	\$15,000.00
June 8, 2018	\$7,308.54
June 9, 2018	\$12,077.33
June 12, 2018	\$13,800.00
June 13, 2018	\$14,048.09
June 14, 2018	\$2,399.14

In total, **ROUSSELL** obtained \$213,372.05 from Company A's checking account [REDACTED], which was under the custody and control of Chase Bank, by means of false or fraudulent pretenses, representations, or promises.

The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from, Special Agents from the Federal Bureau of Investigation, representatives

and employees of Company A, business records from Chase Bank, and documents and tangible exhibits in the custody of the Federal Bureau of Investigation.


READ AND APPROVED:



BRIAN M. KLEBBA
K. PAIGE O'HALE
Assistant United States Attorneys

3/8/2022


Date



STEPHEN H. SHAPIRO
Attorney for Rodney Roussell

3/8/22

Date



RODNEY ROUSSELL
Defendant

3/8/22

Date

