

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

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO. 22-023</b>
<b>v.</b>	*	<b>SECTION: "D" (5)</b>
<b>RONALD S. RILEY, JR.</b>	*	<b>VIOLATIONS: 18 U.S.C. § 371</b>
		<b>18 U.S.C. § 1028A</b>
	*	*
	*	*

**FACTUAL BASIS**

The defendant, **RONALD S. RILEY, Jr.** ("**RILEY**"), has agreed to plead guilty to conspiracy to commit bank fraud and aggravated identity theft.

Should this matter have proceeded to trial, the United States would have proven, through the introduction of competent testimony and admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the Bill of Information.<sup>1</sup>

*Overview of the Conspiracy and Investigation*

In or near January 2019, the United States Postal Inspection Service responded to complaints that a number of mail receptacles (*i.e.*, "blue boxes") in the Greater New Orleans area were being burglarized. The investigation revealed that a United States Postal Service key, which is only supposed to be in the possession of Postal employees, was used to open the blue boxes and to steal the mail. The investigation also discovered that the coconspirators sorted through the stolen mail and then set aside the monetary instruments that contained banking information. In completing the scheme to defraud the bank, **RILEY** then used the stolen checks and the

---

<sup>1</sup> This proffer of evidence is not intended to constitute a complete statement of facts known to the United States. The limited purpose of this factual basis is to demonstrate a sufficient legal basis for **RILEY**'s plea of guilty to the charged offense.

JLS  
CG  
R.R.

corresponding banking information printed on the monetary instruments to convert the stolen items into illicit funds.

To facilitate the scheme, **RILEY** used the stolen checks and stolen banking information (*i.e.*, stolen routing numbers, account numbers, and other account holder identifying information) to create fraudulent checks (*i.e.*, altered and/or counterfeit checks). These fraudulent checks were then deposited into bank accounts belonging to other individuals. The investigation revealed that these account holder coconspirators permitted **RILEY** to use their financial institution accounts to facilitate the illicit transactions in furtherance of the scheme.

During the investigation, postal inspectors retrieved ATM (automated teller machine) video (from 2018 through 2020) that captured **RILEY** depositing fraudulent checks and withdrawing monies related to the illegal deposits. As part of the scheme, **RILEY** used other person's accounts to facilitate the bank fraud and to avoid detection.<sup>2</sup>

The investigation also revealed that, in 2018 and 2019, employees of several local companies texted **RILEY** (using their cellular devices) photographs of payment checks collected by their business and received from local vendors. **RILEY** used the banking information contained on the texted photographs of the business checks to create counterfeit checks that were then used to generate funds from local federally insured banks in the Eastern District of Louisiana.

On December 23, 2020, **RILEY** was apprehended by law enforcement authorities attempting to cash several stolen money order checks at a federally insured financial institution in

---

<sup>2</sup> The financial institutions used by **RILEY** are federally insured banks located in the Eastern District of Louisiana, and their deposits are insured by the Federal Deposit Insurance Corporation.

Slidell, Louisiana. During this encounter, **RILEY** was also found to be in possession of several credit union cards not in his name.<sup>3</sup>

Overview of the Aggravated Identity Theft

On or about June 3, 2019, **RILEY** was captured on ATM video depositing counterfeit checks, in the name of Company “A” and purporting to be drawn on *Iberia Bank*, into the *Capital One* account of Individual “A.” During and in relation to this offense, **RILEY** used the identity of the individual authorized to sign checks on behalf of Company “A” to complete the scheme to defraud the bank. And, following the fraudulent deposits, **RILEY** conducted several financial transactions using the monies generated from the counterfeit check deposits.

---


<sup>3</sup> During an interview with law enforcement authorities in July 2019, **RILEY** waived his rights and admitted committing bank fraud. During the interview, **RILEY** admitted creating counterfeit checks, forging signatures, and depositing counterfeit checks into bank accounts belonging to other individuals. **RILEY** also admitted withdrawing funds generated from the counterfeit checks.

CG  
JL  
RR.

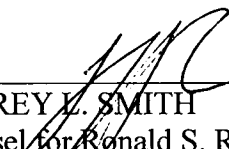
Scope of the Offenses

From 2018 through 2021, **RILEY** conducted a large number of illicit financial transactions in the Eastern District of Louisiana, in furtherance of the scheme to defraud. The investigation has revealed that these transactions were designed to cause losses of no more than \$250,000. All of the evidence introduced at trial would have established the elements of the offense and proven the defendant's guilt beyond a reasonable doubt.

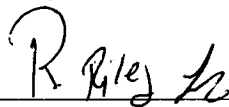
**READ AND APPROVED:**

  
\_\_\_\_\_  
CARTER K. D. GUICE, JR.  
RICHARD R. PICKENS, II  
Assistant United States Attorneys

3-28-22  
Date

  
\_\_\_\_\_  
JEFFREY L. SMITH  
Counsel for Ronald S. Riley, Jr.

3/28/22  
Date

  
\_\_\_\_\_  
RONALD S. RILEY, JR.  
Defendant

3/28/22  
Date