

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

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CRIMINAL NO. 21-128

v.

*

SECTION: "B"

COREY THOMAS

*

a/k/a "Schoolboy"

*

* * *

FACTUAL BASIS

Defendant **COREY THOMAS, a/k/a "Schoolboy"** ("THOMAS"), has agreed to plead guilty to Count 1 of the Indictment. Should this matter proceed to trial, the United States would prove beyond a reasonable doubt, through credible testimony and reliable evidence, the following facts. Unless stated otherwise, the following acts occurred within the jurisdiction of the Eastern District of Louisiana.

THOMAS resided in or around New Orleans, Louisiana, which is in the Eastern District of Louisiana.

Best Buy was a consumer electronics retailer. Best Buy operated retail stores in various locations nationwide, including in Lafayette, Louisiana. Best Buy offered financing to customers in the form of a credit card provided by Citibank. Best Buy customers could apply for a Best Buy credit card while in a Best Buy location and use it to purchase items at Best Buy. Applications for a Best Buy credit card require an applicant to provide a name and address. When a Best Buy customer applied for a Citibank account for a purchase at Best Buy, an electronic signal was sent from the Best Buy retail location where the customer was shopping to a server in Texas.

AUSA NDM
Defendant CT.
Defense Counsel SSJ

Lowe's Home Improvement ("Lowe's") was a home improvement, hardware, and construction retailer. Lowe's operated retail stores in various locations nationwide, including in New Orleans, Baton Rouge, and Slidell, Louisiana. Lowe's offered financing to customers in the form of a credit account provided by Synchrony Bank ("Synchrony"). Lowe's customers could use their Synchrony account while at a Lowe's location to purchase items at Lowe's. To make a credit purchase at a Lowe's, a customer had to provide a Lowe's employee with the customer's Lowe's card or account number, or the customer could provide a photographic identification card, a date of birth, and the last four digits of the customer's social security number. When a Lowe's customer used or attempted to use a Synchrony account for a purchase at Lowe's, an electronic signal was sent from the Lowe's retail location where the customer was shopping to a server in Nebraska.

Victim 1 resided in or around New Orleans, Louisiana, which is in the Eastern District of Louisiana. Victim 1 had a Lowe's credit account with Synchrony. Synchrony's computer systems included Victim 1's personal identifying information, including his name, date of birth, address, and social security number.

At least as early as January 1, 2019, and continuing until at least January 16, 2019, in the Eastern District of Louisiana and elsewhere, the defendant, **THOMAS**, did knowingly devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, by using Victim 1's personal identifying information to make purchases and attempt to make purchases in Victim 1's name and to use, attempt to use, and attempt to open credit accounts in Victim 1's name at retail locations, including Best Buy and Lowe's.

THOMAS informed a third party (“Customer 1”) that **THOMAS** could purchase goods at Lowe’s at a discount on those customers’ behalf. Customer 1 communicated with **THOMAS** by telephone and in person. **THOMAS** purchased goods from Lowe’s by paying with Victim 1’s Lowe’s credit account. **THOMAS** sold goods purchased from Lowe’s to Customer 1, who paid **THOMAS** cash in an amount less than the purchase price that **THOMAS** charged to Victim 1’s Lowe’s credit account.

On or about January 1, 2019, **THOMAS** entered a Best Buy location in Lafayette, Louisiana. **THOMAS** attempted to open a credit account in Victim 1’s name to make a purchase of approximately \$4,830.31. The attempted purchase was denied. **THOMAS** provided Best Buy with Victim 1’s name, street address, and zip code but a different telephone number and email address. As part of this transaction, **THOMAS** caused a wire communication to travel from Louisiana to a Citibank server in Texas.

On or about January 13, 2019, **THOMAS** entered a Lowe’s location in New Orleans, Louisiana. **THOMAS** used Victim 1’s credit account to make a purchase of approximately \$6,239.61. The purchase was approved. A third party paid **THOMAS** approximately \$3,000 in cash for the goods and picked them up from Lowe’s. As part of this transaction, **THOMAS** caused a wire communication to travel from Louisiana to a Synchrony server in Nebraska.

On or about January 14, 2019, **THOMAS** entered a Lowe’s location in Baton Rouge, Louisiana. **THOMAS** attempted to use Victim 1’s credit account to make a purchase of approximately \$1,872. The attempted purchase was denied. As part of this transaction, **THOMAS** caused a wire communication to travel from Louisiana to a Synchrony server in Nebraska.

On or about January 16, 2019, **THOMAS** entered a Lowe's location in Slidell, Louisiana. **THOMAS** attempted to use Victim 1's credit account to make two purchases, of approximately \$2,183 and \$2,410. The attempted purchases were denied. As part of these transactions, **THOMAS** caused wire communications to travel from Louisiana to a Synchrony server in Nebraska.

THOMAS used a cellular telephone that Customer 1 had used to contact **THOMAS** during the January 13, 2019, purchase of goods at Lowe's.

On or about the dates and in the approximate amounts specified in each wiring below, in the Eastern District of Louisiana and elsewhere, the defendant, **THOMAS**, for the purpose of executing and attempting to execute the scheme and artifice to defraud set forth above, did transmit and cause to be transmitted, by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures and sounds, as more particularly described below:

Wiring	Date	Transaction Amount	Description of Wire Communication
A	Jan. 1, 2019	\$4,830.31 (denied)	A wire communication sent from Louisiana to Texas regarding an attempted purchase
B	Jan. 13, 2019	\$6,239.61 (processed)	A wire communication sent from Louisiana to Nebraska regarding a successful purchase
C	Jan. 14, 2019	\$1,872 (denied)	A wire communication sent from Louisiana to Nebraska regarding an attempted purchase
D	Jan. 16, 2019	\$2,183 (denied)	A wire communication sent from Louisiana to Nebraska regarding an attempted purchase
E	Jan. 16, 2019	\$2,410 (denied)	A wire communication sent from Louisiana to Nebraska regarding an attempted purchase

