

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR WIRE FRAUD
AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO.
v.	*	SECTION:
DELORES TROUILLET	*	VIOLATION: 18 U.S.C. § 2
	*	18 U.S.C. § 1343
	*	
	*	
	*	

The United States Attorney charges that:

COUNT 1

(18 U.S.C. § 1343 – Wire Fraud)

A. AT ALL TIMES MATERIAL HEREIN:

1. The defendant, **DELORES TROUILLET** (hereinafter “**TROUILLET**”), resided within the Eastern District of Louisiana.

2. Beginning in or about February 1999, and continuing until in or about February 2014, **TROUILLET** was employed at Company A, a carpet, flooring, and drapery sales and installation company headquartered in Gretna, Louisiana, within the Eastern District of Louisiana. **TROUILLET** was employed as Company A’s bookkeeper.

3. In her capacity as bookkeeper, **TROUILLET** was responsible for, among other things, to provide bookkeeping services for overseeing Company A's finances and accounts, including reconciling accounts payables and receivables. **TROUILLET** had access to Company A's bank accounts, including the ability to conduct wire transfers from Company A's bank accounts.

4. Company A maintained several bank accounts at JPMorgan Chase Bank, NA ("Chase"), including accounts numbered XXXXXX349 ("Operating Account") and XXXXXX593 ("Payroll Account").

5. Company A maintained several corporate credit and debit cards, including American Express credit cards with card numbers XXXXXXXXXXXX51021, XXXXXXXXXXXX51047, XXXXXXXXXXXX54009, and XXXXXXXXXXXX51013 and a Chase business debit card ("debit card").

B. THE SCHEME TO DEFRAUD:

1. Beginning at a time unknown, and continuing until in or about February 2014, in the Eastern District of Louisiana and elsewhere, the defendant, **DELORES TROUILLET**, devised and intended to devise, a scheme and artifice to defraud Company A and obtain money and funds of Company A by means of false and fraudulent promises, pretenses, and representations in five different ways.

2. It was part of the scheme and artifice to defraud that between about November 2005 and February 2014, **TROUILLET**, generated approximately thirty-one (31) checks totaling approximately \$127,942.15 in Company A's name and drawn on Company A's bank accounts, to pay her personal expenses without Company A's authorization or knowledge.

3. It was further part of the scheme and artifice to defraud that, to obtain the requisite number of signatures on checks, **TROUILLET** would contact the assistant bookkeeper for Company A, who had signature authority on all business accounts and ask her to sign blank checks that would be used to pay vendors. **TROUILLET** would then use the checks for her own personal gain and manipulate the books to show the vendor had been paid.

4. It was further part of the scheme and artifice to defraud that, to disguise her fraudulent conduct, **TROUILLET** turned off the “return check” feature at Chase so that checks made out to her would not be returned to Company A. **TROUILLET** also altered how the checks were coded in Company A’s internal record keeping system to avoid detection. To make the payments appear legitimate, **TROUILLET** listed in Company A’s internal records checks she made out to herself and deposited into her personal bank account as being made payable to entities with whom Company A engaged in business or frequently paid funds, such as “State Farm Insurance” and “IRS.”

5. It was further part of the scheme and artifice to defraud that **TROUILLET** paid for daily personal expenses and items using Company A’s corporate credit cards and debit card without Company A’s knowledge or authorization approximately 315 times between about October 30, 2007, and January 22, 2014, totaling approximately \$56,794.38.

6. It was further part of the scheme and artifice to defraud that, to disguise her conduct, **TROUILLET** would download via the Internet an electronic copy of the monthly credit card statement, load it into a spreadsheet program, and remove her unauthorized items. **TROUILLET** would then provide the spreadsheet detailing the credit card purchases—absent

her unauthorized purchases—to her supervisor to approve and code to Company A's general ledger.

7. It was further part of the scheme and artifice to defraud that **TROUILLET** added money to her biweekly payroll in excess of her agreed upon salary, without Company A's knowledge or authorization, on a regular basis between January 2006 and February 2014 totaling approximately \$18,376.54.

8. It was further part of the scheme and artifice to defraud that **TROUILLET** caused payments to be made from Company A's bank account on a regular basis between about May 2012 and March 2013 to pay her personal cellular phone bill at AT&T without Company A's authorization or knowledge totaling approximately \$2,634.60.

9. It was further part of the scheme and artifice to defraud that, between about November 20, 2012, and February 2, 2014, **TROUILLET** did not deduct her portion of her health insurance costs from her salary on approximately fourteen (14) times, totaling approximately \$2,334.36.

C. THE WIRE:

On or about January 16, 2011, in the Eastern District of Louisiana and elsewhere, the defendant, **DELORES TROUILLET**, for the purpose of executing and attempting to execute the scheme and artifice to defraud as described in Parts A and B, did knowingly and willfully cause to be transmitted in interstate commerce certain writings, signs, signals, and sounds by means of wire communications when the defendant, **DELORES TROUILLET**, used one of Company A's American Express credit cards without authorization to obtain property, goods, services, and money in the amount of approximately \$1,671.63 in the Eastern District of

Louisiana and elsewhere, specifically purchasing via the Internet from “Vivid Seats” tickets to see a concert performance by Lady Gaga, which caused a signal, sign, writing, and sound to be transmitted from New Orleans, Louisiana, within the Eastern District of Louisiana, to and through servers located outside the State of Louisiana.

All in violation of Title 18, United States Code, Sections 1343 and 2.

NOTICE OF FORFEITURE

1. The allegations of Count 1 of this Bill of Information are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

2. As a result of the offense alleged in Count 1, the defendant, **DELORES TROUILLET**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461, any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1343.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant:

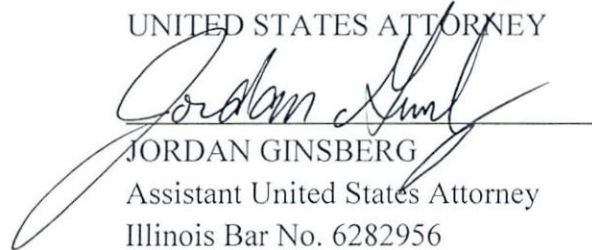
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

KENNETH ALLEN POLITE, JR.
UNITED STATES ATTORNEY



JORDAN GINSBERG
Assistant United States Attorney
Illinois Bar No. 6282956

New Orleans, Louisiana
April 3, 2015