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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF
AMERICA,

Plaintiff,

v.

BRIANNA RENEE READOUS,

Defendant.

_____ /

Case: 2:19-cr-20349
Judge: Cox, Sean F.
MJ: Majzoub, Mona K.
Filed: 05-30-2019
INDI USA VS READOUS (DP)

Violations:

18 U.S.C. § 1344
18 U.S.C. § 1028A
18 U.S.C. § 1709

INDICTMENT

THE GRAND JURY CHARGES:

COUNTS ONE, TWO, THREE, AND FOUR

18 U.S.C. § 1344

BANK FRAUD

On or about the dates set forth below, in the Eastern District of Michigan, the defendant, BRIANNA RENEE READOUS, did knowingly execute and attempt to execute a scheme and artifice to defraud financial institutions, and to obtain money and funds owned by and under the custody and control of said financial institutions, by means of materially false and fraudulent pretenses and representations, that is pretenses and representations that she was the lawfully authorized account holder

signing and executing checks to be deposited into her own personal bank account, and did obtain money and funds in the approximate amounts listed below by those pretenses and representations, all in violation of 18 U.S.C. § 1344, and with each transaction constituting a separate count of this Indictment:

Count	Victim	Date on Check, Issuing Financial Institution	Approximate Date Deposited, Financial Institution of Deposit	Approximate Amount Obtained
1	L.H.	March 20, 2017 Christian Financial Credit Union	March 21, 2017 Michigan First Credit Union	\$400
2	E.H.	March 24, 2017 Genisys Credit Union	March 25, 2017 Michigan First Credit Union	\$660
3	M.L.A.	March 24, 2017 Chase Bank	March 25, 2017 Michigan First Credit Union	\$645
4	L.H.	March 26, 2017 Christian Financial Credit Union	March 27, 2017 Michigan First Credit Union	\$650

COUNTS FIVE, SIX, SEVEN, AND EIGHT**18 U.S.C. § 1028A****AGGRAVATED IDENTITY THEFT**

On or about the dates set forth below, in the Eastern District of Michigan, the defendant, BRIANNA RENEE READOUS, did knowingly possess and use without lawful authority, a means of identification of another person, including, but not limited to, bank account numbers, account holder information, and the forged signature of the account holder on checks issued to other persons that were entrusted to her and came into her possession by virtue of her employment with the United States Postal Service and were taken by her unlawfully, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c) as set forth below, knowing that the means of identification belonged to another actual person, all in violation of Title 18, United States Code, Section 1028A(a)(1), with each date constituting a separate count of this Indictment:

Count	Person Whose Identification Was Used	Approximate Date	Felony Offense
5	L.H.	March 21, 2017	Bank Fraud, 18 U.S.C. § 1344 (Count 1)

6	E.H.	March 25, 2017	Bank Fraud, 18 U.S.C. § 1344 (Count 2)
7	M.L.A.	March 25, 2017	Bank Fraud, 18 U.S.C. § 1344 (Count 3)
8	L.H.	March 27, 2017	Bank Fraud, 18 U.S.C. § 1344 (Count 4)

COUNT NINE

18 U.S.C. § 1709

THEFT OF MAIL MATTER BY OFFICER OR EMPLOYEE

Beginning on or about March 20, 2017 and continuing through March 27, 2017, in the Eastern District of Michigan, the defendant, BRIANNA RENEE READOUS, who was then an employee of the United States Postal Service, did knowingly embezzle, steal, abstract, and remove letters, packages, mail, and articles and things contained therein, including checkbooks and checks issued to third parties, which were entrusted to her, and came into her possession intended to be conveyed by mail and carried and delivered by an employee of the United States Postal Service, in violation of 18 U.S.C. § 1709.

FORFEITURE ALLEGATIONS

18 U.S.C. § 982(a)(2)(A)

The allegations contained in Counts One, Two, Three, and Four of this Indictment are hereby re-alleged and incorporated by reference for purposes of alleging forfeiture pursuant to 18 U.S.C. § 982(a)(2)(A).

Upon conviction of the offenses set forth in Counts One, Two, Three, and Four of this Indictment, the defendant shall forfeit to the United States any property constituting, or derived from, proceeds she obtained, directly or indirectly, as the result of such violation.

If any of the property described above, 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 party;
- 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 that cannot be divided without difficulty;

the United States shall be entitled, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to forfeit any property of such defendant up to the value of the forfeitable property described above.

THIS IS A TRUE BILL

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

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s/ Matthew Roth
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Dated: May 30, 2019

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>XW</u>

Case Title: USA v. Brianna Renne Readous

County where offense occurred : Wayne and Macomb

Check One: **Felony** **Misdemeanor** **Petty**

Indictment/ Information --- no prior complaint.
 Indictment/ Information --- based upon prior complaint [Case number: 17-mj-30394]
 Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

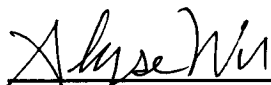
Superseding to Case No: _____ Judge: _____

- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

May 30, 2019
Date



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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.