

UNITED STATES DISTRICT COURT

for the

Western District of Tennessee

United States of America

v.

Katrina Robinson, Katie Ayers, Brooke Boudreaux

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Case No. 21-cr-20003-MSN/tmp

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Oct. 1-Nov. 27, 2017 in the county of Shelby in the Western District of Tennessee, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud) and 18 U.S.C. § 1956(h) (Conspiracy to Commit Money Laundering).

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

[Signature of Brent A. Hayden]

Complainant's signature

Brent A. Hayden, Special Agent, FBI

Printed name and title

Sworn to before me via telephone.

Date: January 14, 2021

[Signature of Tu M. Pham]

Judge's signature

City and state: Memphis, Tennessee

Tu M. Pham, U.S. Magistrate Judge

Printed name and title


AFFIDAVIT

I, Brent A. Hayden, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation and have been since August 2019. I am presently assigned to investigate a wide variety of public corruption related crimes, including schemes to defraud government and private entities. I have received training from the FBI related to investigating and prosecuting public corruption matters, which includes corruption of elected or public officials, and state or federal campaign finance violations. I have executed, and have assisted other agents in the execution of, search warrants in investigations related to public corruption, civil rights, violent crime, and crimes against children.

2. In the course of my duties, I have received training in evidence handling, working with confidential informants, physical surveillance, investigating a wide variety of frauds, forfeiture, search and seizure warrants, and arrest procedures, among other specialized investigative training. I have investigated and assisted with multiple investigations involving the search of residences, vehicles, employment locations, computer systems and seizures of computers and other electronic storage devices. As a federal law enforcement officer, I am authorized to execute search and seizure warrants issued under Rule 41 of the Federal Rules of Criminal Procedure.

3. For the reasons set forth below, there is probable cause to believe that KATRINA ROBINSON ("ROBINSON"), KATIE AYERS ("AYERS"), and BROOKE BOUDREAUX ("BOUDREAX"), together with others, both known and unknown to the United States, have committed violations of Title 18 U.S.C. §§ 1349 (conspiracy to commit wire fraud) and 1956(h) (conspiracy to commit money laundering). I make this affidavit in support of a criminal complaint charging violations of these statutory provisions.



4. The facts set forth in this Affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, and knowledge obtained from other individuals, as well as my training and experience. This Affidavit is intended to show merely that there is sufficient probable cause to support a criminal complaint and the issuance of arrest warrants and does not set forth all of my knowledge about this matter. In order prevent the defendants from being prematurely alerted to the existence of the charges prior to their arrest, it is requested that this Affidavit, along with the accompanying Complaint, be filed **under seal**.

5. The Healthcare Institute (“THI”) is a post-secondary educational provider located at 7253 Winchester, Memphis, Tennessee. It purports to provide training programs for jobs in the healthcare field, including certified nursing assistant, phlebotomist, and licensed practical nurse. It was founded in January 2015 as a Tennessee for-profit LLC, with Katrina Robinson as director.

6. THI received more than \$10,000 in federal funds each year between 2015 and 2019. During that period, ROBINSON stole, converted, and intentionally misapplied property of THI for her own use. As a result, she was indicted in Case No. 2:20-cr-20147-SHL (W.D. Tenn.) on July 30, 2020, and that case is currently pending trial. The charges in this complaint arise from a completely separate fraud scheme in which ROBINSON, AYERS, and BOUDREAUX conspired to use THI as an instrumentality to defraud victim R.S. out of \$14,470.00.

7. During the course of the larger investigation into Katrina Robinson and THI, investigators came across a check written on THI’s primary operating account at Regions Bank (Account #xx9570) dated November 21, 2017 and made payable to Brooke Boudreaux in the amount of \$10,082.00. The memo line read, “Tuition refund – LPN withdrawal”. Subsequent investigation, including the examination of bank and credit card records, as well as text message records and interviews with witnesses, revealed in a scheme in which the three defendants conspired to obtain \$14,470.00 from victim R.S. for the ostensible purpose of paying BOUDREAUX’s tuition and expenses at THI. In reality, BOUDREAUX was never a student at THI, and the money was split among the conspirators.

8. In an interview with FBI investigators, R.S. stated that he met BOUDREAUX at a bar in Las Vegas while he was there on business and the two became friends. Elsewhere in the interview, he described their relationship as “more than close.”

9. In 2017, BOUDREAUX asked R.S. to pay her tuition and expenses to attend nursing school at THI and he agreed. On October 16, 2017, R.S. went to THI in person for that purpose, met with ROBINSON, and paid with a \$14,470.00 charge on his American Express card in a transaction which affected interstate commerce, which is confirmed by American Express records, as well as those of THI’s credit card processor. R.S. told investigators that he was reluctant to believe that BOUDREAUX could be admitted to nursing school with a felony on her record, but upon speaking to ROBINSON, he was led to believe that she would be admitted to THI, and he made the \$14,470.00 payment for that purpose.

10. Approximately one month later, according to R.S., BOUDREAUX told him that she was not able to attend classes at THI, and also unable to get the money back.

11. In fact, the following text message conversations among ROBINSON, AYERS, BOUDREAUX, and another individual (identified herein as “T.A.”) show what actually unfolded, unbeknownst to R.S.:

Date	Time	Sender	Receiver	Message Content
10/11/2017	9:44:55 AM	Katie Ayers (901) xxx- x005	Katrina Robinson (901) xxx- x030	Good morning this you aunt Katie. Call me when u get time. Thanks
10/12/2017	3:13:59 PM	Katie Ayers (901) xxx- x005	Katrina Robinson (901) xxx- x030	Can you please call me it’s a nine one one.*heart emoji*
10/12/2017	3:17:55 PM	T.A. (901) xxx-x831	Katrina Robinson (901) xxx- x030	Call Aunt Katie xxx-x567
10/12/2017	8:28:53 PM	T.A. (901) xxx-x831	Katrina Robinson (901) xxx- x030	Call me

10/14/2017	1:06:59 PM	Katrina Robinson (901) xxx-x030	Tiffany Ayers (901) xxx-7831	He's on it
10/14/2017	2:24:30 PM	Katie Ayers (901) xxx-x005	Katrina Robinson (901) xxx-x030	Hey Katrina, this is Brooke Lauren Boudreaux. I'm going to meet you at 5:30 Monday with [R.S.] for my payment in full for all classes needed. He doesn't know auntie. I also told him about payment having to be in full for my spot to be held in Oct. 30. Also for flexibility if I need to fly out of town. We need to act like we know each other when we meet. I appreciate everything that you are doing for me, Thank you. He may ask about financing for Oct.30 classes. If so, I'll interrupt and say I don't want to finance. And you can just agree with me and say no, it's too late to finance for Oct. 30 class. If you have any questions before Monday meeting, my cell is 678-xxx-x828..thanks again.
10/14/2017	2:26:45 PM	Katrina Robinson (901) xxx-x030	Katie Ayers (901) xxx-x005	Ok
10/14/2017	2:27:37 PM	Katrina Robinson (901) xxx-x030	T.A. (901) xxx-x831	How much money does Aunt Katie need? I need to know cuz I need to get some cash too.
10/14/2017	2:28:18 PM	Katrina Robinson (901) xxx-x030	Katie Ayers (901) xxx-x005	How much money do you need to get out of this transaction?
10/14/2017	2:30:40 PM	Katie Ayers (901) xxx-x005	Katrina Robinson (901) xxx-x030	What's the most for all classes?
10/14/2017	2:33:20 PM	Katie Ayers (901) xxx-x005	Katrina Robinson (901) xxx-x030	All paperwork has been turned in to Sharita

10/14/2017	2:44:56 PM	Katrina Robinson (901) xxx-x030	Katie Ayers (901) xxx-x005	I was asking so I know how much to charge him so I can get some cash
10/14/2017	4:26:13 PM	T.A. (901) xxx-x831	Katrina Robinson (901) xxx-x030	10k
10/16/2017	3:23:23 PM	Katie Ayers (901) xxx-x005	Katrina Robinson (901) xxx-x030	We still on for 5:30 today don't forget
10/16/2017	3:23:32 PM	Katie Ayers (901) xxx-x005	Katrina Robinson (901) xxx-x030	Ok
10/16/2017	5:30:36 PM	Katrina Robinson (901) xxx-x030	Katie Ayers (901) xxx-x005	Hold off til 6
10/16/2017	6:09:48 PM	Katrina Robinson (901) xxx-x030	Katie Ayers (901) xxx-x005	Done
10/16/2017	6:13:09 PM	Katie Ayers (901) xxx-x005	Katrina Robinson (901) xxx-x030	You're the best love.love.love nothing but love. Thanks. thanks
10/16/2017	6:18:46 PM	Katrina Robinson (901) xxx-x030	Katie Ayers (901) xxx-x005	Love u too: now erase all this shit!!
10/26/2017	10:53:53 AM	Katie Ayers (901) xxx-x005	Katrina Robinson (901) xxx-x030	Can we do that Monday.
10/26/2017	4:18:40 PM	Katie Ayers (901) xxx-x005	Katrina Robinson (901) xxx-x030	This auntie can we do that Monday
10/26/2017	4:36:30 PM	Katrina Robinson (901) xxx-x030	Katie Ayers (901) xxx-x005	I'm sorry. Yes Ma'am

10/26/2017	4:37:24 PM	Katie Ayers (901) xxx- x005	Katrina Robinson (901) xxx- x030	Thanks
10/30/2017	10:51:01 AM	Katie Ayers (901) xxx- x005	Katrina Robinson (901) xxx- x030	This auntie, what's a good time for u today?
10/30/2017	10:51:48 AM	Katrina Robinson (901) xxx- x030	Katie Ayers (901) xxx- x005	After office hours
10/30/2017	10:52:15 AM	Katie Ayers (901) xxx- x005	Katrina Robinson (901) xxx- x030	*ok fingers emoji*
10/30/2017	5:57:45 PM	Katie Ayers (901) xxx- x005	Katrina Robinson (901) xxx- x030	U forgot about auntie today
10/31/2017	11:00:44 AM	Katrina Robinson	Katie Ayers (901) xxx- x005	Hey auntie, call that Girl and see what he is saying before I call him back
10/31/2017	11:10:01 AM	Katie Ayers (901) xxx- x005	Katrina Robinson (901) xxx- x030	Make sure that his card only has one charge to the school.
10/31/2017	4:48:03 PM	Katrina Robinson (901) xxx- x030	Katie Ayers (901) xxx- x005	She gave him my cell number??
10/31/2017	4:51:50 PM	Katie Ayers (901) xxx- x005	Katrina Robinson (901) xxx- x030	She doesn't know your#
10/31/2017	4:54:46 PM	Katie Ayers (901) xxx- x005	Katrina Robinson (901) xxx- x030	Did he call your#
10/31/2017	4:59:35 PM	Katrina Robinson (901) xxx- x030	Katie Ayers (901) xxx- x005	Yes

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10/31/2017	4:59:55 PM	Katrina Robinson (901) xxx-x030	Katie Ayers (901) xxx-x005	I think he or she got my card
10/31/2017	5:03:17 PM	Katie Ayers (901) xxx-x005	Katrina Robinson (901) xxx-x030	Most likely she said don't remember... what the mf want
10/31/2017	5:05:26 PM	Katrina Robinson (901) xxx-x030	Katie Ayers (901) xxx-x005	Ima Call you
10/31/2017	5:11:16 PM	Katie Ayers (901) xxx-x005	Katrina Robinson (901) xxx-x030	Got to make a stop down town out of reach about an hour
11/1/2017	10:25:34 AM	Katie Ayers (901) xxx-x005	Katrina Robinson (901) xxx-x030	You got time this morning
11/1/2017	3:19:46 PM	Katie Ayers (901) xxx-x005	Katrina Robinson (901) xxx-x030	Everything good. Give it about two more weeks
11/14/2017	12:50:46 PM	Katie Ayers (901) xxx-x005	Katrina Robinson (901) xxx-x030	I'm ready everything good on the other end. Let me know a good time for you. auntie k
11/14/2017	1:45:20 PM	Katrina Robinson (901) xxx-x030	Katie Ayers (901) xxx-x005	Ok
11/17/2017	11:43:21 AM	Katie Ayers (901) xxx-x005	Katrina Robinson (901) xxx-x030	Would today be a good day for you... auntie k
11/17/2017	11:43:44 AM	Katrina Robinson (901) xxx-x030	Katie Ayers (901) xxx-x005	Hey auntie I am in Chattanooga til Sunday night. I can get with u then if that's ok
11/17/2017	11:44:25 AM	Katie Ayers (901) xxx-x005	Katrina Robinson (901) xxx-x030	*ok fingers emoji* thanks

11/21/2017	2:58:28 PM	Katie Ayers (901) xxx- x005	Katrina Robinson (901) xxx- x030	You think we can do that before thanksgiving. Would be nice auntie k
11/21/2017	2:58:49 PM	Katrina Robinson (901) xxx- x030	Katie Ayers (901) xxx- x005	Yes ma'am
11/21/2017	3:00:19 PM	Katie Ayers (901) 859- 9005	Katrina Robinson (901) xxx- x030	Meeting place and time
11/21/2017	3:20:07 PM	Katie Ayers (901) xxx- x005	Katrina Robinson (901) xxx- x030	Give me a time and place to meet u auntie k
11/21/2017	3:21:58 PM	Katrina Robinson (901) xxx- x030	Katie Ayers (901) xxx- x005	Tonight after [redacted]'s game. They play at GTown
11/21/2017	3:23:26 PM	Katie Ayers (901) xxx- x005	Katrina Robinson (901) xxx- x030	Text when u ready thanks and lots of love auntie k
11/22/2017	10:21:42 AM	Katie Ayers (901) xxx- x005	Katrina Robinson (901) xxx- x030	Don't mean to bother you but need that to go forward...thanks auntie k
11/22/2017	10:27:23 AM	Katrina Robinson (901) xxx- x030	Katie Ayers (901) xxx- x005	Got u. Wya today?
11/22/2017	10:27:57 AM	Katie Ayers (901) xxx- x005	Katrina Robinson (901) xxx- x030	Work
11/22/2017	2:12:19 PM	Katie Ayers (901) xxx- x005	Katrina Robinson (901) xxx- x030	Gets off at 2.30. Should I come to your place. auntie k
11/22/2017	2:46:11 PM	Katie Ayers (901) xxx- x005	Katrina Robinson (901) xxx- x030	Let me know what you want to do so I know the direction to go on these sale call


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11/22/2017	2:47:28 PM	Katie Ayers (901) xxx- x005	Katrina Robinson (901) xxx- x030	Ok. Headed to Office Will leave in envelope if I miss u
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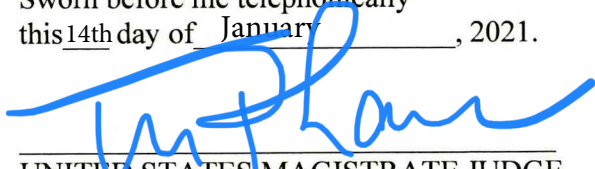
12. Bank records show that Robinson wrote and signed Check #1235 on THI's Regions Bank account (#xx9570) dated November 21, 2017 and made payable to Brooke Boudreaux in the amount of \$10,082.00. The memo line reads, "Tuition refund - LPN withdrawal". Boudreaux endorsed this check over to Brezinski's Security Doors, LLC, which was a business owned by Alaric Ayers and run by Katie Ayers. The check was then deposited into an account of Brezinski's at Wells Fargo Bank (#xx1884) and posted on November 27, 2017 in a transaction which affected interstate commerce.

13. In September 2020, BOUDREAUX submitted to an interview with FBI investigators. During that interview, BOUDREAUX admitted that she had gotten involved in the scheme because she needed money to pay for a lawyer for Alaric Ayers, who is the father of her daughter. She described KATIE AYERS as her daughter's grandmother. BOUDREAUX said that it was a way to get the money from R.S. without revealing the purpose.

14. Accordingly, there is probable cause believe that the defendants have violations of 18 U.S.C. §§ 1349 and 1956(h), and I respectfully request that warrants issue for their arrest.


 BRENT A. HAYDEN
 Special Agent
 Federal Bureau of Investigation

Sworn before me telephonically
 this 14th day of January, 2021.


 UNITED STATES MAGISTRATE JUDGE