

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.
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CAROL L. MICHEL
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR CONSPIRACY
TO COMMIT MAIL FRAUD AND MAIL FRAUD**

UNITED STATES OF AMERICA

v.

PERNELL ANTHONY JONES, JR.

* CRIMINAL NO.

* SECTION:

* VIOLATIONS: 18 U.S.C. § 1349
18 U.S.C. § 1341
* 18 U.S.C. § 2

21-116
SECT. EMAG. 2

* * *

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. Defendant **PERNELL ANTHONY JONES, JR. ("JONES")** resided in Kenner, Louisiana.
2. American Airlines ("American") was a commercial airline headquartered in Fort Worth, Texas.
3. Alaska Airlines ("Alaska") was a commercial airline headquartered in SeaTac, Washington.

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4. Southwest Airlines (“Southwest”) was a commercial airline headquartered in Dallas, Texas.

5. JetBlue Airways (“JetBlue”) was a commercial airline headquartered in Long Island City, New York.

6. United Airlines (“United”) was a commercial airline headquartered in Chicago, Illinois.

7. Louis Armstrong International Airport (“MSY”) was located in Kenner, Louisiana, which is within the Eastern District of Louisiana.

B. THE CONSPIRACY:

Beginning at a time unknown but not later than 2015, and continuing until on or about March 19, 2020, in the Eastern District of Louisiana and elsewhere, **PERNELL ANTHONY JONES, JR.** and others known and unknown to the United States Attorney, did willfully and knowingly combine, conspire, confederate, and agree to devise a scheme and artifice to defraud and to obtain money and property from commercial airlines by means of materially false and fraudulent pretenses, representations, and promises, and did knowingly cause mail matter to be delivered by the United States Postal Service for the purpose of executing or attempting to execute the scheme and artifice to defraud set forth below, in violation of Title 18, United States Code, Section 1341.

C. SCHEME AND ARTIFICE TO DEFRAUD:

1. It was part of the scheme and artifice to defraud that, beginning at a time unknown but not later than 2015, and continuing until on or about March 19, 2020, **JONES** submitted and caused to be submitted over 180 fraudulent claims to commercial airlines, including American,

Alaska, Southwest, JetBlue, and United, requesting over \$550,000.00 in reimbursement for luggage that he falsely alleged had been lost.

2. It was further part of the scheme and artifice to defraud that **JONES** would book flights with commercial airlines online using pre-loaded gift cards.

3. It was further part of the scheme and artifice to defraud that **JONES** usually made the flight reservations under false or fictitious identities.

4. It was further part of the scheme and artifice to defraud that **JONES** possessed fraudulent identification cards containing **JONES's** photograph along with names and other identifiers of false or fictitious identities.

5. It was further part of the scheme and artifice to defraud that **JONES** would often fly into or out of MSY under false or fictitious identities.

6. It was further part of the scheme and artifice to defraud that, on the day of the booked flights, **JONES** would go to the airport for the departure flight and obtain a ticket for a checked bag even though he would not check a bag.

7. It was further part of the scheme and artifice to defraud that **JONES** would sometimes not bring a bag to the airport, and other times he would bring a bag for the purpose of claiming that he had lost it.

8. It was further part of the scheme and artifice to defraud that **JONES** would take domestic flights under fictitious identities and then make false claims for reimbursement for lost baggage at the destination airports.

9. It was further part of the scheme and artifice to defraud that **JONES** and/or Co-Conspirator 1 would provide the commercial airlines with a false list of high value items that were

purportedly in the lost baggage to ensure that the commercial airlines would agree to pay the maximum reimbursement of \$3,500.00 for domestic flights.

10. It was further part of the scheme and artifice to defraud that **JONES** would cause the commercial airlines to mail reimbursement checks to **JONES** via the United States Postal Service (“USPS”) to compensate him for his false claims for lost luggage.

11. It was further part of the scheme and artifice to defraud that **JONES** sometimes used addresses of his friends and associates, including Co-Conspirator 2, T.B., S.B., D.P., S.H., N.B., L.C., and others, to receive the reimbursement checks from commercial airlines by USPS.

12. It was further part of the scheme and artifice to defraud that **JONES** paid S.B. to receive mail at S.B.’s address in New Orleans containing fraudulent reimbursement checks from commercial airlines on **JONES’s** behalf.

13. It was part of the scheme and artifice to defraud that **JONES** caused commercial airlines, including American, Alaska, Southwest, JetBlue, and United, to send checks by USPS to the Eastern District of Louisiana and elsewhere totaling at least \$300,000.00 in reimbursement for luggage that he falsely alleged had been lost.

All in violation of Title 18, United States Code, Section 1349.

COUNT 2

A. AT ALL TIMES MATERIAL HEREIN:

The allegations contained in Parts A and C of Count 1 are hereby re-alleged and incorporated herein by reference.

B. THE OFFENSE:

On or about October 16, 2019, in the Eastern District of Louisiana and elsewhere, the defendant, **PERNELL ANTHONY JONES, JR.**, and others known and unknown to the United

States Attorney, for the purpose of executing or attempting to execute the aforesaid scheme and artifice to defraud and to obtain money, funds, and property by means of false and fraudulent pretenses representations and promises and attempting to do so, did knowingly cause the United States Postal Service to be delivered by mail, an envelope from American Airlines, 1 Skyview Drive, Fort Worth, Texas 76115 to G.W., [REDACTED] [REDACTED] [REDACTED] Chalmett(sic), St. Bernard Parrish(sic), LA 70043, containing check number [REDACTED] in the amount of approximately \$3,500.00, in violation of Title 18, United States Code, Sections 1341 and 2.

NOTICE OF FORFEITURE

1. The allegations of Count 1 and 2 of this Bill of Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture to the United States.

2. As a result of conspiring to violate Title 18, United States Code, Section 1341 as alleged in Count 1 of this Bill of Information; committing mail fraud, in violation of Title 18, United States Code, Sections 1341 and 2 as alleged in Count 2 of this Bill of Information, the defendant, **PERNELL ANTHONY JONES, JR.**, shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461, any property real or personal, that constitutes or is derived from proceeds traceable to said offenses, including but not limited to any property or proceeds stated-above.

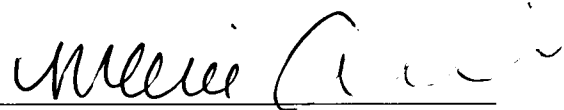
3. If any of the above-described property, as a result of any act or omission of the defendants:

- 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;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

DUANE A. EVANS
UNITED STATES ATTORNEY



MARIA M. CARBONI
Assistant United States Attorney

New Orleans, Louisiana
September 23, 2021