

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

2019 JAN 23 PM 3:14
U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 6:19-cr-14-ORL-31 DCI

18 U.S.C. § 371

18 U.S.C. § 641

18 U.S.C. § 1028A(a)(1)

DEBORAH PIERRE

BILLY ALTIDOR

EVANIE LOUIS

INDICTMENT

SEALED

The Grand Jury charges:

COUNT ONE

(Conspiracy)

A. Introduction

At times material to this Indictment:

1. The Internal Revenue Service (IRS) was an agency of the United States and a component part of the United States Department of the Treasury, a department of the executive branch of the United States.

2. BILLY ALTIDOR and EVANIE LOUIS were residents of the Middle District of Florida.

3. A “means of identification” was any name or number that could be used alone or in conjunction with any other information, to identify a specific person, including the name, social security number, or date of birth of that person.

4. A “reloadable debit card” was a card linked to an account at a financial institution, which could be used to receive deposits electronically, like a traditional bank account, and to make purchases and cash withdrawals with funds in that account, like a traditional debit card.

B. The Conspiracy

5. Beginning on an unknown date, but at least as early as in or around January 2014, and continuing through and including in or around March 2015, in the Middle District of Florida and elsewhere,

EVANIE LOUIS
and
BILLY ALTIDOR,

did knowingly and willfully combine, conspire, confederate, and agree with other persons, known and unknown to the Grand Jury, to commit certain offenses, specifically:

a. to knowingly and willfully steal, embezzle, purloin, and convert to their own use and the use of others, more than \$1,000 in United States currency with the intent to deprive the owner of the use and benefit of the property so taken, said funds being the property of the United States, in the form of tax refund payments, in violation of 18 U.S.C. § 641; and,

b. during and in relation to the crime of theft of government property, to knowingly transfer, possess, and use without lawful authority, a means of identification of another person, in violation of 18 U.S.C. § 1028A.

C. Manner and Means

6. The manner and means by which the conspirators sought to accomplish the objects of the conspiracy included, among others, the following:

a. It was part of the conspiracy that the conspirators, both known and unknown to the Grand Jury, would, and did, obtain personal identifiable information or “PII,” including names, dates of birth, and social security numbers of various individuals.

b. It was further part of the conspiracy that the conspirators, both known and unknown to the Grand Jury, would, and did, use the PII to electronically file fraudulent federal income tax returns in order to generate and obtain tax refunds to which they were not entitled.

c. It was further part of the conspiracy that the conspirators, both known and unknown to the Grand Jury, would, and did, direct that fraudulently obtained tax refunds be deposited into accounts controlled by the conspirators.

d. It was further part of the conspiracy that the conspirators, both known and unknown to the Grand Jury, would, and did, direct that the fraudulently obtained tax refunds be deposited onto reloadable debit cards.

e. It was further part of the conspiracy that the conspirators, both known and unknown to the Grand Jury, would and did perform acts and make statements to hide and conceal the scheme and artifice and the acts committed and executed in furtherance thereof.

D. Overt Acts

7. In furtherance of, and to affect the objectives of the conspiracy, the following overt acts, among others, were committed in the Middle District of Florida and elsewhere:

a. On or about the dates set forth below, each of which constitutes a separate over act, defendants LOUIS and ALTIDOR, alone and together with others known and unknown, caused fraudulent federal income tax returns to be filed in the names of the victims identified by their initials below, without the victims' knowledge or consent:

OVERT ACT	DATE RETURN FILED	VICTIM	AMOUNT OF REFUND CLAIMED
a.1	3/1/2015	J.C.	\$6,795

OVERT ACT	DATE RETURN FILED	VICTIM	AMOUNT OF REFUND CLAIMED
a.2	3/10/2015	L.H	\$7,044
a.3	3/15/15	T.H.	\$8,298
a.4	3/16/15	L.D.B	\$7,251
a.5	3/21/2015	T.S.	\$6,130

b. On or about the dates set forth below, each of which constitutes a separate overt act, defendants LOUIS and ALTIDOR, alone and together with others known and unknown, caused fraudulently obtained tax refunds, each being the property of the United States Treasury in the amount of more than \$1,000, to be deposited into a bank account controlled by LOUIS:

OVERT ACT	DATE REFUND RECEIVED	ACCOUNT	VICTIM	AMOUNT OF REFUND
b.1	3/11/2015	Bank of America account belonging to Royal Collection (Evanie Louis) ending in 4118	J.C.	\$6,795

OVERT ACT	DATE REFUND RECEIVED	ACCOUNT	VICTIM	AMOUNT OF REFUND
b.2	3/19/15	Bank of America account belonging to Royal Collections (Evanie Louis) ending in 4121	L.H	\$7,044

c. On or about the dates set forth below, each of which constitutes a separate overt act, defendant ALTIDOR, alone and together with others known and unknown, caused fraudulently obtained tax refunds, each being the property of the United States Treasury, each being more than \$1,000, and each being issued to the victims identified by their initials below, to be loaded onto reloadable debit cards under the control of the conspirators without the victim's knowledge or consent, receiving tax refunds in the listed amounts:

OVERT ACT	DATE REFUND RECEIVED	RELOADABLE DEBIT CARD AND ACCOUNT	VICTIM	AMOUNT OF REFUND
c.1	3/21/15	Reloadable debit card ending in 2647 associated with MetaBank Account ending in 6412	T.H.	\$8,298

OVERT ACT	DATE REFUND RECEIVED	RELOADABLE DEBIT CARD AND ACCOUNT	VICTIM	AMOUNT OF REFUND
c.2	3/24/15	Reloadable debit card ending in 5383 associated with MetaBank account ending in 4009	L.B.	\$7,251
c.3	3/28/15	Reloadable debit card ending in 9920 associated with MetaBank account ending in 7303	T.S.	\$6,130

In violation of 18 U.S.C. § 371.

COUNT TWO
(Conspiracy)

A. Introduction

At times material to this Indictment:

1. The Social Security Administration (SSA) was an agency of the United States.
2. A “means of identification” was any name or number that could be used alone or in conjunction with any other information, to identify a specific person, including the name, social security number, or date of birth of that person.

3. MySocialSecurity (MySSA) provided a single point of access to users of Social Security Administration (SSA) electronic services. MySSA allowed users to view, update, and correct the users' existing Social Security records.

4. DEBORAH PIERRE, BILLY ALTIDOR, and EVANIE LOUIS were residents of the Middle District of Florida.

B. The Conspiracy

5. Beginning on an unknown date, but at least as early as in or around January 2014, and continuing through and including in or around March 2015, in the Middle District of Florida and elsewhere,

EVANIE LOUIS,
BILLY ALTIDOR
and
DEBORAH PIERRE,

did knowingly and willfully combine, conspire, confederate, and agree with other persons, known and unknown to the Grand Jury, to commit certain offenses, specifically:

a. to knowingly and willfully steal, embezzle, purloin, and convert to their own use and the use of others, more than \$1,000 in United States currency with the intent to deprive the owner of the use and benefit of the property so taken, said funds being the property of the United States, in the form of Social Security benefits, in violation of 18 U.S.C. § 641; and,

b. during and in relation to the crime of theft of government property, to knowingly transfer, possess, and use without lawful authority, a means of identification of another person, in violation of 18 U.S.C. § 1028A.

C. Manner and Means

6. The manner and means by which the conspirators sought to accomplish the objects of the conspiracy included, among others, the following:

a. It was part of the conspiracy that the conspirators, both known and unknown to the Grand Jury, would, and did, obtain personal identifiable information or “PII,” including names, dates of birth, and social security numbers of various individuals.

b. It was further part of the conspiracy that the conspirators, both known and unknown to the Grand Jury, would, and did, use the PII to access the MySSA system and direct Social Security benefit payments to accounts controlled by the conspirators.

c. It was further part of the conspiracy that the conspirators, both known and unknown to the Grand Jury, would, and did, embezzle, steal, purloin, and convert to their use and the use of others the Social Security benefit payments that were diverted into accounts controlled by the conspirators.

d. It was further part of the conspiracy that the conspirators, both known and unknown to the Grand Jury, would and did perform acts and make statements to hide and conceal the scheme and artifice and the acts committed and executed in furtherance thereof.

D. Overt Acts

7. In furtherance of, and to affect the objectives of the conspiracy, the following over acts, among others, were committed in the Middle District of Florida and elsewhere:

a. On or about the dates set forth below, each of which constitutes a separate overt act, defendants PIERRE, ALTIDOR, and LOUIS, alone and together with others known and unknown, would and did cause the MySSA accounts of the victims identified by their initials below to be accessed without said victims' knowledge or consent, and for Social Security benefits in the amounts listed below, to be redirected into accounts used and controlled by PIERRE, ALTIDOR, and LOUIS:

OVERT ACT	DATE BANK ACCOUNT CHANGED IN MySSA	VICTIM	BENEFIT AMOUNT
a.1	11/10/2014	B.D.	\$740.60

OVERT ACT	DATE BANK ACCOUNT CHANGED IN MySSA	VICTIM	BENEFIT AMOUNT
a.2	11/5/2014	B.G.	\$1,643.40
a.3	12/24/2014	B.D.B.	\$1,584.00
a.4	1/16/2015	S.V.	\$715.50
a.5	1/23/2015	J.B.	\$1,563
a.6	3/11/2015	F.D.	\$987.70
a.7	3/10/2015	A.M.	\$634
a.8	2/26/2015	J.Q.B	\$279.10

b. On or about the dates set forth below, each of which constitutes a separate overt act, defendants PIERRE, ALTIDOR, and LOUIS, alone and together with others known and unknown, would and did embezzle, steal, purloin, and convert to their own use and the use of another, the Social Security benefits that had been directed into accounts used and controlled by PIERRE, ALTIDOR, and LOUIS:

OVERT ACT	DEFENDANT	DATE OF SSA DEPOSIT	ACCOUNT	VICTIM	BENEFIT AMOUNT
b.1	Deborah Pierre	1/14/15	Bank of America Account belonging to Pierre ending in 5781	B.D	\$749.30
b.2	Deborah Pierre	1/28/15	Bank of America Account belonging to Pierre ending in 5781	B.G.	\$1,643.40
b.3	Deborah Pierre	1/28/2015	Bank of America Account belonging to Pierre ending in 5781	B.D.B.	\$1,584.00
b.4	Deborah Pierre	2/11/15	Bank of America Account belonging to Pierre ending in 5781	B.D.	\$749.30
b.5	Deborah Pierre	2/18/2015	Bank of America Account belonging to Pierre ending in 5781	S.V.	\$715.50
b.6	Deborah Pierre	2/25/2015	Bank of America Account belonging to Pierre ending in 5781	J.B.	\$1,563

OVERT ACT	DEFENDANT	DATE OF SSA DEPOSIT	ACCOUNT	VICTIM	BENEFIT AMOUNT
b.7	Evanie Louis and Billy Altidor	4/8/2015	Bank of America account belonging to Royal Collection (Evanie Louis) ending in 4118	F.D.	\$987.70
b.8	Evanie Louis and Billy Altidor	4/8/2015	Bank of America account belonging to Royal Collection (Evanie Louis) ending in 4118	A.M.	\$634.00
b.9	Evanie Louis and Billy Altidor	4/15/2015	Bank of America account belonging to Royal Collection (Evanie Louis) ending in 4118	J.Q.B	\$279.10

In violation of 18 U.S.C. § 371.

COUNTS THREE AND FOUR
(Theft of Government Property)

On or about the dates set forth below, in the Middle District of Florida,
and elsewhere, the defendants,

EVANIE LOUIS
and
BILLY ALTIDOR,

did knowingly and willfully embezzle, steal, purloin, and convert to their own use and the use of another, more than \$1,000 of money and a thing of value of the United States and the Internal Revenue Service, a department and agency of the United States, that is, federal income tax refunds, with intent to deprive the United States and the Internal Revenue Service of the use and benefit of the money and thing of value.

COUNT	DATE REFUND RECEIVED	ACCOUNT	VICTIM	AMOUNT OF REFUND
THREE	3/11/2015	Bank of America account belonging to Royal Collection (Evanie Louis) ending in 4118	J.C.	\$6,795
FOUR	3/19/15	Bank of America account belonging to Royal Collections (Evanie Louis) ending in 4121	L.H	\$7,044

In violation of 18 U.S.C. §§ 641 and 2.

COUNTS FIVE THROUGH SEVEN
(Theft of Government Property)

On or about the dates set forth below, in the Middle District of Florida, and elsewhere, the defendant,

BILLY ALTIDOR,

did knowingly and willfully embezzle, steal, purloin, and convert to their own use and the use of another, more than \$1,000 of money and a thing of value of the United States and the Internal Revenue Service, a department and agency of the United States, that is, federal income tax refunds, with intent to deprive the United States and the Internal Revenue Service of the use and benefit of the money and thing of value, as follows:

COUNT	DATE REFUND RECEIVED	RELOADABLE DEBIT CARD AND ACCOUNT	VICTIM	AMOUNT OF REFUND
FIVE	3/21/15	Reloadable debit card ending in 2647 associated with MetaBank Account ending in 6412	T.H.	\$8,298
SIX	3/24/15	Reloadable debit card ending in 5383 associated with MetaBank account ending in 4009	L.B.	\$7,251
SEVEN	3/28/15	Reloadable debit card ending in 9920 associated with MetaBank account ending in 7303	T.S.	\$6,130

In violation of 18 U.S.C. §§ 641 and 2.

COUNTS EIGHT THROUGH THIRTEEN
(Theft of Government Property)

On or about the dates set forth below, in the Middle District of Florida,
 and elsewhere, the defendants,

EVANIE LOUIS,
 BILLY ALTIDOR
 and
 DEBORAH PIERRE,

did knowingly and willfully embezzle, steal, purloin, and convert to the their
 own use and the use of another, more than \$1,000 of money and a thing of
 value of the United States and the Social Security Administration, a
 department and agency of the United States, that is, Social Security benefits,
 with intent to deprive the United States and the Social Security
 Administration of the use and benefit of the money and thing of value, as
 follows:

COUNT	DEFENDANT	DATE OF SSA DEPOSIT	ACCOUNT	VICTIM	BENEFIT AMOUNT
EIGHT	Deborah Pierre	1/28/15	Bank of America Account belonging to Pierre ending in 5781	B.G.	\$1,643.40

COUNT	DEFENDANT	DATE OF SSA DEPOSIT	ACCOUNT	VICTIM	BENEFIT AMOUNT
NINE	Deborah Pierre	1/28/2015	Bank of America Account belonging to Pierre ending in 5781	B.D.B.	\$1,584.00
TEN	Deborah Pierre	2/25/2015	Bank of America Account belonging to Pierre ending in 5781	J.B.	\$1,563
ELEVEN	Evanie Louis and Billy Altidor	4/8/2015	Bank of America account belonging to Royal Collection (Evanie Louis) ending in 4118	F.D.	\$987.70
TWELVE	Evanie Louis and Billy Altidor	4/8/2015	Bank of America account belonging to Royal Collection (Evanie Louis) ending in 4118	A.M.	\$634.00
THIRTEEN	Evanie Louis and Billy Altidor	4/15/2015	Bank of America account belonging to Royal Collection (Evanie Louis) ending in 4118	J.Q.B	\$279.10

In violation of 18 U.S.C. §§ 641 and 2.

COUNTS FOURTEEN AND FIFTEEN
(Aggravated Identity Theft)

On or about the dates listed below, in the Middle District of Florida,
and elsewhere, the defendants,

EVANIE LOUIS
and
BILLY ALTIDOR,

did knowingly possess and use, without lawful authority, a means of
identification of another person, specifically, the names and Social Security
Numbers of J.C. and L.H., during and in relation to a felony violation of theft
of government property, in violation of 18 U.S.C. § 641, as charged in Counts
Three and Four of this Indictment, knowing that such means of identification
belonged to an actual person, as follows:

COUNT	DATE RETURN FILED	DATE REFUND RECEIVED	VICTIM NAME	MEANS OF IDENTIFICATION USED
FOURTEEN	3/1/2015	3/11/2015	J.C.	Name and social security number
FIFTEEN	3/21/2015	3/28/2015	L.H.	Name and social security number

In violation of 18 U.S.C. §§ 1028A(a)(1) and 2.

COUNT SIXTEEN
(Aggravated Identity Theft)

On or about the dates listed below, in the Middle District of Florida,
 and elsewhere, the defendant,

DEBORAH PIERRE,

did knowingly possess and use, without lawful authority, a means of
 identification of another person, specifically, the name and Social Security
 Number of B.G., during and in relation to a felony violation of theft of
 government property, in violation of 18 U.S.C. § 641, as charged in Count
 Eight of this Indictment, knowing that such means of identification belonged
 to an actual person, as follows:

COUNT	DATE DIRECT DEPOSIT CHANGED	DATE BENEFIT PAYMENT RECIIVED	VICTIM NAME	MEANS OF IDENTIFICATION USED
SIXTEEN	11/5/14	1/28/15	B.G.	Name and social security number

In violation of 18 U.S.C. §§ 1028A(a)(1) and 2.

FORFEITURE

1. The allegations contained in Counts One through Thirteen are
 incorporated by reference for the purpose of alleging forfeiture pursuant to 18
 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

2. Upon conviction of a conspiracy to violate of 18 U.S.C. § 641, in violation of 18 U.S.C. § 371, and upon conviction of a violation of 18 U.S.C. § 641, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.


3. The property to be forfeited includes, but is not limited to, the following: a money judgment in the amount of \$91,749.30, which represents the proceeds of the offense.

4. If any of the property described above, 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 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 which cannot be divided without difficulty;

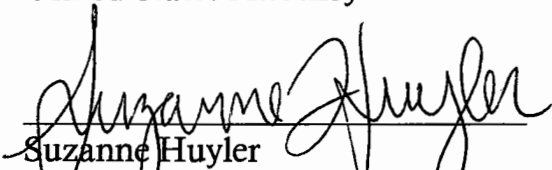
the United States shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,




Foreperson

MARIA CHAPA LOPEZ
United States Attorney

By: 

Suzanne Huyler
Special Assistant United States Attorney

By: 

Roger B. Handberg
Assistant United States Attorney
Chief, Orlando Division

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Orlando Division

THE UNITED STATES OF AMERICA


vs.

DEBORAH PIERRE,
EVANIE LOUIS,
and BILLY ALTIDOR

INDICTMENT

Violations: 18 U.S.C. §§ 371, 641, 1028A

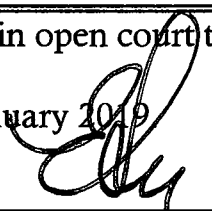
A true bill,



Foreperson

Filed in open court this 23rd day

of January 2019



Clerk

Bail \$ _____
