

ORIGINAL

FILED IN OPEN COURT
U.S.D.C. Atlanta

OCT 11 2013

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

By: *J. Edwards*
JAMES N. HATTEN, Clerk
Deputy Clerk

UNITED STATES OF AMERICA

v.

GAYLA O'NEAL ST. JULIEN

Criminal Information

No. 1:13-CR-403

THE UNITED STATES ATTORNEY CHARGES THAT:

Count One

1. From in or about 2008, through on or about September 11, 2013, in the Northern District of Georgia and elsewhere, defendant GAYLA O'NEAL ST. JULIEN did willfully, knowingly and unlawfully combine, conspire, confederate, agree and have a tacit understanding with A.E.N. and other persons, both known and unknown, to commit certain offenses against the United States, including the following:

(a) To devise and intend to devise a scheme and artifice to defraud financial institutions, other companies and individuals, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, causing the U. S. Postal Service and other interstate carriers to be used, and interstate wire communications to be made, in furtherance of said scheme and artifice to defraud, in violation of Title 18, United States Code, Sections 1341, 1343 and 2.

(b) To knowingly execute, and attempt to execute, a scheme and artifice to defraud financial institutions, as defined in Title 18, United States Code, Section 20, including but not limited to Bank of America, BB&T Bank, Best Bank, Digital Federal Credit Union, Georgia's Own Credit Union, JP Morgan Chase Bank, Nationwide Bank, PNC Bank, Regions Bank, State Farm Bank, SunTrust Bank and Wells Fargo Bank, in violation of Title 18, United States Code, Sections 1344 and 2.

(c) To knowingly possess and use, without lawful authority, means of identification of other persons, during and in relation to the federal felonies of mail, wire and bank fraud, in violation of Title 18, United States Code, Sections 1028A and 2.

Manner and Means

2. It was a part of the conspiracy, and the manner and means thereof, for defendant GAYLA O'NEAL ST. JULIEN, A.E.N. and/or other conspirators:

(a) To incorporate Georgia shell companies purporting to be collection agencies, including Onyx Collections & Locator Service and Reliance Recovery & Collections Group, and apply for access to LexisNexis, Microbuilt and Equifax databases in order to obtain unlimited access to the personal identifiers of others.

(b) To rent dozens of UPS Store addresses online, by phone and in person, in the Atlanta, Georgia area and in other states, in the names of said stolen identities and other aliases.

(c) To create counterfeit drivers' licenses and other identification documents bearing stolen personal identifiers and the photographs of conspirators.

(d) To apply for unclaimed funds from a number of states by stealing the personal identifiers of the true owners of said unclaimed property, causing the funds to be disbursed in checks payable to the stolen identities and directing the checks to UPS mailboxes in various states for forwarding to Atlanta area UPS addresses.

(e) To access a U.S. Department of Housing and Urban Development (HUD) website listing refunds due former homeowners, steal the personal identifiers of those due HUD refunds and cause refund checks to be issued to the stolen identities for forwarding through UPS addresses in other states to the Atlanta area.

(f) To pay postal employees and others for stolen mail, including mail containing United States Treasury checks and other checks.

(g) To apply online for tax refunds and social security payments using stolen identities.

(h) To create shell companies purporting to be vehicle dealerships and auto brokers, including Acura Carland, Crown Car Dealers, Crown Pre-Owned Mobiles, Ferrari Autohaus, Final Auto Solutions, Fitzgerald Motors, Goodwin Automall, My Capital Cadillac, My North Point Volvo, My Scarrett Lincoln Mercury and Signature Luxury Imports, and in some cases to create websites for such dealerships.

(i) To apply for loans in the names of stolen identities for the purchase of non-existent vehicles from the shell dealerships or brokers, with loan proceeds directed to the shell dealerships by mail or interstate wire transfers.

(j) To maintain a disposable phone for each stolen borrower identity to answer any lender inquiries.

(k) To open accounts at Atlanta area and other financial institutions, often in shell company names and always with stolen identities as authorized signers, to negotiate and launder the stolen and fraudulently obtained checks, wire transfers and other fraud proceeds described above.

(l) To attempt the takeover of bank accounts belonging to other persons and without authority disburse the proceeds to accounts controlled by conspirators.

Overt Acts

3. During the course of the conspiracy, in the Northern District of Georgia, defendant GAYLA O'NEAL ST. JULIEN committed the following overt acts at the direction of A.E.N. and other conspirators in furtherance of said conspiracy and to achieve the objects thereof:

(a) Used drivers' licenses bearing her photograph and the stolen identifiers of other persons provided to her by conspirator A.E.N. to access UPS mailboxes for retrieval of unclaimed property checks, HUD refund checks, tax refund checks, social security checks, vehicle loan checks, bank statements, debit cards and correspondence between Onyx and Reliance and Equifax, LexisNexis and Microbuilt.

(b) Posed as an authorized signer in numerous stolen identities in order to deposit and move scheme proceeds through multiple bank accounts before withdrawing the proceeds and providing the majority of the fraudulently obtained funds to co-conspirator A.E.N., with said scheme proceeds including fraudulently obtained checks retrieved from the UPS addresses, checks stolen from the mail and wire transfers.

(c) Used the stolen identity of C.O. to rent a UPS address for Onyx Collections & Locator Service, which address was provided to both Equifax and LexisNexis.

(d) Used the stolen identity of M.P. to pose as a principal of Reliance Recovery & Collections Group and to sign documents during a site visit in connection with Reliance's application for access to the Equifax database, as well as to open and access Reliance bank accounts.

(e) Returned her counterfeit identification documents, debit cards and other account records to co-conspirator A.E.N. after each usage.

All in violation of Title 18, United States Code, Section 371.

Count Two

4. From in or about June 2011, though on or about February 29, 2012, in the Northern District of Georgia, defendant GAYLA O'NEAL ST. JULIEN, aided and abetted by A.E.N., did knowingly possess and use, without lawful authority, a means of identification of another person, that is, the stolen name, social security number and other personal identifiers of M.P., during and in relation to

the federal felonies of mail, wire and bank fraud as set forth in Count One of this Criminal Information and incorporated herein by reference.

All in violation of Title 18, United States Code, Sections 1028A and 2.

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