

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**INDICTMENT FOR CONSPIRACY TO POSSESS
AN UNREGISTERED DESTRUCTIVE DEVICE AND WIRE FRAUD**

UNITED STATES OF AMERICA

v.

GREGORY R. ALEXANDER

* CRIMINAL NO.

* SECTION:

* VIOLATION: 18 U.S.C. §1343
26 U.S.C. §5841
* 26 U.S.C. §5861(d)
26 U.S.C. §5871
* 18 U.S.C. §2

The Grand Jury charges that:

**COUNT 1
POSSESSION OF UNREGISTERED DESTRUCTIVE DEVICE**

On or about February 25, 2013, in the Eastern District of Louisiana, the defendant, **GREGORY R. ALEXANDER**, knowingly received and possessed a firearm, that is, a destructive device commonly known as a bomb, not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

**COUNT 2
WIRE FRAUD**

A. AT ALL MATERIAL TIMES HEREIN:

1. **GREGORY R. ALEXANDER** ("ALEXANDER"), defendant herein, owned a 2005 Ford F150 pickup truck bearing vehicle identification number XXXXX1526, and located in the Eastern District of Louisiana.

2. **ALEXANDER**, on or about February 5, 2013, obtained and owned an automobile insurance policy number 6179013 issued by U.S.Agencies Casualty Insurance Company, Inc. (“USAgencies”) that insured the 2005 Ford F150 pickup truck bearing vehicle identification number XXXXX1526 against accident and theft on February 25, 2013.

3. USAgencies maintained a phone and internet network to handle phone calls, and route claims through a call center located in Addison, Texas.

B. THE SCHEME TO DEFRAUD:

Beginning at a date unknown but prior to February 27, 2013, and continuing until the present, in the Eastern District of Louisiana and elsewhere the defendant, **ALEXANDER** knowingly and willfully devised and intended to devise a scheme and artifice to defraud USAgencies and to obtain money and property from the same, by means of false and fraudulent pretenses, representations and promises through the use of wire transmissions. It was part of the scheme and artifice to defraud that **ALEXANDER** would use the telephones to make false and fraudulent insurance claims based on the alleged theft and damage to his truck.

C. USE OF THE WIRES:

On or about February 27, 2013, in the Eastern District of Louisiana, and elsewhere, the defendant, **ALEXANDER** for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations and promises did knowingly and willfully transmit and cause to be transmitted in interstate commerce by means of a wire communication certain signs, signals, and sounds, that is by electronic transmission, calling from 504 XXX-3804 to USAgencies at their toll free number 800 XXX-3556 making a fraudulent claim for loss under the policy for his truck.

All in violation of Title 18, United States Code, Sections 1343 and 2.

NOTICE OF UNREGISTERED DESTRUCTIVE DEVICE FORFEITURE

1. The allegations of Count 1 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 26, United States Code, Sections 5861, 5872 and Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offense alleged in Count 1, defendant, **GREGORY R. ALEXANDER**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any firearm involved in a violation of Title 18, United States Code, Section 5861(d). Additionally, as a result of the offense alleged in Count 1, defendant, **GREGORY R. ALEXANDER**, shall forfeit to the United States pursuant to Title 49, United States Code, Section 80303, Title 26, United States Code, Section 5872 and Title 28, United States Code, Section 2461, any asset that was involved in or facilitated the violation.

3. If any of the property subject to forfeiture, 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 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;

It is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 26, United States Code, Sections 5861 and 5872, Title 49, United States Code, Section 80303 and Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

NOTICE OF WIRE FRAUD FORFEITURE

1. The allegations of Count 2 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offense alleged in Count 2, defendant, **GREGORY R. ALEXANDER**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1343.

3. If any of the property subject to forfeiture, 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 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

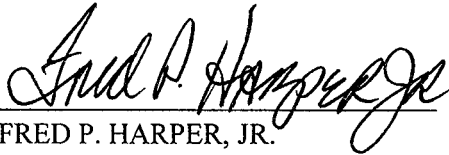
All in violation of Title 18, United States Code, Sections 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

A TRUE BILL:

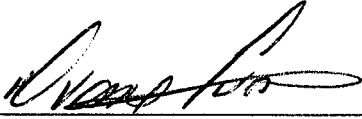
FOREPERSON



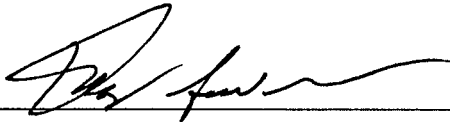
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New Orleans, Louisiana
April 25, 2013