

United States District Court
For The District of Columbia

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

JARRIETTE RICHIE
Xxxx xxxxxxxx xxxxxxxx
xxxxxxxxxx, xx xxxxxx
DOB: xx/xx/xxxx

CASE NUMBER:

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

COUNT ONE
(Access Device Fraud)

From on or about August 10, 2007, to on or about August 13, 2007, in the District of Columbia and elsewhere, JARRIETTE RICHIE, knowingly and with the intent to defraud, used one or more unauthorized access devices, said use affecting interstate commerce, and by such conduct obtained goods and services in excess of \$1,000 during that period.

in violation of Title 18 United States Code, Section 1029 (a)(2).

I further state that I am Diane Eickman, Criminal Investigator with the U.S. Attorney's Office for the District of Columbia, and that this complaint is based on the following facts:

See Attached Affidavit

Continued on the attached sheet and made a part hereof:

[X] Yes [] No

AUSA, Susan Menzer (202) 514-6968
Sworn to before me and subscribed in my presence,

Signature of Complainant
Diane Eickman, Criminal Investigator
U.S. Attorney's Office for the District of Columbia

Date

at Washington, D.C.
City and State

Name & Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Diane Eickman, being duly sworn, depose and state as follows:

Preliminary Information

1. I am a Criminal Investigator with the United States Attorney's Office for the District of Columbia and have been employed in this capacity since September 1999. I was a Special Agent with the Department of State from March 1989 until September 1999. My duties at the United States Attorney's Office for the District of Columbia include the investigation of possible criminal violations of Title 18 of the United States Code. I have personally conducted and assisted in numerous investigations of possible violations of various section of Title 18, including violations of 18 U.S.C. §§371, 1344, 1956, 1957, and 1960. Many of these investigations have required the examination and analysis of financial books and records. In addition, I completed Basic Criminal Investigator training at the Federal Law Enforcement Training Center ("FLETC") in Brunswick, Georgia in May 1989. Since graduation from FLETC, I have received additional training related to financial investigation techniques. I have also attended training courses and seminars related to money laundering.

2. This Affidavit is being submitted for the limited purpose of establishing probable cause to obtain a criminal complaint and an arrest warrant. Thus, I have not set forth each and every fact learned during the course of the investigation.

3. The information set forth in this Affidavit is based on my personal knowledge, information provided to me during the course of this investigation, and my review of records, documents, and other evidence obtained during the investigation.

4. This Affidavit is submitted in support of applications for a criminal complaint and an arrest warrant for JARRIETTE RICHIE. The facts set forth in the Affidavit demonstrate that

there is probable cause to believe that JARRIETTE RICHIE violated Title 18, United States Code, Section 1029 (a)(2) (Access Device Fraud).

The Scheme

5. From June 25, 2007 to September 11, 2007, RICHIE worked as a legal secretary at the Saul Ewing law firm in its Washington, D.C. office, located at 2600 Virginia Avenue, N.W.. Her job duties included, among other things, typing, filing and scheduling matters for several attorneys.

6. In addition to her employment at Saul Ewing, RICHIE served as the Booking Manager for Show N Tell Entertainment, which she operated out of her Clinton, Maryland residence. Show N Tell Entertainment provided male performers exclusively for female audiences. With the assistance of a travel agent, RICHIE planned a Show N Tell Entertainment excursion to Puerto Rico at the Copamarina Beach Resort, in Guanica, for a long weekend in August 2007. The all inclusive resort vacation would include several nights of entertainment featuring the exotic male dancers.

7. On July 18, 2007, RICHIE provided the travel agent with her personal Visa credit card number to cover the required \$5,000 resort deposit. On August 8, 2007, RICHIE notified the travel agent via email that she intended to pay the resort balance with a certified check. Between August 3, 2007 and August 10, 2007, RICHIE deposited approximately \$70,000 of counterfeit checks into her checking and savings accounts at the State Department Federal Credit Union ("SDFCU"). On August 10, 2007 and August 11, 2007, RICHIE made electronic payments and used her SDFCU check card to make various purchases, including 17 tickets with American Airlines and one ticket with US Airways, totaling \$12,800. Upon discovering that the checks RICHIE had deposited into her accounts were drawn on closed accounts, SDFCU

prevented RICHIE from withdrawing any additional funds by freezing her savings and checking accounts. In the meantime, on August 10, 2007, RICHIE, the male performers and several dozen female patrons traveled to Puerto Rico. To purchase additional airline tickets with American Airlines, totaling approximately \$21,375.30, RICHIE provided an American Express card number to pay for more airline tickets to and from Puerto Rico.

8. On August 13, 2007, the day before the scheduled departure date, RICHIE provided the resort in Puerto Rico with the same American Express credit card number to pay the balance. In addition, RICHIE gave the resort a facsimile, purportedly signed by the cardholder, R.J., authorizing her use of his credit card number. RICHIE explained to the resort employee that R.J. had sponsored the event. The resort employee used this American Express credit card number to process the final payment of \$25,473.10. The resort employee, however, told RICHIE that she would also need to see the actual credit card, a photo identification and R.J.'s signature on the invoice. RICHIE assured the resort employee that she would comply, but left the resort without doing so.

9. R.J., a partner at the law firm of Schmeltzer Aptaker & Shepard ("SA&S"), had been issued an American Express credit card, bearing the same numbered account RICHIE provided to American Airlines and the Copamarina Beach Resort. In June 2006, R.J. resigned from SA&S at which time he physically destroyed the card. At the same time, SA&S told American Express to cancel that particular account. On October 3, 2006, SA&S ceased practicing law. Most of SA&S's attorneys were hired by Saul Ewing and continued to work in the same office space. Documents relating to SA&S's American Express cards, including the card issued to R.J., were maintained in a locked room near RICHIE's desk at Saul Ewing. RICHIE was never authorized to use any credit card number, including this American Express

credit card previously issued to R.J.

10. In total, RICHIE fraudulently used this American Express credit card number to obtain \$46,848.40 in goods and services.

Conclusion

11. Based on the facts set forth above, I respectfully submit that there is probable cause to believe that JARRIETTE RICHIE violated Title 18, United States Code, Section 1029(a)(2) (Access Device Fraud). I request that a criminal complaint and an arrest warrant be issued for JARRIETTE RICHIE.

The statements above are true and accurate to the best of my knowledge and belief.

Diane Eickman
Criminal Investigator
United States Attorney's Office
for the District of Columbia

Sworn and subscribed to this _____ day of September, 2009.

United States Magistrate Judge