

the Eastern District of Virginia, to pay for his stay at that hotel, and thereby incurred a charge of approximately \$7,446.44.

III. Relevant Conduct:

4. As more particularly described below, during the period May 2008 - November 2008, LEVAN knowingly and with intent to defraud, used seven additional credit cards without authorization. He also attempted, without authorization, to use a credit card in payment of a hotel bill, but the transaction could not be completed, and the hotel in question bore the loss. The debt associated with the charged conduct and the relevant conduct totaled approximately \$115,264.
5. On or about August 22, 2008, LEVAN stole four credit cards for which the Agency was financially responsible. The account numbers on those four credit cards ended in the numerals "7948," "7397," "2365," and "7324" (hereafter, "card 7948," "card 7397," "card 2365," and "card 7324"). He used those credit cards without authorization from about August 22, 2008 through November 2008 and created a debt of approximately \$75,464 for personal goods and services. For example, LEVAN used card 7397 to pay for expenses he incurred from about August 17, 2008 to September 17, 2008 while he resided at the Staybridge Suites in McLean, Virginia, and thereby incurred a debt of \$7,446 on card 7397. The Agency paid the credit cards balances in full and has not been reimbursed for these payments.
6. On or about May 13, 2008, LEVAN stole a credit card for which another United States Government agency ("the second Agency") was financially responsible. The account number on this credit card ended in the numerals "0485" (hereafter, "card 0485").

LEVAN used card 0485 from about May 15, 2008 through about June 15, 2008, and charged approximately \$7,088 for personal goods and services. One such credit card charge occurred on May 15, 2008 at Liljenquist & Beckstead in McLean, Virginia, for \$709.54, and was for the purchase of a Raymond Weil watch for LEVAN'S personal use. The second Agency paid this credit card bill in full and has not been reimbursed for these payments.

7. Sometime between May 13, 2008 and July 5, 2008, LEVAN stole the personal credit card of an employee of the U.S. Government. The account number on this credit card ended in the numerals "8256" (hereafter, "card 8256"). LEVAN used card 8256 from July 2008 to August 2008 for personal goods and services creating a debt of approximately \$15,188. The credit card's issuing bank absorbed these charges in full and has not been reimbursed.
8. During the period of his use of the four credit cards associated with the Agency, LEVAN used specific identity information related to the four credit cards to obtain two additional credit cards from a different bank using those identities; he had the two additional credit cards mailed in the name of the cardholders to his personal mailing address. The account numbers on those two credit cards ended in the numerals "3572" and "9778" (hereafter, "card 3572" and "card 9778"). LEVAN used those two additional credit cards for personal goods and services and created a total debt on these two cards of approximately \$9,281. The credit card's issuing bank absorbed these charges in full and has not been reimbursed.
9. During the period of his use of the four credit cards associated with the Agency,

LEVAN registered at a Residence Inn in Tyson's Corner, Virginia, which is located in the Eastern District of Virginia area, under an assumed identity and resided there from about September 17, 2008 through January 7, 2009. He checked in using card 7324. Upon Levan's departure, card 7324 was no longer accepting charges. Thus, the Residence Inn bore the loss of approximately \$8,244.

10. Altogether, LEVAN fraudulently used eight credit cards and incurred the following credit card charges and related credit card debt:

Card 0485	\$ 7,088
Card 8256	\$ 15,188
Card 7948	\$ 11,940
Card 7397	\$ 26,891
Card 7324	\$ 17,995
Card 2365	\$ 18,638
Card 3572	\$ 7,388
Card 9778	\$ 1,892
Residence Inn - added debt after card 7324 was rejected	\$ 8,244

TOTAL KNOWN CREDIT CARD FRAUD	\$115,264

IV. Scienter: The conduct described herein was knowing and willful and did not occur by accident, mistake, or other innocent reason.

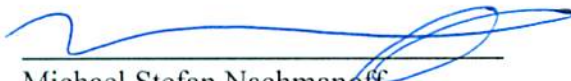
Respectfully submitted,

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Seen and Agreed to:


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