

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **DATE FILED:** \_\_\_\_\_  
v. : **CRIMINAL NO.** \_\_\_\_\_  
**CARLA SPIKES SENAT** : **VIOLATION: 18 U.S.C. § 371**  
 (Conspiracy - 1 count)

**I N F O R M A T I O N**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

1. At all times material to this information, defendant CARLA SPIKES SENAT resided at 135-D Fort Hamilton Parkway, Apt. 4C, Fort Hamilton, Brooklyn, New York, and was the registered owner of a 1998 Ford Windstar, VIN 2FMDA5142WBB30880 (“the 1998 Ford Windstar” or the “vehicle”).

**T H E C O N S P I R A C Y**

2. From in or about February 1999 through in or about April 1999, in the Eastern District of Pennsylvania and elsewhere, the defendant

**CARLA SPIKES SENAT**

conspired and agreed with others, known and unknown to the United States Attorney, to commit an offense against the United States, that is, to devise and intend to devise a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme to defraud, used the United States mail and caused the use of the United States mail, in violation of Title 18, United States Code, Section 1341.

### MANNER AND MEANS

It was part of the conspiracy that defendant CARLA SPIKES SENAT:

1. falsely reported to the police and to her insurance company that her 1998 Ford Windstar had been stolen, when in fact she had given the vehicle to persons known to the United States Attorney with the understanding that they would alter, dismantle or otherwise dispose of the vehicle, causing her auto insurance company to pay approximately \$17,145.00 in connection with the vehicle; and
2. caused the United States mail to be used to execute the scheme to defraud her auto insurance company, in that she mailed to the insurance company various documents associated with the fraudulent loss claim for her vehicle, and the insurance company mailed to the lease holder a check as payment for the fraudulent loss claim.

### OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objects, the following persons performed the following overt acts within the Eastern District of Pennsylvania and elsewhere.

1. On or about December 1, 1998, Jean Thelemaque, prosecuted elsewhere, offered to sell to an undercover agent the 1998 Ford Windstar, which he represented was owned by a close associate who wanted to dispose of the car due to high car payments.
2. On or about February 10, 1999, Jean Thelemaque agreed to sell the undercover agent the 1998 Ford Windstar in exchange for \$2,000.00 in cash.
3. On or about February 19, 2003, defendant CARLA SPIKES SENAT gave to Jean Thelemaque her 1998 Ford Windstar.
4. On or about February 19, 1999, in Philadelphia, Pennsylvania, Jean Thelemaque sold to an undercover agent for \$2000.00 in cash the 1998 Ford Windstar registered to

defendant CARLA SPIKES SENAT, representing that the owner would falsely report that the vehicle had been stolen and would submit a false claim to the owner's insurance company.

5. On or about March 4, 1999, defendant CARLA SPIKES SENAT falsely reported to the police that her 1998 Ford Windstar had been stolen from a parking lot at Fort Hamilton, Brooklyn, sometime between 6:00 p.m. on March 2, 1999, and 6:40 p.m. on March 4, 1999.

6. On or about March 4, 1999, defendant CARLA SPIKES SENAT falsely reported to her auto insurance company, USAA Insurance Company ("USAA") in San Antonio, Texas, that her 1998 Ford Windstar had been stolen, causing USAA to mail to the defendant at her residence in Fort Hamilton, Brooklyn, various theft claim forms.

7. On or about April 7, 1999, defendant CARLA SPIKES SENAT mailed various completed theft claim forms to USAA in San Antonio, Texas.

8. As a result of the false theft claim submitted by defendant CARLA SPIKES SENAT, on or about April 21, 1999, USAA mailed to Ford Motor Credit in Charlotte, North Carolina, a check in the amount of \$17,145.00, representing the outstanding lease balance on the vehicle.

In violation of Title 18, United States Code, Section 371.

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PATRICK L MEEHAN  
United States Attorney