

falsely represented to the banks that deposits into defendant SHANNA M. HUTCHENS'S account or cash paid from the account were comprised of legitimate and properly payable items, whereas, as the defendant then and there well knew, said deposits consisted of checks fraudulently drawn on the accounts of Richardson Hauling, Inc., on which the defendant had forged the signature and which she made payable to herself and her husband, and which defendant was not entitled to receive, each such deposit being a separate execution of the scheme and artifice to defraud, and to obtain money under the control of the banks by means of false and fraudulent pretenses, representations and promises.

All in violation of Title 18, United States Code, Section 1344.

COUNT TWO

On or about November 27, 2006, in the Western District of Missouri and elsewhere, SHANNA M. HUTCHENS, defendant herein, aiding and abetting another, did knowingly engage and cause to be engaged in a monetary transaction, in or affecting interstate commerce, in criminally derived property of a value greater than \$10,000.00, with the funds represented by the transaction having been derived from a specified unlawful activity, that is, bank fraud, and SHANNA M. HUTCHENS knew said monetary transaction involved proceeds of a criminal offense, in that SHANNA M. HUTCHENS caused a check to be issued to the order of "Raytown Dodge" in the amount of \$14,000.

All in violation of Title 18, United States Code, Section 1957 and Section 2.

COUNT THREE

On or about March 3, 2007, in the Western District of Missouri and elsewhere, SHANNA M. HUTCHENS, defendant herein, aiding and abetting another, did knowingly engage and cause

to be engaged in a monetary transaction, in or affecting interstate commerce, in criminally derived property of a value greater than \$10,000.00, with the funds represented by the transaction having been derived from a specified unlawful activity, that is, bank fraud, and SHANNA M. HUTCHENS knew said monetary transaction involved proceeds of a criminal offense, in that SHANNA M. HUTCHENS caused a check to be issued to the order of “ Bob Allen Ford” in the amount of \$17,969.88.

All in violation of Title 18, United States Code, Section 1957 and Section 2.

COUNT FOUR

On or about May 30, 2008, in the Western District of Missouri and elsewhere, SHANNA M. HUTCHENS, defendant herein, aiding and abetting another, did knowingly engage and cause to be engaged in a monetary transaction, in or affecting interstate commerce, in criminally derived property of a value greater than \$10,000.00, with the funds represented by the transaction having been derived from a specified unlawful activity, that is, bank fraud, and SHANNA M. HUTCHENS knew said monetary transaction involved proceeds of a criminal offense, in that SHANNA M. HUTCHENS caused a check to be issued to the order of “C & M Motors” in the amount of \$13,599.

All in violation of Title 18, United States Code, Section 1957 and Section 2.

ALLEGATION OF CRIMINAL FORFEITURE

The allegations contained in Counts One - Four of this Indictment are re-alleged and incorporated by reference for the purpose of alleging a forfeiture pursuant to the provisions of Title 18, United States Code, Sections 982(a)(1) and (a)(2)(A).

The defendant named herein shall forfeit to the United States all property, real and

personal, constituting and derived from any proceeds said defendant obtained directly and indirectly as a result of the violation incorporated by reference in this Allegation and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violation incorporated by reference in this Allegation, including but not limited to the following:

Cash Proceeds

Defendant SHANNA M. HUTCHENS shall forfeit any and all interest in approximately \$750,000.00 in United States Currency, and any interest and proceeds traceable thereto, in that at least this sum, in aggregate, was proceeds of the offenses charged in Counts One - Four.

Substitute Assets

If any of the above-described forfeitable property of the above-named defendant, as a result of any act or omission of the defendant --

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b)(2), to seek forfeiture of any other property of said defendant up to the value of the above-described forfeitable property.

All in violation of Title 18, United States Code, Sections 982(a)(1) and (a)(2)(A), and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL:

/s/ Georgia A. Young
FOREPERSON OF THE GRAND JURY

/s/ Kathleen D. Mahoney
Kathleen D. Mahoney #38828
Assistant United States Attorney

Dated: 7/14/09
Kansas City, Missouri