

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

ANTONITA STUARD LEONARD,

Defendant

) Criminal No. *19cr10470*  
 )  
 ) Violation:  
 )  
 ) Count One: Money Laundering Conspiracy  
 ) (18 U.S.C. § 1956(h))  
 )  
 ) Money Laundering Forfeiture Allegation:  
 ) (18 U.S.C. § 982(a)(1))  
 )

INDICTMENT

At all times relevant to this Indictment:

General Allegations

1. The defendant, ANTONITA STUARD LEONARD, was a resident of California.

Overview of the Money Laundering Conspiracy

2. From in or about August 2017 through in or about October 2017, LEONARD agreed with others known and unknown to the Grand Jury to launder fraud proceeds through bank accounts controlled by LEONARD.

3. As part of this conspiracy, numerous victims were targeted by scammers who pretended to be acting on behalf of the Internal Revenue Service (“IRS”) and to be collecting money owed to the IRS for taxes. These scammers threatened their victims with jail or other harms if they did not wire money as directed by the scammers.

4. In order to conceal their identities, these scammers utilized various bank accounts, wire transfers, and checks to transfer and launder the proceeds derived from the victims of the scam.

Manner and Means of the Money Laundering Conspiracy

5. Among the manner and means by which LEONARD and coconspirators known and unknown to the Grand Jury carried out the conspiracy were the following:

- a. Directing the proceeds of one or more fraudulent schemes to be wired from accounts controlled by fraud victims into one or more bank accounts controlled by LEONARD, or to be deposited via check into one or more such accounts;
- b. Receiving a total of approximately \$500,000 in deposits into such accounts;
- c. Withdrawing most of the deposited funds via bank checks made payable to various individuals or via deposits to various accounts; and
- d. Profiting from the funds derived from the fraud victims.

Acts in Furtherance of the Money Laundering Conspiracy

6. On various dates beginning in or about August 2017, and continuing until in or about October 2017, LEONARD and coconspirators known and unknown to the Grand Jury committed and caused to be committed the following acts, among others, in furtherance of the conspiracy:

- a. On or about September 11, 2017, LEONARD received a wire deposit of \$17,490 into her account at U.S. Bank from an fraud scam victim who resided in Texas.
- b. On or about September 11, 2017, LEONARD withdrew \$16,500 from her account at U.S. Bank in the form of bank checks made payable to two individuals.
- c. On or about September 12, 2017, LEONARD received wire deposits of \$34,290 and \$8,214 into her account at U.S. Bank from a fraud scam victim who resided in Texas.
- d. On or about September 12, 2017, LEONARD withdrew \$40,900 from her account at U.S. Bank in the form of bank checks made payable to five individuals.

e. On or about September 25, 2017, LEONARD received a wire deposit in the amount of \$44,448 into her account at LBS Financial Credit Union from the Bank of America account of a fraud scam victim who resided in Massachusetts.

f. On or about September 25, 2017, LEONARD withdrew \$43,000 from her LBS Federal Credit Union account in the form of a bank check made payable to another individual.

g. On or about September 26, 2017, LEONARD received a wire deposit of \$45,552 into her account at LBS Financial Credit Union from the Bank of America account of a fraud scam victim who resided in Massachusetts.

h. On or about September 26, 2017, LEONARD withdrew a total of \$42,500 from her account at LBS Financial Credit Union in the form of four bank checks made payable to four individuals.

i. On or about September 27, 2017, LEONARD received a wire deposit of \$10,000 into her account at LBS Financial Credit Union from a fraud scam victim who resided in Georgia.

j. On or about September 27, 2017, LEONARD withdrew a total of \$9,000 from her LBS Financial Credit Union account in the form of bank checks made payable to two individuals.

k. On or about October 5, 2017, LEONARD cashed four cashier checks in the amount of \$20,000 each, which checks had been mailed to LEONARD's home address by a fraud scam victim who resided in Massachusetts.

l. Thereafter, LEONARD deposited a total of \$60,852.84 into three accounts at Bank of America, each of which was associated with a separate individual.

COUNT ONE  
Money Laundering Conspiracy  
(18 U.S.C. § 1956(h))

The Grand Jury charges:

7. The Grand Jury re-alleges and incorporates by reference paragraphs 1-6 of this Indictment.

8. From in or about August 2017, through at least in or about October 2017, in the District of Massachusetts, and elsewhere, the defendant,

ANTONITA STUARD LEONARD,

conspired with others known and unknown to the Grand Jury to:

(a) conduct and attempt to conduct financial transactions, to wit, deposits and withdrawals to and from her accounts at America First Credit Union, LBS Federal Credit Union, and U.S. Bank, knowing that the property involved in such transactions represented the proceeds of some form of unlawful activity, and which in fact involved the proceeds of specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, and knowing that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(b) knowingly engage and attempt to engage in monetary transactions in criminally derived property of a value greater than \$10,000, that is, the withdrawal of funds from her accounts at LBS Financial Credit Union and U.S. Bank, where such property was derived from specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, in violation of Title 18, United States Code, Section 1957.

All in violation of Title 18, United States Code, Sections 1956(h).

MONEY LAUNDERING FORFEITURE ALLEGATION  
(18 U.S.C. § 982(a)(1))

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1956(h), as set forth in Count One,

ANTONITA STUARD LEONARD,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, and any property traceable to such property. The property to be forfeited includes, but is not limited to, a sum of money equal to the total amount of money involved in the offense, which may be entered in the form of a money judgment.


2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(1), 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 party;
- 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 divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 29 above.

All pursuant to Title 18, United States Code, Section 982(a)(1).

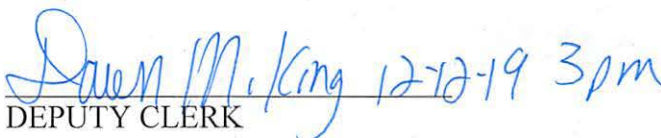
A TRUE BILL

  
FOREPERSON



DAVID G. TOBIN  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: DECEMBER 12, 2019  
Returned into the District Court by the Grand Jurors and filed.

  
DEPUTY CLERK

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: Category No. II Investigating Agency HSI

City Andover Related Case Information:

County Essex Superseding Ind./ Inf. Case No. Same Defendant New Defendant Magistrate Judge Case Number 19-mj-6457-MPK Search Warrant Case Number R 20/R 40 from District of

Defendant Information:

Defendant Name ANTONITA STUARD LEONARD Juvenile: Yes No Is this person an attorney and/or a member of any state/federal bar: Yes No

Alias Name

Address (City & State) California

Birth date (Yr only): 1962 SSN (last4#): Sex F Race: Nationality:

Defense Counsel if known: Scott Lauer Address Federal Public Defender Office

Bar Number 51 Sleeper St., 5th Floor Boston, MA 02210

U.S. Attorney Information:

AUSA David G. Tobin Bar Number if applicable 552558

Interpreter: Yes No List language and/or dialect:

Victims: Yes No If yes, are there multiple crime victims under 18 USC§3771(d)(2) Yes No

Matter to be SEALED: Yes No

Warrant Requested Regular Process In Custody

Location Status:

Arrest Date 10/17/2019

Already in Federal Custody as of in

Already in State Custody at Serving Sentence Awaiting Trial

On Pretrial Release: Ordered by: M.J. Abrams, CD of CA on 10/17/2019

Charging Document: Complaint Information Indictment

Total # of Counts: Petty Misdemeanor Felony 1

Continue on Page 2 for Entry of U.S.C. Citations

I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: 12/12/2019 Signature of AUSA: David G. Tobin

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant ANTONITA STUARD LEONARD

**U.S.C. Citations**

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1956(a)(1)(B) &amp; (h)</u>	<u>Conspiracy to Committ Money Laundering</u>	<u>1</u>
Set 2	_____	_____	_____
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

**ADDITIONAL INFORMATION:** \_\_\_\_\_