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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

UNITED STATES OF AMERICA

v.

KAREN DICKERSON

) INDICTMENT NO.

)

) 18 U.S.C. § 1956(h)

) Conspiracy to Commit Money

) Laundering

)

) 18 U.S.C. § 1956(a)(1)(B)(i)

) Money Laundering

)

) 18 U.S.C. § 1960

) Unlicensed Money Transmitting

) Business

)

) 31 U.S.C. § 5324(a)(3)

) Structuring to Evade Currency

) Transaction Reports

CR 419 072

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times relevant to this Indictment:

Banks and Financial Service Organizations

1. Lincoln Financial Group Trust Company (“Lincoln Financial”), Boston Financial Data Services (“Boston Financial”), AON Trust and Mid Atlantic Capital Group (“Capital Group”) were financial service organizations.
2. Lincoln Financial managed retirement savings accounts for B&G Foods, Inc.
3. AON Trust managed retirement savings accounts for PPG Industries, Inc., in partnership with Capital Group.

4. Boston Financial processed wire transactions for Lincoln Financial out of Quincy, Massachusetts.

5. Huntington National Bank processed wire transactions out of Columbus, Ohio for Capital Group, under the direction of AON Trust.

6. Branch Banking & Trust Company (“BB&T Bank”) and Huntington National Bank were financial institutions as defined under 18 U.S.C. § 20 and 31 U.S.C. 5312(a)(2) that were engaged in, and the activities of which affected, interstate and foreign commerce.

7. BB&T Bank has branch offices in Savannah, Georgia, and throughout the State of Georgia.

Money Transmitting Businesses

8. Title 31, United States Code, Section 5330 and regulations prescribed thereunder require the owner or operator of a money transmitting business to register that business with the Secretary of the Treasury of the United States, to file reports of suspicious activity by customers, and to report cash transactions in amounts greater than \$10,000.00, unless specifically exempted by law.

9. The Official Code of Georgia, Section 7-1-681, requires the owner or operator of a money transmitting business to obtain a license to conduct said business in the State of Georgia.

10. As defined in Title 31, United States Code, Section 5330, a “money transmitting business” includes an individual or entity engaged in check cashing,

currency exchanging, or money transmitting or remittance services, or engaging in an informal money transfer system.

11. “Unlicensed money transmitting business” means, in relevant part, a money transmitting business which affects interstate commerce and foreign commerce in any manner and degree, and either: fails to comply with the money transmitting business registration requirements under Section 5330 of Title 31, United States Code and regulations prescribed under such section; or, is operated without a license in a State where such operation is punishable as a misdemeanor or a felony; or both.

Defendant’s Business and Bank Accounts

12. Defendant **DICKERSON** was a resident of Chatham County, Georgia, in the Southern District of Georgia.

13. On or about April 4, 2015, Defendant **DICKERSON** incorporated or caused to be incorporated WILL’S CLEANING SERVICE in the State of Georgia with an address in Savannah, Georgia.

14. On or about November 22, 2013, Defendant **DICKERSON** opened a BB&T Bank account in the name of “WILL’S CLEANING SERVICE” in the Southern District of Georgia.

15. On or about August 2, 2018, Defendant **DICKERSON** opened a BB&T account in the name of “Karen D. Dickerson” in the Southern District of Georgia.

16. Defendant **DICKERSON** has never possessed a license to operate a

money transmitting business in the State of Georgia and has never registered “WILL’S CLEANING SERVICE,” “Karen D. Dickerson,” or any other individual or entity as a money transmitting business with the Secretary of the Treasury of the United States.

COUNT ONE

Conspiracy to Commit Money Laundering
18 U.S.C. § 1956(h)

17. Paragraphs 1-7 of this Indictment are realleged and incorporated herein.

18. From at least in or around June 2018 and continuing to in or about November 2018, in Chatham County within the Southern District of Georgia and elsewhere, the Defendant,

KAREN DICKERSON,

did knowingly combine, conspire, and agree with other persons known and unknown to commit an offense against the United States in violation of Title 18, United States Code, Section 1956, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, wire fraud in violation of Title 18, United States Code, Section 1343, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

19. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

- a. It was part of the scheme and conspiracy that members of the conspiracy would obtain unauthorized access to Lincoln Financial and AON Trust retirement savings accounts for the purpose of making unauthorized wire transfers.
- b. It was further part of the scheme and conspiracy that members of the conspiracy initiated wire transactions from Lincoln Financial and AON Trust retirement savings accounts by knowingly and intentionally using the materially false and fraudulent pretense that bona fide account holders had authorized the wire transfers.
- c. It was further part of the scheme and conspiracy that Defendant **DICKERSON** would coordinate with members of the conspiracy to have monies wired from Lincoln Financial and AON Trust retirement savings accounts into BB&T Bank accounts controlled by defendant **DICKERSON**, without authorization from the bona fide Lincoln Financial and AON Trust account holders.
- d. It was further part of the scheme and conspiracy that Defendant **DICKERSON** would conduct cash withdrawals from the aforementioned BB&T Bank accounts, after monies were wired from Lincoln Financial and AON Trust retirement savings accounts without authorization from the bona fide account holders.

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

COUNTS TWO AND THREE

Money Laundering
18 U.S.C. § 1956(a)(1)(B)(i)

20. Paragraphs 1 through 7 of this Indictment are hereby realleged and incorporated herein.

21. On or about the dates set forth below, in Chatham County within the Southern District of Georgia and elsewhere, the Defendant,

KAREN DICKERSON,

did knowingly conduct financial transactions, namely cash withdrawals from a BB&T Bank account ending in 7078, affecting interstate and foreign commerce, using, and which involved, the proceeds of a specified unlawful activity, to wit, wire fraud in violation of Title 18, United States Code, Section 1343, 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 said specified unlawful activity and that while conducting and attempting to conduct such financial transactions knew that the money involved in the financial transactions represented the proceeds of some form of unlawful activity.

COUNT	DATE	AMOUNT OF TRANSACTION
2	9/17/2018	\$9,980
3	9/18/2018	\$9,995

All done in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT FOUR

Unlicensed Money Transmitting Business
18 U.S.C. § 1960

22. Paragraphs 8-16 are realleged and incorporated herein.

23. From at least in or around June 2018 and continuing to in or about November 2018, in Chatham County, within the Southern District of Georgia, and elsewhere, the Defendant,

KAREN DICKERSON,

knowingly did conduct, control, manage, supervise, direct, and own a money transmitting business, in a manner affecting interstate and foreign commerce, without obtaining a license to conduct such a business in the State of Georgia, and without complying with the business registration requirements under Title 31, United States Code, Section 5330, and regulations prescribed thereunder.

All done in violation of Title 18, United States Code, Sections 1960(a), (b)(1) and (2).

COUNT FIVE*Structuring to Evade Currency Transaction Reports*
31 U.S.C. § 5324(a)(3)

24. From on or about August 1, 2018 and continuing to on or about September 18, 2018, in Chatham County within the Southern District of Georgia and elsewhere, the Defendant,

KAREN DICKERSON,

knowingly, and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations prescribed thereunder, did structure and assist in structuring, and did attempt to structure and assist in structuring, transactions with a financial institution, in that the defendant made and caused to be made the following cash withdrawals from a BB&T account ending in 7078, as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period:

DATE	AMOUNT OF TRANSACTION
8/1/2018	\$9,900
8/2/2018	\$9,900
8/3/2018	\$9,900
8/13/2018	\$9,900
8/15/2018	\$9,900
8/20/2018	\$9,900
8/29/2018	\$9,975
8/30/2018	\$9,975
9/4/2018	\$9,975
9/17/2018	\$9,980
9/18/2018	\$9,995

All done in violation of Title 31, United States Code, Section 5324(a)(3); Title

31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATIONS

The allegations contained in Counts One through Five of this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1) and Title 31, United States Code, Section 5317(c)(1).

25. Upon conviction of one or more of the Title 18 offenses set forth in Counts One through Four of this Information, the Defendant **KAREN DICKERSON** shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(1) any and all property, real or personal, involved in the offense, or any property traceable to the such property.

26. Upon conviction of the Title 31 offense set forth in Count Five of this Information, the Defendant **KAREN DICKERSON** shall forfeit to the United States pursuant to Title 31, United States Code, Section 5317(c)(1) all property, real or personal, involved in the offense and any property traceable thereto.

26. If any of the property described above, 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 that cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).



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[Redacted]
foreperson *[Signature]*