

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
AT LOUISVILLE

**FILED**  
VANESSA L. ARMSTRONG, CLERK  
MAY 07 2019

UNITED STATES OF AMERICA

U.S. DISTRICT COURT  
WEST'N. DIST. KENTUCKY

INDICTMENT

v.

NO. 3:19-CR-84-DJH

**ALEXANDER JOHNSON**  
**KIM L. JOHNSON**

18 U.S.C. § 2  
18 U.S.C. § 981(a)(1)(C)  
18 U.S.C. § 1028A(a)(1)  
18 U.S.C. § 1028A(c)(5)  
18 U.S.C. § 1341  
18 U.S.C. § 1343  
18 U.S.C. § 1349  
28 U.S.C. § 2461

The Grand Jury charges:

1. Beginning in at least July 2016 and continuing until in or about March 2017, in the Western District of Kentucky, Jefferson County, Kentucky, and elsewhere, **ALEXANDER JOHNSON** and **KIM L. JOHNSON**, defendants herein, devised a scheme and artifice to defraud and obtain money by means of false and fraudulent pretenses, representations and promises, by conspiring to and engaging in wire fraud, mail fraud, and aggravated identity theft, to wit:

***Scheme and Artifice to Defraud***

2. From about April 2015 until December 2016, **ALEXANDER JOHNSON** was a Quality Coach/Customer Service Representative for Computershare Limited ("Computershare"), a stock transfer company that provides corporate trust, stock transfer, and employee share plan services, at Computershare's Louisville, Kentucky location. In that role, **ALEXANDER**

**JOHNSON** had access to sensitive customer account and brokerage information, including customer personal identification information and customer account information.

3. At all times relevant, **KIM L. JOHNSON**, was the mother of **ALEXANDER JOHNSON**. **KIM L. JOHNSON** was not employed by, or otherwise affiliated with, Computershare.

4. It was part of the scheme that **ALEXANDER JOHNSON**, without authorization, created new account information for Computershare customers or accessed information for existing customers, including accounts of deceased customers, and altered customer personal identification or access information in order to fraudulently take over Computershare customer accounts in order to request that customer stock be sold and that the proceeds be sent by Computershare via check to addresses provided by **ALEXANDER JOHNSON** and **KIM L. JOHNSON** and via wire to accounts controlled by defendants **ALEXANDER JOHNSON** and **KIM L. JOHNSON**.

5. It was further part of the scheme that **KIM L. JOHNSON** called into Computershare customer service lines pretending to be Computershare customers, including deceased customer I.S. and customer I.J., and provided personal identification information, including social security numbers, in order to alter and modify customer account information so as to fraudulently take over Computershare customer accounts and to request the sale of customer stock that would ultimately result in proceeds being sent via check to addresses provided by **ALEXANDER JOHNSON** and **KIM L. JOHNSON** and via wire to accounts controlled by defendants **ALEXANDER JOHNSON** and **KIM L. JOHNSON**, including to accounts in the name of **KIM L. JOHNSON** and others.

6. It was further part of the scheme that after fraudulently assuming control of Computershare customer accounts and requesting that stock be sold, **ALEXANDER JOHNSON** and **KIM L. JOHNSON** would obtain the checks from stock sale proceeds sent by Computershare to addresses they provided and would then forge customer names on the checks in order to endorse and negotiate the checks at various financial institutions and other locations so as to obtain funds rightfully belonging to Computershare customers.

7. It was further part of the scheme that **ALEXANDER JOHNSON** and **KIM L. JOHNSON**, using the home address of **ALEXANDER JOHNSON** and **KIM L. JOHNSON**, opened a bank account at Scottrade Bank (“Scottrade”) in the name of a deceased Computershare customer, K.B, into which **ALEXANDER JOHNSON** and **KIM L. JOHNSON** would deposit the proceeds from the sale of K.B.’s stock. Checks from this Scottrade account containing the deceased customer K.B.’s signature were made payable to **KIM L. JOHNSON**.

8. It was further part of the scheme that **KIM L. JOHNSON** would deposit checks payable to her from the victims, some of whom were deceased, into an account bearing her name at Stock Yards Bank. These checks included a check from victim I.S., who was deceased, that was signed “Pay to Kim Johnson” and signed by **KIM L. JOHNSON** and a check from victim K.B., also deceased, payable to **KIM JOHNSON**. In addition, proceeds fraudulently obtained by **ALEXANDER JOHNSON** and **KIM L. JOHNSON** from victim B.M. were wired directly into this Stock Yards account.



9. It was further part of the scheme that **ALEXANDER JOHNSON** and **KIM L. JOHNSON** created false identification documents for certain of the victims, including but not limited to, false driver's licenses, in order to use such documents to get fraudulently obtained proceeds and funds rightfully belonging to Computershare customers.

10. It was further part of the scheme that **ALEXANDER JOHNSON** created false and misleading entries in Computershare's business and accounting records in order to conceal the improper diversion of funds from Computershare to **ALEXANDER JOHNSON** and **KIM L. JOHNSON**.

11. As a result of their scheme, **ALEXANDER JOHNSON** and **KIM L. JOHNSON** fraudulently obtained over \$95,000 in proceeds that rightfully and lawfully belonged to Computershare customers.

COUNTS 1-4  
*(Mail Fraud)*

12. The allegations of paragraphs 1 through 11 of the Indictment are realleged and incorporated as if fully restated herein.

13. On or about the dates listed below, in the Western District of Kentucky, Jefferson County, Kentucky and elsewhere, **ALEXANDER JOHNSON** and **KIM L. JOHNSON**, defendants herein, aided and abetted by each other, for the purpose of executing the aforesaid scheme, and attempting to do so, did knowingly deposit and cause to be deposited by mail or by any private or commercial interstate carrier, caused to be delivered by mail or by any private or commercial interstate carrier, and took and received from an authorized depository for mail, the following mailings, each constituting a separate count of this Indictment:

Count	Customer Initials	Check Number	Date Mailed	Carrier	Amount
1	K.B.	*****828	October 14, 2016	United States Postal Service	\$2,350.00
2	K.B.	*****042	November 7, 2016	United Parcel Service	\$4,902.47
3	K.B.	*****750	January 19, 2017	United Parcel Service	\$4,887.26
4	I.S.	*****982	July 19, 2016	United States Postal Service	\$179.30

In violation of Title 18, United States Code, Section 1341 and Section 2.

The Grand Jury further charges:

COUNTS 5-7  
(Wire Fraud)

14. The allegations of paragraphs 1 through 11 of the Indictment are realleged and incorporated as if fully restated herein.

15. On or about the dates listed below, in the Western District of Kentucky, Jefferson County, Kentucky and elsewhere, **ALEXANDER JOHNSON** and **KIM L. JOHNSON**, defendants herein, aided and abetted by each other, for the purpose of executing the aforesaid scheme, and attempting to do so, did knowingly cause signs, signals, and sounds to be transmitted by means of wire communications in interstate commerce the following wire transmissions, each constituting a separate count of this Indictment:

Count	Date (on or about)	Description of Wire
5	July 29, 2016	Check in the amount of \$179.30 made payable to victim I.S. endorsed to <b>KIM JOHNSON</b> deposited into <b>KIM JOHNSON</b> 's Stock Yards account which caused an interstate wire transaction to be initiated from Stock Yards Bank servers in Louisville, Kentucky to US Bank's servers located in Minnesota and Kansas.
6	January 24, 2017	Check in the amount of \$3,000 from victim K.B. made payable to <b>KIM JOHNSON</b> deposited into <b>KIM JOHNSON</b> 's Stock Yards account which caused an interstate wire transaction to be initiated from Stock Yards Bank servers in Louisville, Kentucky to US Bank's servers located in Minnesota and Kansas.
7	March 13, 2017	ACH wire transfer of \$13,000 from account in the name of victim B.M. to <b>KIM JOHNSON</b> 's Stock Yards account which caused an interstate wire transaction to be initiated from Federal Reserve Bank's servers located in Missouri to the Stock Yards Bank servers in Louisville, Kentucky.

In violation of Title 18, United States Code, Section 1343 and Section 2.

The Grand Jury further charges:

COUNTS 8-11  
(*Aggravated Identify Theft*)

16. The allegations of paragraphs 1 through 11 of the Indictment are realleged and incorporated as if fully restated herein.

17. On or about each of the dates listed below, in the Western District of Kentucky, Jefferson County, Kentucky, and elsewhere, **ALEXANDER JOHNSON** and **KIM L. JOHNSON**, defendants herein, aided and abetted by each other, did knowingly possess, transfer, and use the means of identification of another person, including but not limited to, the person's name and social security number, without lawful authority, during and in relation to the offenses

of mail fraud in violation of 18 U.S.C. § 1341 and wire fraud in violation of 18 U.S.C. § 1343 as charged in Counts 1 through 7 of the Indictment:

<b>Count</b>	<b>Customer Initials</b>	<b>Date (on or about)</b>
8	K.B.	December 16, 2016
9	B.M.	November 28, 2016
10	I.J.	October 17, 2016
11	I.S.	July 29, 2016

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(5) and Section 2.

The Grand Jury further charges:

COUNT 12  
(*Conspiracy to Commit Mail Fraud and Wire Fraud*)

18. The allegations of paragraphs 1 through 17 of the Indictment are realleged and incorporated as if fully restated herein.

19. Beginning in at least July 2016 and continuing until in or about March 2017, in the Western District of Kentucky, Jefferson County, Kentucky, and elsewhere, **ALEXANDER JOHNSON** and **KIM L. JOHNSON**, defendants herein, and other unnamed co-conspirators, did knowingly and willfully conspire, confederate and agree with each other to commit the offenses of Mail Fraud, in violation of 18 U.S.C. § 1341 as charged in Counts 1-4 of the Indictment and Wire Fraud, in violation of 18 U.S.C. § 1343 as charged in Counts 5-7 of the Indictment; the manner and means of which is described in the aforesaid scheme.

In violation of Title 18, United States Code, Section 1349.



NOTICE OF FORFEITURE

If convicted of any violation of Title 18, United States Code, Sections 1341, 1343 and 1349, **ALEXANDER JOHNSON** and **KIM L. JOHNSON**, defendants herein, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds obtained, directly or indirectly, as the result of any such violation, including but not limited to a money judgment for the amount of the proceeds defendants derived.

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461.

A TRUE BILL.

  
FOREPERSON

  
RUSSELL M. COLEMAN  
UNITED STATES ATTORNEY

RMC:CCT/BRC:2017R00188



UNITED STATES OF AMERICA v. **Alexander Johnson and Kim L. Johnson**

**PENALTIES**

Counts 1-4: NM 20 yrs./\$250,000/both/NM 3 yrs. Supervised Release (each count)  
Counts 5-7: NM 20 yrs./\$250,000/both/NM 3 yrs. Supervised Release (each count)  
Counts 8-11: 2 yrs. consecutive/\$250,000/both/NM 3 yrs. Supervised Release (each count)  
Count 12: NM 20 yrs./\$250,000/both/NM 3 yrs. Supervised Release

Forfeiture

**NOTICE**

**ANY PERSON CONVICTED OF AN OFFENSE AGAINST THE UNITED STATES SHALL BE SUBJECT TO SPECIAL ASSESSMENTS, FINES, RESTITUTION & COSTS.**

**SPECIAL ASSESSMENTS**

18 U.S.C. § 3013 requires that a special assessment shall be imposed for each count of a conviction of offenses committed after November 11, 1984, as follows:

Misdemeanor:	\$ 25 per count/individual	Felony:	\$100 per count/individual
	\$125 per count/other		\$400 per count/other

**FINES**

In addition to any of the above assessments, you may also be sentenced to pay a fine. Such fine is due immediately unless the court issues an order requiring payment by a date certain or sets out an installment schedule. You shall provide the United States Attorney's Office with a current mailing address for the entire period that any part of the fine remains unpaid, or you may be held in contempt of court. 18 U.S.C. § 3571, 3572, 3611, 3612

**Failure to pay fine as ordered may subject you to the following:**

1. **INTEREST** and **PENALTIES** as applicable by law according to last date of offense.

For offenses occurring after December 12, 1987:

No **INTEREST** will accrue on fines under \$2,500.00.

**INTEREST** will accrue according to the Federal Civil Post-Judgment Interest Rate in effect at the time of sentencing. This rate changes monthly. Interest accrues from the first business day following the two week period after the date a fine is imposed.

**PENALTIES** of:

10% of fine balance if payment more than 30 days late.

15% of fine balance if payment more than 90 days late.

2. Recordation of a **LIEN** shall have the same force and effect as a tax lien.
3. Continuous **GARNISHMENT** may apply until your fine is paid.

18 U.S.C. §§ 3612, 3613

If you **WILLFULLY** refuse to pay your fine, you shall be subject to an **ADDITIONAL FINE** of not more than the greater of \$10,000 or twice the unpaid balance of the fine; or **IMPRISONMENT** for not more than 1 year or both. 18 U.S.C. § 3615

RESTITUTION

If you are convicted of an offense under Title 18, U.S.C., or under certain air piracy offenses, you may also be ordered to make restitution to any victim of the offense, in addition to, or in lieu of any other penalty authorized by law. 18 U.S.C. § 3663

APPEAL

If you appeal your conviction and the sentence to pay your fine is stayed pending appeal, the court shall require:

1. That you deposit the entire fine amount (or the amount due under an installment schedule during the time of your appeal) in an escrow account with the U.S. District Court Clerk, or
2. Give bond for payment thereof.

18 U.S.C. § 3572(g)

PAYMENTS

If you are ordered to make payments to the U.S. District Court Clerk's Office, certified checks or money orders should be made payable to the Clerk, U.S. District Court and delivered to the appropriate division office listed below:

LOUISVILLE:	Clerk, U.S. District Court 106 Gene Snyder U.S. Courthouse 601 West Broadway Louisville, KY 40202 502/625-3500
BOWLING GREEN:	Clerk, U.S. District Court 120 Federal Building 241 East Main Street Bowling Green, KY 42101 270/393-2500
OWENSBORO:	Clerk, U.S. District Court 126 Federal Building 423 Frederica Owensboro, KY 42301 270/689-4400
PADUCAH:	Clerk, U.S. District Court 127 Federal Building 501 Broadway Paducah, KY 42001 270/415-6400

If the court finds that you have the present ability to pay, an order may direct imprisonment until payment is made.

FORM DBD-34  
JUN.85

No.

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**UNITED STATES DISTRICT COURT**  
Western District of Kentucky  
At Louisville

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THE UNITED STATES OF AMERICA

vs.

**ALEXANDER JOHNSON**  
**KIM L. JOHNSON**

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**INDICTMENT**

**Counts 1 - 4**

*Mail Fraud*

18 U.S.C. §§1341 and 2

**Counts 5 - 7**

*Wire Fraud*

18 U.S.C. §§1343 and 2

**Counts 8 - 11**

*Aggravated Identify Theft*

18 U.S.C. §§1028A(a)(1), (c)(5) and 2

**Count 12**

*Conspiracy to Commit Mail Fraud and Wire Fraud*

18 U.S.C. §1349

**Forfeiture**

*A true bill.*



*Foreperson*

*Filed in open court this 7<sup>th</sup> day of May, 2019.*

**FILED**

VANESSA L. ARMSTRONG, CLERK

MAY 07 2019  
*Clerk*

*Bail, \$*

**U.S. DISTRICT COURT**  
**WESTN. DIST. KENTUCKY**