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FILED

JUN 20 2013

Clerk, U S District Court
District Of Montana
Billings

ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

**UNITED STATES OF
AMERICA,**

Plaintiff,

vs.

ANGELA CORSON SMITH,

Defendant.

CR-13-49-BLG-Scit

INDICTMENT

BANK FRAUD

(Count I) Title 18 U.S.C. § 1344

**(Penalty: 30 years imprisonment,
\$1,000,000 fine, and 5 years
supervised release).**

AGGRAVATED IDENTITY THEFT

(Count II) 18 U.S.C. § 1028A

**(Penalty: 2 years consecutive to any
other sentence imposed).**

	FALSE STATEMENTS TO A BANK (Count III) 18 U.S.C. § 1014 (Penalty: 30 years imprisonment, \$1,000,000 fine, and 5 years supervised release).
	WIRE FRAUD SCHEME (Count IV) Title 18 U.S.C. § 1343 (Penalty: 20 years imprisonment, \$250,000 fine, and 3 years supervised release).
	WIRE FRAUD SCHEME (Counts V-VIII) Title 18 U.S.C. § 1343 (Penalty: 20 years imprisonment, \$250,000 fine, and 3 years supervised release).

THE GRAND JURY CHARGES:

COUNT I
(Bank Fraud)
INTRODUCTION

1. From on or about October 23, 2009, and ending on or about May 15, 2010, the defendant, ANGELA CORSON SMITH, devised a scheme and artifice to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of Altana Federal Credit Union, a credit union with accounts insured by the National Credit Union Share Insurance Fund at the time of conduct

charged, by means of materially false and fraudulent pretenses, representations, and promises.

THE SCHEME

2. On or about October 23, 2009, at Billings, in the State and District of Montana, and elsewhere, the defendant ANGELA CORSON SMITH, knowingly executed a material scheme to defraud Altana Federal Credit Union, in that the defendant submitted an application for a home equity loan on a residence owned by her husband, B.S., to Altana Federal Credit Union, without her husband's permission and using forged documentation, all in an attempt to obtain funds for her own personal use.

MANNER AND MEANS

3. Specifically, on or about October 23, 2009, at Billings, in the State and District of Montana, and elsewhere, the defendant ANGELA CORSON SMITH, obtained a home equity loan of \$27,300.00 on a residence owned by her husband, B.S., by presenting a forged power of attorney to Altana Federal Credit Union, representing that she had her husband's authority to enter into the home equity loan on the residence,

and forging his signature on the loan documents, all in violation of 18 U.S.C. § 1344(1).

COUNT II
(Aggravated Identity Theft)

4. On or about October 23, 2009, at Billings, in the State and District of Montana, the defendant, ANGELA CORSON SMITH, did knowingly use without lawful authority, a means of identification of another person during and in relation to bank fraud in violation of 18 U.S.C. § 1344; that is the defendant, ANGELA CORSON SMITH, used her husband's name and signature, without his authorization, to obtain a home equity loan, all in violation of 18 U.S.C. § 1028A(a)(1).

COUNT III
(False Statements to a Bank)

5. On or about November 6, 2012, in Yellowstone County, within the State and District of Montana, defendant ANGELA CORSON SMITH, knowingly made a material false statement and report for the purpose of influencing the action of Altana Federal Credit Union, a credit union with accounts insured by the National Credit Union Share Insurance Fund at the time of conduct charged, in connection with any deferment of action or otherwise, in that when the defendant was contacted by

employees with Altana Federal Credit Union on November 5, 2012, about delinquent payments on her family's home equity loan, the defendant told employees with Altana Federal Credit Union that her daughter had died of leukemia on November 4, 2012, and that she would be unable to make the payments on the family's home equity loan because of medical and funeral expenses related to her daughter's illness and death, following which the bank deferred four monthly payments on the home equity loan, when in truth and in fact, as the defendant well knew, the defendant's daughter was not suffering from leukemia and was not deceased, all in violation of 18 U.S.C. § 1014.

COUNT IV
(Wire Fraud)
INTRODUCTION

6. Between on or about January 15, 2011, and continuing thereafter until November of 2012, at Billings, in the State and District of Montana and elsewhere, the defendant, ANGELA CORSON SMITH, executed a material scheme and artifice to defraud J.D.K. and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, that is ANGELA CORSON

SMITH utilized interstate wires to obtain thousands of dollars from J.D.K. based entirely on deception.

THE SCHEME

7. ANGELA CORSON SMITH initially told J.D.K. she needed an immediate loan of \$7,500.00 because someone had written her a bad check. J.D.K. agreed to loan ANGELA CORSON SMITH the funds, and she in turn agreed to pay him interest and make full repayment by July 22, 2011. ANGELA CORSON SMITH never repaid the loan to J.D.K. Instead, ANGELA CORSON SMITH informed J.D.K. that she was in need of \$33,000.00 in additional funds because she was very ill and in the middle of a divorce. J.D.K. loaned ANGELA CORSON SMITH the requested money based on her representations that she was gravely ill and in the Cleveland Clinic in Ohio for medical treatments for a rare virus that could kill her.

MANNER AND MEANS

8. In furtherance of the scheme, ANGELA CORSON SMITH, utilized telephones, emails and text messages to send J.D.K. photographs of her in a hospital bed; represented that she was partially paralyzed and

utilizing a feeding tube; that she had been flown by medical plane to Denver, Colorado, and later to Cleveland, Ohio, for medical treatment.

9. ANGELA CORSON SMITH continued to request loans from J.D.K. for various expenses related to her alleged illness and her supposed divorce. J.D.K. continued to support ANGELA CORSON SMITH financially based on her representations as well as her romantic expressions towards him.

10. In furtherance of the scheme, ANGELA CORSON SMITH told J.D.K. repeatedly in voicemails, emails and texts that she would repay the money she owed him with proceeds from her medical billing business, her work as a registered nurse, and a home equity loan if necessary.

11. ANGELA CORSON SMITH never had a medical billing business, was never a registered nurse and had previously taken out a home equity loan on her residence.

THE INTERSTATE WIRING

12. On or about May 20, 2012, at Billings, in the State and District of Montana, the defendant, ANGELA CORSON SMITH, for the purpose of executing the scheme described above in paragraphs 6 through 11,

transmitted any writing, signal, and sound by means of a wire, radio, and television communication in interstate commerce and caused the transmission of any writing, signal, and sound of some kind by means of a wire, radio, and television communication in interstate commerce; that is the defendant, ANGELA CORSON SMITH, sent an email using her Yahoo email account to J.D.K.'s email account, detailing her fake medical condition, her need for additional money, and an explanation for why J.D.K. had not seen the defendant for some time, which caused the transmission of a writing and signal from the state of Montana to a location outside of the state of Montana, all in violation of 18 U.S.C. § 1343.

INTRODUCTION
(Wire Fraud)
Counts V-VIII

13. Beginning on or about September 21, 2010, and continuing thereafter until in or about January 2013, at Billings, in the State and District of Montana and elsewhere, the defendant, ANGELA CORSON SMITH, executed a material scheme and artifice to defraud various individuals and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, that is

ANGELA CORSON SMITH utilized interstate wires to obtain thousands of dollars from various individuals based entirely on deception.

THE SCHEME

14. The defendant, ANGELA CORSON SMITH, contacted various individuals in the greater Yellowstone County area seeking investors for a new business venture – Medical Billing Advocates of Montana, LLC (“MBAM”). The defendant stated that the purpose of MBAM was to act as an interface between physicians, patients and insurance companies to resolve insurance billing issues.

15. The defendant, ANGELA CORSON SMITH, sought investments to get MBAM started and promised investors quick turnaround time on their investments with interest and, in some cases, profit sharing for a period of time.

16. The defendant, ANGELA CORSON SMITH, provided would-be investors with promotional materials and business cards in support of statements regarding the viability of MBAM.

17. MBAM never had an office and used ANGELA CORSON SMITH's home address as its official mailing address. MBAM never had a single client.

MANNER AND MEANS

18. In furtherance of the scheme, ANGELA CORSON SMITH opened a bank account at U.S. Bank in the name of MBAM.

19. ANGELA CORSON SMITH deposited the various investors' checks into her personal accounts and the MBAM account at U.S. Bank.

20. ANGELA CORSON SMITH used the funds in the MBAM account to pay for her personal expenses, all of which were wholly unrelated to the purported business venture.

21. ANGELA CORSON SMITH continued to request loans from her various investors and used the funds obtained from later investors to begin to make payments to the earlier investors.

22. In furtherance of the scheme, ANGELA CORSON SMITH told the various investors as they requested the promised payments on their investments that she was gravely ill, that her daughter was gravely ill and that she was experiencing marital difficulties.

23. ANGELA CORSON SMITH also provided various investors with insufficient funds checks in an attempt to placate the investors.

THE INTERSTATE WIRINGS

24. On or about each of the dates set forth below, at Billings, in the State and District of Montana, the defendant, ANGELA CORSON SMITH, for the purpose of executing the scheme described above in paragraphs 13 through 23, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count:

Count:	Date:	Description:
V	December 28, 2009	Check 5081 from T.B., to Angie Corson, a/k/a ANGELA CORSON SMITH, for \$3,000, which caused a wire to be transmitted from Montana to a location outside the state of Montana.
VI	September 21, 2010	Check 8370 from R.K., to ANGELA CORSON SMITH, for \$5,000, which caused a wire to be transmitted from Montana to a location outside the state of Montana.
VII	November 11, 2010	Check 7299 from N.C., to Angela Smith, a/k/a ANGELA CORSON SMITH, for \$14,500, which caused a wire to be transmitted from Montana

		to a location outside the state of Montana.
VIII	June 14, 2011	Check 1008 from B.W., to Medical Billing Advocates of Montana, for \$35,000, which caused a wire to be transmitted from Montana to a location outside the state of Montana.

All in violation of 18 U.S.C. § 1343.

A TRUE BILL.

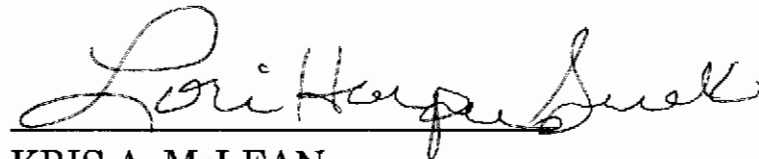


FOREPERSON



MICHAEL W. COTTER

United States Attorney
Attorney for Plaintiff



KRIS A. McLEAN

Criminal Chief Assistant U.S. Attorney
Attorney for Plaintiff

Crim. Summons _____

Warrant: ☒ _____

Bail: _____