

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

SAMUEL R. VANSICKLE
a/k/a **DONALD BLUNT,**
JACOB AIKEN,
ALLEN HELMS,
PAUL WALSH, and
WILLIAM HALL, Attorney,

LOUIS W. STROSNIDER, III,
Defendants.

CRIMINAL NO. _____
(Conspiracy to Commit Bank Fraud,
18 U.S.C. 1349;
Bank Fraud, 18 U.S.C. 1344,
Forfeiture).

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

Introduction

At all times relevant to this Indictment:

1. Defendant **SAMUEL R. VANSICKLE** owned property and developed property in Garrett County, Maryland. He controlled the mailbox with address 114 Friendsville Road, Accident, Maryland 21520 and rented P.O. Box 156, Accident, Maryland 21520.

2. Defendant **LOUIS W. STROSNIDER, III**, owned property and developed property in Garrett County, Maryland. He operated through Stony Brook Development Company, LLC, a Maryland corporation located at 26017 Garrett Highway, McHenry, MD 21541, hereafter "Stony Brook."

3. Defendant **SAMUEL R. VANSICKLE** used the following business names: Freedom Church, Gospel Church, Equity Exchange, Unity Mortgage, Impartial Lenders, Noble

Forest Consultants and used the names Donald Blunt, Allen Helms, Jacob Aiken, Paul Walsh, and William Hall (an attorney).

4. J.S.J. owned and controlled Mountain Top, LLC, [hereafter “Mountain Top”].

5. K Bank and Branch Banking and Trust (“BB&T Bank”) were financial institutions with insurance of accounts by the Federal Deposit Insurance Corporation.

The Scheme to Defraud

6. From on or about December 31, 2001, and continuing until on or about June 30, 2005, in the District of Maryland and elsewhere, the defendants,

SAMUEL R. VANSICKLE and LOUIS W. STROSNIDER, III,

knowingly and willfully devised and intended to devise a scheme and artifice to defraud financial institutions, which were insured by the Federal Deposit Insurance Corporation, and to obtain money and property from those financial institutions by means of materially false and fraudulent pretenses, representations and promises (“the scheme to defraud”) by **SAMUEL R. VANSICKLE**’s purchasing properties and then concealing the ownership and control of the properties through false names and identities, by inflating the value of properties through fraudulent loans and mortgages, by entering into sales contracts with **LOUIS W. STROSNIDER, III**, at inflated amounts with fictitious down payments, and then applying for, and obtaining bank loans at inflated values with fraudulent collateral to finance sales of the properties from entities controlled by **SAMUEL R. VANSICKLE** to **LOUIS W. STROSNIDER, III**, so that the purchase prices were secretly paid to **SAMUEL R. VANSICKLE**.

The Conspiracy to Defraud

7. From on or about December 31, 2001 through on or about June 30, 2005, in the District of Maryland and elsewhere, the defendants,

SAMUEL R. VANSICKLE and LOUIS W. STROSNIDER, III,

did knowingly and willfully conspire, combine, confederate, and agree with each other, and other persons known and unknown to the Grand Jury, to commit bank fraud, that is to knowingly execute and attempt to execute the scheme to defraud financial institutions in violation of Title 18, United States Code, Section 1344.

Object of the Conspiracy and Scheme to Defraud

8. It was the object of the conspiracy and scheme to defraud that defendants **SAMUEL R. VANSICKLE** and **LOUIS W. STROSNIDER, III**, obtained loans for **LOUIS W. STROSNIDER** from financial institutions through false and fraudulent means and used the loan proceeds to secretly pay **SAMUEL R. VANSICKLE** and for their own purposes.

Manner and Means of the Conspiracy and Scheme to Defraud

State Park Road Property at Deep Creek Lake

9. On or about December 31, 2001, **SAMUEL R. VANSICKLE** purchased in his own name 5.87 acres on State Park Road at Deep Creek Lake in Garrett County, Maryland from the State of Maryland for \$199,000 [hereafter “State Park Road property”].

10. Also on December 31, 2001, **SAMUEL R. VANSICKLE** placed a fraudulent indemnity mortgage on the State Park Road property in the name of a fictitious company, namely Impartial Lenders, LLC, in the amount of \$1.5 million.

11. In and around March 30, 2002, **SAMUEL R. VANSICKLE** deeded the State Park Road property to Mountain Top for \$100. The deed contained a certification that it was “prepared by or under the supervision” of William Hall, a fictitious attorney. **SAMUEL R. VANSICKLE** produced the deed at Garrett County land records for filing and gave the address of “114 Friendsville Road, Accident, MD” as the address of the new owner.

12. In and around July 12, 2003, **SAMUEL R. VANSICKLE** caused J.S.J.'s name and signature to be placed on a contract with **LOUIS W. STROSNIDER, III**, for **LOUIS W. STROSNIDER, III**, and his company Stony Brook to purchase the State Park Road property for \$2.9 million from Mountain Top. The contract falsely recited that **LOUIS W. STROSNIDER, III**, had paid a non-refundable deposit of \$1 million to Equity Exchange for the State Park Road property and that the sale would be conducted by Mountain Top as a tax-free exchange.

13. In and around July 13, 2003, **SAMUEL R. VANSICKLE** used a bank account he controlled, in the name of "Unity Mortgage," at First United Bank and Trust to purchase a cashier's check in the amount of \$1 million to create the false impression that **LOUIS W. STROSNIDER, III**, had made the down payment. **SAMUEL R. VANSICKLE** caused the bank cashier's check to be made payable to Equity Exchange and the remitter to be falsely shown as "Stoney [sic] Brook Developments."

14. In and around August 2003, **LOUIS W. STROSNIDER, III**, through a loan broker, applied to K Bank for a loan of \$2.9 million to purchase the State Park Road property from Mountain Top.

15. On or about August 12, 2003, **LOUIS W. STROSNIDER, III**, provided to K Bank, a fraudulent letter signed by the fictitious person "Allen Helms" who purported to be the managing officer of Unity Mortgage, a non-existent company. This letter falsely stated that Unity Mortgage paid for the \$1 million down payment check to Equity Exchange because Unity Mortgage owed Stony Brook for services provided over the past three years.

16. On or about August 28, 2003, K Bank agreed to loan **LOUIS W. STROSNIDER, III**, \$2,026,000 to purchase the Deep Creek Lake property from Mountain Top and build on it.

17. On or about September 22, 2003, A.B., a Garrett County attorney, closed on the sale of the State Park Road property from Mountain Top to **LOUIS W. STROSNIDER, III**.

A.B. disbursed the sales proceeds, not to the record owner of the property, Mountain Top, but instead issued a check to First United Bank to purchase a cashier's check for \$1,902,258.34 payable to Equity Exchange, the name on a bank account controlled by **SAMUEL R.**

VANSICKLE.

18. On or about September 25, 2003, **SAMUEL R. VANSICKLE** caused a Release of the Impartial Lenders Mortgage described in Paragraph 10 to be executed with the name and purported signature of the fictitious person, Jacob Aiken,

19. On September 26, 2003, **SAMUEL R. VANSICKLE** deposited the \$1,902,258.34 cashier's check into his bank account ****49201 called "**SAMUEL R. VANSICKLE** d/b/a/ Equity Exchange" at Farmers & Merchants Bank.

20. On or about September 27, 2003, **SAMUEL R. VANSICKLE** paid \$300,000 from the Equity Exchange bank account at Farmers & Merchants Bank to **LOUIS W. STROSNIDER, III.**

21. On or about November 12, 2003, **SAMUEL R. VANSICKLE** paid an additional \$200,000 to **LOUIS W. STROSNIDER, III,** from the Equity Exchange bank account at Farmers & Merchants Bank.

175 Red Run, Oakland, MD

22. In and around April 30, 2002, **SAMUEL R. VANSICKLE** provided \$600,000 for the benefit of his cousin W.H.B.'s company R&R Lakeside, LLC, to purchase 175 Red Run, Oakland, Maryland for \$600,000 from McComas Beach, Inc., [hereafter "Red Run property"]. Red Run was a restaurant and bed and breakfast which bordered on Deep Creek Lake, Oakland, MD.

23. At the settlement for the purchase of Red Run, **SAMUEL R. VANSICKLE** caused W.H.B. to sign a deed of trust on behalf of R&R Lakeside, LLC to Impartial Lenders,

LLC, for \$2,000,000. Impartial Lenders used **SAMUEL VANSICKLE**'s home address, 782 Spear Road, Unit B, Accident, MD. The security was the Red Run property. The promissory note to pay Impartial Lenders, LLC, was signed in the name of "Allen Helms," a fictitious person who used 114 Friendsville Road, Accident, MD as his address, **SAMUEL R.**

VANSICKLE's mail box. **SAMUEL R. VANSICKLE** notarized the signature of Allan [sic] Helms.

24. In and around April 30, 2003, **SAMUEL R. VANSICKLE** caused R&R Lakeside to transfer Red Run to Gospel Church, a fictitious church with a fictitious trustee purportedly named "Donald Blunt," for \$0. The address of Gospel Church was listed as Post Office Box 156, Accident, MD, a box rented by **SAMUEL R. VANSICKLE**. In and around April 30, 2003, the fraudulent Indemnity deed of trust described in Paragraph 23 was filed in the land records of Garrett County as "paid and satisfied." The Release was signed "Jacob Aiken, Managing Member"; "Jacob Aiken" is a fictitious person. The signature was witnessed by and notarized by **SAMUEL R. VANSICKLE**.

25. In and around February 2004, **LOUIS W. STROSNIDER, III**, contracted with the fictitious trustee "Donald Blunt," for the equally fictitious Gospel Church, to purchase the Red Run property for \$3,000,000. **LOUIS W. STROSNIDER, III**, purportedly placed a \$750,000 non-refundable deposit on the Red Run property in the form of an assignment of a timber agreement for the timber on a Preston County, West Virginia property of 150 acres, more or less. Donald Blunt as Trustee for Freedom Church, 26017 Garrett Highway, McHenry, MD (the same address as Strosnider's Stony Brook business) had acquired the property on December 21, 2001, for \$20,000 after the timber on the property had been clear cut. Three months later, on March 14, 2002, Donald Blunt, Trustee for Freedom Church transferred the property to Stony Brook Development, LLC, in a deed which recited consideration paid of \$995,000.

26. In and around July 2004, **LOUIS W. STROSNIDER, III**, applied to BB&T for a mortgage loan in the amount of \$2,250,000 to purchase the Red Run property from Gospel Church, a fictitious entity. **LOUIS W. STROSNIDER, III** supplied the timber-harvesting agreement described in Paragraph 25 as proof of his non-refundable \$750,000 deposit.

SAMUEL VAN SICKLE supplied inflated financial results from the operation of Red Run.

27. **LOUIS W. STROSNIDER, III** also provided a fraudulent personal financial statement to BB&T which showed that he owned the State Road property at Deep Creek Lake and had over \$1 million in equity in that project, based upon the fraudulent down payment described in Paragraph 12 above.

28. In and around August 2004, **LOUIS W. STROSNIDER, III**, provided to BB&T a letter from “Noble Forest Consultants” located at 114 Friendsville Road, Accident, Maryland and signed by “Paul Walsh” verifying the value of \$350,000 of timber on the Miller Tract in Garrett County, which was proposed additional collateral for the loan. Neither Paul Walsh nor Noble Forest Consultants existed, and the Miller Tract had been logged over.

29. In and around October 19, 2004, A.B., a Garrett County attorney, held a closing in which the fictitious Donald Blunt, as trustee for the fictitious Gospel Church, transferred the Red Run property to **LOUIS W. STROSNIDER, III**, for \$2,725,000. BB&T loaned **LOUIS W. STROSNIDER, III**, \$1,725,000 for the purchase; the remainder of the purchase price was made up by the fraudulent \$750,000 down payment and a purported \$341,379 which the buyer **LOUIS W. STROSNIDER, III**, was supposed to bring to the settlement table. **STROSNIDER** did not provide the funds and did not tell BB&T that he had not provided the funds. **SAMUEL R. VANSICKLE** acted as a notary and witnessed the signature of the fictitious Donald Blunt on the deed transferring Red Run from Gospel Church to **LOUIS W. STROSNIDER, III**. **SAMUEL R. VANSICKLE** received the sales proceeds through a payment to “Unity Mortgage”

of \$1,631,047.88, despite the settlement sheet's recitation that the sales proceeds were \$1,972,427.82. The fictitious seller, Gospel Church, received nothing.

18 U.S.C. § 1349

The Grand Jury for the District of Maryland further charges:

COUNT TWO

1. The allegations of Count One, Paragraphs One through Six and Eight through Twenty-Nine are incorporated as though fully set forth.

2. On or about September 26, 2003, in the District of Maryland, the defendant

SAMUEL R. VANSICKLE

knowingly executed and attempted to execute the scheme and artifice to defraud K Bank and to obtain K Bank's moneys and property by means of false and fraudulent pretenses, representations and promises by causing the settlement agent to pay the sales proceeds from the sale of the State Park Road property at Deep Creek Lake in the amount of \$1,902,258.34 to Equity Exchange, his fictitious company.

18 U.S.C. Section 1344

The Grand Jury for the District of Maryland further charges:

COUNT THREE

1. The allegations of Count One, Paragraphs One through Six and Eight through Twenty-Nine are incorporated as though fully set forth.

2. On or about September 26, 2003, in the District of Maryland, the defendant

SAMUEL R. VANSICKLE

knowingly executed and attempted to execute the scheme and artifice to defraud K Bank and to obtain K Bank's moneys and property by means of false and fraudulent pretenses, representations and promises by issuing a check from his bank account "SAMUEL R. VANSICKLE d/b/a Equity Exchange" to Louis Strosnider in the amount of \$300,000.

18 U.S.C. Section 1344

The Grand Jury for the District of Maryland further charges:

COUNT FOUR

1. The allegations of Count One, Paragraphs One through Six and Eight through Twenty-Nine are incorporated as though fully set forth.

2. In and around July 15, 2004, in the District of Maryland, the defendants **SAMUEL R. VANSICKLE and LOUIS W. STROSNIDER, III,** knowingly executed and attempted to execute the scheme and artifice to defraud BB&T and to obtain BB&T's moneys and property by means of false and fraudulent pretenses, representations and promises by **LOUIS W. STROSNIDER, III,** submitting a fraudulent purchase agreement to BB&T in connection with his loan application to buy Red Run from Gospel Church, a fictitious entity.

18 U.S.C. Section 1344

The Grand Jury for the District of Maryland further charges:

COUNT FIVE

1. The allegations of Count One, Paragraphs One through Six and Eight through Twenty-Nine are incorporated as though fully set forth.

2. In and around July 2004, in the District of Maryland, the defendants **SAMUEL R. VANSICKLE and LOUIS W. STROSNIDER, III,** knowingly executed and attempted to execute the scheme and artifice to defraud BB&T and to obtain BB&T's moneys and property by means of false and fraudulent pretenses, representations and promises by **LOUIS W. STROSNIDER, III,** submitting a fraudulent proof of down payment of \$750,000 to BB&T in connection with his loan application to buy Red Run from Gospel Church, a fictitious entity.

18 U.S.C. Section 1344

The Grand Jury for the District of Maryland charges:

COUNT SIX

1. The allegations of Count One, Paragraphs One through Six and Eight through Twenty-Nine are incorporated as though fully set forth.
2. On or about October 19, 2004, in the District of Maryland, the defendants **SAMUEL R. VANSICKLE and LOUIS W. STROSNIDER, III,** knowingly executed and attempted to execute the scheme and artifice to defraud BB&T and to obtain BB&T's moneys and property by means of false and fraudulent pretenses, representations and promises by **SAMUEL R. VANSICKLE's** receipt through "Unity Mortgage" of \$1,631,047.88 as the sales proceeds from the sale of Red Run to **LOUIS W. STROSNIDER, III,** which was financed by BB&T.

18 U.S.C. Section 1344

FORFEITURE

The Grand Jury further finds that:

1. Pursuant to 18 U.S.C. Section 982(a)(2)(A), upon conviction of an offense in violation of 18 U.S.C. § 1344, or a conspiracy to commit such offense, as alleged in [Counts One-Six](#), each defendant shall forfeit to the United States of America all property, real and personal, which constitutes and is derived from proceeds traceable to the scheme to defraud.

2. The property to be forfeited includes, but is not limited to, the following:

a. A sum of money equal to the value of the proceeds of the scheme to defraud [which amount is at least \\$ 3,751,000](#);

3. If any of the property described above, as a result of any act or omission of the defendants:

- 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), namely

1. Properties in the Name of Gospel Church, PO Box 156, Accident, Maryland 21520:

- a. Tax Account Number Garrett County, MD 02011964: Description: 33.22 acres Trap Run Road, Map 0031, Parcel 0007.
- b. Tax Account Number Garrett County, MD 02012332: Description: 2.74 acres Sand Spring Road, Map 0013, Parcel 0036 (1238 Noah Frazee Road)

(Cont'd) Property in the Name of Gospel Church

c. Tax Account Number Garrett County, MD 05013453: Description: 3.25 acres Spear Road, Map 0033, Parcel 0165.

2. **Properties in the Name of Samuel R. VanSickle, PO Box 156, Accident, Maryland 21520**

a. Tax Account Number Garrett County, MD 18076438: Description: Lot 29, The View, Map 0057, Parcel 0558.

b. Tax Account Number Garrett County, MD 18076446: Description: Lot 28, The View, Map 0057, Parcel 0558.

c. Tax Account Number Garrett County, MD 18076454: Description: Lot 27, The View, Map 0057, Parcel 0558.

d. Tax Account Number Garrett County, MD 18076632: Description: Lot 10, The View, Map 0057, Parcel 0558.

e. Tax Account Number Garrett County, MD 18076640: Description: Lot 9, The View, Map 0057, Parcel 0558.

3. **Property in the name of Samuel R. VanSickle, 1525 Hare Hollow Road, Grantsville, Maryland.**

a. Tax Account Number Garrett County, MD 02012022: Description: 5 acres Trap Run Road, Map 0031, Parcel 0030.

4. **Property in the name DAT Contracting, 1525 Hare Hollow Road, Grantsville, Maryland**

a. Tax Account Number Garrett County, MD 1005375: Description: 49.54 acres Turkey Neck, Map 0074, Parcel 0065.

b. Tax Account Number Garrett County, MD 10015383: Description: Lot 2 Altamont Springs, Map 0074, Parcel 0241.

c. Tax Account Number Garrett County, MD 10015413: Description: Lot 4 Altamont Springs II, Map 0074, Parcel 0238.

d. Tax Account Number Garrett County, MD 10004284: Description: 130 acres Altamont, Map 0080, Parcel 0035.

e. Tax Account Number Garrett County, MD 10004268: Description: 1.99 acres Service Area, Map 0074, Parcel 0129.

f. Tax Account Number Garrett County, MD 10004357: Description: 31.21 acres Altamont, Map 0074, Parcel 0135.

g. Tax Account Number Garrett County, MD 10007224: Description: 214 acres Altamont, Map 0080, Parcel 0029.

h. Tax Account Number Garrett County, MD 10007240: Description: 109 acres, Altamont, Map 0080, Parcel 0021.

i. Tax Account Number Garrett County, MD 10007267: Description: 256 acres, Altamont, Map 0080, Parcel 0002.

j. Tax Account Number Garrett County, MD 10015375: Description: 15.41 acres, Altamont Springs II, Map 0074, Parcel 241.

5. **Raileywood LLC, PO Box 156, Accident, Maryland and its assets, including the following real estate:**

a. Tax Account Number Garrett County, MD 14031707: Description: 50 acres Lakeshore Drive, Map 0058, Parcel 0672.

b. Tax Account Number Garrett County, MD 18077396: Description: Lakeshore Drive, Map 0058, Parcel 759.

c. Tax Account Number Garrett County, MD 14017984: Description: 100 acres, Lakeshore Drive, Map 0058, Parcel 412.

6. **Lost Land GC, LLC, P.O. Box 156, Accident, Maryland and its assets, including the following real estate:**

a. Tax Account Number Garrett County, MD 07013760: Description: .44 acres Webers Crossing, Map 0078, Parcel 0725.

b. Tax Account Number Garrett County, MD 07013795: Description: .30 acres Webers Crossing, 110 Weber Road, Map 0078, Parcel 0725.

c. Tax Account Number Garrett County, MD 07013809: Description: .27 acres, Lot 2, Webers Crossing, Map 0078, Parcel 0725.

d. Tax Account Number Garrett County, MD 07013817: Description: .23 acres, Lot 3, Webers Crossing, Map 0078, Parcel 0725.

e. Tax Account Number Garrett County, MD 07013833: Description: .25 acres, Lot 5, Webers Crossing, Map 0078, Parcel 0725.

f. Tax Account Number Garrett County, MD 07013868: Description: .24 acres, Lot 7, Webers Crossing, Map 0078, Parcel 0725.

g. Tax Account Number Garrett County, MD 07013876: Description: .20 acres, Webers Crossing, Map 0078, Parcel 0725.

h. Tax Account Number Garrett County, MD 10006783: Description: 41.61 acres Sand Flat, Map 0066, Parcel 0092.

i. Tax Account Number Garrett County, MD 10015677: Description: 12.66 acres Sand Flat, Map 0066, Parcel 0527.

7. **Property in the name of Daniel A. Thomas:**

a. Tax Account Number Garrett County, MD 18076667: Description: Lot 7 The View, Map 0057, Parcel 0558.

8. **Property in the name of David A. and Carolyn B. Thomas**

a. Tax Account Number Garrett County, MD 18076373: Description: Lot 33, The View, Map 0057, Parcel 558.

9. **Property in the name of Mary VanSickle:**

a. Tax Account Number Garrett County, MD 18076462: Description: Lot 26 The View, Map 0057, Parcel 558.

b. Tax Account Number, Garrett County, MD 2008475: Description: 4.23 acres Trap Run, Map 0022, Parcel 0060.

c. Tax Account Number, Garrett County, MD 2008459: Description: 86.91 acres Trap Run, Map 022, Parcel 0041.

d. Tax Account Number, Garrett County, MD 5015707: Description: Lot 9 Sect II Bear Creek, Map 0024, Parcel 0245

10. **Property in Somerset County, PA, in the name of Samuel R. VanSickle, P.O. Box 156, Accident, MD:**

a. Property ID No: 170002720, 325.978 acres, Deed Book 1416, page 801, Warren Mills, PA

11. **Property in the name of DAT Contracting, Taylor County, West Virginia:**

a. Tax identification number 0000013437: 155.67 Acres

b. Tax identification number 00000133567: 233.10 Acres

18 U.S.C. Section 981(a)(2)(A); Rule 32.2(a), F.R.Crim.P.

Rod J. Rosenstein
United States Attorney

A TRUE BILL:

Foreperson

Date: _____