

"UNDER SEAL"

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
DOCKET NO. 3:19CR 279 - MOC

FILED
CHARLOTTE, NC

SEP 18 2019

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA)

BILL OF INDICTMENT

v.)

Violations:

(1) ELIZABETH ROBIN WILLIAMS,)
a/k/a LIZ WILLIAMS,)
(2) DONNA GRAVES,)
(3) GERALD MAXWELL)
HARRISON)
a/k/a "TRIPLE")

18 U.S.C. § 641
18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 1343
18 U.S.C. § 1349
18 U.S.C. § 1956(h)
18 U.S.C. § 1957
18 U.S.C. § 2314
18 U.S.C. § 2

THE GRAND JURY CHARGES:

At the specified times and at all relevant times:

INTRODUCTION

1. Beginning in or around January 2015, and continuing to the present, ELIZABETH ROBIN WILLIAMS, a/k/a LIZ WILLIAMS ("WILLIAMS"), DONNA GRAVES ("GRAVES"), and GERALD MAXWELL HARRISON, a/k/a "TRIPLE" ("HARRISON"), (collectively "the Defendants"), as well as other persons known and unknown to the Grand Jury, did and attempted to engage in a scheme and artifice to defraud, exploit, and steal from victim KT, an elderly widow who lived alone and suffered from dementia and other physical and mental challenges (the "fraudulent scheme"). The Defendants knowingly used false statements, misrepresentations, and half-truths to deceive and manipulate victim KT and other persons so that the Defendants could fraudulently enrich themselves at the expense of victim KT. Specifically, the Defendants isolated victim KT from her friends and family, emptied her bank accounts for their own personal use, fraudulently "maxed out" at least one credit card in her name, fraudulently transferred or attempted to transfer her assets to themselves, pawned her jewelry, and stole her federal benefits. As a result of the fraudulent scheme, the Defendants defrauded victim KT of more than \$400,000 which they used to enrich themselves and others.

SCHEME TO DEFRAUD

2. Beginning in or around February 2014, WILLIAMS and GRAVES provided housekeeping services for victim KT through Evo Green Clean, a business owned and operated by GRAVES. At that time, victim KT lived in a senior citizen community in Indian Land, South Carolina in a house she owned ("South Carolina residence"). WILLIAMS and GRAVES, during and in furtherance of the scheme, fraudulently caused victim KT to give them power and control over her financial and personal affairs.

3. During and in furtherance of the fraudulent scheme, WILLIAMS, GRAVES, and HARRISON engaged in numerous illegal and unauthorized financial transactions that substantially depleted victim KT's money and property. They employed several means to accomplish their illegal purposes and conceal their fraudulent scheme, including: draining her bank accounts; creating new bank accounts; transferring funds between bank accounts; "maxing out" victim KT's credit cards; misappropriating, selling, and attempting to sell her real and personal property; and cashing her pension and Social Security checks for their personal benefit and use. Additionally, WILLIAMS unlawfully used victim KT's money to set up businesses that she owned and operated for her personal benefit and use, including a business selling handbags on eBay and a business selling weight loss-related services.

4. As part of the scheme to defraud, WILLIAMS, GRAVES, HARRISON, and others known and unknown to the Grand Jury, did and attempted to do the following:

a. Between July 2014 and April 2015, the Defendants opened the following Wells Fargo accounts:

- i. GRAVES opened Wells Fargo accounts ending 8932 and 4500;
- ii. WILLIAMS opened Wells Fargo accounts ending 5375, 0618, 5559, and 8796. On or about November 12, 2015, Williams added victim KT to Wells Fargo Account ending 5375; and
- iii. HARRISON opened Wells Fargo accounts ending 5887 and 9253.

b. Between on or about September 23, 2015 and on or about October 10, 2015, without the consent of victim KT, WILLIAMS sold dozens of pieces of victim KT's jewelry, knowing the jewelry was stolen, converted or taken by fraud from victim KT.

c. On or about October 10, 2015, without the consent of victim KT, HARRISON sold a piece of victim KT's jewelry, knowing the jewelry was stolen, converted or taken by fraud from victim KT.

d. Between on or about October 10, 2015 and on or about October 13, 2015, GRAVES and WILLIAMS called victim KT's friend MS ("friend MS") and falsely stated that victim's KT's brother AD ("brother AD") was trying to take victim KT's money.

e. On or about October 14, 2015, brother AD left his Indian Land, South Carolina residence, located in the same neighborhood as victim KT's house, for a scheduled procedure at a North Carolina health facility over two hours away. The Defendants took advantage of brother AD's absence and, in furtherance of the fraudulent scheme, WILLIAMS directed the opening of Bank of America account ending 9625. WILLIAMS transferred and caused the transfer of \$264,596.77 from BB&T checking account ending 2642, which victim KT shared with brother AD, to Bank of America account ending 9625, owned by victim KT. After this transfer, BB&T account ending 2642 was closed.

f. On or about October 14, 2015, the Defendants caused victim KT to open Bank of America account ending 4642.

g. During and in furtherance of the fraudulent scheme, and particularly after the October 14, 2015 financial transactions, the Defendants increased their efforts to isolate victim KT from her family and friends and to take control of her finances for their own financial and personal benefit.

h. During and in furtherance of the fraudulent scheme, GRAVES and WILLIAMS hired TH, an individual known to the Grand Jury, who owned and operated a security company and who carried a firearm, to “protect” victim KT and monitor and control her interactions with other people. WILLIAMS, GRAVES, HARRISON, and TH did not allow certain persons, including brother AD, to see or communicate with victim KT without WILLIAMS, GRAVES, HARRISON, or TH being present or otherwise monitoring and controlling the interactions. During the course of the conspiracy, TH received at least \$6,760 for “security” services provided over a period of several days in October 2015. These funds were paid from a bank account owned by victim KT.

i. On or about October 16, 2015, friend MS visited victim KT at her South Carolina residence. During this visit GRAVES and WILLIAMS falsely told friend MS that brother AD was trying to take control of victim KT’s money. After meeting with friend MS, WILLIAMS and GRAVES set up an appointment with a lawyer.

j. On or about October 17, 2015, WILLIAMS and friend MS met GRAVES at a lawyer’s office. Friend MS paid the lawyer \$2,000 to remove brother AD as victim KT’s power of attorney. At the meeting, no new power of attorney was named for victim KT.

k. On or about October 17, 2015, after receiving medical treatment in North Carolina, brother AD returned to Indian Land, South Carolina and attempted to visit victim KT at her South Carolina residence. As he approached the residence, TH approached brother AD from behind, placed a weapon in brother AD’s back, and told him that he would not be allowed to see or speak with his sister without one of the Defendants’ permission or without them being present. Brother AD later sought the assistance of law enforcement so that he could visit with his sister at her residence, but the Defendants soon moved victim KT from her South Carolina residence to Charlotte, North Carolina.

l. On or about October 21, 2015, the Defendants fraudulently induced victim KT to rent an apartment in Charlotte, North Carolina. WILLIAMS falsely told the leasing agent that she was victim KT’s family member. Rent payments were made using checks written on Bank of America account ending 9625.

m. On or about October 26, 2015, without informing brother AD, friend MS, and other close friends and neighbors, and in furtherance of the fraudulent scheme, WILLIAMS, GRAVES, HARRISON, and TH moved and aided and abetted the moving of victim KT from her South Carolina residence to the apartment in Charlotte. When victim KT’s neighbors questioned GRAVES and WILLIAMS about victim KT’s moving, they falsely told the neighbors that victim KT was moving to New York.

n. At the end of 2015, WILLIAMS and HARRISON terminated the lease on the Charlotte apartment and falsely told the leasing agent that victim KT had moved to Florida.

o. On or about October 26, 2015, in furtherance of the fraudulent scheme and to conceal the source of the funds, the Defendants caused victim KT to open Bank of America account ending 8345. On or about October 26, 2015, the Defendants caused victim KT to transfer \$247,290 from Bank of America account ending 9625 to Bank of America account ending 4642. On or about the same date, the Defendants transferred \$7,000 from Bank of America account ending 4642 to Bank of America account ending 8345. Two days later, on or about October 28, 2015, the Defendants caused victim KT to transfer \$240,290 from Bank of America account ending 4642 back to Wells Fargo account ending 9625. On or about the same date, the Defendants transferred \$7,000 from Bank of America account ending 8345 to Bank of America account ending 9625. Prior to and following these transactions, Bank of America accounts ending 8345 and 4642 had zero balances and had little to no activity other than these transactions.

p. In furtherance of the fraudulent scheme, WILLIAMS, GRAVES, and HARRISON attempted to sell victim KT's South Carolina residence. On or about October 26, 2015, GRAVES contacted a realtor about selling victim KT's South Carolina residence and, on or about the next day, WILLIAMS met with the realtor about selling the South Carolina residence. During this initial visit at the residence, the realtor observed furniture in the residence, but no clothing.

q. On or about October 28, 2015, the Defendants caused a bank check to be issued from Bank of America account ending 9625 to victim KT for \$243,894.25, after which Bank of America account ending 9625 had a zero balance.

i. On or about November 2, 2015, WILLIAMS caused victim KT to open Wells Fargo account ending 9609, listing WILLIAMS as co-signer. On or about the same date, the \$243,894 check from Bank of America account ending 9625 was deposited into Wells Fargo account ending 9609.

r. On or about October 30, 2015, WILLIAMS and GRAVES fraudulently induced victim KT to execute a Durable Unlimited Power of Attorney naming WILLIAMS as Attorney-in-Fact and GRAVES as Successor. HARRISON witnessed the document. Under the terms of this document, WILLIAMS agreed to act for the benefit of the principal [victim KT], to "keep the assets of the principal from [her] assets," and to "exercise reasonable caution and prudence." An unindicted co-conspirator, HARRISON's friend, was the notary public who notarized the Durable Unlimited Power of Attorney, but the notary failed to follow proper notarization procedures regarding the presence of witnesses and having persons sign documents in the notary's presence.

s. On or about October 30, 2015, GRAVES fraudulently induced victim KT to sign a listing agreement for victim KT's South Carolina residence with a realtor. After victim KT signed this agreement, the realtor noticed discrepancies on documents that purported to contain victim KT's signature, and the realtor questioned one or more of the

Defendants about this problem. The Defendants then refused to allow the realtor to see or speak with victim KT.

t. On or about November 5, 2015, WILLIAMS caused victim KT to open Wells Fargo account ending 2805, listing WILLIAMS as secondary joint owner. On or about that same date, the Defendants caused \$215,955 to be transferred from Wells Fargo account ending 9609 to Wells Fargo account ending 2805. No other deposits were made into Wells Fargo account ending 2805 other than approximately \$30 in interest payments. WILLIAMS then withdrew \$25,939.63 in cash from Wells Fargo account ending 9609. Further, between November 5, 2015 and February 17, 2016, the Defendants fraudulently depleted all of the funds in Wells Fargo account ending 2805 by spending victim KT's money on personal expenditures.

u. After the Defendants moved and facilitated the move of victim KT in October 2015 from her South Carolina residence to an apartment in Charlotte, victim KT never returned to her South Carolina residence. With the assistance of a hired private investigator, brother AD discovered his sister's location at the apartment in Charlotte. To keep him away from his sister, and in furtherance of the fraudulent scheme, WILLIAMS, GRAVES, HARRISON, and others again moved victim KT. On or about November 5, 2015, WILLIAMS, HARRISON, and victim KT signed a lease for a residence in Mint Hill, North Carolina. WILLIAMS falsely represented to the listing agent that victim KT was her mother. WILLIAMS and HARRISON used victim KT's money to pay a year's rent in advance. The Defendants also moved victim KT's furniture and remaining possessions to this location from her South Carolina residence.

v. On or about November 6, 2015, the Defendants fraudulently caused victim KT's South Carolina residence to be officially listed for sale.

w. On or about November 21, 2015, WILLIAMS opened Bank of America accounts ending 9475 and 9462 in her name, and HARRISON opened Bank of America account ending 9572 in his name.

x. In or around January 2016 and after depleting most of victim KT's financial assets and, because of victim KT's failing mental and physical health, the Defendants began communicating with friend MS about victim KT's poor condition. Unaware of the fraudulent scheme, friend MS began making arrangements for victim KT to live in a nursing facility in New York. Friend MS communicated with victim KT and the Defendants that friend MS planned to travel to North Carolina and take victim KT back to New York.

y. On or about February 12, 2016, friend MS caused a nursing residence representative to speak with WILLIAMS to confirm that a nurse would be conducting an assessment of victim KT. Prior to this call, friend MS was unaware that victim KT had been moved to Mint Hill.

z. On or about February 12, 2016, a fraudulent Quitclaim Deed transferring victim KT's South Carolina residence to HARRISON as an outright gift was filed with the Lancaster County Assessor. Attached to the Quitclaim Deed was an Affidavit for Exempt Transfers signed by HARRISON on or about February 11, 2016. The Quitclaim Deed

was dated November 2, 2015, and the notary who notarized the Quitclaim Deed failed to follow proper notarization procedures regarding the presence of witnesses and having persons sign documents in the notary's presence.

aa. On or about February 12, 2016, a nurse conducted an assessment of victim KT at the home in Mint Hill for placement in the nursing home. WILLIAMS was present during the visit and the nurse noted that victim KT had pressure sores indicating neglect and lack of proper care.

bb. On or about February 15, 2016, friend MS drove from New York to Charlotte, North Carolina with the intention of taking victim KT back to New York.

cc. On or about February 15, 2016, after not speaking to the realtor since the end of October 2015, HARRISON called the realtor and told the realtor that the Defendants had taken over all of victim KT's affairs, including the South Carolina residence that victim KT purportedly gave to him.

dd. On or about February 16, 2016, friend MS called WILLIAMS to tell her she was in Charlotte to get victim KT. WILLIAMS gave friend MS the address to the Mint Hill residence. When friend MS arrived at the Mint Hill residence, victim KT's suitcases were packed, and WILLIAMS and HARRISON were present.

ee. Friend MS questioned WILLIAMS and HARRISON about the location of victim KT's check books, credit cards, mail, and bank information, and WILLIAMS falsely stated that she did not know. Neither WILLIAMS nor HARRISON provided friend MS with any information about the Quitclaim Deed giving victim KT's house to HARRISON or victim KT's numerous bank accounts at Bank of America and Wells Fargo.

ff. On or about February 17, 2016, friend MS took victim KT back to New York, and victim KT required immediate surgery to treat medical problems that occurred and worsened while she was living with WILLIAMS and HARRISON in Mint Hill, North Carolina. Victim KT then lived in a nursing home in New York until her death on December 18, 2016.

gg. On or about March 8, 2016, HARRISON attempted to sell the South Carolina residence through an internet real estate website. A realtor associated with that website spoke with HARRISON, who falsely told the website realtor that HARRISON was gifted the home and wanted to sell it as soon as possible.

hh. On or about March 9, 2016, HARRISON met with the website realtor at the Mint Hill residence and falsely stated that he received the South Carolina residence as a gift and that he was not happy with the services of his previous realtor.

ii. On or about May 6, 2016, a law enforcement officer interviewed WILLIAMS, and she falsely stated that victim KT took her jewelry and fur coats back to New York with her.

jj. During and in furtherance of the fraudulent scheme, WILLIAMS, GRAVES, and HARRISON did and attempted to transmit and caused the transmission of wires, and these wire transmissions were in and affected interstate and foreign commerce. These wire transmissions included, among others, email correspondences and Internet postings to facilitate the listing and selling of victim KT's residence; cell phone communications, including calls and text messages; transfers of bank funds between and within financial institutions; and transfers involving automatic Social Security deposits to victim KT.

kk. As a result of and in furtherance of the fraudulent scheme, the Defendants misappropriated and took approximately \$400,000 from victim KT. They also stole United States currency that victim KT kept in her South Carolina residence.

COUNT ONE
(WIRE FRAUD CONSPIRACY -- 18 U.S.C. § 1349)

5. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 4 of the Bill of Indictment, and further alleges that:

6. Beginning in or about January 2015 and continuing to the present, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendants

(1) ELIZABETH ROBIN WILLIAMS, a/k/a LIZ WILLIAMS,
(2) DONNA GRAVES, and
(3) GERALD MAXWELL HARRISON, a/k/a "TRIPLE"

did knowingly combine, conspire, confederate, and agree with one another, as well as other persons known and unknown to the Grand Jury, to commit an offense against the United States, as follows:

Object of the Conspiracy

7. Wire Fraud: It was a part and an object of the conspiracy that the named Defendants and others known and unknown to the Grand Jury, having devised the above-described scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did and attempted to transmit and cause to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, pictures, and sounds for the purposes of executing said scheme and artifice, in violation of Title 18, United States Code Section 1343.

Manner and Means

8. The conspirators carried out the conspiracy in the manner and means, among others, described in paragraphs 1 through 4 of the Bill of Indictment.

All in violation of 18 U.S.C. § 1349.

COUNT TWO
(WIRE FRAUD– 18 U.S.C. § 1343)

9. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 8 of the Bill of Indictment, and further alleges that:

10. On or about November 27, 2015, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendants

(1) ELIZABETH ROBIN WILLIAMS, a/k/a LIZ WILLIAMS and
(3) GERALD MAXWELL HARRISON, a/k/a “TRIPLE”

and other persons known and unknown to the Grand Jury, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money or property by means of false or fraudulent pretenses, representations, or promises and attempting to do so, did knowingly transmit or cause to be transmitted in interstate commerce, certain signs, signals and sounds, that is, a \$1,000 credit card charge on victim KT’s BB&T credit card ending 1576 toward the \$5,400 purchase of Presas Canarios dogs from Sanders Kennels in Georgia.

All in violation of 18 U.S.C. § 1343.

COUNT THREE
(WIRE FRAUD – 18 U.S.C. § 1343)

11. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 8 of the Bill of Indictment, and further alleges that:

12. On or about January 14, 2016, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant

(1) ELIZABETH WILLIAMS, a/k/a LIZ WILLIAMS

and other persons known and unknown to the Grand Jury, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money or property by means of false or fraudulent pretenses, representations, or promises and attempting to do so, did knowingly transmit or cause to be transmitted in interstate commerce, certain signs, signals and sounds, that is, a \$2,123.50 wire transfer from Wells Fargo checking account ending 2805 to Silicon Valley Bank in California.

All in violation of 18 U.S.C. § 1343.

COUNT FOUR
(WIRE FRAUD – 18 U.S.C. § 1343)

13. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 8 of the Bill of Indictment, and further alleges that:

14. On or about March 8, 2016, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant

(3) GERALD MAXWELL HARRISON, a/k/a “TRIPLE”

and other persons known and unknown to the Grand Jury, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money or property by means of false or fraudulent pretenses, representations, or promises and attempting to do so, did knowingly transmit or cause to be transmitted in interstate commerce, certain signs, signals and sounds, that is, email correspondence between HARRISON and real estate agency Giving Tree regarding the sale of victim KT’s South Carolina residence

All in violation of 18 U.S.C. § 1343.

COUNT FIVE
(AGGRAVATED IDENTITY THEFT – 18 U.S.C. § 1028A(a)(1))

15. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 8 of the Bill of Indictment, and further alleges that:

16. On or about November 27, 2015, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendants

(1) ELIZABETH ROBIN WILLIAMS, a/k/a LIZ WILLIAMS and
(3) GERALD MAXWELL HARRISON, a/k/a “TRIPLE”

and other persons knowingly and without lawful authority did and attempted to transfer, possess and use a means of identification of another person, victim KT, during and in relation to wire fraud (18 U.S.C. § 1343), a felony violation included in 18 U.S.C. § 1028A(c), and aided, abetted, counseled, commanded, induced and procured the commission of this offense.

All in violation of 18 U.S.C. §§ 1028A(a)(1) and 2.

COUNT SIX
(INTERSTATE TRANSPORTATION OF STOLEN PROPERTY -- 18 U.S.C. § 2314)

17. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 8 of the Bill of Indictment, and further alleges that:

18. On or about September 23, 2015, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant

(1) ELIZABETH ROBIN WILLIAMS, a/k/a LIZ WILLIAMS

and other persons known and unknown to the Grand Jury did and attempted to transport, transmit and transfer in interstate commerce any goods, wares, and merchandise of a value of \$5,000 or more, that is, victim KT's jewelry pieces, knowing the same to have been stolen, converted or taken by fraud, and aided, abetted, counseled, commanded, induced and procured the commission of this offense.

All in violation of 18 U.S.C. §§ 2314 and 2.

COUNT SEVEN
(INTERSTATE TRANSPORTATION OF STOLEN PROPERTY -- 18 U.S.C. § 2314)

19. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 8 of the Bill of Indictment, and further alleges that:

20. On or about June 3, 2016, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant

(3) GERALD MAXWELL HARRISON, a/k/a "TRIPLE"

and other persons known and unknown to the Grand Jury did and attempted to transport, transmit and transfer in interstate commerce any goods, wares, and merchandise of a value of \$5,000 or more, that is, victim KT's jewelry pieces, knowing the same to have been stolen, converted or taken by fraud, and aided, abetted, counseled, commanded, induced and procured the commission of this offense.

All in violation of 18 U.S.C. §§ 2314 and 2.

COUNT EIGHT
(THEFT OF GOVERNMENT FUNDS – 18 U.S.C. § 641)

21. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 8 of the Bill of Indictment, and further alleges that:

22. From on or about November 10, 2015 and continuing to on or about April 1, 2016, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant

(1) ELIZABETH ROBIN WILLIAMS, a/k/a LIZ WILLIAMS

and other persons known and unknown to the Grand Jury knowingly and willfully did and attempted to embezzle, steal, purloin, and convert to her own use, money and things of value from a program operated and administered by the United States Social Security Administration, a department and agency of the United States, that is, monetary benefits belonging to Victim KT having a value exceeding \$1,000, and aided, abetted, counseled, commanded, induced and procured the commission of this offense.

All in violation of 18 U.S.C. §§ 641 and 2.

COUNT NINE
(MONEY LAUNDERING CONSPIRACY -- 18 U.S.C. § 1956(h))

23. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 8 of the Bill of Indictment, and further alleges that:

24. From in or about January 2015 through in or about December 2016, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendants

(1) ELIZABETH ROBIN WILLIAMS, a/k/a LIZ WILLIAMS,
(2) DONNA GRAVES, and
(3) GERALD MAXWELL HARRISON, a/k/a "TRIPLE"

did knowingly combine, conspire, confederate, and agree with each other and others known and unknown to the Grand Jury, to commit offenses against the United States, to wit, to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, with the intent to conceal and disguise in whole and in part the nature, location, source, ownership, and control of the proceeds of a 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, Sections 1956(a)(1)(B)(i) (concealment money laundering) and to knowingly engage and attempt to engage in monetary transactions affecting interstate and foreign commerce in property that was criminally derived from specified unlawful activity and was in excess of \$10,000, knowing 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 1957.

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

COUNT TEN
(MONEY LAUNDERING -- 18 U.S.C. § 1957)

25. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 8 of the Bill of Indictment, and further alleges that:

26. On or about November 16, 2015, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant

(1) ELIZABETH ROBIN WILLIAMS, a/k/a LIZ WILLIAMS

and other persons known and unknown to the Grand Jury knowingly did and attempted to engage in a monetary transaction by, through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is, a \$12,500 certified check used as a mortgage payment, such property having been derived from a specified unlawful activity, that is, a wire fraud scheme, and aided, abetted, counseled, commanded, induced and procured the commission of this offense.

All in violation of 18 U.S.C. §§ 1957(a) and 2.

COUNT ELEVEN
(MONEY LAUNDERING -- 18 U.S.C. § 1957)

27. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in the Introduction and preceding Counts in the Bill of Indictment, and further alleges that:

28. On or about February 10, 2016, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant

(1) ELIZABETH ROBIN WILLIAMS, a/k/a LIZ WILLIAMS

knowingly did and attempted to engage in a monetary transaction by, through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is, a \$19,384.97 check refunding a deposit on a home improvement project, such property having been derived from a specified unlawful activity, that is, a wire fraud scheme, and aided, abetted, counseled, commanded, induced and procured the commission of this offense.

All in violation of 18 U.S.C. §§ 1957(a) and 2.

NOTICE OF FORFEITURE

Notice is hereby given of the provisions of 18 U.S.C. § 982 and 28 U.S.C. § 2461(c). Under section 2461(c), criminal forfeiture is applicable to any offenses for which forfeiture is authorized by any other statute, including but not limited to 18 U.S.C. § 981 and all specified unlawful activities listed or referenced in 18 U.S.C. § 1956(c)(7), which are incorporated as to proceeds by § 981(a)(1)(C). The defendant has or had a possessory or legal interest in the following property that is subject to forfeiture in accordance with section 982 and/or section 2461(c):

- a. all property involved in the violations alleged in this Bill of Indictment;
- b. all property which is proceeds of such violations; and
- c. in the event that any property described in (a) and (b) cannot be located or recovered or has been substantially diminished in value or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant, to the extent of the value of the property described (a) and (b).

A TRUE BILL:



R. ANDREW MURRAY
UNITED STATES ATTORNEY

A handwritten signature in cursive script, appearing to read "Ken Smith", written over a horizontal line.

KENNETH M. SMITH
ASSISTANT UNITED STATES ATTORNEY

A handwritten signature in cursive script, appearing to read "Caryn D. Finley", written over a horizontal line.

CARYN D. FINLEY
ASSISTANT UNITED STATES ATTORNEY

"UNDER SEAL"**NEW CRIMINAL CASE COVER SHEET****U. S. DISTRICT COURT**(To be used for **all** new Bills of Indictments and Bills of Information)**CASE SEALED:** ☒ YES ☐ NO**DOCKET NUMBER:**

3:19CR 279

If case is to be sealed, a Motion to Seal and proposed Order **must** be attached.)**CASE NAME**

:US vs Elizabeth Williams, et al

COUNTY OF OFFENSE

: Mecklenburg

RELATED CASE INFORMATION

:

Magistrate Judge Case Number

:

Search Warrant Case Number

:

Miscellaneous Case Number

:

Rule 20b

:

SERVICE OF PROCESS

: Arrest Warrant

U.S.C. CITATIONS (Mark offense carrying greatest weight):☐ Petty☐ Misdemeanor☒ Felony

U.S.C. Section 18 1349

JUVENILE:☐ Yes☒ No**ASSISTANT U. S. ATTORNEY**

: Smith, Kenny

VICTIM/WITNESS COORDINATORS:

Shirley Rutledge

INTERPRETER NEEDED

:

N/A

LIST LANGUAGE AND/OR DIALECT:**REMARKS AND SPECIAL INSTRUCTIONS:**