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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

1 MICHAEL BAILEY
2 United States Attorney
3 District of Arizona
4 Wallace H. Kleindienst
5 Assistant U.S. Attorney
6 State Bar No. 012506
7 United States Courthouse
8 405 W. Congress Street, Suite 4800
9 Tucson, Arizona 85701
10 Telephone: 520-620-7300
11 Email: wallace.kleindienst@usdoj.gov
12 Attorneys for Plaintiff

CR19-01276 TUC-JGZ(BGM)

13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE DISTRICT OF ARIZONA

15 United States of America,

16 Plaintiff,

17 vs.

18 Koreasa M. Williams, aka Kory
19 Williams,

20 Defendant.

CR

INDICTMENT

Violations:

18 U.S.C. § 1343
(Wire Fraud)
Counts 1-65

18 U.S.C. § 1028A(a)(1)
(Aggravated Identity Theft)
Counts 66-73

18 U.S.C. § 981(a)(1)(C) &
28 U.S.C. § 2461(c)
Forfeiture Allegation

21 THE GRAND JURY CHARGES:

CRIMINAL CASE

SEALED

Introductory Allegations

22 At all times material to the Indictment:

23 The defendant, Koreasa M. Williams, also known as Kory Williams, is listed
24 with the Arizona Department of Insurance as the registered agent and owner of
25 GLAM Insurance Services LLC (GLAM), which is located in Tucson, Arizona.
26 GLAM does business as Williams and Associates. The defendant holds a valid
27 Arizona Health and Life Insurance Agent's license. The defendant is in the business
28 of selling life, accident and health insurance policies, which include insurance
annuity policies from various insurance companies on behalf of the clients of

1 Williams and Associates. Many of her clients purchase annuity policies as an
2 investment for subsequent retirement income. Many of her clients are elderly.

3 Annuity policies issued by an insurance company are designed to accept and
4 grow funds, and upon annuitization, will create a stream of income in the form of
5 periodic payments. Contributions to the annuity policy earn a fixed percentage rate
6 of return and are generally tax deferred. Annuity payments either begin
7 immediately, or are deferred to begin on a later specified date. Premature partial
8 withdrawal or a full surrender of the funds in an annuity before the maturity of the
9 annuity by the annuitant, usually results in penalties. The penalties include early
10 surrender and termination fees, the potential of income tax charges, and other
11 negative monetary adjustments.

12 **The Scheme to Defraud**

13 Beginning on or about November 16, 2011 and ending on or about October
14 25, 2018, the defendant instituted a scheme to defraud the life insurance annuity
15 clients of Williams and Associates. The defendant would wire, by either email or
16 facsimile, to the insurance company a fraudulent and fictitious form to request the
17 withdrawal or surrender of annuity funds in the name of the client without the
18 client's knowledge and/or consent. The insurance companies, all located outside the
19 State of Arizona, include, Life Insurance Company of the Southwest, North
20 American Company for Life and Health Insurance, and American Equity Investment
21 Life Insurance Company.

22 The fraudulent and fictitious withdrawal requests submitted by the defendant
23 were either for a partial or full amount of an annuity. The defendant used the
24 respective client's social security number, and other personal identifiers on the
25 request form, and, in most instances, forged the client's name on the request form.
26 (In some instances, the client signed the form without fully understanding the
27 purpose of the form.)
28

1 In most instances, this was a premature withdrawal of funds from the annuity
2 resulting in monetary penalties for the client. The defendant then directed the life
3 insurance company to wire the amount withdrawn to the defendant's bank accounts
4 as direct deposits with USAA Federal Savings Bank, account number XXXX6785
5 or XXXX158017, located in San Antonio, Texas. The insurance companies,
6 particularly North American Company for Life and Health Insurance and American
7 Equity Investment Life Insurance Company, required the submission of a voided
8 bank check with the withdrawal request to verify that the annuitant was the owner
9 of the designated bank account where the money was to be deposited. The defendant
10 complied with this requirement by fraudulently altering one of her USAA Federal
11 Savings Bank checks to reflect that the name of the account holder was the annuitant.

12 The defendant then used the funds wired to her USAA bank accounts for her
13 own use and benefit. The total aggregate loss to the defendant's clients as a result
14 of this scheme to defraud was approximately \$1,064,522. This amount includes the
15 additional early surrender and termination fees, but not income tax charges, and
16 other monetary adjustments.

17 Wire Fraud

18 The Introductory Allegations and the Scheme to Defraud are incorporated
19 herein by reference as if more fully set forth in each of the Wire Fraud Counts
20 charged herein.

21 On or about the dates listed herein, at or near Tucson, Arizona, the defendant
22 devised and intended to devise the aforesaid scheme and artifice to defraud, and for
23 obtaining money by means of materially false and fraudulent pretenses and
24 representations from the individual identified in each Count, and for the purpose of
25 and as an essential part of executing the scheme to defraud and to obtain money by
26 means of materially false and fraudulent pretenses and representations transmitted
27 and knowingly caused to be transmitted from Tucson, Arizona, in interstate
28

1 commerce writings, signs, signals, and pictures requesting the withdrawal of annuity
 2 funds.

<u>Count</u>	<u>Date</u>	<u>Client</u>	<u>Requested Withdrawal Amount</u>	<u>Transmission Method</u>
1	06/17/14	P.W-H.	8000.00	Email
2	04/07/15	M.N.	9000.00	Email
3	06/19/15	M.N.	9850.00	Email
4	08/03/15	M.N.	9200.00	Email
5	08/17/15	M.N.	11039.00	Email
6	07/25/14	D.C.	9000.00	Email
7	08/05/14	D.C.	9500.00	Email
8	04/30/15	D.C.	10003.00	Email/Facsimile
9	05/14/15	D.C.	11194.00	Email
10	06/25/15	D.C.	8500.00	Email
11	09/02/15	D.C.	3662.00	Email
12	08/25/16	R.C.	16929.00	Facsimile
13	09/12/16	R.C.	9500.00	Facsimile
14	09/27/16	R.C.	15800.00	Facsimile
15	10/17/16	R.C.	19500.00	Facsimile
16	10/27/16	R.C.	17300.00	Facsimile
17	11/07/16	R.C.	22800.00	Facsimile
18	11/28/16	R.C.	21700.00	Facsimile
19	12/12/16	R.C.	19000.00	Facsimile
20	12/22/16	R.C.	14400.00	Facsimile
21	01/06/17	R.C.	22500.00	Facsimile
22	01/30/17	R.C.	9800.00	Facsimile
23	02/08/17	R.C.	9200.00	Facsimile
24	02/17/17	R.C.	8800.00	Facsimile
25	03/06/17	R.C.	9880.00	Facsimile
26	03/20/17	R.C.	9880.00	Facsimile
27	03/30/17	R.C.	9700.00	Facsimile
28	04/25/17	R.C.	8200.00	Facsimile
29	05/08/17	R.C.	7850.00	Facsimile
30	10/03/17	R.C.	6012.00	Facsimile

<u>Count</u>	<u>Date</u>	<u>Client</u>	<u>Requested Withdrawal Amount</u>	<u>Transmission Method</u>
31	05/20/14	M.L.	8000.00	Email
32	06/03/14	M.L.	9500.00	Email
33	09/08/14	M.L.	8000.00	Email
34	02/18/15	M.L.	9800.00	Email
35	03/13/15	M.L.	9800.00	Email
36	03/30/15	M.L.	8000.00	Email
37	07/21/15	M.L.	9500.00	Email
38	08/31/15	M.L.	8000.00	Email
39	09/24/15	M.L.	9200.00	Facsimile
40	10/05/15	M.L.	7800.00	Facsimile
41	10/17/15	M.L.	9700.00	Facsimile
42	10/28/15	M.L.	9400.00	Facsimile
43	11/13/15	M.L.	9800.00	Facsimile
44	11/30/15	M.L.	9400.00	Facsimile
45	12/08/15	M.L.	8700.00	Facsimile
46	12/21/15	M.L.	8400.00	Facsimile
47	01/13/16	M.L.	9600.00	Facsimile
48	01/29/16	M.L.	9200.00	Facsimile
49	05/16/17	M.L.	9670.00	Facsimile
50	05/22/17	M.L.	9760.00	Facsimile
51	06/24/17	M.L.	9500.00	Facsimile
52	07/06/17	M.L.	8750.00	Facsimile
53	07/18/17	M.L.	9100.00	Facsimile
54	08/01/17	M.L.	8800.00	Facsimile
55	08/14/17	M.L.	9929.00	Facsimile
56	11/21/17	S.K.	13348.00	Facsimile
57	01/10/18	S.K.	9825.00	Facsimile
58	05/29/18	S.K.	9000.00	Facsimile
59	06/08/18	S.K.	101676.00	Facsimile
60	12/07/17	M.K.	6953.00	Facsimile
61	02/08/18	M.K.	9750.00	Facsimile
62	04/09/18	M.K.	20000.00	Facsimile
63	04/18/18	M.K.	32934.00	Facsimile
64	10/09/18	S.J.	25000.00	Facsimile

<u>Count</u>	<u>Date</u>	<u>Client</u>	<u>Requested Withdrawal Amount</u>	<u>Transmission Method</u>
65	10/25/18	G.B.	20000.00	Facsimile

All in violation of Title 18, United States Code, Section 1343.

Aggravated Identity Theft

On or about the dates listed below, at or near Tucson, in the District of Arizona, the Defendant did, during and in relation to felony enumerated in Title 18 U.S.C. Section 1343, to wit: wire fraud, as charged in Counts 1 through 65, knowingly possess and use without lawful authority, a means of identification of another person, to-wit the social security number of each victim listed in the aforesaid Counts, knowing the means of identification belonged to another person as set forth in each Count below:

<u>Count</u>	<u>Date</u>	<u>Client/ Victim</u>	<u>Predicate Count</u>
66	06/17/14	P.W-H.	1
67	06/19/15	M.N.	3
68	11/30/15	M.L.	44
69	01/06/17	R.C.	21
70	02/08/18	M.K.	61
71	06/08/18	S.K.	59
72	10/09/18	S.J.	64
73	10/25/18	G.B.	65

All in violation of Title 18, United States Code, Section 1028A(a)(1).

FORFEITURE ALLEGATION

Upon conviction of the offenses set forth in Counts One (1) through Sixty-Five (65) of this Indictment, the defendant, Koreasa M. Williams, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(D), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes,

1 but is not limited to, the following: a sum of money equal to the amount of proceeds
2 obtained as a result of the offenses, including but not limited to, \$1,064,522.

3 If any of the property described above, as a result of any act or omission of the
4 defendant: a) cannot be located upon the exercise of due diligence; b) has been transferred
5 or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of
6 the court; d) has been substantially diminished in value; or e) has been commingled with
7 other property which cannot be divided without difficulty, it is the intent of the United
8 States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title
9 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said
10 defendant up to the value of the above forfeitable property, including, but not limited to,
11 all property, both real and personal, owned by the defendant.

12 All in violation of Title 18, United States Code, Section 981(a)(1)(C); Title 28,
13 United States Code, Section 2461(c); and, Rule 32.2(a), Federal Rules of Criminal
14 Procedure.

15 A TRUE BILL

16 /S/

17 _____
18 Presiding Juror

19 MICHAEL BAILEY
20 United States Attorney
21 District of Arizona

22 /S/

23 Assistant U.S. Attorney

24 Dated: _May 15, 2019

**REDACTED FOR
PUBLIC DISCLOSURE**