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District of Montana - Billings

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**ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BUTTE DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**KERI ANN TRAVER and DUSTIN
RAY TRAVER,**

Defendants.

CR 26- 24 -BU- DLC

INDICTMENT

THEFT OF PUBLIC MONEY (Count 1)

Title 18 U.S.C. § 641

Title 18 U.S.C. § 2

**(Penalty: 10 years of imprisonment,
\$250,000 fine, and three years of supervised
release)**

**THEFT IN CONNECTION WITH
HEALTHCARE (Count 2)**

Title 18 U.S.C. § 669

Title 18 U.S.C. § 2

**(Penalty: 10 years of imprisonment,
\$250,000 fine, and three years of supervised
release)**

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to the indictment:

1. The Social Security Administration (SSA) administers Supplemental Security Income (SSI), which is a federally administered welfare program available to the general public. SSI is meant to assure a minimum level of income to people who are aged, blind, and disabled, and who have limited income and resources. SSI benefits are financed from the federal funds of the United States Treasury.

2. Supplemental Nutrition Assistance Program (SNAP) is a federal nutrition assistance program for low-income individuals and families. The State of Montana facilitates the SNAP through its Department of Health and Human Services (DPHHS). To receive SNAP benefits, individuals must identify individuals with whom the applicant lives—either permanently or temporarily—and meet income eligibility standards. SNAP recipients must report changes, including household composition and income. SNAP is financed, at least in part, by federal funds administered through the State of Montana.

3. Medicaid provides healthcare benefits for eligible low-income Montanans. Medicaid pays for services that are medically necessary. Eligibility is determined based upon household composition, income, and resource limits. Medicaid recipients must report any changes impacting eligibility within ten days. If an individual has changes in the household, including marriage and household composition, then those changes must be reported within ten days. Medicaid includes federal funds administered through the State of Montana.

4. The defendants, KERI ANN TRAVER and DUSTIN RAY TRAVER, applied for and received benefits from SSI, SNAP, Medicare and Medicaid. However, the defendants, KERI ANN TRAVER and DUSTIN RAY TRAVER, were not entitled to the full amount of such benefits because they failed to disclose, and affirmatively misled authorities about their marriage, relationship status, household composition, income, and financial resources, none of which was allowed.

COUNT 1

That between in or about June 2021 and October 2025, at Three Forks, within Gallatin County, in the State and District of Montana, and elsewhere, including the Western District of Oklahoma, the defendants, KERI ANN TRAVER and DUSTIN RAY TRAVER, willfully and knowingly embezzled, stole, purloined, and converted to their use and the use of another, money from the United States, and any department and agency thereof, the value of which exceeded, in the aggregate, more than \$1,000 from the SSI, SNAP, Medicare and Medicaid programs, all of which contained federal funds, and which they were not entitled to receive, in whole and in part, due to their marriage, relationship status, household composition, income, and financial resources, all in violation of 18 U.S.C. § 641 and aided and abetted the same, in violation of 18 U.S.C. § 2.

COUNT 2

That between in or about June 2021 and October 2025, at Three Forks, within Gallatin County, in the State and District of Montana, and elsewhere, including the Western District of Oklahoma, the defendants, KERI ANN TRAVER and DUSTIN RAY TRAVER, willfully and knowingly embezzled, stole, purloined, and converted to their use and the use of another, money from the United States, the value of which exceeded, in the aggregate, more than \$100 from the Medicaid program and the Medicare Program, health care benefit programs as defined in Title 18, United States Code, Section 24(b), and which they were not entitled to receive, in whole and in part, due to their marriage, relationship status, household composition, income, and financial resources, all in violation of 18 U.S.C. § 669, and aided and abetted the same, in violation of 18 U.S.C. § 2.

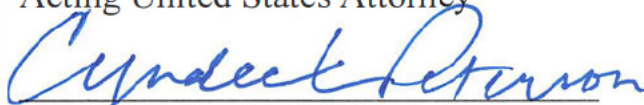
A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

~~FOREPERSON~~



MARK STEGER SMITH
Acting United States Attorney



CYNDEE L. PETERSON
Criminal Chief Assistant U.S. Attorney