

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

FILED  
2018 OCT 16 P 2:52

UNITED STATES OF AMERICA )

v. )

CHRISTINA ERIN MYERS )

No. 3:18cr167

JUDGES Varlan/Poplin

**INDICTMENT**

The Grand Jury charges as follows:

**INTRODUCTION**

1. At all times relevant to this Indictment, the defendant, CHRISTINA ERIN MYERS ("MYERS"), was a resident of either Lenoir City or Knoxville, Tennessee, both within the Eastern District of Tennessee.

2. Williams Ferry Pointe ("WFP") is a senior living community in Lenoir City, Tennessee. WFP is operated by Tennessee Baptist Adult Homes ("TBAH"), a provider of residential care for senior adults and adults with exceptional needs.

MYERS was employed by TBAH as the Marketing Director for WFP until August 2016.

3. From May 2014 through July 2018, MYERS engaged in a scheme to defraud elderly individuals under the guise of selling such individuals residential properties at WFP and other areas in the Eastern District of Tennessee. Myers implemented the scheme by diverting to her own use funds that were for the purchase

of real estate, and through marketing non-existent senior community housing. In addition, Myers promoted and sold fictitious investment opportunities to her victims, and diverted the funds to her own use instead of investing them. Over the course of her scheme, Myers fraudulently obtained approximately \$518,000, which she used to pay for a self-indulgent lifestyle.

### **COUNTS 1 - 3**

(Wire Fraud in Violation of 18 U.S.C. § 1343)

4. The allegations set for above in paragraphs 1 through 3 are incorporated herein by reference.

5. From or about May 2014 through July 2018, in the Eastern District of Tennessee, the defendant, CHRISTINA ERIN MYERS, knowingly executed and attempted to execute a scheme and artifice to defraud and to obtain money and property from her victims by means of materially false and fraudulent pretenses, representations, and promises.

6. It was part of the scheme and artifice that MYERS solicited and accepted funds from her victims as payment for real estate at WFP and other areas in the Eastern District of Tennessee, but diverted such funds to her own use instead of transferring them to TBAH.

7. It was further part of the scheme and artifice that MYERS fraudulently represented to her victims that she was authorized to sell real estate interests at WFP,

when in truth and in fact and as known to MYERS, her employment with TBAH ended in August 2016.

8. It was further part of the scheme and artifice that MYERS fraudulently represented to her victims that funds MYERS solicited and accepted were for the purchase of real estate, when in truth and in fact and as known to MYERS, she was diverting such funds to her own use.

9. On or about the dates set forth below, in the Eastern District of Tennessee and elsewhere, MYERS, having devised a scheme and artifice to defraud and obtain money and property by means of materially false and fraudulent pretenses, representations and promises, as set forth above, and for the purpose of executing a scheme and artifice to defraud and obtain money, did knowingly cause to be transmitted in interstate commerce, by means of a wire communication, that is a wire transmission, certain signs, signals and sounds as set forth below:

<u>Count</u>	<u>Date</u>	<u>Communication</u>
1	7/14/2014	Email message, via the Internet, sent from MYERS to individuals whose initials are P.G. and E.G., whose actual identities are known to the Grand Jury, in which MYERS fraudulently offered a "Lifetime Lease Agreement" with respect to real estate at WFP.
2	8/15/2016	Text message, sent from MYERS to her victims, in which MYERS falsely stated that she would continue to sell real estate for WFP, even though MYERS was no longer employed by TBAH.
3	2/21/2018	Email message, via the Internet, sent from MYERS to an individual whose initials are M.A., whose actual



identity is known to the Grand Jury, in which MYERS falsely represented that she was working with Keller Williams to create an “Upscale Gated Senior community.”

In violation of Title 18, United States Code, Section 1343.

**COUNT 4**

(Wire Fraud in Violation of 18 U.S.C. § 1343)

10. The allegations set forth above in paragraphs 1 through 3 are incorporated herein by reference.

11. From on or about May 2016 through July 2018, in the Eastern District of Tennessee, the defendant, CHRISTINA ERIN MYERS, knowingly executed and attempted to execute a scheme and artifice to defraud and to obtain money and property from her victims by means of materially false and fraudulent pretenses, representations, and promises.

12. It was part of the scheme and artifice that MYERS solicited and accepted funds from her victims for investment in Certificates of Deposit with SouthEast Bank, but diverted such funds to her own use instead of investing them.

13. On or about the dates set forth below, in the Eastern District of Tennessee and elsewhere, MYERS, having devised a scheme and artifice to defraud and obtain money and property by means of materially false and fraudulent pretenses, representations and promises, set forth above, and for the purpose of executing a scheme and artifice to defraud and obtain money, did knowingly cause to be

transmitted in interstate commerce, by means of a wire communication, that is a wire transmission, certain signs, signals and sounds as set forth below:

<u>Count</u>	<u>Date</u>	<u>Communication</u>
4	4/25/2018	Email message, via the Internet, from MYERS to individuals whose initials are C.W. and T.H., whose actual identities are known to the Grand Jury, in which MYERS fraudulently offered an investment opportunity in a Certificate of Deposit with SouthEast Bank.

In violation of Title 18, United States Code, Section 1343.

#### **COUNT 5**

(Money Laundering in Violation of 18 U.S.C. § 1957)

14. The allegations set for above in paragraphs 1 through 13 are incorporated herein by reference.

15. On or about April 26, 2018, in the Eastern District of Tennessee, defendant, CHRISTINA ERIN MYERS, did knowingly engage and attempt 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 the deposit into a financial account of a monetary instrument, to wit, a check drawn in the amount of \$150,000, such property having been derived from a specified unlawful activity, that is, wire fraud in violation of 18 U.S.C. § 1343.

In violation of Title 18, United States Code, Section 1957.

## COUNT 6

(Money Laundering in Violation of 18 U.S.C. § 1956)

16. The allegations set for above in paragraphs 1 through 13 are incorporated herein by reference.

17. On or about October 23, 2017, in the Eastern District of Tennessee, defendant, CHRISTINA ERIN MYERS, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the deposit into a financial account of a check drawn in the amount of \$39,000, which involved the proceeds of a specified unlawful activity, that is wire fraud in violation of 18 U.S.C. § 1343, with the intent to promote the carrying on of specified unlawful activity, to wit, wire fraud in violation of 18 U.S.C. § 1343, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(1)(A)(i)

### FORFEITURE ALLEGATIONS

18. The foregoing paragraphs of this Indictment, are hereby realleged and incorporated herein by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982(a)(1) and 28 U.S.C. § 2461.

19. Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, upon



conviction of any offense in violation of 18 U.S.C. § 1343, any defendant so convicted shall forfeit to the United States any property, real or personal, constituting or traceable to the proceeds of any violation of 18 U.S.C. § 1343, including but not limited to the following:

- a. \$7,242.57 seized on July 27, 2018, from the SouthEast Bank account with the account number ending 9972.
- b. \$24,500.00 seized on July 27, 2018, from the SouthEast Bank account with the account number ending 9754.
- c. A personal money judgment against the defendant and in favor of the United States in the amount not less than \$518,000.

20. Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of any offense in violation of 18 U.S.C. §§ 1956 and/or 1957, any defendant so convicted shall forfeit to the United States any property, real or personal, involved in such offenses, and any property traceable to such property, including but not limited to the following:

- a. \$7,242.57 seized on July 27, 2018, from the SouthEast Bank account with the account number ending 9972.
- b. \$24,500.00 seized on July 27, 2018, from the SouthEast Bank account with the account number ending 9754.
- c. A personal money judgment against the defendant and in favor of the United States in the amount not less than \$518,000.

21. If any of the property subject to forfeiture, as a result of any act or

omission of a defendant: (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 18, United States Code, Section 982(b)(1) and by Title 28, United States Code, Section 2461.

A TRUE BILL:

**SIGNATURE REDACTED**

GRAND JURY FOREPERSON

J. DOUGLAS OVERBEY  
UNITED STATES ATTORNEY

By:

  
Frank M. Dale, Jr.  
Assistant United States Attorney



**CRIMINAL CASE COVER SHEET****U.S. ATTORNEY'S OFFICE**Place of Offense (City & County): **Knoxville, Knox County**

Defendant Information:

Juvenile \_\_\_\_\_ Yes **X** No Matter to be Sealed: **X** Yes \_\_\_\_\_ NoDefendant Name: **Christina Erin Myers**Interpreter: No **X** Yes \_\_\_\_\_ Language \_\_\_\_\_Total # of Counts: \_\_\_\_\_ Petty \_\_\_\_\_ Misdemeanor (Class \_\_\_\_\_) **6** Felony

	<u>ORIGINAL</u> U.S.C. Citation(s) and Description of Offense Charged	Count(s)
Set 1	<b>Wire Fraud - 18 U.S.C. § 1343</b>	<b>1-4</b>
Set 2	<b>Money Laundering – 18 U.S.C. § 1957</b>	<b>5</b>
Set 3	<b>Money Laundering – 18 U.S.C. § 1956</b>	<b>6</b>

(Use tab key after entering counts to create additional rows)

	<u>SUPERSEDING INDICTMENT</u> U.S.C. Citation(s) and Description of Offense Charged	New count? Y or N	New Count #	Old Count # (if applicable)
Set 1				

(Use tab key after entering counts to create additional rows)

Current Trial Date (if set): \_\_\_\_\_ before Judge \_\_\_\_\_

Criminal Complaint Filed: No **X** Yes \_\_\_\_\_ Case No. \_\_\_\_\_

Related Case(s):

Case Number	Defendant's attorney	How related
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**Criminal Informations:**

Pending criminal case: No \_\_\_\_\_ Yes \_\_\_\_\_ Case No. \_\_\_\_\_

New Separate Case \_\_\_\_\_ Supersedes Pending Case \_\_\_\_\_

Name of defendant's attorney: \_\_\_\_\_

Retained: \_\_\_\_\_ Appointed: \_\_\_\_\_

Date: **October 16, 2018**Signature of AUSA: 