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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	Case No.
)	
Plaintiff,)	<u>COUNT 1:</u>
)	CONSPIRACY
vs.)	Vio. of 18 U.S.C. § 371
)	
AMBER ROSE HECKER,)	<u>COUNTS 2-11:</u>
RONALD TRAVIS HECKER, and)	BANK FRAUD
RICHARD KELLY HOGLIN,)	Vio. of 18 U.S.C. § 1344(2)
)	
Defendants.)	<u>COUNTS 12-21:</u>
)	AGGRAVATED IDENTITY THEFT
)	Vio. of 18 U.S.C. § 1028A
)	
)	<u>COUNTS 22:</u>
)	POSSESSION OF STOLEN MAIL
)	Vio. of 18 U.S.C. § 1708
)	
)	

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times material to this indictment:

1. Alaska USA Federal Credit Union (“Alaska USA”) and Credit Union One are financial institutions, the accounts of which are insured by the National Credit Union Administration Board.

COUNT 1 CONSPIRACY

2. Paragraph 1 is incorporated here.

3. Beginning at a time unknown, but at least by April 6, 2017, and continuing through April 2018, within the District of Alaska, the defendants, AMBER ROSE HECKER, RONALD TRAVIS HECKER, and RICHARD KELLY HOGLIN, did knowingly and intentionally combine, conspire, confederate and agree, with others known and unknown to the grand jury, to commit an offense against the United States, namely Bank Fraud in violation of 18 U.S.C. § 1344(2) and Aggravated Identity Theft in violation of 18 U.S.C. § 1028A and Mail Theft 18 U.S.C. § 1708.

PURPOSE OF THE CONSPIRACY

4. The purpose of the conspiracy was for AMBER ROSE HECKER, RONALD TRAVIS HECKER, and RICHARD KELLY HOGLIN, to obtain funds to which they were not entitled by using checks stolen from the mail, and stolen identification and bank cards obtained through theft and vehicle break-ins, to forge and falsely alter the stolen checks to deposit them in the accounts associated with the stolen identities and then make cash withdrawals.

OVERT ACTS

5. In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts were committed by the defendants and others in the District of Alaska to obtain, and attempt to obtain, money from financial institutions and are representative of the overall conspiracy:

(OA1)

- a. On or about April 6, 2017, AMBER HECKER and RONALD HECKER deposited a stolen and forged Bank of America convenience check from victim S.T. into the Alaska USA account of victim J.O. in the amount of \$950 at the Northern Lights branch of Alaska USA.
- b. A few minutes after the transaction in OA1(a), AMBER HECKER and RONALD HECKER withdrew \$900 in cash from victim J.O.'s account at the Alaska USA branch on C Street.

(OA2)

- a. On or about August 18, 2017, RONALD HECKER deposited a stolen and forged U.S. Bank convenience check from victim J.J. in the amount of \$925 into the Alaska USA account of victim T.C. at the East Debarr branch of Alaska USA inside the credit union.
- b. A short while later following the transaction on OA2(a), AMBER HECKER and RONALD HECKER withdrew \$1,000 in cash from

victim T.C.'s account at the Alaska USA branch on East Debarr at the drive-up lane.

(OA3)

- a. On or about November 9, 2017, AMBER HECKER and a co-conspirator deposited a stolen and forged U.S. Bank convenience check from victim E.F. in the amount of \$800 into the Alaska USA account of victim K.W. at the Huffman branch of Alaska USA.
- b. Following the deposit in OA3(a), AMBER HECKER and a co-conspirator made three withdrawals from victim K.W.'s account totaling \$3,450 at three different Alaska USA branches.

(OA4)

- a. On or about November 24, 2017, RONALD HECKER deposited a stolen and forged Citibank convenience check from victim A.G. in the amount of \$2,150 into the Alaska USA account of victim R.M. at the Debarr branch of Alaska USA.
- b. A few minutes later following the transaction in OA4(a), Ronald Hecker withdrew \$700 in cash from victim R.M.'s account at the Alaska USA branch on Northern Lights at the drive-up lane.

(OA5)

- a. On or about November 27, 2017, AMBER HECKER and RONALD HECKER deposited a stolen and forged Capital One convenience check from victim S.R. in the amount of \$1,500 into the Alaska USA

account of victim R.M. at the Northern Lights branch of Alaska USA.

- b. During the same transaction as OA5(a), AMBER HECKER and RONALD HECKER withdrew \$1,000 in cash from victim R.M.'s account.

(OA6)

- a. On or about January 27, 2018, AMBER HECKER and RONALD HECKER deposited a stolen and forged Capital One convenience check from victim M.K. in the amount of \$940 into the Alaska USA account of victim B.W. at the Huffman branch of Alaska USA.
- b. During the same transaction as OA6(a), AMBER HECKER and RONALD HECKER withdrew \$700 in cash from victim B.W.'s account.

(OA7)

- a. On or about February 2, 2018, AMBER HECKER and RONALD HECKER deposited a stolen and forged Wells Fargo check from victims J.S. and B.S. in the amount of \$950 into the Alaska USA account of victim C.D. at the Dimond branch of Alaska USA.
- b. During the same transaction as OA7(a), AMBER HECKER and RONALD HECKER withdrew \$500 in cash from victim C.D.'s account.

//

(OA8)

- a. On or about March 19, 2018, AMBER HECKER and RICHARD HOGLIN deposited a stolen and forged Bank of America convenience check from victims J.C. in the amount of \$2,500 into the Alaska USA account of victim K.S. at the West Northern Lights branch of Alaska USA.
- b. During the same transaction as OA8(b), AMBER HECKER and RICHARD HOGLIN withdrew \$900 in cash from victim K.S.'s account.

(OA9)

- a. On or about March 20, 2018, AMBER HECKER and RICHARD HOGLIN deposited a stolen and forged Bank of America convenience check from victims J.C. in the amount of \$4,800 into the Alaska USA account of victim K.S. at the C Street branch of Alaska USA.
- b. During the same transaction as OA9(a), AMBER HECKER and RICHARD HOGLIN withdrew \$1,000 in cash from victim K.S.'s account.

(OA10)

- a. On or about April 3, 2018, AMBER HECKER and co-conspirator deposited a stolen and forged Wells Fargo check from victims K.H.

in the amount of \$565 into the Credit Union One account of victim S.R. at the Debarr branch.

- b. A short while after the transaction in OA10(a), AMBER HECKER and a con-conspirator withdrew \$400 in cash from victim S.R.'s account at the Alaska USA 8th Avenue branch.

All of which is in violation of 18 U.S.C. § 371.

COUNTS 2-11
BANK FRAUD

6. Paragraph 1 incorporated is here.
7. Beginning on or about April 2017, and continuing thereafter until on or about April 2018, within the district of Alaska, the defendants, listed in each count below, knowingly executed and attempted to execute a material scheme and artifice to obtain moneys, funds, and property owned by, and under the custody and control of Alaska USA Federal Credit Union listed below, by means of material false and fraudulent pretenses, representations and promises.
8. The defendants executed and attempted to execute the material scheme described in paragraphs 3 through 5 of the Indictment, by negotiating and attempting to negotiate checks stolen from the mail and then forged to falsely name an unauthorized payee, and making unauthorized use of a victim's account to deposit the check and make cash withdrawals, with each check identified by date, amount, and financial institution alleged as a separate and distinct count and the defendants charged in each count similarly identified as representative of the overall scheme:

COUNT	DEFENDANT(S)	DATE	FINANCIAL INSTITUTION	APPROX. AMOUNT
2	AMBER HECKER and RONALD HECKER	April 6, 2017	Alaska USA	\$950
3	AMBER HECKER and RONALD HECKER	August 18, 2017	Alaska USA	\$1000
4	AMBER HECKER and RONALD HECKER	November 9, 2017	Alaska USA	\$3,450
5	RONALD HECKER	November 24, 2017	Alaska USA	\$2,150
6	AMBER HECKER and RONALD HECKER	November 27, 2017	Alaska USA	\$1,500
7	AMBER HECKER and RONALD HECKER	January 1, 2018	Alaska USA	\$940
8	AMBER HECKER and RONALD HECKER	February 2, 2018	Alaska USA	\$950
9	AMBER HECKER and RICHARD HOGLIN	March 19, 2018	Alaska USA	\$2,500
10	AMBER HECKER and RICHARD HOGLIN	March 20, 2018	Alaska USA	\$4,800
11	AMBER HECKER	April 3, 2018	Credit Union One	\$565

All of which is in violation of 18 U.S.C. § 1344(2).

COUNTS 12-21
AGGRAVATED IDENTITY THEFT

10. On or about the dates listed below, within the District of Alaska, the defendants listed below, did knowingly use, without lawful authority, a means of identification of another person during and in relation to the commission of Bank Fraud, knowing that the means of identification belonged to another actual person, with the unlawful use of another's identity identified by defendant, date, and victim listed as a separate and distinct count below:

COUNT	DEFENDANT	DATE	VICTIM	DURING AND IN RELATION TO COUNT
12	AMBER HECKER and RONALD HECKER	April 6, 2017	J.O	2
13	AMBER HECKER and RONALD HECKER	August 18, 2017	T.C.	3
14	AMBER HECKER and RONALD HECKER	November 9, 2017	K.W.	4
15	RONALD HECKER	November 24, 2017	R.M.	5
16	AMBER HECKER and RONALD HECKER	November 27, 2017	R.M.	6
17	AMBER HECKER and RONALD HECKER	January 1, 2018	B.W.	7
18	AMBER HECKER and RONALD HECKER	February 2, 2018	C.D.	8
19	AMBER HECKER and RICHARD HOGLIN	March 19, 2018	K.S.	9
20	AMBER HECKER and RICHARD HOGLIN	March 20, 2018	K.S.	10
21	AMBER HECKER	April 3, 2018	S.R.	11

All of which is in violation of 18 U.S.C. § 1028A.

COUNT 22
POSSESSION OF STOLEN MAIL

12. On or about February 17, 2018, within the District of Alaska, the defendants, AMBER HECKER and RONALD HECKER, did receive and unlawfully have in their possession articles, which had been stolen, taken, and abstracted from a letter box or mail receptacle, which was an authorized depository for mail matter, knowing these articles to have been stolen; to wit, AMBER HECKER and RONALD HECKER had in their possession the following articles stolen from the mail from over

500 victims: financial records, social security cards, identification cards, and credit cards, among other things, knowing these items had been stolen.

All of which is in violation of 18 U.S.C. § 1708.

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Andrea T. Steward
ANDREA T. STEWARD
United States of America
Assistant U.S. Attorney

s/ Bryan Schroder
BRYAN SCHRODER
United States of America
United States Attorney

DATE: 4-17-18