

2. On December 8, 2012, Wichita police officers learned a United States Postal vehicle was burglarized in Wichita, Kansas, and during the burglary mail was stolen from the vehicle along with a postal arrow key. A postal arrow key is a master key which allows postal workers to access collection boxes, mail cluster boxes and other USPS controlled mail receptacles. Through investigation the USPIS determined the stolen postal arrow key was used to produce counterfeit postal arrow keys. They further determined the stolen and counterfeit postal arrow keys were used to steal United States mail.

3. USPS customers reported that checks and money orders placed in the mail were stolen and tendered to area businesses without authority. The methods used to cash the checks and money orders included adding another person's name to the payee line, removing the original payee from the check and replacing it with another person's name, forging signatures of account holders, and/or manufacturing new counterfeit checks using the account information on the stolen check.

4. Through its investigation law enforcement authorities learned that the personal financial and identification information of USPS customers was used to build "profiles" which allowed the unlawful use of the customers' names, dates of birth, social security numbers and credit information in order to obtain and attempt to obtain money and other things of value.

5. The defendants charged in this indictment would work in concert with each other, and others not identified, to steal mail, steal authentic mail keys and/or produce counterfeit mail keys and to remove checks and money orders from the stolen mail to be illegally cashed at local banks and other businesses.

COUNTS 1-26**Theft of Mail/Receipt of Stolen Mail
(Title 18, U.S.C. § 1708)**

6. The Grand Jury realleges paragraphs 1 through 5 of this Indictment as though fully set forth herein.

7. On or about the dates set forth below, in the District of Kansas, the defendants identified herein, did knowingly and unlawfully steal United States mail, and an article and thing contained therein, from a United States Postal vehicle and a United States Postal route in Wichita, Kansas or they did knowingly receive mail, an article and thing contained therein, which was stolen, taken and abstracted, knowing that the article and thing contained there were stolen, taken and abstracted from a mail receptacle in the District of Kansas, with each instance constituting a separate count:

COUNT	DATE	DEFENDANT(S)
1	12/08/2012	KRISTA A. GOODWIN and JASON L. WEST
2	12/12/2012	KRISTA A. GOODWIN and JASON L. WEST
3	04/17/2013	JASON L. WEST
4	10/11/2013	JASON L. WEST
5	11/13/2013	JASON L. WEST
6	02/06/2014	JASON L. WEST
7	12/17/2014	KRISTA A. GOODWIN and COLE P. KELLY

8	12/26/2014	COLE P. KELLY
9	12/05/2015	JASON A. FARNER
10	12/12/2015	JASON A. FARNER and SHALAN D. HIATT
11	12/24/2015	JASON A. FARNER
12	01/04/2016	JASON A. FARNER
13	02/01/2016	SHALAN D. HIATT
14	02/04/2016	JASON A. FARNER
15	02/11/2016	JASON A. FARNER
16	04/04/2016	BRANDON L. AMEND CORY D. BLANCHARD and ASHLEY M. CAMPBELL
17	04/29/2016	BRANDON L. AMEND
18	05/04/2016	BRANDON L. AMEND
19	05/11/2016	KEITH J. GIPSON and JERA L. HAMMOND
20	05/31/2016	BRANDON L. AMEND
21	06/02/2016	BRANDON L. AMEND
22	06/13/2016	BRANDON L. AMEND
23	06/13/2016	BRANDON L. AMEND and BETTYE L. AMEND
24	06/14/2016	KEITH J. GIPSON
25	06/14/2016	CORY D. BLANCHARD

26	06/25/2016	BETTYE L. AMEND
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In violation of Title 18, United States Code, Sections 1708 and 2.

COUNTS 27-31

**Theft of Mail Key/Possession of Stolen
or Counterfeit Mail Key
(Title 18, U.S.C. § 1704)**

8. The Grand Jury realleges paragraphs 1 through 5 of this Indictment as though fully set forth herein.

9. On or about the dates set forth below, in the District of Kansas, the defendants identified herein, did knowingly and unlawfully steal a postal arrow key which was suitable for locks adopted by the United States Postal Service for use with receptacles authorized for the deposit or delivery of mail or they did knowingly possess a postal arrow key or a counterfeit postal arrow key with the intent to unlawfully use it in that they used the postal arrow key or intended to use it to steal United States mail with each instance constituting a separate count:

COUNT	DATE	DEFENDANT(S)
27	12/08/2012	KRISTA A. GOODWIN and JASON L. WEST
28	12/12/2012	KRISTA A. GOODWIN and JASON L. WEST
29	12/17/2014	KRISTA A. GOODWIN and COLE P. KELLY

30	02/11/2016	JASON A. FARNER
31	03/07/2016	SHALAN D. HIATT

In violation of Title 18, United States Code, Sections 1704 and 2.

COUNTS 32-58

**Bank Fraud/Attempted Bank Fraud
(Title 18, U.S.C. §§ 1344(2); 1349 and 2)**

10. The Grand Jury realleges paragraphs 1 through 5 of this Indictment as though fully set forth herein.

11. On or about the dates set forth below, in the District of Kansas, the defendants identified herein, did knowingly and willfully devise a scheme and artifice to obtain money owned by, and under the custody and control of a financial institution whose accounts were insured by the Federal Deposit Insurance Corporation (FDIC), by means of a materially false and fraudulent pretenses and representations, in that, the defendants stole and then forged checks or money orders belonging to another person or company in order to illegally obtain money from a federally insured financial institution or they did attempt to do so with each act constituting a separate count:

COUNT	DEFENDANT(S)	DATE	TRANSACTION
32	KRISTA A. GOODWIN and JASON L. WEST	04/05/2013	GOODWIN attempted to pass a stolen check in the amount of \$350.00 at Fidelity Bank, 3101 S. Seneca, Wichita, Ks. on an account belonging to S.M.

33	JASON L. WEST	09/16/2013	WEST passed a stolen check at Bank of the West in Wichita, Ks. on an account belonging to C.L.
34	JASON L. WEST	11/14/2013	WEST attempted to pass a stolen check in the amount of \$509.00 at Intrust Bank, 3211 S. Seneca, Wichita, Ks. on an account belonging to M.S.
35	CORY D. BLANCHARD	04/02/2016	BLANCHARD passed a stolen check in the amount of \$2,500.00 at Intrust Bank, 9800 E. Central, Wichita, Ks. on an account belonging to Eastminster Presbyterian Church.
36	BRANDON L. AMEND and CORY D. BLANCHARD	04/04/2016	BLANCHARD passed a stolen check in the amount of \$2,496.67 at Intrust Bank, 7707 E. Central, Wichita, Ks. on an account belonging to Eastminster Presbyterian Church.
37	BRANDON L. AMEND, CORY D. BLANCHARD and ASHLEY M. CAMPBELL	04/04/2016	CAMPBELL passed a stolen check at Intrust Bank, 5500 E. Harry, Wichita, Ks. on an account belonging to Eastminster Presbyterian Church.
38	BRANDON L. AMEND	04/29/2016	AMEND passed a stolen check in the amount of \$2,500.00 at Emprise Bank, 9485 E. 21st Street, Wichita, Ks. on an account belonging to Woodframe Construction Inc.
39	BRANDON L. AMEND	05/02/2016	AMEND passed a stolen check in the amount of \$420.00 at Intrust Bank, 3707 N. Woodlawn, Wichita, Ks. on an account belonging to Vess Oil Corp.

40	BRANDON L. AMEND	05/04/2016	AMEND passed a stolen check in the amount of \$3,407.52 at Intrust Bank, 10515 W. Central, Wichita, Ks. on an account belonging to Peterson, Peterson & Goss, L.C.
41	BRANDON L. AMEND	05/04/2016	AMEND attempted to pass a stolen check in the amount of \$1,000.00 at Emprise Bank, 8807 W. Central, Wichita, Ks. on an account belonging to GEN2 WTE LLC
42	KEITH J. GIPSON and JERA L. HAMMOND	05/14/2016	HAMMOND passed a stolen check in the amount of \$1,231.21 at Emprise Bank, 11111 E. Harry, Wichita, Ks. on an account belonging to HOC Industries.
43	KEITH J. GIPSON and JERA L. HAMMOND	05/14/2016	GIPSON attempted to pass a stolen check in the amount of \$3,813.11 at Emprise Bank, 6030 E. Central, Wichita, Ks. on an account belonging to HOC Industries.
44	BRANDON L. AMEND	05/31/2016	AMEND passed a stolen check in the amount of \$250.00 at Intrust Bank, 9450 E. Harry, Wichita, Ks. on an account belonging to D.C. and J.C.
45	BRANDON L. AMEND	06/02/2016	AMEND passed a stolen check in the amount of \$1,747.09 at Intrust Bank, 4747 S. Broadway, Wichita, Ks. on an account belonging to G.T.
46	BRANDON L. AMEND	06/06/2016	AMEND attempted to pass a stolen check in the amount of \$1,800.00 at Emprise Bank, 1601 E. 61st North, Park City, Ks. on an account belonging to Peach One, LLC.
47	BRANDON L. AMEND	06/13/2016	AMEND passed a stolen check in the amount of \$2,750.00 at Intrust Bank, 1544 S. Webb, Wichita, Ks. on an account belonging to Great Bend Custard Realty, LLC.

48	BRANDON L. AMEND	06/13/2016	AMEND passed a stolen check in the amount of \$2,260.00 at Intrust Bank, 7707 E. Central, Wichita, Ks. on an account belonging to Great Bend Custard Realty, LLC.
49	BETTYE L. AMEND	06/13/2016	AMEND passed a stolen check in the amount of \$1,730.00 at Intrust Bank, 7707 E. Central, Wichita, Ks. on an account belonging to Great Bend Custard Realty, LLC.
50	BETTYE L. AMEND	06/13/2016	AMEND passed a stolen check in the amount of \$1,950.00 at Intrust Bank, 5500 E. Harry, Wichita, Ks. on an account belonging to Great Bend Custard Realty, LLC.
51	BRANDON L. AMEND	06/13/2016	AMEND passed a stolen check in the amount of \$2,330.00 at Intrust Bank, 9800 E. Central, Wichita, Ks. on an account belonging to Great Bend Custard Realty, LLC.
52	CORY D. BLANCHARD	06/14/2016	BLANCHARD passed a stolen check in the amount of \$2,450.00 at Intrust Bank, 10222 W. 21st Street, Wichita, Ks. on an account belonging to Great Bend Custard Realty, LLC.
53	CORY D. BLANCHARD	06/14/2016	BLANCHARD passed a stolen check in the amount of \$2,500.00 at Intrust Bank, 7707 E. Central, Wichita, Ks. on an account belonging to Great Bend Custard Realty, LLC.
54	BETTYE L. AMEND	06/29/2016	AMEND passed a stolen check in the amount of \$433.58 at Intrust Bank, 5500 E. Harry, Wichita, Ks. on an account belonging to A.B.
55	BRANDON L. AMEND	06/29/2016	AMEND passed a stolen check in the amount of \$512.60 at Intrust Bank, 5500 E. Harry, Wichita, Ks. on an account belonging to G.S. and M.S.

56	BRANDON L. AMEND	06/30/2016	AMEND passed a stolen check in the amount of \$2,600.00 at Intrust Bank, 3801 N. Rock Road, Wichita, Ks. on an account belonging to Roberts Resources, Inc.
57	BRANDON L. AMEND	06/30/2016	AMEND passed a stolen check in the amount of \$2,500.70 at Intrust Bank, 8202 E. 21st Street, Wichita, Ks. on an account belonging to Roberts Resources, Inc.
58	BRANDON L. AMEND	06/30/2016	AMEND passed a stolen check in the amount of \$2,350.00 at Intrust Bank, 9800 E. Central, Wichita, Ks. on an account belonging to Roberts Resources, Inc.

In violation of Title 18, United States Code, Sections 1344(2); 1349 and 2.

COUNT 59

**Aggravated Identity Theft
(Title 18, U.S.C. § 1028A)**

12. On or about December 12, 2012, in the District of Kansas,

**KRISTA A. GOODWIN,
and JASON L. WEST,**

defendants herein, did knowingly and willfully possess and use, without lawful authority, a means of identification of another person (J.T.) during and in relation violations of Bank Fraud, Title 18, United States Code, Section 1344 and Attempted Bank Fraud, Title 18, United States Code Section 1349.

In violation of Title 18, United States Code, Sections 1028A and 2.

COUNT 60

**Aggravated Identity Theft
(Title 18, U.S.C. § 1028A)**

13. On or about April 5, 2013, in the District of Kansas,

**KRISTA A. GOODWIN,
and JASON L. WEST,**

defendants herein, did knowingly and willfully possess and use, without lawful authority, a means of identification of another person (A.D.) during and in relation to violations of Bank Fraud, Title 18, United States Code, Section 1344 and Attempted Bank Fraud, Title 18, United States Code Section 1349.

In violation of Title 18, United States Code, Sections 1028A and 2.

COUNT 61

**Possession of a Firearm
by a User of a Controlled Substance
[Title 18, U.S.C. § 922(g)(3)]**

14. On or about December 26, 2014, in the District of Kansas,

COLE P. KELLY,

a defendant herein, being a user of a controlled substance did knowingly and unlawfully possess, in and affecting commerce, a loaded Phoenix Arms .22 caliber semi-automatic handgun, a firearm which was not produced in the state of Kansas and had been shipped and transported in interstate commerce.

In violation of Title 18, United States Code Sections 922(g)(3) and 2.

COUNT 62

**Aggravated Identity Theft
(Title 18, U.S.C. § 1028A)**

15. On or about April 29, 2016, in the District of Kansas,

BRANDON L. AMEND,

a defendant herein, did knowingly and willfully possess and use, without lawful authority, a means of identification of another person (A.P.) during and in relation to a violation of Bank Fraud, Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Sections 1028A and 2.

COUNT 63

**Aggravated Identity Theft
(Title 18, U.S.C. § 1028A)**

16. On or about May 4, 2016, in the District of Kansas,

BRANDON L. AMEND,

a defendant herein, did knowingly and willfully possess and use, without lawful authority, a means of identification of another person (T.J.) during and in relation to a violation of Attempted Bank Fraud, Title 18, United States Code, Sections 1344 and 1349.

In violation of Title 18, United States Code, Sections 1028A and 2.

COUNT 64

**Aggravated Identity Theft
(Title 18, U.S.C. § 1028A)**

17. On or about June 2, 2016, in the District of Kansas,

BRANDON L. AMEND,

a defendant herein, did knowingly and willfully possess and use, without lawful authority, a means of identification of another person (W.G.) during and in relation to a violation of Bank Fraud, Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Sections 1028A and 2.

COUNT 65

**Aggravated Identity Theft
(Title 18, U.S.C. § 1028A)**

18. On or about June 6, 2016, in the District of Kansas,

BRANDON L. AMEND,

a defendant herein, did knowingly and willfully possess and use, without lawful authority, a means of identification of another person (S.C.) during and in relation to a violation of Attempted Bank Fraud, Title 18, United States Code, Sections 1344 and 1349.

In violation of Title 18, United States Code, Sections 1028A and 2.

A TRUE BILL

February 28, 2017
DATE

s/Foreperson
FOREMAN OF THE GRAND JURY

s/Thomas E. Beall
THOMAS E. BEALL
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District of Kansas
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Ks.S.Ct. No. 19929

(It is requested that trial be held in Wichita, Kansas.)