

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ABINGDON DIVISION

UNITED STATES OF AMERICA :  
 :  
 vs. : Case No. \_\_\_\_\_  
 :  
 ANNA LAURA HOWELL : Violations: 18 U.S.C. § 1956(a)(1)(B)(i)

INDICTMENT

COUNT ONE

The Grand Jury charges that:

1. On or about and between September 2007 and October 2, 2008, in the Western District of Virginia and elsewhere, ANNA LAURA HOWELL knowingly conducted and attempted to conduct a financial transaction, that is transactions totaling \$31,328.24, affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, specifically mail fraud, in violation of 18 U.S.C. § 1341, and wire fraud, in violation of 18 U.S.C. § 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature and source of the proceeds of said specified unlawful activity 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.

2. On or about and between September 2007 and October 2, 2008, ANNA LAURA HOWELL issued stop payment orders on various checks written from an attorney's trust account and directed the bank to reissue the funds in the forms of money orders. She then used the money orders to pay her own personal expenses, resulting in a loss to the trust account of \$31,328.24.

3. All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT TWO

The Grand Jury charges that:

1. On or about October 2, 2008, in the Western District of Virginia and elsewhere, ANNA LAURA HOWELL, having devised and intending to devise a scheme and artifice to defraud and for obtaining money or property by means of false pretenses, for the purpose of executing and in order to effect the scheme and artifice, knowingly placed in any post office and authorized depository for mail matter and knowingly caused to be delivered by mail according to the direction thereon, a matter or thing to be sent and delivered by the United States Postal Service.

2. On or about October 2, 2008, ANNA LAURA HOWELL knowingly placed into the mail a fraudulently obtained money order for \$629 payable to Heritage Propane for the purpose of paying a personal bill, having obtained the funds by using her authority at her place of employment to stop payment on a check issued from an attorney's trust account and to have a money order using those funds issued for her personal use.

3. All in violation of Title 18, United States Code, 1341.

COUNT THREE

1. On or about February 28, 2008, in the Western District of Virginia and elsewhere, ANNA LAURA HOWELL, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses and representations, transmitted and caused to be transmitted in interstate and foreign commerce, writings for the purpose of executing such scheme and artifice.

2. On or about February 28, 2008, ANNA LAURA HOWELL sent and caused to be sent a facsimile transmission to Anthem Insurance directing that she be named administrator for her

employer's group health insurance account without permission from, or the knowledge of, her employer.

3. On or about February 28, 2008, ANNA LAURA HOWELL sent and caused to be sent a facsimile transmission to Anthem Insurance directing that members of her family be added to her employer's group health insurance plan without authority from her employer.

3. As a result of her transmission, her employer paid an additional \$2228.34 in insurance premiums.

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

A TRUE BILL, this \_\_\_\_\_ day of March, 2009

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Grand Jury Foreperson

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JULIA C. DUDLEY  
United States Attorney