

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MAR 9 2006
DAVID J. MALAND, CLERK
BY
DEPUTY

UNITED STATES OF AMERICA

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§
§

-vs-

Cause No. 4:06cr 67
Judge Brown

REBEKAH K. DEAN,
a.k.a. Nicole A. Wilson

Defendant

INDICTMENT

The United States Grand Jury Charges:

COUNT ONE

Violation: 18 U.S.C. § 1344
(Bank Fraud)

A. INTRODUCTION

1. Chase Manhattan Bank ("Chase") was located in the city of Lewisville, Denton County, Texas, within the Eastern District of Texas. Chase was a financial institution the accounts of which were insured by the Federal Deposit Insurance Corporation.

B. THE SCHEME AND ARTIFICE TO DEFRAUD

2. On or about March 8, 2001, DEAN devised and intended to devise a scheme and artifice to defraud Chase Manhattan Bank and to obtain money, funds, and credits owned by or under control of Chase Manhattan Bank by means of false and fraudulent pretenses, representation or promises.

C. THE MANNER AND MEANS OF THE SCHEME TO DEFRAUD

3. Defendant, REBEKAH K. DEAN, a.k.a. Nicole A. Wilson ("DEAN"), opened Chase checking account #843-9064943-65 on or about November 29, 2000. Dean opened the account using the false identification of "Nicole A. Wilson." Dean used a false Texas driver's license, #06755092, and false social security number, 548-53-4291, to open the account.

4. Dean opened the Chase account using false identification in order to, among other things, disguise her true identity.

5. Subsequent to the opening of the account, Dean made three deposits of \$20,000.00 into the account and numerous withdrawals from the account between February 22, 2001 and March 16, 2001. On or about March 7, 2001, the last deposit of \$20,000.00 was made. On or about March 8, 2001, Dean withdrew \$22,244.00 in cash. On or about March 8, 2001, Dean further withdrew \$15,000.00 in cash. On or about March 12, 2001, the \$20,000.00 deposit made on March 7, 2001 was charged back to the account.

6. Based on the deposits and withdrawals, Chase suffered a loss of \$5,513.57. Dean moved and had her phone disconnected. As Chase only had false identification information on Nicole A. Wilson, Dean was unable to be located.

D. THE EXECUTION OF THE SCHEME AND ARTIFICE

7. On or about March 8, 2001, within the Eastern District of Texas, DEAN, for the purposes of executing the scheme and artifice, knowingly withdrew \$15,000.00 from Chase checking account #843-906943-65.

In violation of Title 18, United States Code, Section 1344.

COUNT TWO

Violation: 31 U.S.C. § 5324(a)
(Structuring transaction to avoid
reporting requirements)

8. The Grand Jury realleges and reincorporates by reference the factual allegations contained in paragraphs 1-7 and further alleges that:

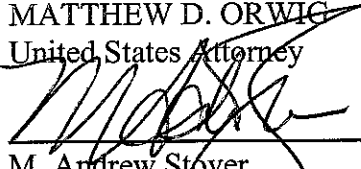
9. On or about March 8, 2001, within the Eastern District of Texas, Defendant, DEAN, did knowingly and willfully and for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, caused a domestic financial institution as defined in 31 CFR § 103.11 to wit: Chase, to file a currency transaction report as required by 31 U.S.C. § 5313 containing a material misstatement of fact to wit:

A Currency Transaction Report (Form 4789) that reflected the person conducting the transaction, involving \$22,244.00 in currency, was Nicole A. Wilson, date of birth November 29, 1978, and social security number 548-53-4291.

All in violation of Title 31, United States Code, Section 5324(a)(2).


Foreman of the Grand Jury

MATTHEW D. ORWIG
United States Attorney


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REBEKAH K. DEAN
a.k.a Nicole A. Wilson

NOTICE OF PENALTY

Count One

Violation: 18 U.S.C. § 1344

Penalty: A fine not to exceed \$1,000,000.00 or imprisonment of not more than thirty (30) years, or both, and a term of supervised release of not more than (five) 5 years.

Special Assessment: \$100.00

Count Two

Violation: 31 U.S.C. § 5324(a)

Penalty: A fine not to exceed \$250,000.00 or imprisonment of not more than five (5) years, or both, and a term of supervised release of not more than three (3) years.

Special Assessment: \$100.00