

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 26-CR

26 - CR - 018

[18 U.S.C. §§ 1343, 1344, 1028A, 1956,
1512(b)(3), 1001(a), & 2(a)]

BRANDI ELLIS, JASON FLANDERS,
RAMON HERNANDEZ, and
JEZLIA BARAJAS,

Defendants.

INDICTMENT

Background Allegations Common to Counts One through Seven

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment:
 - a. Company A was a charitable organization operating in the Eastern District of Wisconsin.
 - b. As part of its work, Company A issued payments to legitimate vendors who performed work for Company A via checks.
 - c. Company A employed individuals in its finance department to issue payments to legitimate vendors.
 - d. Employees in Company A's finance department were only authorized to issue payments for work that was actually completed.
 - e. Company A's Chief Operating Officer (COO) was the only individual authorized to sign checks on behalf of Company A to issue payments to its

vendors.

f. During their respective employment periods, as described below, JASON FLANDERS and BRANDI ELLIS had access to the COO's signature stamp and were authorized to apply it only to checks that the COO approved.

g. No employee of Company A was authorized to issue or provide a check to a vendor without first submitting the check to the COO for review and approval.

2. JASON FLANDERS was employed as the Director of Finance at Company A between May 2012 and June 2016. FLANDERS was promoted to Chief Financial Officer of Company A in July 2016. FLANDERS separated from Company A in January 2019.

3. During his employment with Company A, FLANDERS had access to Company A's accounting system, the ability to print checks on Company A's accounts, responsibility over Company A's Information Technology vendors, and the authorization to apply the COO's signature stamp to checks issued to vendors to whom payment was authorized by Company A's management based on actual work performed.

4. FLANDERS did not have the authority to issue checks for work that was not performed, to issue checks to himself, to stamp checks with the COO's signature that were not properly issued pursuant to Company A's protocols, nor to provide checks issued by Company A that the COO did not authorize.

5. BRANDI ELLIS was employed by Company A as an Accountant from February 2014 to December 2019. She was promoted to Accounting Manager in January 2020 and promoted again to Finance Manager in July 2022. ELLIS was terminated from Company A in May 2024.

6. During her employment with Company A, ELLIS had access to Company A's accounting system, the ability to print checks on Company A's accounts, and the authorization to

apply the COO's signature stamp only to checks issued to vendors to whom payment was authorized by Company A's management based on actual work performed.

7. ELLIS did not have the authority to issue checks for work that was not performed, to issue checks to herself, to stamp checks with the COO's signature that were not properly issued pursuant to Company A's protocols, nor to provide checks issued by Company A that the COO did not authorize.

8. JEZLIA BARAJAS was employed by Company A as an accounting specialist in 2018.

9. BARAJAS did not have authorization to receive checks from Company A for work she did not perform nor to provide FLANDERS or ELLIS with cash from checks improperly drawn on Company A's bank accounts.

10. RAMON HERNANDEZ was not employed by Company A, had never provided janitorial services to Company A as a vendor, and was not an authorized payee of Company A.

11. Between on or about July 2016, and continuing through on or about May 2024, in the State and Eastern District of Wisconsin and elsewhere,

**BRANDI ELLIS, JASON FLANDERS,
RAMON HERNANDEZ, and
JEZLIA BARAJAS,**

along with others known and unknown to the grand jury, with intent to defraud, knowingly carried out a scheme to obtain money, funds, credits, assets, securities, and other property that were in the care, custody, and control of Bank A by means of false and fraudulent pretenses, representations, promises, and omissions.

Manner and Means of the Scheme

12. Between 2016 and 2019, JASON FLANDERS created false invoices purporting to detail work performed by Company A's Information Technology ("IT") vendor, which requested checks be issued on Company A's account to the IT Vendor.

13. After receiving approval of those invoices, FLANDERS caused checks to be issued on Company A's account at Bank A, payable to FLANDERS rather than the IT vendor, which checks FLANDERS endorsed with the signature stamp of Company A's COO.

14. Company A's COO did not authorize FLANDERS to use the COO's signature stamp to endorse checks drawn on Company A's account at Bank A and made payable to FLANDERS.

15. FLANDERS subsequently deposited the checks he issued to himself from Company A's accounts or cashed them and thereby converted their proceeds to his personal use.

16. When FLANDERS presented the checks drawn on Company A's account at Bank A, which he had fraudulently endorsed with the COO's signature stamp without the COO's approval, FLANDERS made a false and fraudulent representation to Bank A that the check he was negotiating had been approved and endorsed by the person at Company A with authority to issue checks on Company A's bank accounts.

17. When FLANDERS made the false and fraudulent representation that the check he was negotiating was a valid financial instrument endorsed by the person with signatory authority on Company A's bank accounts, FLANDERS knowingly obtained money and property in the custody and control of Bank A by means of false and fraudulent representations.

18. Between 2016 and 2024, BRANDI ELLIS caused checks to be issued on Company A's accounts at Bank A, which checks were made payable to RAMON

HERNANDEZ, JEZLIA BARAJAS, L.M.B., B.P., K.J., N.J., and BRANDI ELLIS, knowing that such checks were not authorized by Company A.

19. ELLIS endorsed those checks with the signature stamp of Company A's COO.

20. Company A's COO did not authorize ELLIS to use the COO's signature stamp to endorse checks made payable to RAMON HERNANDEZ, JEZLIA BARAJAS, L.M.B., B.P., K.J., N.E., or BRANDI ELLIS.

21. After fraudulently affixing the COO's signature to the unauthorized checks, ELLIS delivered the checks to RAMON HERNANDEZ, JEZLIA BARAJAS, L.M.B., B.P., K.J., or N.E., each of whom subsequently deposited or cashed the checks.

22. When ELLIS delivered the fraudulently endorsed checks, ELLIS knew that the checks would be presented to financial institutions.

23. When the checks that ELLIS fraudulently endorsed with the COO's signature stamp were presented to financial institutions for negotiation, ELLIS knew that the checks made a false and fraudulent representation, namely that the checks had been approved and endorsed by the person at Company A with authority to issue checks on Company A's bank accounts.

24. In making that false and fraudulent representation and otherwise causing it to be made, ELLIS and others knowingly obtained money and property in the custody and control of Bank A by means of false and fraudulent representations.

25. RAMON HERNANDEZ and JEZLIA BARAJAS knew that they were not authorized payees of Company A and that they were not authorized to receive funds from Company A.

26. RAMON HERNANDEZ, JEZLIA BARAJAS, L.M.B., B.P., K.J., and N.E., provided funds from the fraudulent checks to ELLIS after depositing or cashing them.

27. Throughout the period of the scheme, Bank A was insured by the Federal Deposit Insurance Corporation.

28. Throughout the time period of the scheme, the above-named defendants resided in the Eastern District of Wisconsin.

COUNT ONE

(Bank Fraud, 18 U.S.C. § 1344(2))

THE GRAND JURY FURTHER CHARGES THAT:

29. All of the allegations set forth in paragraphs 1-28 above are hereby incorporated in support of the following charge as if set forth here in full.

30. On or about May 1, 2017, in the State and Eastern District of Wisconsin and elsewhere,

JASON FLANDERS,

in furtherance of the scheme and to obtain money, funds, credits, assets, securities, and other property that were in the care, custody, and control of Bank A, knowingly used and caused the use of, without authorization, Company A's COO's signature stamp to fraudulently endorse a check in the amount of \$2,500 payable to JASON FLANDERS, which check was written on Company A's bank account at Bank A, knowing that the check was not authorized to be issued to FLANDERS and that it would be presented as a valid financial instrument to obtain money in the care, custody, and control of Bank A.

All in violation of Title 18, United States Code, Sections 1344(2) and 2(a).

COUNT TWO

(Bank Fraud, 18 U.S.C. § 1344(2))

THE GRAND JURY FURTHER CHARGES THAT:

31. All of the allegations set forth in paragraphs 1-28 above are hereby incorporated in support of the following charge as if set forth here in full.

32. On or about June 21, 2018, in the State and Eastern District of Wisconsin and elsewhere,

BRANDI ELLIS and RAMON HERNANDEZ,

in furtherance of the scheme and to obtain money, funds, credits, assets, securities, and other property that were in the care, custody, and control of Bank A, knowingly used and caused to be used, without authorization, Company A's COO's signature stamp to fraudulently endorse a check in the amount of \$3,800 payable to Ramon Hernandez, which check was written on Company A's bank account at Bank A, knowing that the check would be presented as a valid financial instrument to obtain money in the care, custody, and control of Bank A.

All in violation of Title 18, United States Code, Sections 1344(2) and 2(a).

COUNT THREE
(Bank Fraud, 18 U.S.C. § 1344(2))

THE GRAND JURY FURTHER CHARGES THAT:

33. All of the allegations set forth in paragraphs 1-28 above are hereby incorporated in support of the following charge as if set forth here in full.

34. On or about June 27, 2018, in the State and Eastern District of Wisconsin and elsewhere,

JASON FLANDERS,

in furtherance of the scheme and to obtain money, funds, credits, assets, securities, and other property that were in the care, custody, and control of Bank A, knowingly used and caused to be used, without authorization, Company A's COO's signature stamp to fraudulently endorse a check in the amount of \$2,747.45 payable to JASON FLANDERS, which check was written on Company A's bank account at Bank A, knowing that the check was not authorized to be issued to FLANDERS and that it would be presented as a valid financial instrument to obtain money in the care, custody, and control of Bank A.

All in violation of Title 18, United States Code, Sections 1344(2) and 2(a).

COUNT FOUR

(Bank Fraud, 18 U.S.C. § 1344(2))

THE GRAND JURY FURTHER CHARGES THAT:

35. All of the allegations set forth in paragraphs 1-28 above are hereby incorporated in support of the following charge as if set forth here in full.

36. On or about July 16, 2018, in the State and Eastern District of Wisconsin and elsewhere,

JASON FLANDERS,

in furtherance of the scheme and to obtain money, funds, credits, assets, securities, and other property that were in the care, custody, and control of Bank A, knowingly used and caused to be used, without authorization, Company A's COO's signature stamp to fraudulently endorse a check in the amount of \$2,858.93 payable to JASON FLANDERS, which check was written on Company A's bank account at Bank A, knowing that the check was not authorized to be issued to FLANDERS and that it would be presented as a valid financial instrument to obtain money in the care, custody, and control of Bank A.

All in violation of Title 18, United States Code, Sections 1344(2) and 2(a).

COUNT FIVE
(Bank Fraud, 18 U.S.C. § 1344(2))

THE GRAND JURY FURTHER CHARGES THAT:

37. All of the allegations set forth in paragraphs 1-28 above are hereby incorporated in support of the following charge as if set forth here in full.

38. On or about July 19, 2019, in the State and Eastern District of Wisconsin and elsewhere,

BRANDI ELLIS,

in furtherance of the scheme and to obtain money, funds, credits, assets, securities, and other property that were in the care, custody, and control of Bank A, knowingly used and caused to be used, without authorization, Company A's COO's signature stamp to fraudulently endorse a check in the amount of \$8,000 payable to B.P., which check was written on Company A's bank account at Bank A, knowing that the check would be presented as a valid financial instrument to obtain money in the care, custody, and control of Bank A.

All in violation of Title 18, United States Code, Sections 1344(2) and 2(a).

COUNT SIX

(Bank Fraud, 18 U.S.C. § 1344(2))

THE GRAND JURY FURTHER CHARGES THAT:

39. All of the allegations set forth in paragraphs 1-28 above are hereby incorporated in support of the following charge as if set forth here in full.

40. On or about February 24, 2023, in the State and Eastern District of Wisconsin and elsewhere,

BRANDI ELLIS,

in furtherance of the scheme and to obtain money, funds, credits, assets, securities, and other property that were in the care, custody, and control of Bank A, knowingly used and caused to be used, without authorization, Company A's COO's signature stamp to fraudulently endorse a check in the amount of \$4,677.21 payable to M.I.H. Creations, which check was written on Company A's bank account at Bank A, knowing that the check would be presented as a valid financial instrument to obtain money in the care, custody, and control of Bank A.

All in violation of Title 18, United States Code, Sections 1344(2) and 2(a).

COUNT SEVEN
(Bank Fraud, 18 U.S.C. § 1344(2))

THE GRAND JURY FURTHER CHARGES THAT:

41. All of the allegations set forth in paragraphs 1-28 above are hereby incorporated in support of the following charge as if set forth here in full.

42. On or about August 9, 2023, in the State and Eastern District of Wisconsin and elsewhere,

**BRANDI ELLIS and
JEZLIA BARAJAS,**

in furtherance of the scheme and to obtain money, funds, credits, assets, securities, and other property that were in the care, custody, and control of Bank A, knowingly used and caused to be used, without authorization, Company A's COO's signature stamp to fraudulently endorse a check in the amount of \$3,000 payable to JEZLIA BARAJAS, which check was written on Company A's bank account at Bank A, knowing that the check would be presented as a valid financial instrument to obtain money in the care, custody, and control of Bank A.

All in violation of Title 18, United States Code, Sections 1344(2) and 2(a).

COUNT EIGHT

(Bank Fraud, 18 U.S.C. § 1344(2))

THE GRAND JURY FURTHER CHARGES THAT:

43. All of the allegations set forth in paragraphs 1-28 above are hereby incorporated in support of the following charge as if set forth here in full.

44. On or about October 4, 2023, in the State and Eastern District of Wisconsin and elsewhere,

BRANDI ELLIS,

in furtherance of the scheme and to obtain money, funds, credits, assets, securities, and other property that were in the care, custody, and control of Bank A, knowingly used and caused to be used, without authorization, Company A's COO's signature stamp to fraudulently endorse a check in the amount of \$2,400 payable to K.J., which check was written on Company A's bank account at Bank A, knowing that the check would be presented as a valid financial instrument to obtain money in the care, custody, and control of Bank A.

All in violation of Title 18, United States Code, Sections 1344(2) and 2(a).

COUNT NINE

(Bank Fraud, 18 U.S.C. § 1344(2))

THE GRAND JURY FURTHER CHARGES THAT:

45. All of the allegations set forth in paragraphs 1-28 above are hereby incorporated in support of the following charge as if set forth here in full.

46. On or about November 8, 2023, in the State and Eastern District of Wisconsin and elsewhere,

BRANDI ELLIS,

in furtherance of the scheme and to obtain money, funds, credits, assets, securities, and other property that were in the care, custody, and control of Bank A, knowingly used and caused to be used, without authorization, Company A's COO's signature stamp to fraudulently endorse a check in the amount of \$3,000 payable to N.E., which check was written on Company A's bank account at Bank A, knowing that the check would be presented as a valid financial instrument to obtain money in the care, custody, and control of Bank A.

All in violation of Title 18, United States Code, Sections 1344(2) and 2(a).

COUNT TEN

(Money Laundering Conspiracy, 18 U.S.C. § 1956(h))

THE GRAND JURY FURTHER CHARGES THAT:

47. Paragraphs 1-28 of the Indictment are realleged and incorporated here, and the following is further alleged.

48. Beginning by at least July 2016, and continuing through in or about May 2024, in the State and Eastern District of Wisconsin and elsewhere,

**BRANDI ELLIS, RAMON HERNANDEZ, and
JEZLIA BARAJAS,**

did knowingly conspire with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, namely:

a. to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, bank fraud and wire fraud, in violation of Title 18, United States Code, Sections 1343 and 1344, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

Manner and Means

49. The victim of the scheme was Company A, which employed ELLIS in its finance department.

50. As part of the scheme, ELLIS caused fraudulent and unauthorized checks to be issued by Company A to RAMON HERNANDEZ, JEZLIA BARAJAS, L.M.B., B.P., K.J., N.E. and herself under the false pretenses that those individuals performed work for Company A.

51. ELLIS and the individuals referenced in paragraph 45 knew that they had not performed work for Company A and were not, therefore, entitled to payment by Company A.

52. ELLIS utilized a signature stamp of Company A's COO to endorse the fraudulently issued checks without the COO's knowledge or authorization.

53. ELLIS directed the individuals referenced in paragraph 45 to either cash the checks or deposit them in bank accounts in their own names.

54. HERNANDEZ, BARAJAS, ELLIS and others conducted financial transactions to negotiate the fraudulent checks to convert them to cash in order to conceal and disguise the nature, location, source, ownership and control of the proceeds.

55. The financial transactions conducted caused interstate wire communications to travel between the Eastern District of Wisconsin and other states.

56. In some instances, ELLIS caused checks issued to the above-named individuals to be issued in the names of business entities associated with those individuals, including M.I.H. Creations and Porter Networking. Issuing the checks to these entities was designed to further conceal and disguise the nature, location, source, ownership and control of the proceeds.

57. ELLIS subsequently directed HERNANDEZ, BARAJAS, L.M.B., B.P., K.J., and N.E. to withdraw portions of the funds from the fraudulently issued checks in cash and to give that

cash to ELLIS. These financial transactions were also designed to conceal and disguise the nature, location, source, ownership, and control of the proceeds.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT ELEVEN

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

THE GRAND JURY FURTHER CHARGES THAT:

58. On or about November 8, 2023, in the State and Eastern District of Wisconsin,

BRANDI ELLIS

knowingly possessed and used, without lawful authority, a means of identification of another person, specifically the name and signature stamp of Company A's COO during and in relation to the felony offense of bank fraud, in violation of 18 U.S.C. § 1344, as charged above in Count Nine, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

Background Allegations Common to Counts Twelve and Thirteen

THE GRAND JURY FURTHER CHARGES THAT:

59. At all times material to this indictment:
- a. Company A was a charitable organization operating in the Eastern District of Wisconsin.
 - b. As part of its work, Company A issued payments to legitimate vendors who performed work for Company A via checks.
 - c. Company A employed individuals in its finance department to issue payments to legitimate vendors.
 - d. Company A issued credit cards in the name of its employees for their use to pay only for legitimate business expenses.
 - e. No employee of Company A was authorized to utilize the credit cards issued to them by Company A for personal expenses.
60. BRANDI ELLIS was employed by Company A as an Accountant from February 2014 to December 2019. She was promoted to Accounting Manager in January 2020, and promoted again to Finance Manager in July 2022. ELLIS was terminated from Company A in May 2024.
61. During her employment with Company A, ELLIS had access to Company A's credit card accounts and the responsibility for allocating expenses incurred on Company A's credit card accounts in the accounting system, and the responsibility for ensuring the statements were paid.
62. ELLIS did not have the authority to utilize Company A's credit cards for personal expenses.
63. ELLIS had access to Company A's credit cards in her name and in the name of

former employees.

64. Between 2019 and 2024, ELLIS used credit cards in her own name and in the name of former employees to pay for personal expenses, including, but not limited to, designer clothing and luxury travel.

65. Beginning by at least January 2019, and continuing through at least May 2024, in the State and Eastern District of Wisconsin and elsewhere,

BRANDI ELLIS,

with intent to defraud, knowingly devised, participated in, and carried out a scheme to defraud, which is described more fully below.

66. As part of the scheme, ELLIS utilized credit cards issued for Company A's business-purpose use in her own name, and in the name of prior and current employees, to make unauthorized personal purchases.

67. As part of the scheme, ELLIS caused the unauthorized credit card bills to be paid by Company A, using Company A's funds, without authorization.

68. During the period of the scheme, ELLIS resided primarily in the Eastern District of Wisconsin.

69. During the period of the scheme, ELLIS made purchases using credit cards associated with banks whose servers reside outside the Eastern District of Wisconsin and made purchases at locations outside the Eastern District of Wisconsin.

70. All the transactions that constituted the execution of ELLIS's scheme caused interstate wire communications between the Eastern District of Wisconsin and elsewhere, resulting in interstate and international wire communications.

71. As a result of the scheme, ELLIS fraudulently obtained, and attempted to obtain, over \$2,000,000.

COUNT TWELVE
(Wire Fraud, 18 U.S.C. § 1343)

THE GRAND JURY FURTHER CHARGES THAT:

72. All of the allegations set forth in paragraphs 59-71 above are hereby incorporated in support of the following charge as if set forth here in full.

73. On or about December 13, 2022, in the State and Eastern District of Wisconsin and elsewhere,

BRANDI ELLIS,

with the intent to defraud, knowingly devised and participated in, the above-described scheme to obtain money and property by materially false and fraudulent pretenses, representations, promises, and omissions.

74. For the purpose of executing and attempting to execute the scheme, ELLIS caused a purchase transaction of \$3,057.66 to be made at Gucci, using Company A's credit card.

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

COUNT THIRTEEN
(Wire Fraud, 18 U.S.C. § 1343)

THE GRAND JURY FURTHER CHARGES THAT:

75. All of the allegations set forth in paragraphs 59-71 above are hereby incorporated in support of the following charge as if set forth here in full.

76. On or about March 21, 2023, in the State and Eastern District of Wisconsin and elsewhere,

BRANDI ELLIS,

with the intent to defraud, knowingly devised and participated in, the above-described scheme to obtain money and property by materially false and fraudulent pretenses, representations, promises, and omissions.

77. For the purpose of executing and attempting to execute the scheme, ELLIS caused a purchase transaction of \$1,364.18 to be made at Venetian/Palazzo, using Company A's credit card.

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

COUNT FOURTEEN

(Tampering with a Witness, 18 U.S.C. § 1512(b)(3))

THE GRAND JURY FURTHER CHARGES THAT:

78. All of the allegations set forth in paragraphs 1-28 and 59-71 above are hereby incorporated in support of the following charge as if set forth here in full.

79. Between on or about May 24, 2024, and on or about October 2025, in the State and Eastern District of Wisconsin and elsewhere,

BRANDI ELLIS

did knowingly attempt to corruptly persuade N.E., RAMON HERNANDEZ, and JEZLIA BARAJAS by advising them to lie to law enforcement about having performed work for Company A and by providing them with advice on how to lie to a law enforcement officer of the United States about their role in the scheme described above with the intent to hinder, delay, and prevent the communication to a law enforcement officer of information relating to the commission of a federal offense, namely, bank fraud and money laundering as described above in paragraphs 1-28 and Counts One through Nine.

All in violation of Title 18, United States Code, Section 1512(b)(3).

COUNT FIFTEEN

(False Statements, 18 U.S.C. § 1001)

THE GRAND JURY FURTHER CHARGES THAT:

80. All of the allegations set forth in paragraphs 1-28 above are hereby incorporated in support of the following charge as if set forth here in full.

81. On or about July 25, 2025, in the State and Eastern District of Wisconsin,

JASON FLANDERS

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the executive and judicial branch of the Government of the United States, by stating to agents of the Internal Revenue Service Criminal Investigations that he had an arrangement with Company A's legitimate IT vendor to have checks due and owing to the IT vendor issued in FLANDERS' name, that the legitimate IT vendor authorized Company A to issue the vendor's checks to FLANDERS, and that FLANDERS paid back the monies owed to the legitimate vendor in cash within days after using the funds from the checks to gamble on slot machines at Potawatomi casino. The statements and representations were false because, as FLANDERS then and there knew, some of the invoices upon which FLANDERS received payment in lieu of Company A's legitimate IT vendor were fraudulent and Company A's legitimate IT vendor had never authorized Company A to issue his payments in checks payable to FLANDERS.

All in violation of Title 18, United States Code, Section 1001(a).

FORFEITURE NOTICE

1. Upon conviction of one or more bank fraud offenses in violation of Title 18, United States Code, Section 1344, set forth in Counts One through Nine of this Indictment, Defendants shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2), any property constituting or derived from proceeds that the Defendants obtained directly or indirectly as the result of the offense. The property to be forfeited includes, but is not limited to, a sum of money equal to the proceeds of the offense as well as the following:

- a. approximately \$13,664.27 seized from Ally Bank Account ending in 6258;
- b. approximately \$6,169.39 seized from Ally Bank Account ending in 7285;
- c. approximately 786.23 seized from Ally Bank Account ending in 3279;
- d. approximately \$2,417.60 seized from Ally Bank Account ending in 6269;
- e. approximately \$7,595.91 seized from Associated Bank Account ending in 1622;
- f. approximately \$1,271.51 seized from Associated Bank Account ending in 7685;
- g. approximately \$8,835.90 seized from Betterment Account ending in 6446;
- h. approximately \$48,284.67 seized from Betterment Account ending in 6305;
- i. approximately \$155.03 seized from Betterment Account ending in 6066;
- j. approximately \$50,653.74 seized from Educators Credit Union Account ending in 1885; and
- k. approximately \$171.83 seized from Educators Credit Union Account ending in 9038.

2. Upon conviction of one or more of the wire fraud offenses in violation of Title 18, United States Code, Section 1343, as set forth in Counts Twelve and Thirteen of this Indictment, Defendant BRANDI ELLIS shall forfeit to the United States of America, pursuant to Title 18,

United States Code, Section 981(a)(1)(c) and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, proceeds that she obtained directly or indirectly from the offense. The property to be forfeited includes, but is not limited to, a sum of money equal to the proceeds of the offense as well as the following:

- a. approximately \$13,664.27 seized from Ally Bank Account ending in 6258;
- b. approximately \$6,169.39 seized from Ally Bank Account ending in 7285;
- c. approximately 786.23 seized from Ally Bank Account ending in 3279;
- d. approximately \$2,417.60 seized from Ally Bank Account ending in 6269;
- e. approximately \$7,595.91 seized from Associated Bank Account ending in 1622;
- f. approximately \$1,271.51 seized from Associated Bank Account ending in 7685;
- g. approximately \$8,835.90 seized from Betterment Account ending in 6446;
- h. approximately \$48,284.67 seized from Betterment Account ending in 6305;
- i. approximately \$155.03 seized from Betterment Account ending in 6066;
- j. approximately \$50,653.74 seized from Educators Credit Union Account ending in 1885; and
- k. approximately \$171.83 seized from Educators Credit Union Account ending in 9038.

3. Upon conviction of the money laundering offense in violation of Title 18, United States Code, Section 1956(h), as set forth in Count Ten of this Indictment, Defendants shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, and any property traceable to such property, including, but not limited to a sum of money equal to the value of the property involved in the offense. The property to be forfeited includes, but is not limited to, a sum of money equal to the proceeds of the offense as well as the following:

- a. approximately \$13,664.27 seized from Ally Bank Account ending in 6258;
- b. approximately \$6,169.39 seized from Ally Bank Account ending in 7285;
- c. approximately 786.23 seized from Ally Bank Account ending in 3279;
- d. approximately \$2,417.60 seized from Ally Bank Account ending in 6269;
- e. approximately \$7,595.91 seized from Associated Bank Account ending in 1622;
- f. approximately \$1,271.51 seized from Associated Bank Account ending in 7685;
- g. approximately \$8,835.90 seized from Betterment Account ending in 6446;
- h. approximately \$48,284.67 seized from Betterment Account ending in 6305;
- i. approximately \$155.03 seized from Betterment Account ending in 6066;
- j. approximately \$50,653.74 seized from Educators Credit Union Account ending in 1885; and
- k. approximately \$171.83 seized from Educators Credit Union Account ending in 9038.

4. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided 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 Title 28, United States Code, Section 2461(c).

A TRUE BILL:



FOREPERSON

Dated: 2/3/20

A handwritten signature in black ink, appearing to read 'Brad D. Schimel', written over a horizontal line.

BRAD D. SCHIMEL
United States Attorney