

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**(01) LAWRENCE COURTNEY LAWHORN,**  
a/k/a “Courtney McAllister,” “Cooter,” “Coot”  
[DOB: 01/21/1988]

**(02) LAUREN COURTNEY LUQUE,**  
[DOB: 03/10/1986]

**(03) LATOYA MARIE BROWN,**  
[DOB: 09/09/1985]

**(04) MICHAEL JADON CARTER,**  
[DOB: 07/14/1990]

**(05) MATTHEW STEPHEN AKINS,**  
[DOB: 09/22/1988]

**(06) MICHAEL STUART SMITH,**  
a/k/a “Black Mike”,  
[DOB: 09/20/1986]

**(07) TARON DONTE FORD,**  
[DOB: 06/25/1985]

**(08) TIERA RACHELL WALLACE,**  
[DOB: 01/20/1992]

**(09) LANAY DESHAWN WALLACE,**  
[02/15/1994]

**(10) DYLAN JAMES DANIELSSON,**  
[09/16/1994]

**(11) LARELL MONTEZ BANKS,**  
[DOB: 05/17/1993]

No. 20-04071-01/19-CR-C-RK

**COUNTS 1 and 2**

18 U.S.C. § 1349

NMT 20 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

**COUNTS 3 through 46**

18 U.S.C. § 1343

NMT 20 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

**COUNTS 47 through 66**

18 U.S.C. § 1341

NMT 20 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

**COUNT 67**

18 U.S.C. § 1956(h)

NMT 20 Years Imprisonment

NMT \$500,000 Fine or Twice the Amount  
of the Criminally Derived Property

NMT 3 Years Supervised Release

Class C Felony

**COUNTS 68 and 69**

18 U.S.C. § 1028A(a)(1)

NMT 2 Years Imprisonment

(to be served consecutively)

NMT \$250,000

NMT 1 Year Supervised Release

Class E Felony

**FORFEITURE ALLEGATION**

18 U.S.C. § 981(a)(1)(C)

28 U.S.C. § 2461(c)

(12) CORNELIUS DESHAWN PHELPS,  
[DOB: 11/06/1985]

(13) DONTAY LARAY CAMPBELL,  
[DOB: 03/13/1989]

(14) ERIONA TYJAEZ FLEEKES,  
[DOB: 12/27/1992]

(15) KATHY DAVY KIMHANG,  
[DOB: 04/04/1991]

(16) MAURICE FRANK PENNY, JR.,  
[DOB: 12/02/1983]

(17) TARA COLLEEN JACKSON,  
[DOB: 07/08/1963]

(18) MICHAEL LEE GENE STAPLETON,  
[DOB: 03/19/1986]

and

(19) CEDRICK SHAWNDALE GOLDMAN,  
[DOB: 05/01/1976]

Defendants.

\$100 Special Assessment (Each Count)  
Mandatory Restitution (Each Count)

Defendants/Counts

(01) L. Lawhorn: 1-69

(02) L. Luque: 1-2, 27-28, 30-32, 34, 47,  
69.

(03) L. Brown: 1-11, 21, 29, 33, 35-39,  
51-56, 64-65.

(04) M. Carter: 1-3, 51-53, 67.

(05) M. Akins: 1-3, 51-53.

(06) M. Smith: 1-2, 4-11, 41-46, 54-56.

(07) T. Ford: 1-2, 4-11, 18-20, 22-26, 54-  
56, 62-63.

(08) T. Wallace: 1-2, 12-17, 57-61.

(09) L. Wallace: 1-2, 12-17, 57-61.

(10) D. Danielsson: 1-2, 12-17, 57-61.

(11) L. Banks: 1-2, 18-20, 22-26, 62-63.

(12) C. Phelps: 1, 41-46.

(13) D. Campbell: 1, 41-46.

(14) E. Fleeks: 1, 41-46.

(15) K. Kimhang: 1-2, 40, 66.

(16) M. Penny, Jr.: 1-2, 40, 66.

(17) T. Jackson: 1-2, 35-39, 64-65.

(18) M. Stapleton: 1-2, 35-39, 64-65.

(19) C. Goldman: 1-2, 12-17, 57-61.

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

Introduction and Background

At all times relevant to this Indictment:

1. Defendant **LAWRENCE COURTNEY LAWHORN** a/k/a “Courtney McAllister,” “Cooter,” “Coot” (“**LAWHORN**”) was a resident of the Western District of Missouri, who at various times resided in Columbia and the Kansas City, Missouri areas. **LAWHORN** was in romantic relationships with defendants **LAUREN COURTNEY LUQUE**,

**LATOYA MARIE BROWN** and **KATHY DAVY KIMHANG**. **LAWHORN** had a Snapchat account with a user account name “courtmcallister.” **LAWHORN** was involved in an incident on or about June 5, 2017. **LAWHORN** was directly involved in an incident with **BROWN** on or about January 6, 2019. **LAWHORN** sought medical treatment for the incidents on June 5, 2017, and January 6, 2019. **LAWHORN** signed a Release For All Claims Agreement with Equity Insurance Company and received \$1,500 from Equity Insurance Company. **LAWHORN** received \$17,350.00 from Progressive. **LAWHORN** did not make any payments to medical providers. In connection with incidents on December 17, 2017, May 12, 2018, August 11, 2018, February 21, 2019, February 27, 2019, August 6, 2019, October 20, 2019, and December 16, 2019, **LAWHORN** sent emails to insurance companies, made telephone calls to insurance companies, directed others what to tell insurance companies, reviewed insurance policies prior to incidents, witnessed release agreements, and assumed the identity of parties to the incidents or people related to parties to these incidents in communication with insurance companies.

2. Defendant **LAUREN COURTNEY LUQUE** (“**LUQUE**”) was a resident of the Western District of Missouri, who resided in Columbia, Missouri. **LUQUE** had a Snapchat account with the user name “laluque52.” **LAWHORN** directed **LUQUE** what to tell medical providers and what tests to request from medical providers in order to increase the medical billing submitted to State Farm Mutual Automobile Insurance Company, which in turn increased the money paid on **LUQUE**’s claim from the August 6, 2019, incident. **LUQUE** followed **LAWHORN**’s direction and obtained medical treatment on multiple occasions. **LUQUE** signed a release with State Farm and received approximately \$12,494.01 from State Farm Mutual Automobile Insurance Company. **LUQUE** did not make any payments to medical providers.

3. Defendant **LATOYA MARIE BROWN** (“**BROWN**”) was a resident of the Western District of Missouri, who at various times resided in Columbia and the Kansas City, Missouri areas. **BROWN** has a child in common with **LAWHORN**. **BROWN** was involved in an incident on or about December 17, 2017, with **MATTHEW STEPHEN AKINS** and **MICHAEL JADON CARTER**. **BROWN** was involved in an incident on or about May 12, 2018, with **MICHAEL STUART SMITH** and **TARON DONTE FORD**. **BROWN** was involved in an incident on or about January 6, 2019, with **LAWHORN**. **BROWN** saw medical providers, often multiple times, after these incidents. **BROWN** made a verbal release to State Farm Mutual Automobile Insurance Company and received \$18,528.25 from State Farm Mutual Automobile Insurance Company. **BROWN** caused a release to be made with Progressive and received \$8,000.00 from Progressive Insurance Company. **BROWN** signed a Release and Indemnity Agreement with American Family Insurance and received approximately \$17,741.34 from American Family Insurance Company. **BROWN** did not make any payments to medical providers. In connection with incidents on May 12, 2018, and December 16, 2019, **BROWN** gathered information for **LAWHORN** and communicated with State Farm Mutual Automobile Insurance Company at **LAWHORN**’s direction.

4. Defendant **MICHAEL JADON CARTER** (“**CARTER**”) was a resident of Columbia, Missouri, in the Western District of Missouri, who was involved in an incident on or about December 17, 2017, with **BROWN** and **MATTHEW STEPHEN AKINS**. **CARTER** sought medical treatment for the December 17, 2017, incident. **CARTER** signed a Release and Indemnity Agreement with American Family Insurance Company and received approximately \$50,000.00 from American Family Insurance Company. After receiving the \$50,000.00 from

American Family Insurance, **CARTER** obtained approximately \$20,000.00 in cashier's checks made payable to **LAWHORN**. **CARTER** did not make any payments to medical providers.

5. Defendant **MATTHEW STEPHEN AKINS** ("**AKINS**") was a resident of the Western District of Missouri, who at various times resided in Columbia and Fulton, Missouri. **AKINS** was involved in an incident on or about December 17, 2017, with **BROWN** and **CARTER**. **AKINS** was Facebook friends with **BROWN** and **LAWHORN**. **AKINS** sought medical treatment for the December 17, 2017, incident. **AKINS** signed a Release and Indemnity Agreement with American Family Insurance Company and received \$12,777.55 from American Family Insurance Company. **AKINS** did not make any payments to medical providers.

6. Defendant **MICHAEL STUART SMITH** a/k/a "Black Mike" ("**SMITH**") was a resident of the Kansas City, Missouri area in the Western District of Missouri. **SMITH** had a Snapchat account with the user name "black504mike." **SMITH** was a friend of **LAWHORN**. **SMITH** was involved in an incident on or about May 12, 2018, with **BROWN** and **TARON DONTE FORD**. **SMITH** sought medical treatment for the May 12, 2018, incident. **SMITH** signed a release agreement with State Farm Mutual Automobile Insurance Company and received \$30,130.00 from State Farm Mutual Automobile Insurance Company. **SMITH** was involved in an incident on or about February 27, 2019, with **DONTAY LARAY CAMPBELL**, **CORNELIUS DESHAWN PHELPS** and **ERIONA TYJAEZ FLEEKES**. Prior to the incident, **SMITH** sent **LAWHORN** a Snapchat message that included a picture of a GEICO insurance policy for an automobile involved in the February 27, 2019, incident. **SMITH** had contact with **DONTAY LARAY CAMPBELL** prior to the accident via phone. **SMITH** made a statement to GEICO where he denied knowing **DONTAY LARAY CAMPBELL**. **SMITH** sought medical

treatment for the February 27, 2019, incident. **SMITH** did not make any payments to medical providers.

7. Defendant **TARON DONTE FORD** (“**FORD**”) was a resident of the Kansas City, Missouri area in the Western District of Missouri. **FORD** had a Snapchat account with the user name “tyweed4300.” **FORD** was involved in the May 12, 2018, incident with **BROWN** and **SMITH**. **FORD** sought medical treatment for the May 12, 2018, incident. **FORD** received \$14,369.25 from State Farm Mutual Automobile Insurance Company. **FORD** did not pay any medical bills. **FORD** was involved in the February 21, 2019, incident with **LARELL MONTEZ BANKS**. Approximately four hours prior to the incident, **FORD** sent a Snapchat message to **LAWHORN** that included the address where the incident occurred. **FORD** received \$39,972.00 from State Farm Mutual Automobile Insurance Company. **FORD** did not make any payments to medical providers.

8. Defendant **TIERA RACHELL WALLACE** was a resident of the Columbia, Missouri area in the Western District of Missouri. **TIERA RACHELL WALLACE** was related to **LAWHORN**, **LANAY DESHAWN WALLACE** and **TARA COLLEEN JACKSON**. **TIERA RACHELL WALLACE** was involved in an incident on or about August 11, 2018, with **DYLAN JAMES DANIELSSON**, **LANAY DESHAWN WALLACE** and **CEDRICK SHAWNDALE GOLDMAN**. **TIERA RACHELL WALLACE** sought medical treatment for the August 11, 2018, incident. **TIERA RACHELL WALLACE** signed a Hold Harmless Agreement with AssuranceAmerica Insurance Company and received approximately \$10,000.00 from AssuranceAmerica Insurance Company. **TIERA RACHELL WALLACE** did not make any payments to medical providers.

9. Defendant **LANAY DESHAWN WALLACE** was a resident of the Columbia, Missouri area in the Western District of Missouri. **LANAY DESHAWN WALLACE** was related to **LAWHORN, TIERA RACHELL WALLACE** and **TARA COLLEEN JACKSON**. **LANAY DESHAWN WALLACE** was involved in an incident on or about August 11, 2018, with **DYLAN JAMES DANIELSSON, TIERA RACHELL WALLACE** and **CEDRICK SHAWNDALE GOLDMAN**. **LANAY DESHAWN WALLACE** sought medical treatment for the August 11, 2018, incident and did not pay any medical bills. **LANAY DESHAWN WALLACE** signed a Hold Harmless Agreement with AssuranceAmerica Insurance Company and received approximately \$2,000.00 from AssuranceAmerica Insurance Company. **LANAY DESHAWN WALLACE** did not make any payments to medical providers.

10. Defendant **DYLAN JAMES DANIELSSON** (“**DANIELSSON**”) was a resident of the Columbia, Missouri area in the Western District of Missouri. **DANIELSSON** was involved in an incident on or about August 11, 2018, with **TIERA RACHELL WALLACE, LANAY DESHAWN WALLACE** and **CEDRICK SHAWNDALE GOLDMAN**. **DANIELSSON** sought medical treatment for the August 11, 2018, incident. **DANIELSSON** signed a Hold Harmless Agreement with AssuranceAmerica Insurance Company and received approximately \$5,289.95 from AssuranceAmerica Insurance Company. **DANIELSSON** did not make any payments to medical providers.

11. Defendant **LARELL MONTEZ BANKS** (“**BANKS**”) was a resident of Columbia, Missouri, in the Western District of Missouri. **BANKS** had a Snapchat account with the user name “rydacash.” **BANKS** was involved in an incident on or about February 21, 2019, with **FORD**. Prior to the incident on February 21, 2019, **BANKS** sent a Snapchat message to

**LAWHORN** that included a picture of a State Farm Mutual Automobile Insurance Company policy for the car he and **FORD** rode in during the incident. **BANKS** sought medical treatment for the February 21, 2019, incident. **BANKS** received approximately \$53,552.00 from State Farm Mutual Automobile Insurance Company. **BANKS** did not make any payments to medical providers. After a check from State Farm Mutual Automobile Insurance Company was deposited into a Bank of America joint account held by **BANKS** and another, the other account holder obtained a cashier's check in the amount of \$13,400.00 made payable to **LUQUE**.

12. Defendant **CORNELIUS DESHAWN PHELPS** (“**PHELPS**”) was a resident of the Western District of Missouri, who at various times resided in the Kansas City and Lee's Summit, Missouri areas. **PHELPS** was involved an incident on or about February 27, 2019, with **DONTAY LARAY CAMPBELL**, **SMITH** and **ERIONA TYJAEZ FLEEKES**. **PHELPS** made a statement to The Government Employees Insurance Company (“**GEICO**”) that he did not know of or have contact with **ERIONA TYJAEZ FLEEKES** prior to the incident. **PHELPS** had telephone contact with **ERIONA TYJAEZ FLEEKES** prior to the incident. **PHELPS** sought medical treatment for the February 27, 2019, incident. **PHELPS** did not make any payments to medical providers.

13. Defendant **DONTAY LARAY CAMPBELL** (“**CAMPBELL**”) was a resident of the Kansas City, Missouri area in the Western District of Missouri. **CAMPBELL** was involved in an incident on or about February 27, 2019, with **PHELPS**, **SMITH** and **ERIONA TYJAEZ FLEEKES**. **CAMPBELL** made a call to **GEICO** to make a claim for the incident on February 27, 2019. **CAMPBELL** had telephone contact with **SMITH** prior to the accident. **CAMPBELL**



sought medical treatment for the incident on February 27, 2019. **CAMPBELL** did not make any payments to medical providers.

14. Defendant **ERIONA TYJAEZ FLEEKES** (“**FLEEKES**”) was a resident of the Kansas City, Missouri area in the Western District of Missouri. **FLEEKES** was involved in an incident on or about February 27, 2019, with **PHELPS, SMITH** and **CAMPBELL**. **FLEEKES** made a call to GEICO make a claim for the incident on February 27, 2019. **FLEEKES** had telephone contact with **PHELPS** prior to the incident. **FLEEKES** sought medical treatment for the February 27, 2019 incident. **FLEEKES** did not make any payments to medical providers.

15. Defendant **KATHY DAVY KIMHANG** (“**KIMHANG**”) was at times a resident of the Columbia, Missouri area in the Western District of Missouri. At various times, **KIMHANG** also resided in St. Louis, Missouri. **KIMHANG** had a Snapchat account with the user name “kimkat6.” **KIMHANG** was in an incident on or about October 20, 2019, with **MAURICE FRANK PENNY**. **LAWHORN** directed **KIMHANG** what to tell Progressive Insurance Company representative, who was working in Columbia, Missouri, about the incident. **KIMHANG** gave a recorded statement to Progressive Insurance Company about the October 20, 2019, incident where she denied speaking to **LAWHORN** about the automobile accident. **KIMHANG** sought medical treatment for the October 20, 2019, incident. **KIMHANG** signed a release with The Progressive Corporation and received approximately \$18,429.64 from Progressive Insurance Company. **KIMHANG** did not make any payments to medical providers.

16. Defendant **MAURICE FRANK PENNY, JR.** (“**PENNY**”) was a resident of St. Louis, Missouri and various locations in the Western District of Missouri. **PENNY** was involved in an incident on or about October 20, 2019, with **KIMHANG**. **PENNY** gave a recorded

interview about the October 20, 2019, incident to Progressive Insurance Company. **PENNY** sought medical treatment for the October 20, 2019, incident. **PENNY** signed a release with The Progressive Corporation and received approximately \$5,871.00 from Progressive Insurance Company. **PENNY** did not make any payments to medical providers.

17. Defendant **TARA COLLEEN JACKSON** (“**JACKSON**”) was a resident of Independence, Missouri, in the Western District of Missouri. **JACKSON** was **LAWHORN**’s mother. **JACKSON** was involved in an incident on or about December 16, 2019, with **MICHAEL LEE GENE STAPLETON**. **JACKSON** sought medical treatment for the December 16, 2019, incident from multiple medical providers. **LAWHORN** directed **BROWN** to communicate with the State Farm Mutual Automobile Insurance Company on behalf of **JACKSON**. **JACKSON** received approximately \$50,000.00 from State Farm Mutual Automobile Insurance Company. **JACKSON** did not make any payments to medical providers.

18. Defendant **MICHAEL LEE GENE STAPLETON** (“**STAPLETON**”) was a resident of Columbia, Missouri, in the Western District of Missouri. **STAPLETON** had a Snapchat account with the user name “lgezzy86.” **JACKSON** was involved in an incident on or about December 16, 2019, with **JACKSON**. **STAPLETON** sought medical treatment for the incident on December 16, 2019. **LAWHORN** directed **STAPLETON** to communicate with State Farm Mutual Automobile Insurance Company. **STAPLETON** received approximately \$50,000.00 from State Farm Mutual Automobile Insurance Company. **STAPLETON** did not make any payments to medical providers.

19. Defendant **CEDRICK SHAWNDALE GOLDMAN** (“**GOLDMAN**”) was a resident of Columbia, Missouri, in the Western District of Missouri. **GOLDMAN** was involved

in the August 11, 2018, incident. **GOLDMAN** sought medical treatment for the incident on August 11, 2018. **CEDRICK SHAWNDALE GOLDMAN** signed a Hold Harmless Agreement with AssuranceAmerica Insurance Company and received approximately \$14,900.00 from AssuranceAmerica Insurance Company. **GOLDMAN** did not make any payments to medical providers.

20. Snap, Inc., a social media company based in Santa Monica, California, developed Snapchat, a multimedia messaging application. The conspirators communicated through Snapchat to achieve the objectives of the conspiracy.

21. Google, LLC, a web services provider based in Mountain View, California, developed Gmail, an e-mail service. The conspirators communicated through Gmail to achieve the objectives of the conspiracy.

22. Yahoo! Inc., a web services provider based in Sunnyvale, California, developed Yahoo mail, an e-mail service. The conspirators communicated through Yahoo mail to achieve the objectives of the conspiracy.

23. Equity Insurance Company (“Equity Insurance”), an insurance company based in Tulsa, Oklahoma, offered automobile insurance in Missouri. State Farm Mutual Automobile Insurance Company made claim on a policy issued by Equity Insurance in connection with an incident that that occurred on or about June, 5, 2017.

24. American Family Insurance (“American Family”), a private mutual company headquartered in Madison, Wisconsin, offered automobile insurance in Missouri. Members of the conspiracy made a claim on a policy issued by American Family in connection with an incident that occurred on or about December 17, 2017.

25. State Farm Mutual Automobile Insurance Company (“State Farm”), an insurance company headquartered in Bloomington, Illinois, offered automobile insurance in Missouri. Members of the conspiracy made claims on policies issued by State Farm in connection with incidents that occurred on or about May 12, 2018, February 21, 2019, August 6, 2019, and December 16, 2019.

26. The Progressive Corporation (“Progressive”), an insurance company headquartered in Mayfield Village, Ohio, offered insurance in Missouri. Members of the conspiracy made claims on policies issued by Progressive in connection with incidents that occurred on or about January 6, 2019, and October 20, 2019.

27. GEICO, an insurance company headquartered in Chevy Chase, Maryland, offered automobile insurance in Missouri. Members of the conspiracy made a claim on a policy issued by GEICO in connection with an incident that occurred on or about February 27, 2019.

28. AssuranceAmerica Insurance Company (“AssuranceAmerica”), an insurance company headquartered in Atlanta, Georgia, offered automobile insurance in Missouri. Members of the conspiracy made a claim on a policy issued by AssuranceAmerica in connection with an incident that occurred on or about August 11, 2018.

**Scheme and Artifice to Obtain Money by Materially False Representations**

29. Between on or about June 2017 and July 2020, said dates being approximate, defendants **(01) LAWRENCE COURTNEY LAWHORN** a/k/a “Courtney McAllister,” “Cooter,” “Coot,” **(02) LAUREN COURTNEY LUQUE**, **(03) LATOYA MARIE BROWN**, **(04) MICHAEL JADON CARTER**, **(05) MATTHEW STEPHEN AKINS**, **(06) MICHAEL STUART SMITH** a/k/a “Black Mike,” **(07) TARON DONTE FORD**, **(08) TIERA RACHELL**

**WALLACE, (09) LANAY DESHAWN WALLACE, (10) DYLAN JAMES DANIELSSON, (11) LARELL MONTEZ BANKS, (12) CORNELIUS DESHAWN PHELPS, (13) DONTAY LARAY CAMPBELL, (14) ERIONA TYJAEZ FLEEKES, (15) KATHY DAVY KIMHANG, (16) MAURICE FRANK PENNY, JR., (17) TARA COLLEEN JACKSON, (18) MICHAEL LEE GENE STAPLETON and (19) CEDRICK SHAWNDALE GOLDMAN** , devised a scheme and artifice to defraud and to obtain money and property from Equity Insurance, State Farm, American Family, AssuranceAmerica, Progressive and GEICO by means of materially false and fraudulent pretenses, representations and promises that they had suffered bodily injury and that they would be personally liable for any medical bills related to insurance claims.

30. Members of the conspiracy filed and caused to be filed materially false bodily injury claims with Equity Insurance, State Farm, American Family, Assurance America, Progressive, and GEICO.

31. Members of the conspiracy made or caused to be made materially false release agreements with Equity Insurance, State Farm, American Family, Assurance America, Progressive, and GEICO, in which that member of the conspiracy falsely stated that he or she would be personally liable for any medical bills related to the insurance claim.

32. Members of the conspiracy made and caused to be made communications with Equity Insurance, State Farm, American Family, Assurance America, Progressive, and GEICO about these materially false claims and releases via electronic messages, e-mails, interstate telephone calls, and mailings.

33. Members of the conspiracy obtained funds from Equity Insurance, State Farm, American Family, AssuranceAmerica, and Progressive as the result of these materially false claims and releases.

34. Members of the conspiracy used the funds obtained from Equity Insurance, State Farm, American Family, AssuranceAmerica and Progressive for personal expenses unrelated to medical care covered by the materially false claims.

35. Members of the conspiracy also attempted to obtain money based on materially false representations made to GEICO.

36. In aggregate, this scheme and artifice to obtain money by materially false misrepresentations obtained and caused the loss of approximately \$1,234,581.14 in United States currency.

**COUNT 1**  
(Conspiracy to Commit Wire Fraud)  
18 U.S.C. § 1349

37. The factual allegations of paragraphs 1 through 36 of this Superseding Indictment are incorporated by reference as if fully set forth.

38. Between on or about June 2017 and July 2020, said dates being approximate, within Boone and Jackson Counties, in the Western District of Missouri, and elsewhere, defendants, **(01) LAWRENCE COURTNEY LAWHORN** a/k/a “Courtney McAllister,” “Cooter,” “Coot,” **(02) LAUREN COURTNEY LUQUE**, **(03) LATOYA MARIE BROWN**, **(04) MICHAEL JADON CARTER**, **(05) MATTHEW STEPHEN AKINS**, **(06) MICHAEL STUART SMITH** a/k/a “Black Mike,” **(07) TARON DONTE FORD**, **(08) TIERA RACHELL WALLACE**, **(09) LANAY DESHAWN WALLACE**, **(10) DYLAN JAMES DANIELSSON**, **(11) LARELL**

**MONTEZ BANKS, (12) CORNELIUS DESHAWN PHELPS, (13) DONTAY LARAY CAMPBELL, (14) ERIONA TYJAEZ FLEEKES, (15) KATHY DAVY KIMHANG, (16) MAURICE FRANK PENNY, JR., (17) TARA COLLEEN JACKSON, (18) MICHAEL LEE GENE STAPLETON and (19) CEDRICK SHAWNDALE GOLDMAN** knowingly and intentionally combined, conspired and agreed with each other and others, both known and unknown to the grand jury, to commit the following offense against the United States, that is, having devised and intended to devise a scheme for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, that is, materially false representations and promises to Equity Insurance, State Farm, American Family, Assurance America, Progressive and GEICO, that they had suffered bodily injuries covered by insurance policies and that they would be personally liable for any medical bills related to claims on these insurance policies, and for the purpose of executing such scheme and artifice, transmitted and caused to be transmitted by means of wire, radio or television communication in interstate commerce, any writings, signs, signals, pictures, or sounds, all contrary to the provisions of Title 18, United States Code, Section 1343; all in violation of Title 18, United States Code, Section 1349.

**COUNT 2**  
(Conspiracy to Commit Mail Fraud)  
18 U.S.C. § 1349

39. The factual allegations of paragraphs 1 through 36 of this Superseding Indictment are incorporated by reference as if fully set forth.

40. Between on or about June 2017 and July 2020, said dates being approximate, within Boone and Jackson Counties, in the Western District of Missouri, and elsewhere, defendants,

**(01) LAWRENCE COURTNEY LAWHORN** a/k/a “Courtney McAllister,” “Cooter,” “Coot,”  
**(02) LAUREN COURTNEY LUQUE, (03) LATOYA MARIE BROWN, (04) MICHAEL JADON CARTER, (05) MATTHEW STEPHEN AKINS, (06) MICHAEL STUART SMITH** a/k/a “Black Mike,” **(07) TARON DONTE FORD, (08) TIERA RACHELL WALLACE, (09) LANAY DESHAWN WALLACE, (10) DYLAN JAMES DANIELSSON, (11) LARELL MONTEZ BANKS, (15) KATHY DAVY KIMHANG, (16) MAURICE FRANK PENNY, JR., (17) TARA COLLEEN JACKSON, (18) MICHAEL LEE GENE STAPLETON** and **(19) CEDRICK SHAWNDALE GOLDMAN** knowingly and intentionally combined, conspired and agreed with each other and others, both known and unknown to the grand jury, to commit the following offense against the United States, that is, having devised and intended to devise a scheme for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, that is, materially false representations and promises to Equity Insurance, State Farm, American Family, AssuranceAmerica and Progressive, that they had suffered bodily injuries covered by insurance policies and that they would be personally liable for any medical bills related to claims on these insurance policies, and for the purpose of executing such scheme and artifice, knowingly caused to be placed in an authorized depository for mail, to be sent and delivered, and to cause to be delivered, by a private and commercial interstate carrier and United States mail, letters and settlement checks from Equity Insurance, State Farm, American Family, Assurance America and Progressive, all contrary to the provisions of Title 18, United States Code, Section 1341; all in violation of Title 18, United States Code, Section 1349.

41.



**COUNTS 3 through 40**  
 (Wire Fraud)  
18 U.S.C. § 1343

42. The factual allegations of paragraphs 1 through 36 of this Superseding Indictment are incorporated by reference as if fully set forth to allege a scheme and artifice to obtain money by materially false representations.

43. On or about the dates set forth in each individual count, within Boone and Jackson Counties, in the Western District of Missouri and elsewhere, the defendants set forth in each individual count, aiding and abetting each other and others, for the purpose of executing the above-described scheme and artifice to obtain money by materially false representations, knowingly transmitted or caused to be transmitted in interstate commerce by means of wire communications the following signs, signals and sounds, each constituting a separate counts of this superseding indictment, as follows:

| <b>COUNT</b> | <b>DATE</b> | <b>DEFENDANT(S)</b>  | <b>INTERSTATE TRANSMISSION</b>   |
|--------------|-------------|--|--|
| 3            | 1/09/2018   | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a “Courtney McAllister,” “Cooter,” “Coot,”<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(04) MICHAEL JADON CARTER,</b><br><b>(05) MATTHEW STEPHEN AKINS</b>                | Email from <a href="mailto:sadedeji@amfam.com">sadedeji@amfam.com</a> to <a href="mailto:latoyab323@yahoo.com">latoyab323@yahoo.com</a> concerning Release and Indemnity Agreement for <b>BROWN</b> to sign in order to receive settlement check in connection with incident that occurred on or about December 17, 2017 |
| 4            | 6/4/2018    | <b>(01) LAWRENCE COURTNEY LAWHORN,</b> a/k/a “Courtney McAllister,” “Cooter,” “Coot,”<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(06) MICHAEL STUART SMITH</b> a/k/a “Black Mike,”<br><b>(07) TARON DONTE FORD</b> | E-mail from <a href="mailto:latoyab323@yahoo.com">latoyab323@yahoo.com</a> to <a href="mailto:statefarmclaims@statefarm.com">statefarmclaims@statefarm.com</a> that included medical bills and invoices, in connection with an incident that occurred on or about May 12, 2018   |

| COUNT | DATE      | DEFENDANT(S)  | INTERSTATE TRANSMISSION  |
|-------|-----------|---|--|
| 5     | 6/5/2018  | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(06) MICHAEL STUART SMITH</b> a/k/a "Black Mike,"<br><b>(07) TARON DONTE FORD</b> | E-mail from <a href="mailto:rickmeals1959@gmail.com">rickmeals1959@gmail.com</a> to <a href="mailto:statefarmclaims@statefarm.com">statefarmclaims@statefarm.com</a> that included medical bills and invoices, in connection with an incident that occurred on or about May 12, 2018                                 |
| 6     | 6/13/2018 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(06) MICHAEL STUART SMITH</b> a/k/a "Black Mike,"<br><b>(07) TARON DONTE FORD</b> | E-mail from <a href="mailto:michealstuartsmith1@gmail.com">michealstuartsmith1@gmail.com</a> to <a href="mailto:statefarmclaims@statefarm.com">statefarmclaims@statefarm.com</a> that included medical information, in connection with an incident that occurred on or about May 12, 2018                            |
| 7     | 6/13/2018 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(06) MICHAEL STUART SMITH</b> a/k/a "Black Mike,"<br><b>(07) TARON DONTE FORD</b> | E-mail from <a href="mailto:wboone85@gmail.com">wboone85@gmail.com</a> to <a href="mailto:statefarmclaims@statefarm.com">statefarmclaims@statefarm.com</a> that included medical information, in connection with an incident that occurred on or about May 12, 2018  |
| 8     | 6/13/2018 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(06) MICHAEL STUART SMITH</b> a/k/a "Black Mike,"<br><b>(07) TARON DONTE FORD</b> | E-mail from <a href="mailto:presidentachel86@gmail.com">presidentachel86@gmail.com</a> to <a href="mailto:statefarmclaims@statefarm.com">statefarmclaims@statefarm.com</a> that included medical information, in connection with an incident that occurred on or about May 12, 2018                                  |
| 9     | 6/13/2018 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(06) MICHAEL STUART SMITH</b> a/k/a "Black Mike,"<br><b>(07) TARON DONTE FORD</b> | E-mail from <a href="mailto:taronford@gmail.com">taronford@gmail.com</a> to <a href="mailto:statefarmclaims@statefarm.com">statefarmclaims@statefarm.com</a> that included medical information, in connection with an incident that occurred on or about May 12, 2018  |
| 10    | 6/14/2018 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(06) MICHAEL STUART SMITH</b> a/k/a "Black Mike,"<br><b>(07) TARON DONTE FORD</b> | E-mail from <a href="mailto:presidentachel86@gmail.com">presidentachel86@gmail.com</a> to <a href="mailto:statefarmclaims@statefarm.com">statefarmclaims@statefarm.com</a> that included a request for the direct payment of medical expenses, in connection with an incident that occurred on or about May 12, 2018 |

| COUNT | DATE       | DEFENDANT(S)   | INTERSTATE TRANSMISSION   |
|-------|------------|--|---|
| 11    | 7/19/2018  | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(06) MICHAEL STUART SMITH</b> a/k/a "Black Mike,"<br><b>(07) TARON DONTE FORD</b>                                  | E-mail from <a href="mailto:michealstuartsmith1@gmail.com">michealstuartsmith1@gmail.com</a> to <a href="mailto:statefarmclaims@statefarm.com">statefarmclaims@statefarm.com</a> that included a signed release of claims form, in connection with an incident that occurred on or about May 12, 2018 |
| 12    | 9/12/2018  | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(08) TIERA RACHELL WALLACE,</b><br><b>(09) LANAY DESHAWN WALLACE,</b><br><b>(10) DYLAN JAMES DANIELSSON,</b><br><b>(19) CEDRICK SHAWNDALE GOLDMAN</b> | E-mail from <a href="mailto:cedgoldman@gmail.com">cedgoldman@gmail.com</a> to <a href="mailto:LKozel@aainsco.com">LKozel@aainsco.com</a> that included medical bills and reports, in connection with an incident that occurred on or about August 11, 2018  |
| 13    | 09/16/2018 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(08) TIERA RACHELL WALLACE,</b><br><b>(09) LANAY DESHAWN WALLACE,</b><br><b>(10) DYLAN JAMES DANIELSSON,</b><br><b>(19) CEDRICK SHAWNDALE GOLDMAN</b> | E-mail from <a href="mailto:lanaywallace@gmail.com">lanaywallace@gmail.com</a> to <a href="mailto:LKozel@aainsco.com">LKozel@aainsco.com</a> that included medical bills, in connection with an incident that occurred on or about August 11, 2018  |
| 14    | 10/08/2018 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(08) TIERA RACHELL WALLACE,</b><br><b>(09) LANAY DESHAWN WALLACE,</b><br><b>(10) DYLAN JAMES DANIELSSON,</b><br><b>(19) CEDRICK SHAWNDALE GOLDMAN</b> | E-mail from <a href="mailto:wtiera122@gmail.com">wtiera122@gmail.com</a> to <a href="mailto:LKozel@aainsco.com">LKozel@aainsco.com</a> that included medical bill, in connection with an incident that occurred on or about August 11, 2018   |
| 15    | 10/25/2018 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(08) TIERA RACHELL WALLACE,</b><br><b>(09) LANAY DESHAWN WALLACE,</b><br><b>(10) DYLAN JAMES DANIELSSON,</b><br><b>(19) CEDRICK SHAWNDALE GOLDMAN</b> | E-mail from <a href="mailto:cedgoldman@gmail.com">cedgoldman@gmail.com</a> to <a href="mailto:LKozel@aainsco.com">LKozel@aainsco.com</a> that included a Hold Harmless Agreement, in connection with an incident that occurred on or about August 11, 2018  |

| COUNT | DATE       | DEFENDANT(S)   | INTERSTATE TRANSMISSION  |
|-------|------------|--|--|
| 16    | 11/13/2018 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a “Courtney McAllister,” “Cooter,” “Coot,”<br><b>(08) TIERA RACHELL WALLACE,</b><br><b>(09) LANAY DESHAWN WALLACE,</b><br><b>(10) DYLAN JAMES DANIELSSON,</b><br><b>(19) CEDRICK SHAWNDALE GOLDMAN</b> | E-mail from <a href="mailto:dylanjamesdanielsson@gmail.com">dylanjamesdanielsson@gmail.com</a> to <a href="mailto:LKozel@aainsco.com">LKozel@aainsco.com</a> that included a Hold Harmless Agreement, in connection with an incident that occurred on or about August 11, 2018 |
| 17    | 12/06/2018 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a “Courtney McAllister,” “Cooter,” “Coot,”<br><b>(08) TIERA RACHELL WALLACE,</b><br><b>(09) LANAY DESHAWN WALLACE,</b><br><b>(10) DYLAN JAMES DANIELSSON,</b><br><b>(19) CEDRICK SHAWNDALE GOLDMAN</b> | E-mail from <a href="mailto:dylanjamesdanielsson@gmail.com">dylanjamesdanielsson@gmail.com</a> to <a href="mailto:LKozel@aainsco.com">LKozel@aainsco.com</a> that included a Stop Payment Affidavit, in connection with an incident that occurred on or about August 11, 2018  |
| 18    | 2/17/2019  | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a “Courtney McAllister,” “Cooter,” “Coot,”<br><b>(07) TARON DONTE FORD,</b><br><b>(11) LARELL MONTEZ BANKS</b>   | Snapchat message from “rydacash” to “courtmcallister,” wherein “rydacash” sent “courtmcallister” images of State Farm automobile policy for a 2013 Chevrolet Camaro that was involved in an incident on or about February 21, 2019   |
| 19    | 2/22/2019  | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a “Courtney McAllister,” “Cooter,” “Coot,”<br><b>(07) TARON DONTE FORD,</b><br><b>(11) LARELL MONTEZ BANKS</b>   | Snapchat message from “rydacash” to “courtmcallister,” wherein “rydacash” sent “courtmcallister” <b>BANKS’S</b> personal identifying information, in connection with an incident that occurred on or about February 21, 2019   |
| 20    | 2/25/2019  | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a “Courtney McAllister,” “Cooter,” “Coot,”<br><b>(07) TARON DONTE FORD,</b><br><b>(11) LARELL MONTEZ BANKS</b>   | Snapchat message from “tyweed4300” to “courtmcallister,” wherein “tyweed4300” sent “courtmcallister” <b>FORD’S</b> personal identifying information, in connection with an incident that occurred on or about February 21, 2019  |

| COUNT | DATE      | DEFENDANT(S)   | INTERSTATE TRANSMISSION  |
|-------|-----------|--|--|
| 21    | 3/14/2019 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN</b>                                   | Telephone call from <b>BROWN</b> to a Progressive Special Investigative Unit Investigator outside the State of Missouri concerning claim in connection with the incident on or about January 6, 2019   |
| 22    | 3/15/2019 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(07) TARON DONTE FORD,</b><br><b>(11) LARELL MONTEZ BANKS</b> | E-mail from <a href="mailto:larellbanks@gmail.com">larellbanks@gmail.com</a> to <a href="mailto:AutoMedicalClaims@StateFarm.com">AutoMedicalClaims@StateFarm.com</a> concerning medical bills, a contact number, and <b>BANKS'</b> statement that he would deal with medical providers directly, in connection with an incident that occurred on or about February 21, 2019    |
| 23    | 3/27/2019 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(07) TARON DONTE FORD,</b><br><b>(11) LARELL MONTEZ BANKS</b> | E-mail from <a href="mailto:larellbanks@gmail.com">larellbanks@gmail.com</a> to <a href="mailto:statefarmclaims@statefarm.com">statefarmclaims@statefarm.com</a> concerning medical bills, in connection with an incident that occurred on or about February 21, 2019  |
| 24    | 4/15/2019 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(07) TARON DONTE FORD,</b><br><b>(11) LARELL MONTEZ BANKS</b> | E-mail from <a href="mailto:taronford4300@gmail.com">taronford4300@gmail.com</a> to <a href="mailto:statefarmclaims@statefarm.com">statefarmclaims@statefarm.com</a> concerning medical bills and reports, in connection with an incident that occurred on or about February 21, 2019  |
| 25    | 4/23/2019 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(07) TARON DONTE FORD,</b><br><b>(11) LARELL MONTEZ BANKS</b> | E-mail from <a href="mailto:taronford4300@gmail.com">taronford4300@gmail.com</a> to <a href="mailto:AutoMedicalClaims@statefarm.com">AutoMedicalClaims@statefarm.com</a> requesting direct payment of medical bills and <b>FORD's</b> statement that he would deal directly with medical providers, in connection with an incident that occurred on or about February 21, 2019 |

| <b>COUNT</b> | <b>DATE</b> | <b>DEFENDANT(S)</b>  | <b>INTERSTATE TRANSMISSION</b>   |
|--------------|-------------|--|--|
| 26           | 05/22/2019  | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(07) TARON DONTE FORD,</b><br><b>(11) LARELL MONTEZ BANKS</b> | Facsimile sent from a FedEx office in Independence, Missouri to State Farm, 855-820-6318, outside the State of Missouri concerning medical bills and records of <b>FORD</b> in connection with an incident that occurred on or about February 21, 2019                   |
| 27           | 8/6/2019    | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(02) LAUREN COURTNEY LUQUE</b>                                | Snapchat message from "courtmcallister" to "laluque52," wherein "courtmcallister" told "laluque52" to go to various hospitals to make false medical claims and to run all the most expensive tests, in connection with an incident that occurred on about August 6, 2019 |
| 28           | 8/7/2019    | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(02) LAUREN COURTNEY LUQUE</b>                                | Snapchat message from "courtmcallister" to "laluque52," wherein "courtmcallister" told "laluque52" to go back to a hospital and make false medical claims and to run further tests, in connection with an incident that occurred on or about August 6, 2019              |
| 29           | 08/13/2019  | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN</b>                                   | Telephone call from <b>LAWHORN</b> to a Progressive Special Investigative Unit Investigator outside the State of Missouri concerning claim in connection with the incident on or about January 6, 2019   |
| 30           | 9/10/2019   | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(02) LAUREN COURTNEY LUQUE</b>                                | E-mail from <a href="mailto:laluque52@gmail.com">laluque52@gmail.com</a> to <a href="mailto:statefarmclaims@statefarm.com">statefarmclaims@statefarm.com</a> that included medical bills, in connection with an incident that occurred on or about August 6, 2019        |
| 31           | 9/13/2019   | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(02) LAUREN COURTNEY LUQUE</b>                                | E-mail from <a href="mailto:laluque52@gmail.com">laluque52@gmail.com</a> to <a href="mailto:statefarmclaims@statefarm.com">statefarmclaims@statefarm.com</a> that included a release agreement, in connection with an incident that occurred on or about August 6, 2019  |

| <b>COUNT</b> | <b>DATE</b> | <b>DEFENDANT(S)</b>  | <b>INTERSTATE TRANSMISSION</b>   |
|--------------|-------------|--|--|
| 32           | 9/17/2019   | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(02) LAUREN COURTNEY LUQUE</b>  | Interstate telephone call from <b>LUQUE</b> to State Farm Insurance agent correcting address for mail payment causing a stop payment on prior check and new payment to be issued, in connection with an incident that occurred on or about August 6, 2019  |
| 33           | 9/20/2019   | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN</b>   | A check from Progressive, check # 2779494490, in the amount of \$17,350.00 was deposited at a United Credit union account in the Western District of Missouri, account number ending in xx6179 and said account belonging to <b>LAWHORN</b> , in connection with an incident that occurred or about January 6, 2019. This caused a wire transfer from a Progressive PNC Bank account outside the State of Missouri to a United Credit Union account, account number ending in xx6179 |
| 34           | 9/23/2019   | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(02) LAUREN COURTNEY LUQUE</b>  | A \$7,472.01 wire transfer from a State Farm JP Morgan Chase outside the state of Missouri to a Bank of America account number ending in xx2210 that belonged to <b>LUQUE</b> , in connection with an incident that occurred or about August 6, 2019   |
| 35           | 12/18/2019  | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(17) TARA COLLEEN JACKSON,</b><br><b>(18) MICHAEL LEE GENE STAPLETON</b> | Snapchat message from "courtmcallister" to "lgezzy86" in connection with the incident that occurred on or about December 16, 2019. "courtmcallister" wrote "Just let me know you were hit in kc you and you aunt. Your car is damaged and you are currently in pain and need to open a claim. And that you were told that whoever hit you said that they do not have insurance"  |



| COUNT | DATE       | DEFENDANT(S)   | INTERSTATE TRANSMISSION  |
|-------|------------|--|--|
| 36    | 12/23/2019 | (01) LAWRENCE COURTNEY LAWHORN a/k/a "Courtney McAllister," "Cooter," "Coot,"<br>(03) LATOYA MARIE BROWN,<br>(17) TARA COLLEEN JACKSON,<br>(18) MICHAEL LEE GENE STAPLETON | Snapchat message from "courtmcallister" to "lgezzy86" in connection with the incident that occurred on or about December 16, 2019. "courtmcallister" provided the State Farm claim number, first name of the claim representative, and phone number for the claim representative                   |
| 37    | 12/30/2019 | (01) LAWRENCE COURTNEY LAWHORN a/k/a "Courtney McAllister," "Cooter," "Coot,"<br>(03) LATOYA MARIE BROWN,<br>(17) TARA COLLEEN JACKSON,<br>(18) MICHAEL LEE GENE STAPLETON | Snapchat message from "courtmcallister" to "lgezzy86" in connection with the incident that occurred or about December 16, 2019. "courtmcallister" wrote "Please call me to discuss my options for resolution, as my debt terribly exceeds the coverage that appears available to me. (573)3181628" |
| 38    | 12/30/2019 | (01) LAWRENCE COURTNEY LAWHORN a/k/a "Courtney McAllister," "Cooter," "Coot,"<br>(03) LATOYA MARIE BROWN,<br>(17) TARA COLLEEN JACKSON,<br>(18) MICHAEL LEE GENE STAPLETON | Facsimile sent from Columbia, Missouri by STAPLETON to State Farm, 855-820-6318, outside the State of Missouri concerning medical bills and records of STAPLETON in connection with an incident that occurred on or about December 16, 2019  |
| 39    | 01/15/2020 | (01) LAWRENCE COURTNEY LAWHORN a/k/a "Courtney McAllister," "Cooter," "Coot,"<br>(03) LATOYA MARIE BROWN,<br>(17) TARA COLLEEN JACKSON,<br>(18) MICHAEL LEE GENE STAPLETON | E-mail from <a href="mailto:marie.lawhorn@yahoo.com">marie.lawhorn@yahoo.com</a> to <a href="mailto:statefarmclaims@statefarm.com">statefarmclaims@statefarm.com</a> that included a medical bills, in connection with an incident that occurred or about December 16, 2019                        |
| 40    | 06/03/2020 | (01) LAWRENCE COURTNEY LAWHORN a/k/a "Courtney McAllister," "Cooter," "Coot,"<br>(15) KATHY DAVY KIMHANG,<br>(16) MAURICE FRANK PENNY, JR.                                 | Telephone call from a Progressive Special Investigative Unit Investigator outside the State of Missouri to PENNY concerning claim in connection with the incident on or about October 20, 2019   |

All in violation of Title 18, United States Code, Sections 1343 and 2.



**COUNTS 41 through 46**  
 (Attempted Wire Fraud)  
18 U.S.C. § 1349

44. The factual allegations of paragraphs 1 through 36 of this Superseding Indictment are incorporated by reference as if fully set forth to allege a scheme and artifice to obtain money by materially false representations.

45. On or about the dates set forth in each individual count, within Boone and Jackson Counties, in the Western District of Missouri and elsewhere, the defendants set forth in each individual count, aiding and abetting each other and others, for the purpose of attempting to executing the above-described scheme and artifice to obtain money by materially false representations, knowingly transmitted or caused to be transmitted in interstate commerce by means of wire communications the following signs, signals and sounds, each constituting a separate counts of this Superseding Indictment, as follows:

| <b>COUNT</b> | <b>DATE</b> | <b>DEFENDANT(S)</b>  | <b>INTERSTATE TRANSMISSION</b>   |
|--------------|-------------|--|--|
| 41           | 2/24/2019   | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a “Courtney McAllister,” “Cooter,” “Coot,”<br><b>(06) MICHAEL STUART SMITH</b> a/k/a “Black Mike,”<br><b>(12) CORNELIUS DESHAWN PHELPS,</b><br><b>(13) DONTAY LARAY CAMPBELL,</b><br><b>(14) ERIONA TYJAEZ FLEEKES</b> | Snapchat message from “black504mike” to “courtmcallister,” wherein “black504mike” sent “courtmcallister” images of a GEICO automobile policy for a 2007 Chevrolet Equinox, in connection with an incident that would occur on or about February 27, 2019 |
| 42           | 2/28/2019   | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a “Courtney McAllister,” “Cooter,” “Coot,”<br><b>(06) MICHAEL STUART SMITH</b> a/k/a “Black Mike,”<br><b>(12) CORNELIUS DESHAWN PHELPS,</b><br><b>(13) DONTAY LARAY CAMPBELL,</b><br><b>(14) ERIONA TYJAEZ FLEEKES</b> | T-Mobile cellphone call from <b>FLEEKES</b> to a GEICO representative to report a claim in connection with an incident that occurred on or about February 27 2019  |

| COUNT | DATE      | DEFENDANT(S)  | INTERSTATE TRANSMISSION   |
|-------|-----------|---|---|
| 43    | 3/02/2019 | (01) LAWRENCE COURTNEY LAWHORN a/k/a "Courtney McAllister," "Cooter," "Coot,"<br>(06) MICHAEL STUART SMITH a/k/a "Black Mike,"<br>(12) CORNELIUS DESHAWN PHELPS,<br>(13) DONTAY LARAY CAMPBELL,<br>(14) ERIONA TYJAEZ FLEEKES | A T-Mobile cellphone call from SMITH to a GEICO representative regarding alleged injuries in connection with an incident that occurred on or about February 27, 2019  |
| 44    | 3/05/2019 | (01) LAWRENCE COURTNEY LAWHORN a/k/a "Courtney McAllister," "Cooter," "Coot,"<br>(06) MICHAEL STUART SMITH a/k/a "Black Mike,"<br>(12) CORNELIUS DESHAWN PHELPS,<br>(13) DONTAY LARAY CAMPBELL,<br>(14) ERIONA TYJAEZ FLEEKES | An AT&T cellphone call from CAMPBELL to a GEICO representative regarding alleged injuries in connection with an incident that occurred on or about February 27, 2019  |
| 45    | 3/05/2019 | (01) LAWRENCE COURTNEY LAWHORN a/k/a "Courtney McAllister," "Cooter," "Coot,"<br>(06) MICHAEL STUART SMITH a/k/a "Black Mike,"<br>(12) CORNELIUS DESHAWN PHELPS,<br>(13) DONTAY LARAY CAMPBELL,<br>(14) ERIONA TYJAEZ FLEEKES | Snapchat message from "black504mike" to "courtmcallister," wherein "black504mike" sent "courtmcallister" SMITH's personal information, PHELPS' name, and vehicle information in connection with an incident that occurred on or about February 27, 2019 |
| 46    | 3/06/2019 | (01) LAWRENCE COURTNEY LAWHORN a/k/a "Courtney McAllister," "Cooter," "Coot,"<br>(06) MICHAEL STUART SMITH a/k/a "Black Mike,"<br>(12) CORNELIUS DESHAWN PHELPS,<br>(13) DONTAY LARAY CAMPBELL,<br>(14) ERIONA TYJAEZ FLEEKES | A T-Mobile cellphone call from a GEICO representative to PHELPS regarding alleged injuries in connection with an incident that occurred on or about February 27, 2019   |

All in violation of Title 18, United States Code, Sections 1343 and 1349.

**COUNT 47**  
(Mail Fraud)  
18 U.S.C. § 1341

46. The factual allegations of paragraphs 1 through 36 of this Superseding Indictment are incorporated by reference as if fully set forth.

47. On or about September 18, 2019, in Boone County, in the Western District of Missouri, and elsewhere, for the purpose of executing and attempting to execute the above described scheme and artifice to defraud and obtain money, the defendants, **(01) LAWRENCE COURTNEY LAWHORN** a/k/a “Courtney McAllister,” “Cooter,” “Coot” and **(02) LAUREN COURTNEY LUQUE**, aiding and abetting each other, knowingly caused to be placed in an authorized depository for mail, to be sent and delivered by a private and commercial interstate carrier an envelope sent via UPS, tracking number 1Z6331051378481315, on September 18, 2019, from State Farm to **(02) LAUREN COURTNEY LUQUE**, conveying a check dated September 18, 2019, in the amount of \$3,200.00, drawn on a JP Morgan Chase Bank account of State Farm Mutual Automobile Insurance Company; all in violation of Title 18, United States Code, Sections 1341 and 2.

**COUNTS 48-66**  
(Mail Fraud)  
18 U.S.C. § 1341

48. The factual allegations of paragraphs 1 through 36 of this Superseding Indictment are incorporated by reference as if fully set forth.

49. On or about the dates set forth in each individual count, within Boone and Jackson Counties, in the Western District of Missouri and elsewhere, the defendants set forth in each individual count, aiding and abetting each other and others, for the purpose of executing the above-

described scheme and artifice to obtain money by materially false representations, knowingly caused to be placed in an authorized depository for mail, to be sent and delivered, and to cause to be delivered, by a private and commercial interstate carrier and United States mail, the following documents, each constituting a separate count of this Indictment:

| <b>COUNT</b> | <b>DATE</b> | <b>DEFENDANT(S)</b>   | <b>DESCRIPTION OF MAILING</b>   |
|--------------|-------------|---|---|
| 48           | 6/22/2017   | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot"   | A settlement check from State Farm, check #336932, in the amount of \$5,000.00, sent by State Farm to <b>LAWHORN</b> at 5601 Manning Ave, Raytown, MO via United States mail in connection with the incident that occurred on or about June 5, 2017                 |
| 49           | 10/19/2017  | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot"   | Letter sent to Equity Insurance at P.O. Box 756, Tulsa, Oklahoma by <b>LAWHORN</b> in connection with the incident that occurred on or about June 5, 2017   |
| 50           | 01/02/2018  | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot"   | A settlement check from Equity Insurance, check #554489, in the amount of \$1,500.00, sent by Equity Insurance to <b>LAWHORN</b> at 5309 Lewis Ave, Kansas City, MO via United States mail in connection with the incident that occurred on or about June 5, 2017   |
| 51           | 1/24/2018   | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(04) MICHAEL JADON CARTER,</b><br><b>(05) MATTHEW STEPHEN AKINS</b> | A settlement check from American Family, check #241210, in the amount of \$50,000.00, sent by American Family to <b>CARTER</b> at 6 Bright Star Dr., Columbia, MO via United States mail in connection with an incident that occurred on or about December 17, 2017 |
| 52           | 1/25/2018   | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(04) MICHAEL JADON CARTER,</b><br><b>(05) MATTHEW STEPHEN AKINS</b> | A settlement check from American Family, check #244712, in the amount of \$12,878.23 sent by American Family to <b>BROWN</b> at 5309 Lewis Ave, Kansas City, MO via United States mail in connection with an incident that occurred on or about December 17, 2017   |

| COUNT | DATE       | DEFENDANT(S)   | DESCRIPTION OF MAILING  |
|-------|------------|--|---|
| 53    | 1/30/2018  | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(04) MICHAEL JADON CARTER,</b><br><b>(05) MATTHEW STEPHEN AKINS</b>  | A settlement check from American Family, check #253269, in the amount of \$9,977.55, sent by American Family to <b>AKINS</b> at 14195 Old Highway 66, Saint James, MO via United States mail in connection with an incident that occurred on or about December 17, 2017 |
| 54    | 06/13/2018 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(06) MICHAEL STUART SMITH</b> a/k/a "Black Mike,"<br><b>(07) TARON DONTE FORD</b>                                  | A settlement check from State Farm, check #568939, in the amount of \$18,528.25, sent by State Farm to <b>BROWN</b> at 4411 Ria Street, Columbia, MO via UPS in connection with an incident that occurred on or about May 12, 2018                                      |
| 55    | 06/21/2018 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(06) MICHAEL STUART SMITH</b> a/k/a "Black Mike,"<br><b>(07) TARON DONTE FORD</b>                                  | A settlement check from State Farm, check #574699, in the amount of \$14,369.25, sent by State Farm to <b>FORD</b> at 6905 E. 143rd Street, Grandview, MO via United States mail in connection with an incident that occurred on or about May 12, 2018                  |
| 56    | 07/20/2018 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(06) MICHAEL STUART SMITH</b> a/k/a "Black Mike,"<br><b>(07) TARON DONTE FORD</b>                                  | A settlement check from State Farm, check #593191, in the amount of \$30,130.00, sent by State Farm to <b>SMITH</b> at 3807 Chestnut Ave, Kansas City, MO via United States mail in connection with an incident that occurred on or about May 12, 2018                  |
| 57    | 09/17/2018 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(08) TIERA RACHELL WALLACE,</b><br><b>(09) LANAY DESHAWN WALLACE,</b><br><b>(10) DYLAN JAMES DANIELSSON,</b><br><b>(19) CEDRICK SHAWNDALE GOLDMAN</b> | A settlement check from AssuranceAmerica, check #567306, in the amount of \$2,000.00, sent by AssuranceAmerica to <b>LANAY DESHAWN WALLACE</b> at 301 Moore Walkway, Columbia, MO via United States mail in connection with an incident that occurred August 11, 2018   |

| COUNT | DATE       | DEFENDANT(S)  | DESCRIPTION OF MAILING   |
|-------|------------|---|--|
| 58    | 09/28/2018 | (01) LAWRENCE COURTNEY LAWHORN a/k/a "Courtney McAllister," "Cooter," "Coot,"<br>(08) TIERA RACHELL WALLACE,<br>(09) LANAY DESHAWN WALLACE,<br>(10) DYLAN JAMES DANIELSSON,<br>(19) CEDRICK SHAWNDALE GOLDMAN | A settlement check from AssuranceAmerica, check #569275, in the amount of \$4,000.00, sent by AssuranceAmerica to GOLDMAN at 6 Bright Star Drive, Columbia, Missouri via United States mail in connection with an incident that occurred August 11, 2018             |
| 59    | 10/19/2018 | (01) LAWRENCE COURTNEY LAWHORN a/k/a "Courtney McAllister," "Cooter," "Coot,"<br>(08) TIERA RACHELL WALLACE,<br>(09) LANAY DESHAWN WALLACE,<br>(10) DYLAN JAMES DANIELSSON,<br>(19) CEDRICK SHAWNDALE GOLDMAN | A settlement check from AssuranceAmerica, check #572205, in the amount of \$10,000.00, sent by AssuranceAmerica to TIERA RACHELL WALLACE at 211 Providence Walkway, Columbia, MO via United States mail in connection with an incident that occurred August 11, 2018 |
| 60    | 10/29/2018 | (01) LAWRENCE COURTNEY LAWHORN a/k/a "Courtney McAllister," "Cooter," "Coot,"<br>(08) TIERA RACHELL WALLACE,<br>(09) LANAY DESHAWN WALLACE,<br>(10) DYLAN JAMES DANIELSSON,<br>(19) CEDRICK SHAWNDALE GOLDMAN | A settlement check from AssuranceAmerica, check #573138, in the amount of \$10,900.00, sent by AssuranceAmerica to GOLDMAN at 6 Bright Star Drive, Columbia, MO via United States mail in connection with an incident that occurred August 11, 2018                  |
| 61    | 11/15/2018 | (01) LAWRENCE COURTNEY LAWHORN a/k/a "Courtney McAllister," "Cooter," "Coot,"<br>(08) TIERA RACHELL WALLACE,<br>(09) LANAY DESHAWN WALLACE,<br>(10) DYLAN JAMES DANIELSSON,<br>(19) CEDRICK SHAWNDALE GOLDMAN | A settlement check from AssuranceAmerica, check #575690, in the amount of \$5,289.95, sent by AssuranceAmerica to DANIELSSON at 4407 Ria Street, Columbia, MO via United States mail in connection with an incident that occurred August 11, 2018                    |
| 62    | 5/10/2019  | (01) LAWRENCE COURTNEY LAWHORN a/k/a "Courtney McAllister," "Cooter," "Coot,"<br>(07) TARON DONTE FORD,<br>(11) LARELL MONTEZ BANKS   | A settlement check from State Farm, check #771789, in the amount of \$48,552.00, sent by State Farm to BANKS at 602 Pennant Street, Columbia, MO via United States mail in connection with an incident that occurred on or about February 21, 2019                   |

| COUNT | DATE       | DEFENDANT(S)   | DESCRIPTION OF MAILING   |
|-------|------------|--|--|
| 63    | 06/06/2019 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(07) TARON DONTE FORD,</b><br><b>(11) LARELL MONTEZ BANKS</b>   | A settlement check from State Farm, check #787775, in the amount of \$34,972.00, sent by State Farm to <b>FORD</b> at 7205 College Ave, Kansas City, MO via United States mail in connection with an incident that occurred on or about February 21, 2019                                |
| 64    | 01/16/2020 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(17) TARA COLLEEN JACKSON,</b><br><b>(18) MICHAEL LEE GENE STAPLETON</b> | A settlement check from State Farm, check #932437, in the amount of \$50,000.00, sent by State Farm to <b>STAPLETON</b> at 2300 Sears Ct., Apt. 4, Columbia, MO via UPS (tracking # 1Z6331051379229659) in connection with an incident that occurred on or about December 16, 2019       |
| 65    | 02/07/2020 | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(03) LATOYA MARIE BROWN,</b><br><b>(17) TARA COLLEEN JACKSON,</b><br><b>(18) MICHAEL LEE GENE STAPLETON</b> | A settlement check from State Farm, check #946195, in the amount of \$50,000.00, sent by State Farm to <b>JACKSON</b> at 16800 E. Larkspur Lane, Apt. 3, Independence via UPS (tracking # 1Z6331051379360293) in connection with an incident that occurred on or about December 16, 2019 |
| 66    | 7/07/2020  | <b>(01) LAWRENCE COURTNEY LAWHORN</b> a/k/a "Courtney McAllister," "Cooter," "Coot,"<br><b>(15) KATHY DAVY KIMHANG,</b><br><b>(16) MAURICE FRANK PENNY, JR.</b>  | A settlement check from Progressive, check # 2780725183, in the amount of \$9,267.75 sent by Progressive to <b>KIMHANG</b> at 6947 Vermont Ave., Louis, MO via United States mail in connection with an incident that occurred on or about October 20, 2019                              |

All in violation of Title 18, United States Code, Sections 1341 and 2.

**COUNT 67**  
(Laundering of Monetary Instruments)  
18 U.S.C. § 1956(a)(1)(B)(i)

50. On Between February 2, 2018, and March 23, 2018, said dates being approximate, within Boone County, in the Western District of Missouri, and elsewhere, the defendants, **(01) LAWRENCE COURTNEY LAWHORN** a/k/a "Courtney McAllister," "Cooter," "Coot" and



**(04) MICHAEL JADON CARTER**, knowingly and intentionally combined, conspired and agreed with each other and others, known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, mail fraud, as charged in Count 51 of this Superseding Indictment, 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 that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, contrary to the provisions of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**Manner and Means**

51. The members of the conspiracy used various manners and means to effect the objects and purposes of the conspiracy, including but not limited to the following:

52. On or about February 1, 2018, **CARTER** opened two bank accounts at U.S. Bank.

53. On or about February 1, 2018, **CARTER** deposited \$20,000 into one account, \$20,000 into the second account, and obtained \$10,000 all from an American Family insurance settlement check in the amount of \$50,000 in connection with the December 17, 2017, incident. This settlement check was proceeds of the mail fraud charged in Count 51.

54. On or about February 2, 2018, **CARTER** purchased five cashier's checks, each in the amount of \$4,000 and each made payable to **LAWHORN**.



55. On or about February 9, 2018, **CARTER** closed the two U.S. Bank accounts he opened on February 1, 2018.

56. On or about March 23, 2018, **LAWHORN** cashed each of the five cashier's checks purchased by **CARTER** on or about February 2, 2018.

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

**COUNT 68**  
(Aggravated Identity Theft)  
18 U.S.C. § 1956(a)(1)(B)(i)

58. Between on or about May 12, 2018, and June 13, 2018, in the Western District of Missouri, and elsewhere, defendant **(01) LAWRENCE COURTNEY LAWHORN** a/k/a "Courtney McAllister," "Cooter," "Coot," did knowingly use, without lawful authority, a means of identification of another person, R.M., during and in relation to the commission of a felony enumerated in 18 U.S.C. § 1028A(c)(1), to wit: 18 U.S.C. §§ 1341, 1343 and 1349, and charged in Counts 1 2, 4 through 11, and 54 through 56 of this Superseding Indictment, knowing that the means of identification belonged to another actual person; all in violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT 69**  
(Aggravated Identity Theft)  
18 U.S.C. § 1956(a)(1)(B)(i)

59. Between on or about September 18, 2019, and September 19, 2019, in the Western District of Missouri, and elsewhere, defendant **(01) LAWRENCE COURTNEY LAWHORN** a/k/a "Courtney McAllister," "Cooter," "Coot," and **(02) LAUREN COURTNEY LUQUE**, aiding and abetting each other, did knowingly use, without lawful authority, a means of identification of another person, R.L., during and in relation to the commission of a felony

enumerated in 18 U.S.C. § 1028A(c)(1), to wit: 18 U.S.C. §§ 1341, 1343 and 1349, and charged in Counts 1, 2, 27, 28, 30 through 32, 34, and 47 of this Superseding Indictment, knowing that the means of identification belonged to another actual person; all in violation of Title 18, United State Code, Sections 1028A(a)(1) and 2.

### **FORFEITURE ALLEGATION**

60. The factual allegations of paragraphs 1 through 49 of the Superseding Indictment are re-alleged and incorporated as though fully set forth herein for the purpose of alleging forfeiture to the United States pursuant to the provisions of Title 18, United States Code, Sections 981(a)(1)(A) and (C), and Title 28, United States Code, Section 2461.

61. As a result of the offenses alleged in this Indictment, and pursuant to Title 18, United States Code, Sections 981(a)(1)(A) and (C) and Title 28, United States Code, Section 2461, the defendants:

- a. **(01) LAWRENCE COURTNEY LAWHORN** a/k/a “Courtney McAllister,” “Cooter,” “Coot” in relation to offenses alleged in Counts 1-67;
- b. **(02) LAUREN COURTNEY LUQUE**, in relation to offenses alleged in Counts 1-2, 27-28, 30-32, 34, and 47;
- c. **(03) LATOYA MARIE BROWN** in relation to offenses alleged in Counts 1-11, 21, 29, 33, 35-39, 51-56, and 64-65;
- d. **(04) MICHAEL JADON CARTER** in relation to offenses alleged in Counts 1-3, 51-53, 67;
- e. **(05) MATTHEW STEPHEN AKINS** in relation to offenses alleged in Counts 1-3 and 51-53;

- f. **(06) MICHAEL STUART SMITH** a/k/a “Black Mike” in relation to offenses alleged in Counts 1-2, 4-11, 41-46, and 54-56;
- g. **(07) TARON DONTE FORD** in relation to offenses alleged in Counts 1-2, 4-11, 18-20, 22-26, 54-56 and 62-63;
- h. **(08) TIERA RACHELL WALLACE** in relation to offenses alleged in Counts 1-2, 12-20, 22-25 and 57-63;
- i. **(09) LANAY DESHAWN WALLACE** in relation to offenses alleged in Counts 1-2, 12-17 and 57-61;
- j. **(10) DYLAN JAMES DANIELSSON** relation to offenses alleged in Counts 1-2, 12-17 and 57-61;
- k. **(11) LARELL MONTEZ BANKS** in relation to offenses alleged in Counts 1-2 and 12;
- l. **(15) KATHY DAVY KIMHANG** in relation to offenses alleged in Counts 1-2, 40, 66;
- m. **(16) MAURICE FRANK PENNY, JR.**, in relation to offenses alleged in Counts 1-2, 40, 66;
- n. **(17) TARA COLLEEN JACKSON** in relation to offenses alleged in Counts 1-2, 35-39 and 64-65;
- o. **(18) MICHAEL LEE GENE STAPLETON** in relation to offenses alleged in Counts 1-2, 35-39 and 64-65; and
- p. **(19) CEDRICK SHAWNDALE GOLDMAN** in relation to offenses alleged in Counts 1-2, 12-17 and 57-61;

shall forfeit to the United States all property, real and personal, constituting and involved in and derived from any proceeds the defendant obtained directly and indirectly as a result of the violation incorporated by reference in this Allegation.

### **Money Judgment**

62. A money judgment representing proceeds obtained by the defendants referenced in paragraph 53 of this forfeiture allegation, in that the sum in aggregate constitutes and derived from proceeds traceable to the offenses set forth in the counts related to the defendants referenced in paragraph 53 of this forfeiture allegation and all property involved in and derived from proceeds from the money laundering offense.

### **Substitute Assets**

63. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of forfeitable property.

**A TRUE BILL.**

/s/ Betsy Dougherty  
**FOREPERSON OF THE GRAND JURY**

/s/ Aaron Manes  
**Aaron M. Maness**  
Assistant United States Attorney  
Missouri Bar No. 63666

Dated: 11/18/2020

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

**County of Offense / Division of Filing**

Boone / Central

**Matter to be Sealed**

- Secret Indictment  
 Juvenile

**Defendant Information**

Defendant Name: LAWRENCE COURTNEY LAWHORN

Alias Name: "Courtney McAllister," "Cooter," "Coot"

Birth Date: 01/21/1988

**Related Case Information**

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-01-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any:

Prior Target Letter Case Number, if any:

**U.S. Attorney Information**

AUSA Aaron M. Maness

**Interpreter Needed?**

- Yes Language and/or Dialect:  
 No

**Location Status**

Arrest Date:

- Currently in Federal Custody  
 Currently in State Custody  
 Currently on Bond

Writ Required?  Yes  No

Warrant Required?  Yes  No

**U.S.C. Citations**

Total # of Counts 69

| Set | Index Key & Description of Offense Charged                | Count(s)   |
|-----|---|------------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD.         | 1-2, 41-46 |
| 2   | 18:1343.F "FRAUD BY WIRE, RADIO, OR TELEVISION"           | 3-40       |
| 3   | 18:1341.F FRAUDS AND SWINDLES                             | 47-66      |
| 4   | 18:1956-6501.F "MARIJUANA - SELL, DISTRIBUTE OR DISPENSE" | 67-69      |

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

**County of Offense / Division of Filing**

Boone / Central

**Matter to be Sealed**

- Secret Indictment  
 Juvenile

**Defendant Information**

Defendant Name: LAUREN COURTNEY LUQUE

Alias Name:

Birth Date: 03/10/1986

**Related Case Information**

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-02-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any:

Prior Target Letter Case Number, if any:

**U.S. Attorney Information**

AUSA Aaron M. Maness

**Interpreter Needed?**

- Yes Language and/or Dialect:  
 No

**Location Status**

Arrest Date:

- Currently in Federal Custody  
 Currently in State Custody  
 Currently on Bond

Writ Required?  Yes  No

Warrant Required?  Yes  No

**U.S.C. Citations**

Total # of Counts 10

| Set | Index Key & Description of Offense Charged                | Count(s)         |
|-----|---|------------------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD          | 1-2              |
| 2   | 18:1343.F "FRAUD BY WIRE, RADIO, OR TELEVISION"           | 27-28, 30-32, 34 |
| 3   | 18:1341.F FRAUDS AND SWINDLES                             | 47               |
| 4   | 18:1956-6501.F "MARIJUANA - SELL, DISTRIBUTE OR DISPENSE" | 69               |

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

**County of Offense / Division of Filing**

Boone / Central

**Matter to be Sealed**

- Secret Indictment  
 Juvenile

**Defendant Information**

Defendant Name: LATOYA MARIE BROWN

Alias Name:

Birth Date: 09/09/1985

**Related Case Information**

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-03-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any:

Prior Target Letter Case Number, if any:

**U.S. Attorney Information**

AUSA Aaron M. Maness

**Interpreter Needed?**

- Yes Language and/or Dialect:  
 No

**Location Status**

Arrest Date:

- Currently in Federal Custody  
 Currently in State Custody  
 Currently on Bond

Writ Required?  Yes  No

Warrant Required?  Yes  No

**U.S.C. Citations**

Total # of Counts 27

| Set | Index Key & Description of Offense Charged        | Count(s)                |
|-----|---|-------------------------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD. | 1-2                     |
| 2   | 18:1343.F "FRAUD BY WIRE, RADIO, OR TELEVISION"   | 3-11, 21, 29, 33, 35-39 |
| 3   | 18:1341.F FRAUDS AND SWINDLES                     | 51-56, 64-65            |
| 4   |   |                         |



UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

**County of Offense / Division of Filing**

Boone / Central

**Matter to be Sealed**

- Secret Indictment  
 Juvenile

**Defendant Information**

Defendant Name: MICHAEL JADON CARTER

Alias Name:

Birth Date: 03/19/1986

**Related Case Information**

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-04-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any:

Prior Target Letter Case Number, if any:

**U.S. Attorney Information**

AUSA Aaron M. Maness

**Interpreter Needed?**

- Yes Language and/or Dialect:  
 No

**Location Status**

Arrest Date:

- Currently in Federal Custody  
 Currently in State Custody  
 Currently on Bond

Writ Required?  Yes  No

Warrant Required?  Yes  No

**U.S.C. Citations**

Total # of Counts 7

| Set | Index Key & Description of Offense Charged                | Count(s) |
|-----|---|----------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD.         | 1-2      |
| 2   | 18:1343.F "FRAUD BY WIRE, RADIO, OR TELEVISION"           | 3        |
| 3   | 18:1341.F FRAUDS AND SWINDLES                             | 51-53    |
| 4   | 18:1956-6501.F "MARIJUANA - SELL, DISTRIBUTE OR DISPENSE" | 67       |

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

**County of Offense / Division of Filing**

Boone / Central

**Matter to be Sealed**

- Secret Indictment  
 Juvenile

**Defendant Information**

Defendant Name: MATTHEW STEPHEN AKINS

Alias Name:

Birth Date: 09/22/1988

**Related Case Information**

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-05-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any:

Prior Target Letter Case Number, if any:

**U.S. Attorney Information**

AUSA Aaron M. Maness

**Interpreter Needed?**

- Yes Language and/or Dialect:  
 No

**Location Status**

Arrest Date:

- Currently in Federal Custody  
 Currently in State Custody  
 Currently on Bond

Writ Required?  Yes  No

Warrant Required?  Yes  No

**U.S.C. Citations**

Total # of Counts 6

| Set | Index Key & Description of Offense Charged        | Count(s) |
|-----|---|----------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD. | 1-2      |
| 2   | 18:1343.F "FRAUD BY WIRE, RADIO, OR TELEVISION"   | 3        |
| 3   | 18:1341.F FRAUDS AND SWINDLES                     | 51-53    |
| 4   |   |          |

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

**County of Offense / Division of Filing**

Boone / Central

**Matter to be Sealed**

- Secret Indictment  
 Juvenile

**Defendant Information**

Defendant Name: MICHAEL STUART SMITH

Alias Name: Black Mike

Birth Date: 12/24/1986

**Related Case Information**

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-06-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any: \_\_\_\_\_

Prior Target Letter Case Number, if any: \_\_\_\_\_

**U.S. Attorney Information**

AUSA Aaron M. Maness

**Interpreter Needed?**

- Yes Language and/or Dialect: \_\_\_\_\_  
 No

**Location Status**

Arrest Date: \_\_\_\_\_

- Currently in Federal Custody  
 Currently in State Custody  
 Currently on Bond

Writ Required?  Yes  No

Warrant Required?  Yes  No

**U.S.C. Citations**

Total # of Counts 19

| Set | Index Key & Description of Offense Charged        | Count(s)   |
|-----|---|------------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD. | 1-2, 41-46 |
| 2   | 18:1343.F "FRAUD BY WIRE, RADIO, OR TELEVISION"   | 4-11       |
| 3   | 18:1341.F FRAUDS AND SWINDLES                     | 54-56      |
| 4   |   |            |

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

**County of Offense / Division of Filing**

Boone / Central

**Matter to be Sealed**

- Secret Indictment  
 Juvenile

**Defendant Information**

Defendant Name: TARON DONTE FORD

Alias Name:

Birth Date: 06/25/1985

**Related Case Information**

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-07-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any:

Prior Target Letter Case Number, if any:

**U.S. Attorney Information**

AUSA Aaron M. Maness

**Interpreter Needed?**

- Yes Language and/or Dialect:  
 No

**Location Status**

Arrest Date:

- Currently in Federal Custody  
 Currently in State Custody  
 Currently on Bond

Writ Required?  Yes  No

Warrant Required?  Yes  No

**U.S.C. Citations**

Total # of Counts 23

| Set | Index Key & Description of Offense Charged        | Count(s)           |
|-----|---|--------------------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD. | 1-2                |
| 2   | 18:1343.F "FRAUD BY WIRE, RADIO, OR TELEVISION"   | 4-11, 18-20, 22-26 |
| 3   | 18:1341.F FRAUDS AND SWINDLES                     | 54-56, 62-63       |
| 4   |   |                    |

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

**County of Offense / Division of Filing**

Boone / Central

**Matter to be Sealed**

- Secret Indictment  
 Juvenile

**Defendant Information**

Defendant Name: TIERA RACHELL WALLACE

Alias Name:

Birth Date: 01/20/1992

**Related Case Information**

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-08-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any:

Prior Target Letter Case Number, if any:

**U.S. Attorney Information**

AUSA Aaron M. Maness

**Interpreter Needed?**

- Yes Language and/or Dialect:  
 No

**Location Status**

Arrest Date:

- Currently in Federal Custody  
 Currently in State Custody  
 Currently on Bond

Writ Required?  Yes  No

Warrant Required?  Yes  No

**U.S.C. Citations**

Total # of Counts 13

| Set | Index Key & Description of Offense Charged        | Count(s) |
|-----|---|----------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD. | 1-2      |
| 2   | 18:1343.F "FRAUD BY WIRE, RADIO, OR TELEVISION"   | 12-17    |
| 3   | 18:1341.F FRAUDS AND SWINDLES                     | 57-61    |
| 4   |   |          |

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

**County of Offense / Division of Filing**

Boone / Central

**Matter to be Sealed**

- Secret Indictment  
 Juvenile

**Defendant Information**

Defendant Name: LANAY DESHAWN WALLACE

Alias Name:

Birth Date: 02/15/1994

**Related Case Information**

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-09-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any:

Prior Target Letter Case Number, if any:

**U.S. Attorney Information**

AUSA Aaron M. Maness

**Interpreter Needed?**

- Yes Language and/or Dialect:  
 No

**Location Status**

Arrest Date:

- Currently in Federal Custody  
 Currently in State Custody  
 Currently on Bond

Writ Required?  Yes  No

Warrant Required?  Yes  No

**U.S.C. Citations**

Total # of Counts 13

| Set | Index Key & Description of Offense Charged        | Count(s) |
|-----|---|----------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD. | 1-2      |
| 2   | 18:1343.F "FRAUD BY WIRE, RADIO, OR TELEVISION"   | 12-17    |
| 3   | 18:1341.F FRAUDS AND SWINDLES                     | 57-61    |
| 4   |   |          |

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

**County of Offense / Division of Filing**

Boone / Central

**Matter to be Sealed**

- Secret Indictment  
 Juvenile

**Defendant Information**

Defendant Name: DYLAN JAMES DANIELSSON

Alias Name: \_\_\_\_\_

Birth Date: 09/16/1994

**Related Case Information**

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-10-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any: \_\_\_\_\_

Prior Target Letter Case Number, if any: \_\_\_\_\_

**U.S. Attorney Information**

**AUSA Aaron M. Maness**

**Interpreter Needed?**

- Yes Language and/or Dialect: \_\_\_\_\_  
 No

**Location Status**

Arrest Date: \_\_\_\_\_

- Currently in Federal Custody  
 Currently in State Custody  
 Currently on Bond

**Writ Required?**  Yes  No

**Warrant Required?**  Yes  No

**U.S.C. Citations**

Total # of Counts 13

| Set | Index Key & Description of Offense Charged        | Count(s) |
|-----|---|----------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD. | 1-2      |
| 2   | 18:1343.F "FRAUD BY WIRE, RADIO, OR TELEVISION"   | 12-17    |
| 3   | 18:1341.F FRAUDS AND SWINDLES                     | 57-61    |
| 4   |   |          |

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

**County of Offense / Division of Filing**

Boone / Central

**Matter to be Sealed**

- Secret Indictment  
 Juvenile

**Defendant Information**

Defendant Name: LARELL MONTEZ BANKS

Alias Name: \_\_\_\_\_

Birth Date: 05/17/1993

**Related Case Information**

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-11-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any: \_\_\_\_\_

Prior Target Letter Case Number, if any: \_\_\_\_\_

**U.S. Attorney Information**

**AUSA Aaron M. Maness**

**Interpreter Needed?**

- Yes Language and/or Dialect: \_\_\_\_\_  
 No

**Location Status**

Arrest Date: \_\_\_\_\_

- Currently in Federal Custody  
 Currently in State Custody  
 Currently on Bond

**Writ Required?**  Yes  No

**Warrant Required?**  Yes  No

**U.S.C. Citations**

Total # of Counts 12

| Set | Index Key & Description of Offense Charged        | Count(s)     |
|-----|---|--------------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD. | 1-2          |
| 2   | 18:1343.F "FRAUD BY WIRE, RADIO, OR TELEVISION"   | 18-20, 22-26 |
| 3   | 18:1341.F FRAUDS AND SWINDLES                     | 62-63        |
| 4   |   |              |



UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

County of Offense / Division of Filing

Boone / Central

Matter to be Sealed

- Secret Indictment
- Juvenile

Defendant Information

Defendant Name: CORNELIUS DESHAWN PHELPS

Alias Name:

Birth Date: 11/06/1985

Related Case Information

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-12-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any:

Prior Target Letter Case Number, if any:

U.S. Attorney Information

AUSA Aaron M. Maness

Interpreter Needed?

- Yes Language and/or Dialect:
- No

Location Status

Arrest Date:

- Currently in Federal Custody
- Currently in State Custody
- Currently on Bond

Writ Required?  Yes  No

Warrant Required?  Yes  No

U.S.C. Citations

Total # of Counts 7

| Set | Index Key & Description of Offense Charged        | Count(s) |
|-----|---|----------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD. | 1, 41-46 |
| 2   |   |          |
| 3   |   |          |
| 4   |   |          |

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

**County of Offense / Division of Filing**

Boone / Central

**Matter to be Sealed**

- Secret Indictment  
 Juvenile

**Defendant Information**

Defendant Name: DONTAY LARAY CAMPBELL

Alias Name:

Birth Date: 03/13/1989

**Related Case Information**

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-13-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any:

Prior Target Letter Case Number, if any:

**U.S. Attorney Information**

AUSA Aaron M. Maness

**Interpreter Needed?**

- Yes Language and/or Dialect:  
 No

**Location Status**

Arrest Date:

- Currently in Federal Custody  
 Currently in State Custody  
 Currently on Bond

Writ Required?  Yes  No

Warrant Required?  Yes  No

**U.S.C. Citations**

Total # of Counts 7

| Set | Index Key & Description of Offense Charged        | Count(s) |
|-----|---|----------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD. | 1, 41-46 |
| 2   |   |          |
| 3   |   |          |
| 4   |   |          |

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

**County of Offense / Division of Filing**

Boone / Central

**Matter to be Sealed**

- Secret Indictment  
 Juvenile

**Defendant Information**

Defendant Name: ERIONA TYJAEZ FLEEKES

Alias Name:

Birth Date: 12/27/1992

**Related Case Information**

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-14-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any:

Prior Target Letter Case Number, if any:

**U.S. Attorney Information**

AUSA Aaron M. Maness

**Interpreter Needed?**

- Yes Language and/or Dialect:  
 No

**Location Status**

Arrest Date:

- Currently in Federal Custody  
 Currently in State Custody  
 Currently on Bond

Writ Required?  Yes  No

Warrant Required?  Yes  No

**U.S.C. Citations**

Total # of Counts 7

| Set | Index Key & Description of Offense Charged        | Count(s) |
|-----|---|----------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD. | 1, 41-46 |
| 2   |   |          |
| 3   |   |          |
| 4   |   |          |

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

**County of Offense / Division of Filing**

Boone / Central

**Matter to be Sealed**

- Secret Indictment  
 Juvenile

**Defendant Information**

Defendant Name: KATHY DAVY KIMHANG

Alias Name:

Birth Date: 04/04/1991

**Related Case Information**

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-15-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any:

Prior Target Letter Case Number, if any:

**U.S. Attorney Information**

AUSA Aaron M. Maness

**Interpreter Needed?**

- Yes Language and/or Dialect:  
 No

**Location Status**

Arrest Date:

- Currently in Federal Custody  
 Currently in State Custody  
 Currently on Bond

Writ Required?  Yes  No

Warrant Required?  Yes  No

**U.S.C. Citations**

Total # of Counts 4

| Set | Index Key & Description of Offense Charged        | Count(s) |
|-----|---|----------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD. | 1-2      |
| 2   | 18:1343.F "FRAUD BY WIRE, RADIO, OR TELEVISION"   | 40       |
| 3   | 18:1341.F FRAUDS AND SWINDLES                     | 66       |
| 4   |   |          |

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

**County of Offense / Division of Filing**

Boone / Central

**Matter to be Sealed**

- Secret Indictment  
 Juvenile

**Defendant Information**

Defendant Name: MAURICE FRANK PENNY, JR.

Alias Name:

Birth Date: 12/02/1983

**Related Case Information**

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-16-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any:

Prior Target Letter Case Number, if any:

**U.S. Attorney Information**

AUSA Aaron M. Maness

**Interpreter Needed?**

- Yes Language and/or Dialect:  
 No

**Location Status**

Arrest Date:

- Currently in Federal Custody  
 Currently in State Custody  
 Currently on Bond

Writ Required?  Yes  No

Warrant Required?  Yes  No

**U.S.C. Citations**

Total # of Counts 4

| Set | Index Key & Description of Offense Charged        | Count(s) |
|-----|---|----------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD. | 1-2      |
| 2   | 18:1343.F "FRAUD BY WIRE, RADIO, OR TELEVISION"   | 40       |
| 3   | 18:1341.F FRAUDS AND SWINDLES                     | 66       |
| 4   |   |          |

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

**County of Offense / Division of Filing**

Boone / Central

**Matter to be Sealed**

- Secret Indictment  
 Juvenile

**Defendant Information**

Defendant Name: TARA COLLEEN JACKSON

Alias Name:

Birth Date: 07/08/1963

**Related Case Information**

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-17-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any:

Prior Target Letter Case Number, if any:

**U.S. Attorney Information**

AUSA Aaron M. Maness

**Interpreter Needed?**

- Yes Language and/or Dialect:  
 No

**Location Status**

Arrest Date:

- Currently in Federal Custody  
 Currently in State Custody  
 Currently on Bond

Writ Required?  Yes  No

Warrant Required?  Yes  No

**U.S.C. Citations**

Total # of Counts 9

| Set | Index Key & Description of Offense Charged        | Count(s) |
|-----|---|----------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD. | 1-2      |
| 2   | 18:1343.F "FRAUD BY WIRE, RADIO, OR TELEVISION"   | 35-39    |
| 3   | 18:1341.F FRAUDS AND SWINDLES                     | 64-65    |
| 4   |   |          |

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

County of Offense / Division of Filing

Boone / Central

Matter to be Sealed

- Secret Indictment
- Juvenile

Defendant Information

Defendant Name: MICHAEL LEE GENE STAPLETON

Alias Name:

Birth Date: 03/19/1986

Related Case Information

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-18-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any:

Prior Target Letter Case Number, if any:

U.S. Attorney Information

AUSA Aaron M. Maness

Interpreter Needed?

- Yes Language and/or Dialect:
- No

Location Status

Arrest Date:

- Currently in Federal Custody
- Currently in State Custody
- Currently on Bond

Writ Required?  Yes  No

Warrant Required?  Yes  No

U.S.C. Citations

Total # of Counts 9

| Set | Index Key & Description of Offense Charged        | Count(s) |
|-----|---|----------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD. | 1-2      |
| 2   | 18:1343.F "FRAUD BY WIRE, RADIO, OR TELEVISION"   | 35-39    |
| 3   | 18:1341.F FRAUDS AND SWINDLES                     | 64-65    |
| 4   |   |          |

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

**County of Offense / Division of Filing**

Boone / Central

**Matter to be Sealed**

- Secret Indictment  
 Juvenile

**Defendant Information**

Defendant Name: CEDRICK SHAWNDALE GOLDMAN

Alias Name:

Birth Date: 05/01/1976

**Related Case Information**

Superseding Indictment?  Yes  No If yes, original case number: 20-04071-19-CR-C-RK

New Defendant(s)?  Yes  No

Prior Complaint Case Number, if any:

Prior Target Letter Case Number, if any:

**U.S. Attorney Information**

AUSA Aaron M. Maness

**Interpreter Needed?**

- Yes Language and/or Dialect:  
 No

**Location Status**

Arrest Date:

- Currently in Federal Custody  
 Currently in State Custody  
 Currently on Bond

Writ Required?  Yes  No

Warrant Required?  Yes  No

**U.S.C. Citations**

Total # of Counts 13

| Set | Index Key & Description of Offense Charged        | Count(s) |
|-----|---|----------|
| 1   | 18:1349.F ATTEMPT AND CONSPIRACY TO COMMIT FRAUD. | 1-2      |
| 2   | 18:1343.F "FRAUD BY WIRE, RADIO, OR TELEVISION"   | 12-17    |
| 3   | 18:1341.F FRAUDS AND SWINDLES                     | 57-61    |
| 4   |   |          |