

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION

UNITED STATES OF AMERICA,)	Cr. No. _____
)	
Plaintiff,)	18 U.S.C. §2
)	18 U.S.C. §371
v.)	18 U.S.C. §982
)	18 U.S.C. § 1343
VIRGINIA LOUISE VOLNER,)	
a/k/a VIRGINIA LOUISE FOSTER)	
and PATSY A. WILKERSON,)	
)	
Defendants.)	

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

INTRODUCTION

At all times material herein to this Indictment:

1. **VIRGINIA LOUISE VOLNER**, a/k/a **VIRGINIA LOUISE FOSTER** is and has been a resident of the West Tennessee area. **VIRGINIA LOUISE VOLNER** indicated to numerous victims that she lived and worked in the Memphis, Tennessee area as a restaurant employee sometime in the 1960's. **VIRGINIA LOUISE VOLNER** was later married to Jim Foster and lived in the Selmer, Tennessee area during the late 1980's. Jim Foster passed away in 1997. **VIRGINIA LOUISE VOLNER** married Howell Volner, a local minister in a small country church near Scotts Hill, Tennessee.

2. **PATSY A. WILKERSON** resides with her husband in Marion, Arkansas. **PATSY**

A. WILKERSON was a Financial Service Representative, Customer Service manager with Regions Bank, Memphis, Tennessee. **PATSY A. WILKERSON** worked in a Regions Bank branch which was formerly known as Union Planters National Bank. Throughout the majority of **PATSY A. WILKERSON'S** involvement in the scheme with **VIRGINIA LOUISE VOLNER** the banking activities were under the name of Union Planters National Bank. **PATSY A. WILKERSON** has formally been an employee of Union Planters National Bank/Regions Bank for approximately sixteen (16) years.

Western Union Financial Services, Inc.

3. Western Union Financial Services, Inc. ("Western Union") is a business entity that engages in the transmission of funds in interstate and international commerce on behalf of its customers. When conducting a transmission of funds, Western Union uses electronic signals in interstate commerce to debit and credit accounts that it creates in the sender's and recipient's names. Western Union also requires money recipients to show valid picture identification prior to releasing the transmitted funds for transmissions over a certain amount. Western Union is headquartered in Greenwood Village, Colorado.

4. Beginning on or about January 1, 2000, a more specific date being unknown to the Grand Jury, until on or about August 31, 2007, in the Western District of Tennessee and elsewhere, the defendants:

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----
-----**and**-----
-----**PATSY A. WILKERSON**-----

aided and abetted each by the other, did knowingly and willfully combine, conspire,

confederate, agree, and reach a tacit understanding together to commit certain offenses against individuals within the United States of America, that is:

To knowingly and willfully execute a scheme and artifice to defraud and obtain monies as described herein, did transmit and cause to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, wire transfers from various locations across the United States to a Western Union branch located in the Western District of Tennessee, in violation of Title 18, United States Code, Section 1343.

MEANS AND METHODS OF CONSPIRACY
and
THE SCHEME AND ARTIFICE TO DEFRAUD

5. Between on or about January 1, 2000, up to and including August 31, 2007, in the Western District of Tennessee, and elsewhere, the defendants:

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----
-----**and**-----
-----**PATSY A. WILKERSON**-----

did knowingly, willingly and unlawfully devise and intend to devise a scheme and artifice to defraud and to obtain money by means of false and fraudulent pretenses, representations and promises, to induce victims into making loans by way of wire communications by falsely and fraudulently promising excessively high repayments on the victim's loans.

6. **VIRGINIA LOUISE VOLNER** claimed to have become acquainted with one, Gust John Mirestes, a restaurant/club owner in Memphis during her time in the Memphis area. Gust John Mirestes died in Memphis on March 25, 1990 and **VIRGINIA LOUISE VOLNER** used this association with Gust John Mirestes as the basis for her scheme to

deceive and defraud. **VIRGINIA LOUISE VOLNER** falsely proclaimed herself to be the beneficiary of a portion of an estate from Gust John Mirestes, whom she described to her victims as “a wealthy individual”. **VIRGINIA LOUISE VOLNER** used her church relationships to gain access to victims. **VIRGINIA LOUISE VOLNER** became a spiritual advisor and psychic, not licensed with the State of Tennessee. She established a business in Scotts Hill, Tennessee called ABC Counseling, and provided counseling to many local residents, whom later became victims to her fraudulent scheme. **VIRGINIA LOUISE VOLNER** would also travel to other states, primarily southern Illinois, and Kentucky, and advertise her counseling services. Many of **VIRGINIA LOUISE VOLNER’S** victims were clients and their extended family members, who had seen her for spiritual counseling. Based on the promise to victims to receive large repayments for personal loans **VIRGINIA LOUISE VOLNER** obtained monies and funds in excess of five million dollars from at least thirty individuals by falsely and fraudulently signing promissory notes and providing false details of property named in the estate, and furthering the scheme by continuing to tell the victims that the attorneys were finalizing the details of her inheritance.

7. It was further a part of the scheme and artifice to defraud that from on or about January 1, 2000 until August 31, 2007, **PATSY A. WILKERSON** aided and abetted **VIRGINIA LOUISE VOLNER** in her scheme by using her position at Union Planters National Bank, Memphis, Tennessee to lend credence to the claims of an impending inheritance **VIRGINIA LOUISE VOLNER** was to receive from the estate of a deceased individual. **PATSY A. WILKERSON** would act as a reference for **VIRGINIA LOUISE VOLNER** by telling to the victims that the inheritance was real and offering to open

accounts to handle their money they were to receive from **VIRGINIA LOUISE VOLNER**.

8. It was further a part of the scheme and artifice to defraud that **VIRGINIA LOUISE VOLNER** used some of the following false and fictitious explanations when victims asked about the nature of her inheritance:

- a) the inheritance was from an individual named Gust John Mirestes, Memphis, Tennessee;
- b) Mr. Mirestes passed away in Memphis on March 25, 1990 and left a large estate including properties and assets;
- c) Mr. Mirestes' estate would be divided between Nick Mirestes, Christine Mirestes, and **VIRGINIA LOUISE VOLNER**;
- d) Mr. Mirestes' estate was worth "billions" of dollars;
- e) unnamed attorneys were handling the details of the estate through the legal process;
- f) money was needed to pay taxes on the properties named in the estate and ;
- g) money was needed to pay the attorney fees for those handling the legal matters regarding the estate.

9. It was further a part of the scheme and artifice to defraud that **VIRGINIA LOUISE VOLNER** would show victims a list of properties in Arkansas, Memphis, Tennessee and areas of West Tennessee, and other valuables which she represented were included in the Mirestes estate.

10. It was further a part of the scheme and artifice to defraud that **VIRGINIA LOUISE VOLNER** would drive victims to Arkansas, Memphis, Tennessee and areas of West Tennessee and show them properties she claimed were included in the Mirestes estate.

11. It was further a part of the scheme and artifice to defraud that **VIRGINIA LOUISE VOLNER** would give victims the telephone number of Union Planters National Bank, Memphis, Tennessee and the name of **PATSY A. WILKERSON**, an employee of Union Planters National Bank, and have them talk to **WILKERSON** about the inheritance **VIRGINIA LOUISE VOLNER** was to receive.

12. It was further a part of the scheme and artifice to defraud that **PATSY A. WILKERSON** would then act as a reference for **VIRGINIA LOUISE VOLNER** by telling the victims the inheritance was real.

13. It was further a part of the scheme and artifice to defraud that **VIRGINIA LOUISE VOLNER** would draft, sign, and sometimes notarize, hand-written Promissory Notes to individuals that loaned her money based on the false and fraudulent pretenses that she was to receive a large inheritance. These Promissory Notes agree to the repayment of the loan amount, plus exorbitant amounts of money in excess of the loan principal amount.

15. In furtherance of the scheme, **VIRGINIA LOUISE VOLNER** obtained more than five million dollars (\$5,000,000.00) from her victims.

OVERT ACTS IN VIOLATION OF 18 USC 371

16. In furtherance of the conspiracy, the defendants committed or caused to be committed in the Western District of Tennessee at least one of the following overt acts, during the time period of the conspiracy, combination, confederation, and agreement:

a. On or about October 24, 2002, **VIRGINIA LOUISE VOLNER** wrote a promissory note regarding payment of interest to David Newton and Scott Norman.

b. On or about December 5, 2002, **VIRGINIA LOUISE VOLNER** wrote a

promissory note regarding payment of interest to David Newton and Scott Nordman.

c. On or about December 27, 2002, **VIRGINIA LOUISE VOLNER** telephoned J. Dean May in Bowling Green, Kentucky to solicit money.

d. On or about January 15, 2003, **PATSY A. WILKERSON** notarized a promissory agreement between Virginia Foster (aka Volner) and Scott Nordman and David Newton.

c. On or about January 31, 2003, **VIRGINIA LOUISE VOLNER** contacted Debra Clark, Cape Coral, Florida via telephone to solicit money.

d. On or about April 16, 2003, **VIRGINIA LOUISE VOLNER** caused a fax to be sent from ABC Counseling, Scotts Hill, Tennessee to Janta Dann, Mattoon, Illinois.

e. On or about January 7, 2004 in a telephone conversation with Jason Fultz **PATSY A. WILKERSON** confirmed **VIRGINIA LOUISE VOLNER** was to receive an inheritance from the estate of Gust John Mirestes.

f. On or about January 24, 2004, during a telephone conversation **PATSY A. WILKERSON** told Jason Fultz the inheritance was legitimate and Ms. Virginia would receive her inheritance very soon.

g. On or about February 16, 2004, during a telephone conversation **PATSY A. WILKERSON** told Jason Fultz Ms. Virginia's funds would be wired to his account.

h. On or about April 27, 2005, **VIRGINIA LOUISE VOLNER** contacted Rosa Werkmeister in Maywood, Nebraska via telephone to solicit money.

i. On or about August 20, 2005, **PATSY A. WILKERSON** told Fultz he would never have a greater return on his money than the one he would receive through his loan investment with Volner.

j. On or about October 14, 2005, **VIRGINIA LOUISE VOLNER** contacted Rosa Werkmeister in Maywood, Nebraska via telephone to solicit money.

k. On or about October 24, 2005, **VIRGINIA LOUISE VOLNER** contacted Debra Clark in Cape Coral, Florida via telephone to solicit money.

All in violation of Title 18 USC 371.

THE WIRES

COUNTS 2 THROUGH 27:

COUNT 2

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about October 29, 2002, in the Western District of Tennessee and elsewhere the defendants,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----
-----**and**-----
-----**PATSY A. WILKERSON**-----

aided and abetted each by the other, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$3,800.00 Western Union wire transfer from David Newton, Paducah, Kentucky to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343 and Section 2.

[nmt 5 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 3

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about December 16, 2002, in the Western District of Tennessee and elsewhere the defendant,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----

for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$2,200.00 Western Union wire transfer from Rosa Werkmeister in McCook, Nebraska to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343.

[nmt 5 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 4

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about December 27, 2002, in the Western District of Tennessee and elsewhere the defendants,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----
-----**and**-----
-----**PATSY A. WILKERSON**-----

aiding and abetting each, by the other, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$4000.00 Western Union wire transfer from J Dean May, Bowling Green, KY to Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER**, all in violation of Title 18, United States Code, Section 1343, Section 2.

[nmt 5 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 5

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about January 24, 2003, in the Western District of Tennessee and elsewhere the defendant,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----

for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain

money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$1,700.00 Western Union wire transfer from Rosa Werkmeister in Maywood, Nebraska to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343.

[nmt 5 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 6

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about January 25, 2003, in the Western District of Tennessee and elsewhere the defendant,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----

for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$1,240.00 Western Union wire transfer from Rosa Werkmeister in Maywood, Nebraska to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343.

[nmt 5 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 7

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about January 31, 2003, in the Western District of Tennessee and elsewhere the defendant,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----

for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$2,200.00 Western Union wire transfer from Debra Clark, Cape Coral, Florida to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343.

[nmt 5 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 8

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about January 31, 2003, in the Western District of Tennessee and elsewhere the defendant,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----

for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$1,000.00 Western Union wire transfer from Rosa Werkmeister in Maywood, Nebraska to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343.

[nmt 5 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 9

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about February 7, 2003, in the Western District of Tennessee and elsewhere the defendant,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----

for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$ 1,000.00 Western Union

wire transfer from Rosa Werkmeister in Maywood, Nebraska to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343.

[nmt 5 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 10

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about April 16, 2003, in the Western District of Tennessee and elsewhere the defendant,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----

for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$2,000.00 Western Union wire transfer from Debra Clark, North Fort Myers, Florida to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343.

[nmt 5 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 11

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about April 16, 2003, in the Western District of Tennessee and elsewhere the defendant,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----

for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, transmitted and caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a fax communication identified as a letter purportedly from Stephen M. Milam, Attorney at Law, fraudulently stating that Virginia Foster was involved in an estate settlement, sent from ABC Counseling, Scotts Hill, TN and sent to Janta Dann, Mattoon, Illinois, in violation of Title 18, United States Code, Section 1343.

[nmt 5 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 12

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about May 29, 2003, in the Western District of Tennessee and elsewhere

the defendant,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----

for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$1,000.00 Western Union wire transfer from Rosa Werkmeister in McCook, Nebraska to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343.

[nmt 5 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 13

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about August 4, 2003, in the Western District of Tennessee and elsewhere the defendant,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----

for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$3,200.00 Western Union wire transfer from Debra Clark, Napels, Florida to the Dodges Store #667, 46 S. Broad

St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343.

[nmt 5 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 14

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about April 27, 2005, in the Western District of Tennessee and elsewhere the defendants,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----
-----**and**-----
-----**PATSY A. WILKERSON**-----

aided and abetted each by the other, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$2,500.00 Western Union wire transfer from Rosa Werkmeister, in Maywood, Nebraska to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343 and Section 2.

[nmt 20 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 15

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about May 9, 2005, in the Western District of Tennessee and elsewhere the defendant,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----

for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$5,000.00 Western Union wire transfer from Debra Clark, Cape Coral, Florida to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343.

[nmt 20 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 16

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about August 18, 2005, in the Western District of Tennessee and elsewhere the defendants,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----
-----**and**-----
-----**PATSY A. WILKERSON**-----

aided and abetted each other, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$3,000.00 Western Union wire transfer from Rosa Werkmeister in Maywood, Nebraska to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343 and Section 2.

[nmt 20 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 17

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about August 25, 2005, in the Western District of Tennessee and elsewhere the defendants,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----
-----**and**-----

-----PATSY A. WILKERSON-----

aided and abetted each other, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$4,500.00 Western Union wire transfer from Rosa Werkmeister in Maywood, Nebraska the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343 and Section 2.

[nmt 20 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 18

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about August 27, 2005, in the Western District of Tennessee and elsewhere the defendant,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----

for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$2,000.00 Western Union wire transfer from Debra Clark, Cape Coral, Florida to the Dodges Store #667, 46 S.

Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343.

[nmt 20 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 19

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about August 27, 2005, in the Western District of Tennessee and elsewhere the defendant,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----

for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$2,000 Western Union wire transfer from Debra Clark, Cape Coral, Florida to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343.

[nmt 20 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 20

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about October 1, 2005, in the Western District of Tennessee and elsewhere the defendants,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----
-----**and**-----
-----**PATSY A. WILKERSON**-----

aided and abetted each other, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$5,000.00 Western Union wire transfer from Rosa Werkmeister in Maywood, Nebraska to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343 and Section 2.

[nmt 20 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 21

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about October 5, 2005, in the Western District of Tennessee and elsewhere the defendants,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----
-----**and**-----
-----**PATSY A. WILKERSON**-----

aided and abetted each other, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$4,000.00 Western Union wire transfer from Rosa Werkmeister in Maywood, Nebraska to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343 and Section 2.

[nmt 20 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 22

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about October 14, 2005, in the Western District of Tennessee and elsewhere the defendants,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----
-----**and**-----

-----PATSY A. WILKERSON-----

aided and abetted each other, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$1,700.00 Western Union wire transfer from Rosa Werkmeister in North Platte, Nebraska to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343 and Section 2.

[nmt 20 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 23

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about October 24, 2005, in the Western District of Tennessee and elsewhere the defendant,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----

for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$700.00 Western Union wire transfer from Debra Clark, Cape Coral, Florida to the Dodges Store #667, 46 S.

Broad St., Lexington, Tennessee paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343.

[nmt 20 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 24

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about November 4, 2005, in the Western District of Tennessee and elsewhere the defendants,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----
-----**and**-----
-----**PATSY A. WILKERSON**-----

aided and abetted each other, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$3,300.00 Western Union wire transfer from Rosa Werkmeister in North Platte, Nebraska the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343 and Section 2.

[nmt 20 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 25

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about November 10, 2005, in the Western District of Tennessee and elsewhere the defendants,

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----
-----**and**-----
-----**PATSY A. WILKERSON**-----

aided and abetted each other, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$3,000.00 Western Union wire transfer from Rosa Werkmeister in McCook, Nebraska to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343 and Section 2.

[nmt 20 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 26

The grand jury realleges all of the allegations contained in Count One paragraphs 1 through 3 and 5 through 15.

On or about November 18, 2005, in the Western District of Tennessee and elsewhere the defendants,

~~-----**VIRGINIA LOUISE VOLNER**-----~~
~~-----**a/k/a VIRGINIA LOUISE FOSTER**-----~~
~~-----**and**-----~~
~~-----**PATSY A. WILKERSON**-----~~

aided and abetted each other, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money, caused to be transmitted in interstate commerce, by means of a wire communication, certain signs, signals and sounds, that is, a \$2,000 Western Union wire transfer from Rosa Werkmeister in McCook, Nebraska to the Dodges Store #667, 46 S. Broad St., Lexington, Tennessee, paid to the name of **VIRGINIA FOSTER** in violation of Title 18, United States Code, Section 1343 and Section 2.

[nmt 20 yrs, and nmt \$250,000.00 fine or both, nmt 3 yrs supervised release, together with a mandatory special assessment of \$100, see 18 U.S.C., 3013(a)].

COUNT 27

FORFEITURE ALLEGATIONS

In committing one or more of the felony offenses alleged in Counts 1 through 26 of this Indictment, each punishable by imprisonment for more than one year, the

defendant used or intended to use the below-described property to commit and facilitate the said wire fraud violations and the below-described personal property constitutes and is derived from proceeds obtained directly or indirectly as a result of the commission of the aforesaid violations of Title 18, United States Code, Sections 371 and 1343, including but not limited to the following:

Approximately \$ 5,500,000.00 in United States Currency and if those funds are unavailable, as a result of any act and omission of the defendant, and,

- (a) Cannot be located upon the exercise of due diligence;
- (b) Has been transferred or sold to, or deposited with a third person;
- (c) Has been placed beyond the jurisdiction of the Court;
- (d) Has been substantially diminished in value;
- (e) Has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

The property equivalent value belonging to:

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----

And, any and all interest

-----**VIRGINIA LOUISE VOLNER**-----
-----**a/k/a VIRGINIA LOUISE FOSTER**-----

has in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to Title 18, United States Code, Section 982.

A TRUE BILL:

FOREPERSON

DATE

UNITED STATES ATTORNEY