

DISTRICT COURT, CITY AND COUNTY OF  
DENVER, COLORADO

Denver, CO 80202

PEOPLE OF THE STATE OF COLORADO,

v.

TRACY LEA VASSEUR,

DOB: [REDACTED]

KAREN RAE VASSEUR, A/K/A, KAREN RAE  
KOWALUK, A/K/A, KAREN RAE KOWALIC,

DOB: [REDACTED]

Defendants.

JOHN W. SUTHERS, Attorney General

DAVID R. COSSON,

Senior Assistant Attorney General\*

FILED IN ADAMS COUNTY  
COMBINED COURT

JUN 14 2012

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Case No.: 11CR01

Ctrm.: 6

**COLORADO STATE GRAND JURY INDICTMENT: 2011-2012 SESSION**

Of the 2011-2012 term of the Denver District Court in the year 2012, the 2011-2012 Colorado State Grand Jurors, chosen, selected and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following:

**COUNT ONE**

**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT--  
(CONDUCTING AN ENTERPRISE THROUGH A PATTERN OF RACKETEERING  
ACTIVITY,) § 18-17-104(3), C.R.S. (CLASS 2 FELONY)**

Between February 25, 2009, and March 24, 2012, but not initially discovered until on or about August, 2010, in the State of Colorado, **TRACY VASSEUR AND KAREN RAE VASSEUR**, persons employed by or associated with an enterprise as defined at §18-17-103(2), C.R.S., as amended, did unlawfully, feloniously and knowingly conduct or participate in said enterprise, directly or indirectly, through a pattern of racketeering activity as defined at § 18-17-103(3) and (5), C.R.S., in violation of sections 18-17-104(3) and 18-17-105, C.R.S.

**COUNT TWO**

**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT--  
(RACKETEERING CONSPIRACY IN VIOLATION OF COCCA) § 18-17-104(4),  
C.R.S. (CLASS 2 FELONY)**

Between February 25, 2009, and March 24, 2012, but not initially discovered until on or about August, 2010, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, persons associated with an enterprise as defined at § 18-17-103(2), C.R.S., as amended, and described below, did unlawfully, feloniously and knowingly conspire to conduct or participate in said enterprise, directly or indirectly, through a pattern of racketeering activity in violation of sections 18-17-104(4) and 18-17-104(3), C.R.S.

The offenses alleged in Counts One and Two of this Indictment were committed in the following manner:

**THE ENTERPRISE**

The enterprise alleged in Counts One and Two is primarily a group of individuals, associated in fact, although not a legal entity, as well as two legal entities. More specifically, the enterprise included, but was not limited to, the following associated in fact individuals and/or legal entities:

**Tracy Lea Vasseur, Karen Rae Vasseur, a/k/a, Karen Rae Kowaluk, a/k/a, Karen Rae Kowalic, A-Team Distributions, Inc., LLC, and KKJ Services, and other persons or entities known or as yet unknown to the Colorado State Grand Jury who were involved in racketeering activity described herein that was related to the conduct of the Enterprise.**

The associated individuals and entities listed above, who comprise the enterprise, participated in a purposeful, ongoing scheme with other individuals, located primarily in Nigeria, to commit theft by ensnaring and then defrauding hundreds of unwitting victims, mostly female, looking for love and companionship on the internet. As of the date of this indictment the grand jury is aware of one or more individuals residing in Nigeria, who are involved in the criminal enterprise and pattern of racketeering, but is unable to affirmatively identify them at this time.

Over the course of more than three years, **Tracy Vasseur** and her mother, **Karen Vasseur**, were actively engaged with others in what is commonly referred to as an internet romance scam. Three hundred and seventy-four victims from Colorado and approximately 38 other states within the U.S. and its territories and from 40 other countries were consistently targeted on various dating web sites or social networking sites on the internet, such as Facebook. Members of the illegal enterprise, not yet positively identified, engaged in communications with the victims, usually via e-mail, and would consistently represent that they were members of the U.S. Armed Forces. After an on-line relationship was established, the perpetrator would often send the victim fake military documents and personal photographs in order to convince the victim that they were truly a member of the U.S. military serving in a foreign country, usually Afghanistan.

After a relationship was established, the purported military member would begin asking the victim to send money to an "agent" in Colorado. Victims were primarily instructed to send money via Western Union or Money Gram. Among other reasons, victims were frequently told that the money they sent would pay for satellite phones, so that the victim and the perpetrator could talk directly to each other, or for travel expenses, so that the "soldier" could take authorized leave from duty to visit the victim in the U.S. Western Union and Money Gram provide an electronic fund transfer service, by which a person can either receive or send money via a "wire." **Tracy and Karen Vasseur** acted as a military "agent" for the vast majority of wire transactions discussed in this indictment but, occasionally, would recruit family members or friends to participate. **Tracy Vasseur** frequently used her minor daughter to both send and receive wires containing stolen money. The daughter wired over \$52,000 in stolen money to individuals in Nigeria.

At times, victims were also instructed to wire funds directly into various bank accounts owned by **Tracy and Karen Vasseur** in Colorado. This method was used when a victim was being instructed to send a large amount of money, usually over ten thousand dollars and as high as fifty-nine thousand dollars. If a victim attempted to wire similar large amounts of money using a money transfer service, such as Western Union, it would inevitably raise suspicions and be declined. Using bank accounts also allowed **Tracy and Karen Vasseur** to move money between accounts to disguise the nature, source and

ownership of the funds. **Tracy and Karen Vasseur** opened 20 personal and business accounts at 11 separate banks. Small business accounts were opened by **Tracy Vasseur** under the name "A-Team Distributions, Inc., LLC" at several banks, and **Karen Vasseur** opened a small business account under the name of "KKJ Services" at Vectra Bank. **Tracy Vasseur** falsely represented to different banks that A-Team Distributions, Inc., LLC was involved in either heavy equipment sales, the precious metals business or other businesses. The **Vasseur's** engaged in extensive money laundering activities during 2010 to 2012 related to the various bank accounts.

**Tracy and Karen Vasseur**, acting on instructions from other members of the enterprise, travelled to local banks and Western Union and Money Gram outlets--66 in all--to receive incoming funds being wired directly from victims. After picking up the money, **Tracy and Karen Vasseur** would keep a percentage of it (approximately 10 percent, although they would often receive less), and then send the remaining funds via wire to associates, primarily in Nigeria. Over the course of the criminal scheme, **Tracy and Karen Vasseur**, in order to conceal their fraudulent activity, utilized 68 separate Western Union, Money Gram or bank locations in Colorado to wire money out from. Many of the wire outlets were located in King Soopers, Safeway or Wal-Mart stores. **Karen and Tracy Vasseur** travelled to 19 different cities to complete the fraudulent wire transactions, including Brighton, Thornton, Denver, Aurora, Commerce City, Firestone, Ft. Lupton, Greeley, Federal Heights, Westminster, Wheatridge, Boulder, Louisville, Broomfield, Fort Collins, Alamosa, Erie, Lafayette and Loveland.

**Tracy and Karen Vasseur**, acting on instructions from their accomplices, then forwarded the stolen money to 94 different locations in Nigeria. Very often, the money received in Colorado would be wired back out to Nigeria within minutes of its receipt by either **Tracy or Karen Vasseur**. Over the course of the scheme, **Tracy and Karen Vasseur** sent stolen money addressed to 112 different names in Nigeria. The name that was used the most to send wires to was "Olamigoke Ayodeji." They also wired money to individuals in Ecuador, Great Britain, India, United Arab Emirates and the United States.

There is no evidence that **Tracy or Karen Vasseur** ever met with any of the other members of the enterprise in person; however, **Tracy Vasseur** engaged in regular, frequent and detailed discussions with persons, primarily by computer, where she received specific instructions concerning who would be sending her money, where it was going to be sent, how much she could keep for herself, and where she should send the remaining money to. **Tracy Vasseur** also admitted to Investigators that she set up a "dating website" for one her associates. There is no evidence that **Karen or Tracy Vasseur** ever communicated with or solicited money directly from any of the named victims.

In order to deceive Western Union and Money Gram and to conceal the purpose of the fraudulent wire activity, **Tracy and Karen Vasseur** utilized a combined total of 24 alias names when sending or receiving money. They also utilized false phone numbers and addresses for many of the transactions. In addition, when Western Union became suspicious about the size and amount of transactions occurring in **Tracy Vasseur's** name, it restricted her ability to continue to send and receive wires using their service. **Tracy Vasseur** responded by forging fraudulent Power of Attorney forms and giving them to Western Union, which enabled her to continue her fraudulent wire activity.

**Tracy and Karen Vasseur** participated in the theft of nearly 1.1 million dollars from 374 victims, including 29 at-risk adults during the course of their criminal enterprise. None of the victims that investigators spoke to had any of their money returned.

Both **Tracy and Karen Vasseur** were fully aware of the criminality of their activities. **Tracy Vasseur** was interviewed in July, 2011, by members of the Brighton Police Department, who informed her that what she was doing was illegal. **Karen Vasseur** was given the same warning after a search was conducted of her home on March 14, 2012. Subsequent to that date, **Karen Vasseur** continued to wire money to Nigeria on two separate occasions. In addition, The **Vasseur's** made 28 attempts to receive wires that were restricted by the wire service due to suspicious activity, and also made 58 attempts to send money with the same result. Yet, after those incidents, both **Tracy and Karen Vasseur** continued to send and receive wires fraudulently by implementing additional deceptive practices.

The Enterprise's operations, Since December of 2009, were centered at a residence owned by **Karen Vasseur** at 3703 Weld County Road 37, Brighton, Colorado, 80603. During most of the criminal episode, **Tracy Vasseur** resided at this location with her mother. Prior to that date, during the early stages of the enterprise's operations, **Tracy and Karen Vasseur** resided together at 12960 Hayesmont Road, Commerce City, CO, 80022. When Investigators searched the residence at County Road 37 in March of 2012, **Karen and Tracy Vasseur** were there. A large number of Western Union receipts was found in the main work area on a large table in a dining room off of the kitchen, and they contained the names of both **Tracy and Karen Vasseur** on them. Most of the Western Union receipts contained false names and addresses as used by both **Tracy and Karen Vasseur**. A large number of other documents related to the described criminal activity was also discovered, along with several computers.

## PATTERN OF RACKETEERING ACTIVITY

**Tracy Lea Vasseur and Karen Rae Vasseur** and others known and unknown to the Grand Jury, directly and in concert, engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in at least two predicate acts, including any lesser offenses, related to the conduct of the enterprise, with at least one of which took place in the State of Colorado after July 1, 1981 and the last of the acts of racketeering activity occurring within ten years after a prior act of racketeering activity and include:

Theft, § 18-4-401, C.R.S.

Money Laundering, § 18-5-309, C.R.S.

Forgery, § 18-5-102, C.R.S.

Identity Theft, § 18-5-902, C.R.S.

Criminal Impersonation, § 18-5-113, C.R.S.

## RACKETEERING ACTIVITY

The following predicate acts constitute the pattern of racketeering activity underlying the charges in Counts One and Two:

### PREDICATE ACT NUMBER ONE

(Theft-\$20,000 or More)

On or about and between February 16, 2011, and April 8, 2011, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from Mrs. R. Bell, with the intent to permanently deprive her of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

The offenses alleged in Predicate Act One, and in the associated stand-alone Count Three, were committed in the following manner:

Mrs. R. Bell resides in Hertfordshire, England. On February 16, 2011, Mrs. Bell wired \$95,080.00 to **Tracy Vasseur's** business account, A-Team Distributions, at Colorado State Bank and Trust. On April 8, 2011, Mrs. Bell wired an additional \$47,919.49 to **Tracy Vasseur's** business account, A-Team Distributions, at Chase Bank. **Tracy Vasseur** admitted to grand jury investigators that she kept \$9,000 of Mrs. Bell's money for herself and sent the rest to an associate in Nigeria. To avoid raising suspicion, numerous wires in smaller amounts were sent to Nigeria, with two of **Tracy Vasseur's** daughters having sent

out multiple wires. **Tracy Vasseur** also attempted to send wires with the stolen money to her mother, **Karen Vasseur**. **Tracy Vasseur** admitted to investigators that A-Team Distributions, Inc., LLC, had no legitimate business purpose, but was registered by her in Colorado for the sole purpose of allowing her to more easily receive and send larger amounts of money and to avoid detection.

**PREDICATE ACT NUMBER TWO**  
**(Theft-\$20,000 or More)**

On or about and between October 11, 2011 and October 24, 2011, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from Mrs. C.A. Evans, with the intent to permanently deprive her of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

The offenses alleged in Predicate Act Two, and in the associated stand-alone Count Four, were committed in the following manner:

Mrs. Evans resides in Lancashire, Great Britain. Between October 11, 2011 and October 24, 2011, Mrs. Evans sent three wires in the amounts of \$7,554.00, \$29,923.70 and \$23,815.75 to the A-Team account at First National Bank. Immediately after each wire was received **Tracy Vasseur**, using alias names such as "Tracy Myhre," "Lea Kline," "Tracy Kells," "Lea Austin," and other names, wired the stolen money out in smaller amounts to associates in Nigeria. **Tracy Vasseur** admitted to investigators that she intentionally would break down larger amounts sent by victims into smaller amounts in order to avoid raising the suspicion of the wire services.

**PREDICATE ACT NUMBER THREE**  
**(Theft-\$20,000 or More)**

On or about April 1, 2011 and April 12, 2011, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from Mrs. M.R. Middleton, with the intent to permanently deprive her of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

The offenses alleged in Predicate Act Three, and in the associated stand-alone Count Five, were committed in the following manner:

Mrs. Middleton resides in Great Britain. On April 1, 2011 and April 12, 2011, Mrs. Middleton sent two wires in the amounts of \$58.35 and \$59,547.39. Both wires were sent to A-Team Distributions at Chase Bank in Colorado. In the three days after the incoming wire for \$59,547.39 was received, nine checks, totaling approximately \$56,000.00, were written on the A-Team account at Chase Bank and made out to **Tracy Vasseur's** daughter, to KKJ Services, to **Karen Vasseur**, to **Tracy Vasseur** and to A-Team Distributions. KKJ Services is a business owned by **Karen Vasseur**. A small business account was set up by **Karen Vasseur** for KKJ Services at Vectra Bank on February 20, 2009.

**PREDICATE ACT NUMBER FOUR**  
**(Theft-\$20,000 or More)**

On or about and between April 7, 2011 and June 2, 2011, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from Kerstin Hellsten, with the intent to permanently deprive her of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

The offenses alleged in Predicate Act Four, and in the associated stand-alone Count Six, were committed in the following manner:

Ms. Hellston resides in Sweden. Between April 7, 2011 and June 2, 2011, she sent three wires to Colorado in the amounts of \$827.49, \$16,485.73 and \$29,004.00, respectively. The first wire for approximately \$827 was sent to **Karen Vasseur**. The other two wires were sent to A-Team Distributions at US Bank. Bank records indicate that the money from the wire for \$16,485 was withdrawn shortly after it was received, and, Western Union records show that during the two-day period after the wire was received, **Karen Vasseur** sent out nine separate wires to Nigeria totaling approximately \$15,000. Five of the wires were for \$1,950 and a sixth wire was in the amount of \$1,998.75. Evidence presented to the grand jury indicated that Western Union would not process any transaction over \$2,000 without it raising an alert concerning suspicious activity. **Tracy Vasseur** also admitted to investigators that she was aware of this transaction threshold and would intentionally conduct wire transactions that would not exceed \$2,000.



**PREDICATE ACT NUMBER FIVE**  
**(Theft-\$20,000 or More)**

On or about and between February 9, 2011 and March 16, 2011, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from Corina Shonias, with the intent to permanently deprive her of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

The offenses alleged in Predicate Act Five, and in the associated stand-alone Count Seven, were committed in the following manner:

Ms. Shonias resides in Ontario, Canada. Between February 9, 2011 and March 16, 2011, she sent four wires to Colorado totaling \$43,950.00. The wires were sent to **Tracy Vasseur's** A-Team Distributions accounts at Colorado State Bank and Trust and Chase Bank. The first three wires, in the amounts of \$15,000, \$10,000 and \$8,450 were sent to the A-Team account at Colorado State Bank and Trust. The final wire, in the amount of \$10,500.00 was received into the A-Team account at Chase Bank.

The first wire for \$15,000 was received on February 9, 2011. On the same day, **Tracy Vasseur** sent five outgoing wires to Nigeria, and on the following day she sent out another four wires. The total of the nine wires sent out was \$15,080.

The day after **Tracy Vasseur** received the second wire for \$10,000 at Colorado State Bank and Trust on February 16, 2011, she withdrew \$8,900 in her name.

On the same day that the wire for \$8,450.00 was received, March 4, 2011, **Tracy Vasseur** wrote a check to herself as the payee in the amount of \$7,300.00. As mentioned above in the factual summary for Counts One and Two, evidence before the grand jury proved that **Tracy and Karen Vasseur** typically kept 10 percent or less of the money a victim would send to them. On the same day, **Tracy Vasseur's** mother, **Karen Vasseur**, sent eight wires out to Nigeria over a five-hour period for a total of \$14,445.

An unusual occurrence happened at the time **Karen Vasseur** was sending these wires out. Western Union records show that, at 4:03 p.m., after she had sent out three wires, **Karen Vasseur** sent a wire to Nigeria in the amount of \$1,845. The records then show that two minutes later, at 4:05 p.m., she received a wire in the same amount from a different Western Union location in Thornton, Colorado, and the name of the sender was **Karen Vasseur**. Just two minutes later, **Karen Vasseur** sent out four more wires in four hours

from the same location where the previous four wires were sent from. Each wire was in the amount of \$1,800.

On the same day that the final wire from Ms. Shonias for \$10,500 was received at Chase Bank on March 16, 2011, a cashier's check, in the amount of \$9,600 was written to **Tracy Vasseur**; and on that same day the same cashier's check, # 9463805237, was deposited into **Karen Vasseur's** KKJ Services account at Vectra Bank. On the following day, March 17, 2011, over a five-and-a-half hour time period, **Karen Vasseur** sent six wires from a Western Union outlet in Fort Lupton, Colorado to Nigeria. The total amount she wired out was \$9,400.

**PREDICATE ACT NUMBER SIX**  
**(Theft-\$20,000 or More)**

On or about and between November 9, 2010 and December 31, 2010, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from Frances Goins, with the intent to permanently deprive her of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

The offenses alleged in Predicate Act Six, and in the associated stand-alone Count Eight, were committed in the following manner:

Ms. Goins resides in North Carolina. Between November 9, 2010 and December 31, 2010, she sent nine wires directly to **Tracy Vasseur** and a tenth wire was sent to **Tracy Vasseur** at TCF bank December 31, 2010. The total amount of the ten wires was \$24,200.

The first wire received by **Tracy Vasseur** was on November 9, 2010, and was for \$2,000. It was received at a Western Union outlet at King Soopers store # 101 at 8:04 p.m. Western Union records show that **Tracy Vasseur** kept \$200 and wired out \$1,800 to Nigeria on the same day, just 26 minutes later, but from another location: King Soopers store # 68.

The next eight wires sent by Ms. Goins were also received directly by **Tracy Vasseur**. Frances Goins was interviewed by a grand jury investigator and she indicated that she corresponded with a person who called himself Jack Campbell, and who represented that he was in the military. They developed a romantic relationship over the internet. Mr. Campbell repeatedly asked Ms. Goins to send money for various reasons, such as for travel expenses and to get some of his personal items through customs. The person using the name Mr. Campbell explicitly instructed Ms. Goins to send money to a military "agent" named **Tracy L. Vasseur** in Brighton, Colorado. On November 9, 2010, the date that Ms. Goins

sent out her first wire as described above, the person posing as a military member e-mailed Ms. Goins the following message: "Darling the Department need you to call the money gram location so that the agent in charge can be able to pick up the fees darling [sic] they need you to do that now. Jacky." On that day, Ms. Goins wired \$2,000 to **Tracy Vasseur**. Ms. Goins indicated that she lost all of the money she sent to **Tracy Vasseur**.

The final wire sent by Ms. Goins for \$1,200 was sent to **Tracy Vasseur's** personal account at TCF Bank on New Year's Eve, December 31, 2010. Bank records show that on the same day, **Tracy Vasseur** wrote herself a check in the amount of \$1,150, and, also on the same day, wired \$1,300 to Nigeria. Interestingly, on the following day, January 1<sup>st</sup>, 2011, **Karen Vasseur** wired \$1,200 to her daughter, **Tracy Vasseur** (who used the false name of "Tracy Myhre" to pick up the money at a Western Union outlet).

**PREDICATE ACT NUMBER SEVEN**  
**(Theft-\$20,000 or More)**

On or about and between April 21, 2011 to May 9, 2011, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from Luzviminda Domingo Juan, with the intent to permanently deprive her of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

The offenses alleged in Predicate Act Seven, and in the associated stand-alone Count Nine, were committed in the following manner:

Ms. Domingo Juan resides in the Philippines. Between April 21, 2011 to May 9, 2011, she sent three wires to Colorado totaling \$22,478. She wired \$4,000 on April 21, 2011 to **Karen Vasseur**, and \$3,500 on the next day, also to **Karen Vasseur**. Finally, she wired \$14,978 on May 9, 2011 to A-Team Distributions at US Bank. On the two days following the first wire for \$4,000, **Karen Vasseur** and one of **Tracy Vasseur's** daughters sent three wires to Nigeria totaling \$3,900. Similarly, on the two days after the second wire sent by the victim, **Tracy Vasseur's** two daughters sent several outgoing wires to Nigeria, surpassing the amount sent by the victim. **Tracy Vasseur** admitted to investigators that she knowingly and intentionally involved both of her daughters in the sending and receiving of wires containing victims' money.

The last wire sent by the victim for \$14,978, was received on May 9, 2011, into the A-Team Distributions account at US Bank. On the same day, **Tracy Vasseur** withdrew, from the same account, \$12,700. On the following day, May 10, 2011, **Karen Vasseur** and one of **Tracy Vasseur's** daughters sent out nine wires to Nigeria and the U.S. for a total of \$14,500.

**PREDICATE ACT NUMBER EIGHT**  
**(Theft-\$20,000 or More)**

On or about and between February 25, 2009 and March 24, 2012, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from 338 victims known to the grand jury through witness testimony and exhibits, with the intent to permanently deprive them of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

**PREDICATE ACT NUMBER NINE**  
**(Theft-\$500 or More-At-Risk Adult )**

On or about and between February 25, 2009 and March 1, 2012, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of five hundred dollars (\$500.00) or more from 29 victims known to the grand jury through witness testimony and exhibits, with the intent to permanently deprive them of the thing of value. Further, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR** committed theft against at-risk adults while acting in a position of trust, whether or not in the presence of the victim, in violation of sections 18-6.5-103(5) and 18-4-401(1), C.R.S.

The offenses alleged in Predicate Acts Eight and Nine, and in the associated stand-alone Counts Ten and Eleven, were committed in the following manner:

Facts constituting the offenses contained in Predicate Acts Eight and Nine are described in the factual summary for Counts One and Two and are incorporated herein by reference.

Between February 25, 2009 and March 24, 2012, **Tracy and Karen Vasseur** engaged in hundreds of fraudulent financial transactions intended to gain control over money sent to them under fraudulent pretenses, take a portion of the money for themselves, and send the remainder to persons in Nigeria and other countries. A total of \$603,118.71 was stolen from 338 victims. Victims suffered financial losses in varying amounts. In addition, the

actions of **Tracy and Karen Vasseur** also resulted in 29 at-risk adults, aged 60 years and older, losing a total of \$59, 280.00. These combined 367 victims are in addition to the seven victims named in Predicate Acts One through Seven. All of the victims referred to in Predicate Act Eight and Nine were identified through subpoenaed bank records and records obtained from Western Union and Money Gram.

Although neither **Tracy or Karen Vasseur** appeared to participate in contacting victims or in getting them to believe that they were dealing with real armed service members, they did communicate with other individuals regularly who regularly provided them with information and instructions that ultimately led to victims losing money which they thought was going to a worthy cause. The role the **Vasseur's** played was crucial to the success of the criminal enterprise. Acting as "agents" of the military and accepting hundreds of money transfers sent to them, they extended and perpetuated the fraud. The enterprise members in Nigeria could not instruct victims to send thousands of dollars to Nigeria on behalf of U.S. military members because of the suspicions that would raise. By telling them to send the money to a "military agent" in the United States, victims would more readily believe that the request for money was legitimate and, thus, were defrauded. Six victims resided in Colorado at the time they had money stolen from them.

**Tracy and Karen Vasseur** made deliberate and extensive efforts to conceal the amount of wire activity they were engaged in. Once the money was received, **Karen and Tracy Vasseur** took a portion of the victim's money and sent the rest to far-flung Nigeria. Financial records, presented to the grand jury, show that the **Vasseur's** were engaged in regular and ongoing activity involving picking up money from victims and sending it back out immediately to unknown associates in Nigeria. Their activities were frequent. In the month of October, 2011, alone, the **Vasseur's** sent out 69 wires to Nigeria. Although both women claimed that they believed they were sending money that was intended to support a Nigerian charity, neither of them could provide any information about any charity that could be confirmed.

Several victims provided statements to grand jury investigators that showed a clear pattern of deceit. Each victim was lured over the internet and attracted by the opportunity to have a relationship with a member of the armed forces, and then each was given a pitch concerning the often desperate need for funds by the person communicating with them. Each victim indicated that the money they sent did not go toward its intended purpose, and each victim indicated that they were never repaid.

**PREDICATE ACT NUMBER TEN**

**(Money Laundering-Financial Transaction to Conceal or Disguise Nature or Avoid Reporting)**

On or about and between February 25, 2009 and March 24, 2012, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR** unlawfully and feloniously conducted or attempted to conduct a financial transaction that involved money or any other thing of value that the defendant knew or believed to be the proceeds, in any form, of a criminal offense, with knowledge or a belief that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense or avoid a transaction reporting requirement under federal law; in violation of section 18-5-309(1)(a)(II), C.R.S.

The offenses alleged in Predicate Act Ten, and in the associated stand-alone Count Twelve, were committed in the following manner:

Facts constituting the offenses contained in Predicate Act Ten are described in the factual summary for Predicate Acts One through Seven and are incorporated herein by reference.

**Tracy Vasseur** made several admissions concerning her involvement with the on-going enterprise. She admitted being suspicious about the activity she was involved in, and admitted that what she was doing "wasn't right." She said that no one made her do anything and that she did it of her "own free will." She also said she believed that the other people she was working with somehow "manipulate them," (victims) into sending money.

**Tracy Vasseur** admitted to deceiving various banks related to the manner in which she opened and used her accounts. She admitted that she transferred money between bank accounts to avoid detection and admitted to falsely representing the type of business that A-Team Distributions was engaged in. She admitted that she intentionally withdrew smaller amounts from her bank accounts containing stolen money to avoid the federal \$10,000 reporting requirements. She admitted that she also made efforts to subvert restrictions on her wiring activity imposed by Western Union and Money Gram. She admitted intentionally keeping transactions at Western Union below a threshold amount to avoid wiring restrictions being imposed on her. She admitted using fake names in order to send money through Western Union, and this was confirmed through records provided by Western Union and from wire transfer receipts found at **Karen and Tracy Vasseur's** residence. She admitted that her mom, **Karen Vasseur** helped "pickup and sending," and said that, conversely, she helped her mom with "her thing," which allegedly involved **Karen Vasseur** picking up money and sending it to Nigeria in connection with an alleged inheritance she claimed she was about to receive.

**Karen Vasseur** was the recipient of several checks made out to her personally or to her company, KKJ Services. These checks were written by **Tracy Vasseur** to her mom so that **Karen Vasseur** could either deposit them into her bank accounts for later withdrawal or to cash the checks and take the money to a Western Union location so it could be wired to Nigeria. **Karen Vasseur** also admitted to investigators that Western Union had prohibited her from sending wires due to the large number of wires she was receiving and sending. She also admitted that at that time she obtained a new drivers license in another name. Western Union records show that **Karen Vasseur** then began conducting extensive wire activity in the new name as well as in other names. **Karen Vasseur** also admitted that she willingly took money from victims and sent it to Nigeria.

Specific examples of money laundering that occurred are: On February 18, 2011, **Tracy Vasseur** withdrew \$15,000 from Colorado State Bank and Trust through two \$5,000 checks and \$5,000 in cash. On the same day, she deposited one of the \$5,000 checks into the account for A-Team Distributions at the Credit Union of Colorado and deposited the other \$5,000 check into the A-Team account at Summit Bank. It is unknown what she did with the \$5,000 in cash, but on the same day, **Tracy Vasseur**, using the name Tracy Kline, wired \$1,800 to Nigeria and \$900 to **Karen Vasseur**. Also on the same day, another \$5,000 was withdrawn from Colorado State Bank and Trust by check, made out to KKJ Services, **Karen Vasseur's** company. On that day, the same check was deposited at Vectra Bank, where **Karen Vasseur** maintained both a personal account and a small business account in the name of KKJ Services. Finally, also on the same day, February 18, 2011, **Tracy Vasseur's** daughter completed six separate wires, all to Nigeria, in the amount of \$5,400.

On February 23, 2011, a wire for \$52,000 was sent by A-Team Distributions to the A-Team account at Colorado State Bank and Trust. On the same day the money was wired back out to an A-Team account at Chase Bank. Over the next four days, **Tracy and Karen Vasseur** sent 29 wires out to Nigeria for over \$30,000. During that wire period, **Karen Vasseur** also wired \$1,650 to **Tracy Vasseur**.

On April 8, 2011, a wire from a victim in the amount of \$47,919.49 was received into the A-Team account at Chase Bank. On the same day, four separate cashier's checks were written on the account: one to KKJ Services, two to A-Team Distributions and one to **Tracy Vasseur**. Also on the same day, the cashier's check written to KKJ Services was deposited at Vectra Bank by **Karen Vasseur**. The other cashier's checks were deposited at the Credit Union of Colorado and at Summit Bank. Then, between April 10 and April 19, 2011, 26 wires were sent to Nigeria for a total amount of nearly \$40,000. Twenty of the wires were sent by **Karen Vasseur** and the rest were sent by **Tracy Vasseur's** daughter.

Between February, 2009 and January, 2012, **Karen and Tracy Vasseur** opened a total of 20 bank accounts at 11 different banks. At the height of their money wiring and money laundering activity, they had opened 14 accounts at eight separate banks in just a 10 month period between December, 2010 and September, 2011.

**PREDICATE ACT NUMBER ELEVEN**  
**(Theft-\$20,000 or More)**

On or about and between February 2, 2012 and April 5, 2012, in the State of Colorado, **TRACY LEA VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from PayPal and seven victims named below, with the intent to permanently deprive them of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

**PREDICATE ACT NUMBER TWELVE**  
**(Identity Theft-Uses Information to Obtain Thing of Value)**

On or about and between February 2, 2012 and April 5, 2012, in the State of Colorado, **TRACY LEA VASSEUR**, did unlawfully, feloniously and knowingly use the personal identifying information, financial identifying information, or financial device of victims known to the grand jury through witness testimony and exhibits without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment, in violation of section 18-5-902(1)(a), C.R.S.

The offenses alleged in Predicate Acts Eleven and Twelve, and in the associated stand-alone Counts Thirteen and Fourteen, were committed in the following manner:

When **Karen Vasseur's** residence was searched on March 14, 2012, Investigators found a handwritten list of 17 names of people from various states in the U.S. **Tracy Vasseur** admitted to writing the list based on information she says was provided to her by a person living in the United Kingdom. The list was located in **Tracy Vasseur's** bedroom. It contained addresses and phone numbers of the people along with their credit card numbers and corresponding Card Verification Code, or "CVC," located on the back of credit cards. In the margin, **Tracy Vasseur** made notations beside three of the names saying "declined."



**Tracy Vasseur** fraudulently opened a PayPal account in the name of A-Team for the express purpose of attempting to run the credit card information she possessed through as a charge and see if it would clear. Most of the attempts were declined. However, **Tracy Vasseur** succeeded in submitting seven credit card numbers for payment through the PayPal account. The victims were: Stuart Huddleston, Rebecca Spicer, Margaret Gregory, Anna Fliege, Margaret Caplan, Katherine McGee and Sharon Mayo. **Vasseur** obtained \$25,313.00 from the fraudulent use of these people's credit cards. After the transactions were completed using PayPal, **Tracy Vasseur** then transferred the money to her account at First National Bank. Records indicate that funds from those PayPal transactions were wired to an individual in Nigeria. The amount of the loss and the names of the victims were obtained through subpoenaed PayPal records and interviews conducted with fraud investigators from the banks that issued the credit cards. **Tracy Vasseur** told Investigators that she did not believe that what she had done was legitimate, and indicated that the PayPal account was later closed for suspicious activity.

**PREDICATE ACT NUMBER THIRTEEN**  
**(First Degree Forgery)**

On or about and between February 25, 2009, and March 24, 2012, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, with the intent to defraud Western Union and Money Gram, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: wire transfer receipts; in violation of section 18-5-102(1)(c), C.R.S.

Facts constituting the offenses contained in Predicate Act Thirteen are described in the factual summary for Counts One and Two and Predicate Act Ten, and are incorporated herein by reference.

**PREDICATE ACT NUMBER FOURTEEN**  
**(First Degree Forgery)**

On or about and between December 8, 2008 and February 9, 2009, in the State of Colorado, **TRACY LEA VASSEUR**, with the intent to defraud Western Union and Money Gram, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument,

promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Powers of Attorney; in violation of section 18-5-102(1)(c), C.R.S.

The offenses alleged in Predicate Act Fourteen, and in the associated stand-alone Count Sixteen, were committed in the following manner:

During the search of the **Vasseur** residence, Investigators retrieved two Power of Attorney documents. One, purported to be signed by a Paul Johnson, appointed **Tracy Vasseur** as his "agent" in financial matters. **Tracy Vasseur** admitted that she created the document and forged the signatures on it, including that of the Notary Public. She said that she made the document and submitted it to Western Union because they had restricted her from doing wire transactions and the power of attorney allowed her to resume sending and receiving wires related to the scheme. Investigators spoke with the person whose name appeared on the document as the Notary Public and she confirmed that she did not certify it at any time. A second, essentially similar power of attorney document was also retrieved during the search, purporting to have been executed by a person named Olamikoke, Ayodeji, who is the person that **Tracy and Karen Vasseur** sent the largest number of wires to in Nigeria. **Tracy Vasseur** made the same admissions regarding her involvement with this document and the same Notary Public confirmed that she did not notarize it at any time.

**PREDICATE ACT NUMBER FIFTEEN**  
**(First Degree Forgery)**

On or about and between March 11, 2011 and January 30, 2012, in the State of Colorado, **TRACY LEA VASSEUR**, with the intent to defraud PayPal and Aaron Raney, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a PayPal account application ; in violation of section 18-5-102(1)(c), C.R.S.

The offenses alleged in Predicate Act Fifteen, and in the associated stand-alone Count Seventeen, were committed in the following manner:

In order to facilitate the fraudulent use of stolen credit cards numbers that she had in her possession, **Tracy Vasseur** contacted PayPal and submitted an application so that she could open a merchant account and use the PayPal service to process the stolen credit card information. **Tracy Vasseur** admitted that she submitted the application in her nephew's

name, Aaron Raney, without his permission. Aaron Raney told Investigators that he was unaware of what had happened and that **Tracy Vasseur** did not have his permission to use his name in connection with opening a PayPal account. After receiving the initial application, PayPal sent an e-mail addressed to "ateamdistinc@yahoo.com." In it, a PayPal representative informed Mr. Raney that they had visited the URL but that it did not contain sufficient information for them to approve the application. The email instructs Mr. Raney to provide a list of documents and to sign the email and return it within seven days. **Tracy Vasseur** admitted to filling out and signing the e-mail on January 30, 2012, and providing it to PayPal. As a result, PayPal opened a merchant account for A-Team Distributions, Inc., and **Tracy Vasseur** then began running the stolen credit card numbers through the PayPal system.

**PREDICATE ACT NUMBER SIXTEEN**  
**(First Degree Forgery)**

On or about and between June 30, 2011, in the State of Colorado, **TRACY LEA VASSEUR**, with the intent to defraud US Bank, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a legal demand letter sent to US Bank; in violation of section 18-5-102(1)(c), C.R.S.

The offenses alleged in Predicate Act Sixteen, and in the associated stand-alone Count Eighteen, were committed in the following manner:

On June 2, 2011, theft victim Kerstin Hellsten, who is the victim from Sweden named in Predicate Act Four, sent a wire to A-Team Distributions at US Bank in the amount of \$29,004.00. Later, Ms. Hellsten became suspicious and contacted US Bank to report what she thought was fraud and to see if she could get her money back. US Bank, acting on the information provided by Ms. Hellsten, froze the funds that were in the A-Team account. **Tracy Vasseur** became upset and when the bank would not release the funds based on her demands, she hired a law firm in California to write a demand letter to the bank.

In the letter, the attorney that drafted it accused the bank of acting fraudulently and of violating "numerous Federal Banking Laws and Regulations." Based on information **Tracy Vasseur** gave him, the attorney represented that **Tracy Vasseur** ran a business that shipped goods to other countries, and that she had sold Ms. Hellsten a "2006 bobcat 442C which cost Ms. Vasseur \$39,000.00" The attorney went on to threaten punitive damages and damages

for severe emotional distress and accused the bank of engaging in "illegal conduct." Soon after the letter was received by the bank, it released the funds to **Tracy Vasseur** and Ms. Hellsten was never repaid. Tracy told investigators that she "lied about it." She further admitted that, after receiving the funds, she sent them to Olaymigoke in Nigeria.

**PREDICATE ACT NUMBER SEVENTEEN**  
**(Criminal Impersonation)**

On or about and between February 25, 2009, and March 24, 2012, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, and in such identity or capacity did an act with intent to unlawfully gain a benefit for herself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

Facts constituting the offenses contained in Predicate Act Seventeen are described in the factual summary for Counts One and Two and Predicate Acts Eight, Nine and Ten and are incorporated herein by reference.

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**COUNT NUMBER THREE**  
**THEFT- \$20,000 or More, §18-4-401 (1)(a), (2)(d), C.R.S. (F3)**

On or about and between February 16, 2011, and April 8, 2011, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from Mrs. R. Bell, with the intent to permanently deprive her of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

The offenses alleged in Count Three were previously described in the factual summary in support of Predicate Act One and is incorporated by reference.

**COUNT NUMBER FOUR**

**THEFT- \$20,000 or More, §18-4-401 (1)(a), (2)(d), C.R.S. (F3)**

On or about and between October 11, 2011 and October 24, 2011, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from Mrs. C.A. Evans, with the intent to permanently deprive her of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

The offenses alleged in Count Four were previously described in the factual summary in support of Predicate Act Two and is incorporated by reference.

**COUNT NUMBER FIVE**

**THEFT- \$20,000 or More, §18-4-401 (1)(a), (2)(d), C.R.S. (F3)**

On or about April 1, 2011 and April 12, 2011, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from Mrs. M.R. Middleton, with the intent to permanently deprive her of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

The offenses alleged in Count Five were previously described in the factual summary in support of Predicate Act Three and is incorporated by reference.

**COUNT NUMBER SIX**

**THEFT- \$20,000 or More, §18-4-401 (1)(a), (2)(d), C.R.S. (F3)**

On or about and between April 7, 2011 and June 2, 2011, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from Kerstin Hellsten, with the intent to permanently deprive her of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

The offenses alleged in Count Six were previously described in the factual summary in support of Predicate Act Four and is incorporated by reference.

**COUNT NUMBER SEVEN**

**THEFT- \$20,000 or More, §18-4-401 (1)(a), (2)(d), C.R.S. (F3)**

On or about and between February 9, 2011 and March 16, 2011, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from Corina Shonias, with the intent to permanently deprive her of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

The offenses alleged in Count Seven were previously described in the factual summary in support of Predicate Act Five and is incorporated by reference.

**COUNT NUMBER EIGHT**

**THEFT- \$20,000 or More, §18-4-401 (1)(a), (2)(d), C.R.S. (F3)**

On or about and between November 9, 2010 and December 31, 2010, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from Frances Goins, with the intent to permanently deprive her of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

The offenses alleged in Count Eight were previously described in the factual summary in support of Predicate Act Six and is incorporated by reference.

**COUNT NUMBER NINE**

**THEFT- \$20,000 or More, §18-4-401 (1)(a), (2)(d), C.R.S. (F3)**

On or about and between April 21, 2011 to May 9, 2011, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from Luzviminda Domingo Juan, with the intent to permanently deprive her of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

The offenses alleged in Count Nine were previously described in the factual summary in support of Predicate Act Seven and is incorporated by reference.

**COUNT NUMBER TEN**

**THEFT- \$20,000 or More, §18-4-401 (1)(a), (2)(d), C.R.S. (F3)**

On or about and between May 13, 2009 and March 24, 2012, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from victims known to the grand jury through witness testimony and exhibits, with the intent to permanently deprive them of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

**COUNT NUMBER ELEVEN**

**THEFT- \$500 or More-At-Risk Adult, §18-4-401 (1)(a), (2)(d), C.R.S. (F3)**

On or about and between February 25, 2009 and March 1, 2012, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of five hundred dollars (\$500.00) or more from victims known to the grand jury through witness testimony and exhibits, with the intent to permanently deprive them of the thing of value. Further, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR** committed theft against at-risk adults while acting in a position of trust, whether or not in the presence of the victim, in violation of sections 18-6.5-103(5) and 18-4-401(1), C.R.S.

The offenses alleged in Counts Ten and Eleven were previously described in the factual summary in support of Predicate Acts Eight and Nine and is incorporated by reference.

**COUNT NUMBER TWELVE**

**MONEY LAUNDERING – FINANCIAL TRANSACTION TO CONCEAL OR DISGUISE NATURE OR AVOID REPORTING, §18-5-309(1)(a)(II), C.R.S. (F3)**

On or about and between February 25, 2009 and March 24, 2012, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR** unlawfully and feloniously conducted or attempted to conduct a financial transaction that involved money or any other thing of value that the defendant knew or believed to be the proceeds, in any form, of a criminal offense, with knowledge or a belief that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense or avoid a transaction reporting requirement under federal law; in violation of section 18-5-309(1)(a)(II), C.R.S.

The offenses alleged in Count Twelve were previously described in the factual summary in support of Predicate Act Ten and is incorporated by reference.

**COUNT NUMBER THIRTEEN**

**THEFT- \$20,000 or More, §18-4-401 (1)(a), (2)(d), C.R.S. (F3)**

On or about and between February 2, 2012 and April 5, 2012, in the State of Colorado, **TRACY LEA VASSEUR**, did unlawfully, feloniously, knowingly, and by deceit, take a thing of value, to-wit: money of the value of twenty thousand dollars (\$20,000) or more, from PayPal and seven victims named below, with the intent to permanently deprive them of the thing of value, in violation of section 18-4-401 (1)(a) and (2)(d), C.R.S.

**COUNT NUMBER FOURTEEN**

**Identity Theft, \$20,000 or More, §18-4-401 (1)(a), (2)(d), C.R.S. (F3)**

On or about and between February 2, 2012 and April 5, 2012, in the State of Colorado, **TRACY LEA VASSEUR**, did unlawfully, feloniously and knowingly use the personal identifying information, financial identifying information, or financial device of victims known to the grand jury through witness testimony and exhibits without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment, in violation of section 18-5-902(1)(a), C.R.S.

The offenses alleged in Counts Thirteen and Fourteen were previously described in the factual summary in support of Predicate Acts Eleven and Twelve and is incorporated by reference.

**COUNT NUMBER FIFTEEN**

**Forgery, § 18-5-102(1)(c), C.R.S. (F5)**

On or about and between February 25, 2009, and March 24, 2012, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, with the intent to defraud Western Union and Money Gram, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: wire transfer receipts; in violation of section 18-5-102(1)(c), C.R.S.



Facts constituting the offenses contained in Count Fifteen are described in the factual summary for Counts One and Two and Predicate Act Ten, and are incorporated herein by reference.

**COUNT NUMBER SIXTEEN**  
**Forgery, § 18-5-102(1)(c), C.R.S. (F5)**

On or about and between December 8, 2008 and February 9, 2009, in the State of Colorado, **TRACY LEA VASSEUR**, with the intent to defraud Western Union and Money Gram, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Powers of Attorney; in violation of section 18-5-102(1)(c), C.R.S.

The offenses alleged in Count Sixteen were previously described in the factual summary in support of Predicate Act Fourteen and is incorporated by reference.

**COUNT NUMBER SEVENTEEN**  
**Forgery, § 18-5-102(1)(c), C.R.S. (F5)**

On or about and between March 11, 2011 and January 30, 2012, in the State of Colorado, **TRACY LEA VASSEUR**, with the intent to defraud PayPal and Aaron Raney, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a PayPal account application ; in violation of section 18-5-102(1)(c), C.R.S.

The offenses alleged in Count Seventeen were previously described in the factual summary in support of Predicate Act Fifteen and is incorporated by reference.

**COUNT NUMBER EIGHTEEN**  
**Forgery, § 18-5-102(1)(c), C.R.S. (F5)**

On or about and between June 30, 2011, in the State of Colorado, **TRACY LEA VASSEUR**, with the intent to defraud US Bank, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legalright, interest, obligation, or status, namely: a legal demand letter sent to US Bank; in violation of section 18-5-102(1)(c), C.R.S.

The offenses alleged in Count Eighteen were previously described in the factual summary in support of Predicate Act Sixteen and is incorporated by reference.

**COUNT NUMBER NINETEEN**  
**Criminal Impersonation, §18-5-113(1)(b)(II), C.R.S. (F5)**

On or about and between February 25, 2009, and March 24, 2012, in the State of Colorado, **TRACY LEA VASSEUR AND KAREN RAE VASSEUR**, unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, and in such identity or capacity did an act with intent to unlawfully gain a benefit for herself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

The offenses alleged in Count Nineteen were previously described in the factual summary in support of Counts One and Two and Predicate Acts Eight, Nine and Ten and is incorporated by reference.

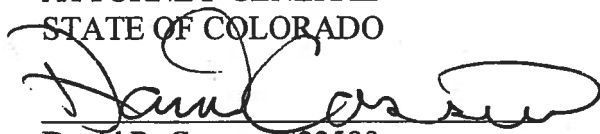
**COUNT NUMBER TWENTY**  
**Contributing to the Delinquency of a Minor, § 18-6-701(1), C.R.S. (F4)**

On or about and between February 18, 2011 and February 3, 2012, in the State of Colorado, **Tracy Lea Vasseur** unlawfully, feloniously, and knowingly induced, aided, or encouraged a child to violate any federal or state law, in violation of section 18-6-701(1), C.R.S.

The offense alleged in Count Twenty was committed in the following manner:

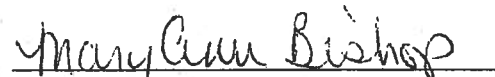
**Tracy Vasseur** admitted to Investigators that she used her minor daughter, Molly Myhre, to send and receive fraudulent wires containing stolen money because her ability to wire had been restricted by Western Union. Financial records show that Molly engaged in wiring funds from victims between February 18, 2011 and February 3, 2012. During that period, she received wires totaling \$5,890 and she sent dozens of wires out, mainly to Nigeria, in the total amount of \$52,380. At the time Molly was engaging in this activity, she was only 16 years old.

JOHN W. SUTHERS  
ATTORNEY GENERAL  
STATE OF COLORADO



David R. Cosson, #22589  
Senior Assistant Attorney General  
Criminal Justice Section

Subscribed to before me in the City and County of Denver, State of Colorado, this  
14<sup>th</sup> day of June 2012.

  
Notary Public

My commission expires: 1-5-2013