

# FELONY

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**INDICTMENT FOR CONSPIRACY AND BANK FRAUD**

UNITED STATES OF AMERICA

v.

**MEGAN MICHEL MERRIMAN**

a/k/a MEGEAN LERRIMAN

a/k/a MEGAN M. LERRIMAN

a/k/a MEAGEN M. LERRIMAN

a/k/a MEAGEN MICHELLE LERRIMAN

**SARAH M. SMITH**

a/k/a MICHELLE S. SMITH

**ALVIN L. WELCH**

\* CRIMINAL DOCKET NO.

\* SECTION:

\* VIOLATIONS: 18 U.S.C. § 371

18 U.S.C. § 1344

18 U.S.C. § 2

\* \* \*

The Grand Jury charges that:

**COUNT 1**

**CONSPIRACY**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. Iberia Bank, located in Marrero, Louisiana, in the Eastern District of Louisiana, was a bank whose deposits were insured by the Federal Deposit Insurance Corporation, as provided by Title 18, United States Code, Section 20.

2. AmSouth Bank (now known as Regions Bank), located in Marrero, Louisiana, in the Eastern District of Louisiana, was a bank whose deposits were insured by the Federal Deposit Insurance Corporation, as provided by Title 18, United States Code, Section 20.

3. Capital One Bank, located in New Orleans, Louisiana, in the Eastern District of Louisiana, was a bank whose deposits were insured by the Federal Deposit Insurance Corporation, as provided by Title 18, United States Code, Section 20.

4. Capital One Bank, located in Harvey, Louisiana, in the Eastern District of Louisiana, was a bank whose deposits were insured by the Federal Deposit Insurance Corporation, as provided by Title 18, United States Code, Section 20.

5. ASI Federal Credit Union, located in Westwego, Louisiana, in the Eastern District of Louisiana, was a bank whose deposits were insured by the National Credit Union Share Insurance Fund (NCUSIF), as provided by Title 18, United States Code, Section 20.

6. Whitney National Bank, located in Gretna, Louisiana, in the Eastern District of Louisiana, was a bank whose deposits were insured by the Federal Deposit Insurance Corporation, as provided by Title 18, United States Code, Section 20.

7. AmSouth Bank (now known as Regions Bank), located in Gretna, Louisiana, in the Eastern District of Louisiana, was a bank whose deposits were insured by the Federal Deposit Insurance Corporation, as provided by Title 18, United States Code, Section 20.

8. Iberia Bank, in Terrytown, Louisiana, in the Eastern District of Louisiana, was a bank whose deposits were insured by the Federal Deposit Insurance Corporation, as provided by Title 18, United States Code, Section 20.

9. Jefferson Parish School Board Employees Credit Union, located in Harvey, Louisiana, in the Eastern District of Louisiana, was a bank whose deposits were insured by the National Credit

Union Share Insurance Fund (NCUSIF), as provided by Title 18, United States Code, Section 20.

10. ASI Federal Credit Union, located in New Orleans, Louisiana, in the Eastern District of Louisiana, was a bank whose deposits were insured by the National Credit Union Share Insurance Fund (NCUSIF), as provided by Title 18, United States Code, Section 20.

11. Capitol One Bank, located in Gretna, Louisiana, in the Eastern District of Louisiana, was a bank whose deposits were insured by the Federal Deposit Insurance Corporation, as provided by Title 18, United States Code, Section 20.

**B. THE CONSPIRACY:**

From a time unknown but prior to August 30, 2007 and continuing until or about October 11, 2007, in the Eastern District of Louisiana and elsewhere, the defendants, **MEGAN M. MERRIMAN**, a/k/a **MEGEAN LERRIMAN**; a/k/a **MEGAN M. LERRIMAN**; a/k/a **MEAGEN M. LERRIMAN**; a/k/a **MEAGEN MICHELLE LERRIMAN**, **SARAH M. SMITH**, a/k/a **MICHELLE S. SMITH** and **ALVIN L. WELCH** along with others known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate and agree to devise a scheme to defraud various federally insured financial institutions as identified in Counts 2-15 and to obtain money owned by and under the custody and control of these institutions, by means of false and fraudulent pretenses, representations and promises, in that the defendants fraudulently presented and cashed altered checks, knowing said checks to have been fraudulently and falsely altered in violation of Title 18, United States Code, Section 1344.

**C. OVERT ACTS:**

During the course of the conspiracy, in the Eastern District of Louisiana and elsewhere, the following overt acts, among others, were committed in furtherance of the above described conspiracy:

1. In or around September 2007, **MEGAN M. MERRIMAN** and **SARAH M. SMITH**,

were approached by an individual, E.M. in New Orleans, Louisiana and were asked whether they were interested in making money.

2. In or around September 2007, E.M. drove **MERRIMAN** and **SMITH** to a Walmart retail outlet located on Manhattan Boulevard in Harvey, Louisiana and provided both defendants with \$100 to purchase medical scrubs, white t-shirts and socks.

3. E.M. told **MERRIMAN** and **SMITH** that they could keep the change and to remain in Walmart until he called them on a cellular telephone, approximately two (2) hours later.

4. In or around September 2007, after providing E.M. with their identification cards, E.M. drove **MERRIMAN** and **SMITH**, in a rental car, to various banks to cash checks E.M. had altered by making the checks payable to **MERRIMAN** and **SMITH**.

5. These checks, stolen from residential mail boxes, were also altered so as to increase the amount of the check and the account holder's signature was forged.

6. In the memo section of the altered checks E.M. wrote "care staff" or "mother's care staff" or "home health care".

7. In or around September 2007, the defendants wore the clothing purchased at Walmart so as to appear they were employed as home health care workers.

8. After cashing the checks, **MERRIMAN** and **SMITH** provided E.M. with the money illegally received from the banks and in turn E.M. provided the defendants with money and/or drugs.

9. On or about September 25, 2007, **ALVIN L. WELCH** was approached by E.M. in New Orleans, Louisiana and was asked whether he had any identification and if he was interested in making money.

10. On or about September 25, 2007, E.M. drove **WELCH** in a rental car to various banks

and waited in the car while **WELCH** attempted to cash checks E.M. had altered by making the checks payable to **WELCH**.

11. These checks, stolen from residential mail boxes, were also altered so as to increase the amount of the check and the account holder's signature was forged.

12. In the memo section of the altered checks E. M wrote "home repairs", "paid in full" or "renovations completed".

13. After **WELCH** successfully cashed the fictitious checks, E.M. provided a portion of the illegal proceeds to **WELCH**.

All in violation of Title 18 United States Code, Section 371.

### COUNT 2

On or about September 4, 2007, defendant **MEGAN MICHEL MERRIMAN**, a/k/a **MEGEAN LERRIMAN**; a/k/a **MEGAN M. LERRIMAN**; a/k/a **MEAGEN M. LERRIMAN**; a/k/a **MEAGEN MICHELLE LERRIMAN**, devised a scheme and artifice to defraud Iberia Bank, located in Marrero, Louisiana, in the Eastern District of Louisiana, and to obtain money owned by and under the custody of Iberia Bank, by means of false and fraudulent pretenses, representations and promises and in execution of the scheme and artifice as set forth above, she fraudulently presented and cashed an altered check in the amount of \$966.81, knowing said check to have been fraudulently and falsely altered; all in violation of Title 18, United States Code, Sections 1344 and 2.

### COUNT 3

On or about September 4, 2007, defendant **MEGAN MICHEL MERRIMAN**, a/k/a **MEGEAN LERRIMAN**; a/k/a **MEGAN M. LERRIMAN**; a/k/a **MEAGEN M. LERRIMAN**; a/k/a **MEAGEN MICHELLE LERRIMAN**, devised a scheme and artifice to defraud AmSouth Bank (now

known as Regions Bank), located in Marrero, Louisiana, in the Eastern District of Louisiana, and to obtain money owned by or under the custody of AmSouth Bank, by means of false or fraudulent pretenses, representations or promises, and in execution of the scheme and artifice as set forth above, she fraudulently presented and cashed an altered check in the amount of \$1,170.89, knowing said check to have been fraudulently and falsely altered; all in violation of Title 18, United States Code, Sections 1344 and 2.

#### COUNT 4

On or about September 4, 2007, defendant **SARAH M. SMITH**, a/k/a MICHELLE S. SMITH, devised a scheme and artifice to defraud Capital One Bank, in New Orleans, Louisiana, in the Eastern District of Louisiana, and to obtain money owned by and under the custody of Capitol One Bank, by means of false and fraudulent pretenses, representations and promises and in execution of the scheme and artifice as set forth above, she fraudulently presented and cashed an altered check in the amount of \$965.00, knowing said check to have been fraudulently and falsely altered; all in violation of Title 18, United States Code, Sections 1344 and 2.

#### COUNT 5

On or about September 5, 2007, defendant **MEGAN MICHEL MERRIMAN**, a/k/a MEGEAN LERRIMAN; a/k/a MEGAN M. LERRIMAN; a/k/a MEAGEN M. LERRIMAN; a/k/a MEAGEN MICHELLE LERRIMAN, devised a scheme and artifice to defraud Capital One Bank, in Harvey, Louisiana in the Eastern District of Louisiana, and to obtain money owned by and under the custody of Capitol One Bank, by means of false and fraudulent pretenses, representations and promises and in execution of the scheme and artifice as set forth above, she fraudulently presented and cashed an altered check in the amount of \$975.63, knowing said check to have been fraudulently

and falsely altered; all in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT 6**

On or about September 5, 2007, defendant **MEGAN MICHEL MERRIMAN**, a/k/a **MEGEAN LERRIMAN**; **MEGAN M. LERRIMAN**; a/k/a **MEAGEN M. LERRIMAN**; a/k/a **MEAGEN MICHELLE LERRIMAN**, devised a scheme and artifice to defraud ASI Federal Credit Union, located in Westwego, Louisiana, in the Eastern District of Louisiana, and to obtain money owned by and under the custody of ASI Federal Credit Union, by means of false and fraudulent pretenses, representations and promises and in execution of the scheme and artifice as set forth above, she fraudulently presented and cashed an altered check in the amount of \$916.52, knowing said check to have been fraudulently and falsely altered; all in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT 7**

On or about September 5, 2007, defendant **MEGAN MICHEL MERRIMAN**, a/k/a **MEGEAN LERRIMAN**; a/k/a **MEGAN M. LERRIMAN**; a/k/a **MEAGEN M. LERRIMAN**; a/k/a **MEAGEN MICHELLE LERRIMAN**, devised a scheme and artifice to defraud Whitney National Bank, located in Gretna, Louisiana in the Eastern District of Louisiana, and to obtain money owned by and under the custody of Whitney National Bank, by means of false and fraudulent pretenses, representations and promises and in execution of the scheme and artifice as set forth above, she fraudulently presented and cashed an altered check in the amount of \$988.00, knowing said check to have been fraudulently and falsely altered; all in violation of Title 18, United States Code, Sections 1344 and 2.

### COUNT 8

On or about September 5, 2007, defendant **SARAH M. SMITH**, a/k/a **MICHELLE S. SMITH**, devised a scheme and artifice to defraud AmSouth Bank (now known as Regions Bank), located in Gretna, Louisiana, in the Eastern District of Louisiana, and to obtain money owned by and under the custody of AmSouth Bank, by means of false and fraudulent pretenses, representations and promises and in execution of the scheme and artifice as set forth above, she fraudulently presented and cashed an altered check in the amount of \$988.94, knowing said check to have been fraudulently and falsely altered; all in violation of Title 18, United States Code, Sections 1344 and 2.

### COUNT 9

On or about September 5, 2007, defendant, **SARAH M. SMITH**, a/k/a **MICHELLE S. SMITH** devised a scheme and artifice to defraud ASI Federal Credit Union, located in Westwego, Louisiana, in the Eastern District of Louisiana, and to obtain money owned by and under the custody of ASI Federal Credit Union, by means of false and fraudulent pretenses, representations or promises and in execution of the scheme and artifice as set forth above, she fraudulently presented and cashed an altered check in the amount of \$984.46, knowing said check to have been fraudulently and falsely altered; all in violation of Title 18, United States Code, Sections 1344 and 2.

### COUNT 10

On or about September 7, 2007, defendant **MEGAN MICHEL MERRIMAN**, a/k/a **MEGEAN LERRIMAN**; a/k/a **MEGAN M. LERRIMAN**; a/k/a **MEAGEN M. LERRIMAN**; a/k/a **MEAGEN MICHELLE LERRIMAN**, devised a scheme and artifice to defraud Iberia Bank, in Terrytown, Louisiana, in the Eastern District of Louisiana, and to obtain money owned by and under



the custody of Iberia Bank, by means of false and fraudulent pretenses, representations and promises and in execution of the scheme and artifice as set forth above, she fraudulently presented and cashed an altered check in the amount of \$971.06, knowing said check to have been fraudulently and falsely altered; all in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT 11**

On or about September 7, 2007, defendant **MEGAN MICHEL MERRIMAN**, a/k/a **MEGEAN LERRIMAN**; a/k/a **MEGAN M. LERRIMAN**; a/k/a **MEAGEN M. LERRIMAN**; a/k/a **MEAGEN MICHELLE LERRIMAN**, devised a scheme and artifice to defraud Jefferson Parish School Board Employees Credit Union, located in Harvey, Louisiana, in the Eastern District of Louisiana, and to obtain money owned by and under the custody of Jefferson Parish School Board Employees Credit Union, by means of false and fraudulent pretenses, representations and promises and in execution of the scheme and artifice as set forth above, she fraudulently presented and cashed an altered check in the amount of \$987.68, knowing said check to have been fraudulently and falsely altered; all in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT 12**

On or about September 10, 2007, defendant **MEGAN MICHEL MERRIMAN**, a/k/a **MEGEAN LERRIMAN**; a/k/a **MEGAN M. LERRIMAN**; a/k/a **MEAGAN M. LERRIMAN**; a/k/a **a/k/a MEAGEN MICHELLE LERRIMAN** devised a scheme and artifice to defraud AmSouth Bank, (now known as Regions Bank) located in Gretna, Louisiana in the Eastern District of Louisiana, and to obtain money owned by and under the custody of AmSouth Bank, by means of false and fraudulent pretenses, representations or promises and in execution of the scheme and artifice as set forth above, she fraudulently presented and cashed an altered check in the amount of \$987.00, knowing said check to have been fraudulently and falsely altered; all in violation of Title 18, United

States Code, Sections 1344 and 2.

**COUNT 13**

On or about October 4, 2007, defendant **ALVIN L. WELCH**, devised a scheme and artifice to defraud ASI Federal Credit Union, located in New Orleans, Louisiana, in the Eastern District of Louisiana, and to obtain money owned by and under the custody of ASI Federal Credit Union, by means of false and fraudulent pretenses, representations and promises and in execution of the scheme and artifice as set forth above, he fraudulently presented and cashed an altered check in the amount of \$1,976.00, knowing said check to have been fraudulently and falsely altered; all in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT 14**

On or about October 9, 2007, defendant **ALVIN L. WELCH**, devised a scheme and artifice to defraud Capitol One Bank, located in Harvey, Louisiana, in the Eastern District of Louisiana, and to obtain money owned by and under the custody of Capitol One Bank, by means of false and fraudulent pretenses, representations and promises and in execution of the scheme and artifice as set forth above, he fraudulently presented and cashed an altered check in the amount of \$1,024.77, knowing said check to have been fraudulently and falsely altered; all in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT 15**

On or about October 11, 2007, defendant **ALVIN L. WELCH**, devised a scheme and artifice to defraud Capitol One Bank, located in Gretna, Louisiana, in the Eastern District of Louisiana, and to obtain money owned by and under the custody of Capitol One Bank, by means of false and fraudulent pretenses, representations and promises and in execution of the scheme and

artifice as set forth above, he fraudulently presented and cashed an altered check in the amount of \$2,102.95, knowing said check to have been fraudulently and falsely altered; all in violation of Title 18, United States Code, Sections 1344 and 2.

### NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 15 of this indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of the offense alleged in Counts 1 through 15 the defendants, **MEGAN MICHEL MERRIMAN**, a/k/a **MEGEAN LERRIMAN**; a/k/a **MEGAN M. LERRIMAN**; a/k/a **MEAGEN M. LERRIMAN**; a/k/a **MEAGEN MICHELLE LERRIMAN**, **SARAH M. SMITH**, a/k/a **MICHELLE S. SMITH** and **ALVIN L. WELCH**, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts 1 through 15 of this indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred 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; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property. All in violation of Title 21, United States Code, Section 853.

**A TRUE BILL:**

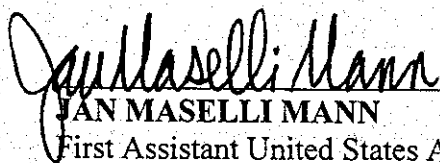
---

**FOREPERSON**



---

**JIM LETTEN**  
United States Attorney  
La. Bar Roll No. 8517



---

**JAN MASELLI MANN**  
First Assistant United States Attorney  
La. Bar Roll No. 9020



---

**JULIA K. EVANS**  
Assistant United States Attorney

New Orleans, Louisiana  
July 25, 2008