

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

UNITED STATES OF AMERICA,

Plaintiff,

v.

LISA A. LEWIS,

Defendant.

2013 NOV -5 P 4:46

JON A. SANFILIPPO
CLERK

13 - CR219

Case No. 13-CR-

[18 U.S.C. § 1343]
Green Bay Division

INDICTMENT

THE GRAND JURY CHARGES:

1. Beginning in approximately September 2006, and continuing thereafter until at least July 2013, in the State and Eastern District of Wisconsin,

LISA A. LEWIS

devised and carried out a scheme to defraud investors, and to obtain money from them by means of materially false and fraudulent pretenses (the "scheme"), which scheme is more fully described below.

2. At all times material to this indictment:

- a. Lisa A. Lewis ("Lewis") resided in the Eastern District of Wisconsin and held herself out as an "account representative" with Fidelity Investments and Fidelity Brokerage Services.
- b. Fidelity Brokerage Services, National Financial Services, and Fidelity Management Trust Company are all affiliated financial institutions that are

among the companies collectively doing business as Fidelity Investments (“Fidelity”).

- c. Lewis was neither affiliated with Fidelity nor a registered broker with the Financial Industry Regulatory Authority (FINRA), although she had previously been so registered from 1990 through 2006.
- d. Lewis maintained bank accounts at JP Morgan Chase Bank (Chase) and Wells Fargo Bank (“Wells”) that she used to deposit funds belonging to investors in order to unlawfully convert them for her private use.

The Scheme

3. Lewis’ scheme was essentially to defraud approximately thirteen elderly investors located in the greater Green Bay area (the “Clients”) as follows:

- a. Lewis convinced the Clients to transfer their money to Fidelity where she falsely claimed that she was employed as an account representative who was paid by commission for each account established.
- b. Lewis created or assisted Clients in creating an individual investment account with Fidelity, thereby, obtaining the Client’s personal account information, including passwords.
- c. Lewis then created joint Fidelity accounts under her name and that of the Client, often without the Client’s knowledge and consent. Lewis created these accounts via the internet and linked them to the Client’s individual account. Lewis intentionally misrepresented her identity in the creation of some accounts, for example, falsely describing herself as the niece of one Client.

- d. Lewis then misappropriated the Clients money by transferring funds from the Clients personal accounts to the Lewis/Client joint account and then to one of Lewis' personal accounts. This was done without the Clients knowledge or consent and was not pursuant to any legitimate investment being made on behalf of the Clients.
- e. Lewis also made unauthorized account transfers of Client funds in order to fraudulently withdraw Client funds by forging the Client's signature on checks drawn on that account. Lewis used the funds for personal expenditures and other expenses unrelated to the Client's purported investment.
- f. Without authorization, Lewis applied for and received debit cards from Fidelity that were associated with a Client's individual account or the joint Lewis/Client accounts. Lewis then used the debit card to withdraw funds without permission from the accounts and make personal expenditures.
- g. Lewis used the Client's funds to, among other things: (a) pay back previous Clients who requested access to their money; (b) purchase a 2013 Chevrolet Camaro; (c) gamble at local casinos; (d) pay personal expenses including credit card bills, and make cash payments to herself; and (e) pay for elective surgery for a friend.
- h. In order to continue and prevent her scheme from being detected, Lewis had Client account statements sent exclusively to her address. Lewis also sent fictitious account statements and documents to Clients that misrepresented the value or existence of the Client portfolio.

- i. Lewis also spoke telephonically with Fidelity account representatives and falsely identified herself as a Client in order to make unauthorized transfers or changes to Client accounts.
- j. When Lewis did pay a Client, she did so with another Client's money, furthering the illusion that she was acting as an account representative who was earning actual returns for the Client.
4. As a result of the scheme, Lewis wrongfully obtained funds in excess of \$1,000,000.

Executions of Scheme

5. On or about the dates indicated below, in the State and Eastern District of Wisconsin,

LISA A. LEWIS

executed her scheme in the manner described:

Count	Date	Execution of scheme
One	June 5, 2007	Wire transfer via computer located in Wisconsin of \$8,700 from Fidelity Investment account of M.K. to Fidelity Investment account of M.K. for purposes of Lewis forging M.K.'s signature on a check drawn on that account which Lewis cashed and used for personal expenses.
Two	December 20, 2011	Wire transfer via computer located in Wisconsin of \$30,000 from Fidelity Investment account of R.G. to Fidelity Investment joint account of R.G. and Lewis for purposes of Lewis later transferring funds to her individual account to use for personal expenses.
Three	June 5, 2012	Wire transfer via computer located in Wisconsin of \$40,000 from Fidelity Investment account of S.R. to Fidelity Investment joint account of S.R. and Lewis for purposes of Lewis later transferring funds to her individual account to use for personal expenses.
Four	August 27, 2012	Wire transfer via computer located in Wisconsin of \$8,000 from

Count	Date	Execution of scheme
		Fidelity Investment account of C.P. to Fidelity Investment joint account of C.P. and Lewis for purposes of Lewis later transferring funds to her individual account to use for personal expenses.
Five	March 20, 2013	Wire transfer via computer located in Wisconsin of \$9,000 from Fidelity Investment account of G.S. to Fidelity account of Lewis and then transfer to Lewis' Wells Fargo account for purposes of purchasing a Chevrolet Camaro automobile.

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

FORFEITURE NOTICE

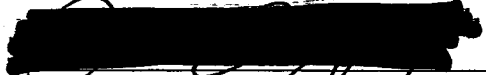
1. Upon conviction of the offense(s) in violation of Title 18, United States Code, Section 1343, set forth in Counts 1-5 of this Indictment, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense(s).

The property to be forfeited includes:

- a. One 2013 Chevrolet Camaro coupe, VIN 2G1FB1E38D9206264; and
- b. A sum of money equal to the proceeds derived from the offense(s).

2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).


A TRUE BILL:



FOREPERSON

11/5/2013

Date



JAMES L. SANTELLE
United States Attorney