

FILED  
U. S. DISTRICT COURT  
DISTRICT OF NEBRASKA  
13 AUG 20 PM 4:56  
OFFICE OF THE CLERK

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	8:13CR 310
	)	
vs.	)	INDICTMENT
	)	
PATRICIA WALKER-HALSTEAD,	)	18 U.S.C. § 1343
	)	18 U.S.C. § 2
Defendant	)	18 U.S.C. § 981(a)(1)(C)
	)	28 U.S.C. § 2461(c)
	)	18 U.S.C. § 1956(c)(7)(A) and
	)	18 U.S.C. § 1961(1)
	)	18 U.S.C. § 984(a)(2)(b)

The Grand Jury Charges:

**INTRODUCTION**

At all times material herein:

1. Defendant, PATRICIA WALKER-HALSTEAD (WALKER-HALSTEAD), resided in Omaha, Nebraska. From on or about March, 2011, up to and including on or about December, 2012, WALKER-HALSTEAD was engaged in the business of providing investigative services to customers, using the trade name Walker Investigations.

2. Walker Investigations' principal place of business was WALKER-HALSTEAD's residence in Omaha, Nebraska. Since April, 2005, Walker Investigations has been registered as a trade name with the Nebraska Secretary of State and identifies WALKER-HALSTEAD as the sole contact.

3. Between at least March, 2011, up to and including on or about November, 2012, WALKER-HALSTEAD maintained bank accounts for Walker Investigations, which bank accounts were located at Bank of the West, First National Bank, and US Bank. WALKER-HALSTEAD was the sole account owner of the Walker Investigations bank accounts. Between

at least March, 2011, up to and including on or about November, 2012, WALKER-HALSTEAD actively used Walker Investigations' bank accounts for personal financial transactions.

4. On or about March, 2011, WALKER-HALSTEAD was introduced to K.C, a name fully known to the Grand Jury. Between at least March, 2011, up to and including on or about November, 2012, K.C. resided within the District of Nebraska.

**COUNTS I - XI**  
**(WIRE FRAUD)**

5. The Grand Jury reincorporates the allegations contained in paragraphs 1 through 4 of this Indictment as if fully set forth herein.

6. From on or about March, 2011, and continuing through November, 2012, in the District of Nebraska, WALKER-HALSTEAD, did devise and intend to devise a scheme and artifice to defraud K.C., a name fully known to the Grand Jury, and for obtaining money by means of materially false and fraudulent pretenses, representations and promises, which scheme and artifice to defraud is more fully described as follows:

**THE SCHEME AND ARTIFICE TO DEFRAUD**

- A) On or about March, 2011, WALKER-HALSTEAD met with K.C. at Walker Investigations' principal place of business in Omaha, Nebraska. During this meeting, K.C. agreed Walker Investigations could handle all of K.C.'s personal security concerns, including investigation into a third party who K.C. believed was stalking her.
- B) As a part of the scheme and artifice to defraud K.C., in 2011, WALKER-HALSTEAD made materially false and fraudulent pretenses, representations and promises to K.C. that WALKER-HALSTEAD had obtained enough evidence to "go to trial" against K.C.'s stalker. WALKER-HALSTEAD expressly

misrepresented to K.C. that there was “so much” evidence relating to K.C.’s investigation that WALKER-HALSTEAD wanted to take the evidence to an Investigator named “Scott” who was employed with the Nebraska State Patrol. WALKER-HALSTEAD expressly misrepresented to K.C. that “Scott” held the rank of Captain with the Nebraska State Patrol and could assist with the investigation of K.C.’s security concerns. In fact, the Nebraska State Patrol did not have an employee named “Scott” who holds the rank of Captain and who assisted with the investigation of K.C.’s security concerns. In fact, “Scott” was a person made up by WALKER-HALSTEAD and who has never existed.

- C) Between at least March 11, 2011, up to and including on or about October 20, 2011, as a result of WALKER-HALSTEAD’s materially false and fraudulent pretenses, representations and promises to K.C., WALKER-HALSTEAD induced K.C. into making payments to Walker Investigations in the form of personal checks for investigative services and expenses purportedly provided to K.C. by Walker Investigations and WALKER-HALSTEAD.
- D) Between at least March 11, 2011, up to and including on or about October 20, 2011, K.C. issued to Walker Investigations twenty-eight (28) payments in the form of personal checks for investigative services purportedly provided by Walker Investigations and WALKER-HALSTEAD, totaling \$276,383.82. K.C.’s personal checks were deposited into three separate bank accounts that WALKER-HALSTEAD solely owned and maintained in the name of Walker Investigations. Walker Investigations’ bank accounts were located at Bank of the West, First National Bank, and US Bank in Omaha, Nebraska. Nineteen (19) of

K.C.'s personal checks were deposited into Walker Investigations' Bank of the West account, five (5) of K.C.'s personal checks were deposited into Walker Investigations' First National Bank account, and four (4) of K.C.'s personal checks were deposited into Walker Investigations' US Bank account.

- E) As a further part of the scheme and artifice to defraud K.C., beginning in at least March, 2011, up to and including November, 2012, WALKER-HALSTEAD continually made false and fraudulent material misrepresentations to K.C. that the payments to Walker Investigations were being used for investigative services and related expenses purportedly incurred on K.C.'s behalf. In fact, WALKER-HALSTEAD did not perform investigative work for which K.C. paid, nor did WALKER-HALSTEAD develop evidence, work product, or other material relating to K.C.'s investigation as WALKER-HALSTEAD falsely claimed. In fact, payments in the form of personal checks made by K.C. to Walker Investigations between March 11, 2011, up to and including October 20, 2011, were used by WALKER-HALSTEAD for gambling expenses and to make purchases of goods and services for her own personal use.
- F) As a further part of the scheme and artifice to defraud K.C., between at least January, 2012, up to and including November, 2012, WALKER-HALSTEAD made materially false and fraudulent pretenses, representations and promises to K.C. that "Scott" was having financial troubles related to medical expenses, legal expenses, business expenses, and personal expenses and that "Scott" needed K.C.'s financial assistance. WALKER-HALSTEAD convinced K.C. that "Scott" could be a future love interest and possible marriage partner of K.C. WALKER-

HALSTEAD made false and fraudulent material misrepresentations that any money K.C. gave to WALKER-HALSTEAD would be sent to "Scott" to assist with his financial troubles.

G) Between January, 2012, up to and including November, 2012, WALKER-HALSTEAD's express false and fraudulent pretenses, material misrepresentations and promises induced K.C. to issue payments in the form of personal checks to Walker Investigations for the benefit of "Scott." In fact, the monetary payments in the form of personal checks issued by K.C. to Walker Investigations were deposited into Walker Investigations' bank accounts used by WALKER-HALSTEAD for gambling expenses and to make purchases of goods and services for her own personal use, which included, but is not limited to, the following:

a) Purchase of a 2012 GMC Terrain (VIN: 2GKFLXEK7C6301997).

H) Between at least January 20, 2012, up to and including November 28, 2012, K.C. issued to Walker Investigations thirty-one (31) payments in the form of personal checks totaling \$579,696.40, which K.C. believed were for the benefit of "Scott". K.C.'s payments in the form of personal checks were deposited into Walker Investigations' bank account located at US Bank in Omaha, Nebraska, which account WALKER-HALSTEAD solely owned and maintained. K.C.'s payments in the form of personal checks were deposited into Walker Investigations' US Bank account.

#### **USE OF INTERSTATE COMMUNICATION FACILITIES**

7. Between at least March, 2011, up to and including November, 2012, it was a part of the fraud that interstate wire communication facilities would be used in furtherance of the

scheme. WALKER-HALSTEAD routinely communicated with K.C. by emails which updated K.C. on the status of Walker Investigations and WALKER-HALSTEAD's purported investigation of K.C.'s security concerns. WALKER-HALSTEAD also routinely communicated with K.C. by emails which updated K.C. on the status of "Scott" and his financial needs.

8. Emails sent by, or at the direction of, WALKER-HALSTEAD to K.C. were routed through AOL Inc. email servers located in the State of Virginia and AT&T Inc. email servers located in the State of California. K.C. was located within the State of Nebraska when she received emails from WALKER-HALSTEAD, thus WALKER-HALSTEAD's emails traveled in interstate commerce into the State of Nebraska.

#### **LOSS CAUSED BY THE FRAUD**

9. As a result of the scheme and artifice to defraud K.C., from at least March 11, 2011, and continuing through at least November 28, 2012, WALKER-HALSTEAD's materially false and fraudulent pretenses, representations and promises, which were made and caused to be made by WALKER-HALSTEAD to K.C., fraudulently induced K.C. to issue fifty-nine (59) monetary payments in the form of personal checks from K.C. to Walker Investigations totaling \$856,080.22. Payments made by K.C. to Walker Investigations beginning in at least March 11, 2011, and continuing through at least November 28, 2012, were used by WALKER-HALSTEAD for personal gambling expenses and to make purchases of goods and services for her own personal use.

#### **THE COUNTS – (COUNTS I – XI)**

10. For the purpose of executing the above described scheme and artifice to defraud, WALKER-HALSTEAD did knowingly cause to be transmitted by means of wire communications in interstate commerce, certain writings, signs and signals for the purpose of

executing the scheme and artifice to defraud, in that, she did cause the transmission of emails to K.C. which contained express false and fraudulent pretenses, material misrepresentations and promises, each of said wire communications constituting a separate count:

<b>Count</b>	<b>Date</b>	<b>Wire Communication</b>
I	4/29/2012	Email from WALKER-HALSTEAD to K.C. of text purportedly taken from an email sent by "Scott" in which "Scott" discusses his employment with the "State Patrol" and debt of over \$200,000.
II	4/30/2012	Email from WALKER-HALSTEAD to K.C. of text purportedly taken from an email sent by "Scott" in which "Scott" discusses having a secretive relationship
III	5/1/2012	Email from WALKER-HALSTEAD to K.C. of text purportedly taken from an email sent by "Scott" in which "Scott" discusses being responsible for a \$32,000 medical bill
IV	5/2/2012	Email from WALKER-HALSTEAD to K.C. of text purportedly taken from an email sent by "Scott" in which "Scott" discusses his need to care for a deceased friend's son and that it would be a "Conflict of Interest" to have a relationship with anyone associated to an open case.
V	5/6/2012	Email from WALKER-HALSTEAD to K.C. of text purportedly taken from an email sent by "Scott" in which "Scott" discusses that it is difficult to have a relationship with so many obstacles in the way
VI	5/14/2012	Email from WALKER-HALSTEAD to K.C. of text purportedly taken from an email sent by "Scott" in which "Scott" discusses his concern with debt that he has incurred
VII	5/22/2012	Email from WALKER-HALSTEAD to K.C. of text purportedly taken from an email sent by "Scott" in which "Scott" discusses the State Patrol website and whether K.C. was checking the State Patrol website
VIII	5/25/2012	Email from WALKER-HALSTEAD to K.C. of text purportedly taken from an email sent by "Scott" in which "Scott" discusses borrowing money for a \$20,000 medical expenses associated with a deceased friend's son who developed a tumor and paying off his debt related to medical and other expenses
IX	5/27/2012	Email from WALKER-HALSTEAD to K.C. of text purportedly taken from an email sent by "Scott" in which "Scott" discusses medical costs associated with a deceased friend's son who developed a tumor
X	6/4/2012	Email from WALKER-HALSTEAD to K.C. of text purportedly taken from an email sent by "Scott" in which "Scott" discusses K.C.'s "case", that WALKER-HALSTEAD "sold stocks" to finance the "case", and that WALKER-HALSTEAD "took her 401K and invested in this case"
XI	7/10/2012	Email from WALKER-HALSTEAD to K.C. of text purportedly

		taken from an email sent by "Scott" in which "Scott" tells K.C. that he wants K.C. to delete and destroy previous e-mails and correspondence between them
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In violation of Title 18, United States Code, Section 1343 and 2.

**CRIMINAL FORFEITURE ALLEGATIONS**

10. The allegations contained in Count I through XI of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

11. Upon conviction of any of the offenses in violation of Title 18, United States Code, Section 1343, as set forth in Counts I through XI of this Indictment, the Defendant, WALKER-HALSTEAD, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to, the following:

- a. One 2012 GMC Terrain (VIN: 2GKFLXEK7C6301997) registered to Patricia Walker-Halstead;
- b. Contents of WALKER-HALSTEAD's bank account number xxxxxx3478 under the name Walker Investigations at US Bank, Omaha, Nebraska;

12. If any of the property described above, as a result of any act or omission of WALKER-HALSTEAD:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided  
without difficulty,

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).

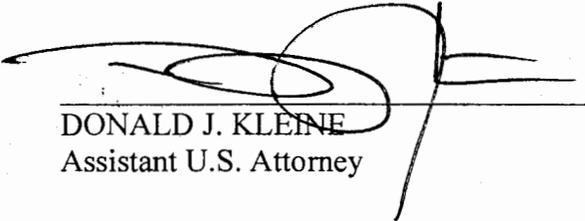
Pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 984(a)(2)(b),  
1956(c)(7)(A), 1961(1), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

  
FOREPERSON

  
DEBORAH R. GILG  
United States Attorney

The United States of America requests that trial of this case be held at Omaha, Nebraska,  
pursuant to the rules of this Court.

  
DONALD J. KLEINE  
Assistant U.S. Attorney