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## PRESS RELEASE

FOR IMMEDIATE RELEASE

Contact: Justin Southern (WVSAO)

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304-558-2251

### **Auditor Gainer Comments on Corporate Fraud Indictment**

(CHARLESTON) –State Auditor Glen B. Gainer III was pleased to learn of the first indictment relating to West Virginia’s corporate identity theft case.

Auditor Gainer said, “Federal and state authorities investigating this case should be commended for their speed and thoroughness.”

“We are continuing to assist with the investigation and are looking forward to future indictments relating to this case,” the Auditor also said.

-WVSAO-

*Note: Attached below is the indictment.*

~~SEALED~~

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON GRAND JURY 2009  
MAY 19, 2009 SESSION

**FILED**  
MAY 20 2009  
TERESA L. DEPPNER, CLERK  
U.S. District Court  
Southern District of West Virginia

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:09-cr-00132  
18 U.S.C. § 1956(h)

ANGELLA MUTHONI CHEGGE-KRASZESKI  
also known as "Christina Ann Clay"

I N D I C T M E N T

The Grand Jury Charges:

(Conspiracy to Engage in Illegal Monetary Transactions)

**Background**

At all relevant times:

1. The State of West Virginia, its departments, agencies and subdivisions contracted with vendors to provide goods and services to the State of West Virginia. Payments to vendors for the goods and services were processed by the West Virginia State Auditor's Office through its office located in Charleston, West Virginia.

2. Deloitte Consulting LLP, doing business throughout the United States, contracted with the West Virginia Department of

Health and Human Resources ("DHHR") to operate its public welfare data systems.

3. Unisys Corporation, doing business throughout the United States, contracted with three agencies of the State of West Virginia to provide administrative and claims processing services.

4. TCF Bank located in Minneapolis, Minnesota was a financial institution as defined in 31 U.S.C. § 5312(a)(2), which was engaged in, and the activities of which affected interstate commerce.

### **Conspiracy**

5. Beginning at a date unknown but at least in December 2008 and continuing to in or about May 2009 at or near Minneapolis, Minnesota and elsewhere, defendant ANGELLA MUTHONI CHEGGE-KRASZESKI and others known and unknown to the Grand Jury, did knowingly conspire to commit violations of 18 U.S.C. § 1957(a), that is, knowingly to engage, and attempt to engage in monetary transactions by, through, or to financial institutions affecting interstate commerce, and which involved criminally derived property, each transaction having a value greater than \$10,000 and which was derived from specified unlawful activities committed at or near Charleston, Kanawha County, West Virginia, and within the Southern District of West Virginia, that is, mail fraud in violation of 18 U.S.C. § 1341 and wire fraud in violation of 18 U.S.C. § 1343, while knowing the property was criminally derived.

6. Defendant ANGELLA MUTHONI CHEGGE-KRASZESKI and others known and unknown to the grand jury participated in the transfer of the proceeds of the aforesaid specified unlawful activities from Charleston, Kanawha County, West Virginia, to Minneapolis, Minnesota and committed acts in furtherance of the attempt and conspiracy at or near Charleston, West Virginia and within the Southern District of West Virginia as set forth below.

**Manner and Means of the Conspiracy**

7. It was a part of the conspiracy, that in 2008, defendant ANGELLA MUTHONI CHEGGE-KRASZESKI obtained a fraudulent South African passport in the name of "Christina Ann Clay" which provided means of a false identification for defendant ANGELLA MUTHONI CHEGGE-KRASZESKI.

8. It was a further part of the conspiracy that beginning in or about January 2009, at the direction of persons known and unknown to the grand jury, defendant ANGELLA MUTHONI CHEGGE-KRASZESKI created at least four corporate entities in the State of North Carolina using the false identity of Christina Ann Clay, including two corporation having a name similar to two corporate entities doing business with the State of West Virginia as follows:

- a. Deloitte (sic) Consulting Corporation
- b. Unisyss (sic) Corporation

9. It was further part of the conspiracy that defendant ANGELLA MUTHONI CHEGGE-KRASZESKI, with the assistance and at the direction of persons known and unknown to the grand jury, would and did fraudulently open a bank account in the name of Deloitte Consulting Corporation, account number xxxxxx9204, and a bank account in the name of Unisys Corporation, account number xxxxxx2292, at a branch of TCF Bank near Minneapolis, Minnesota.

10. It was further part of the conspiracy that persons unknown to the grand jury accessed the West Virginia State Auditor's Office website, printed "Company eVendor Agreement" forms and completed the forms in the name of Deloitte Consulting, LLP and in the name Unisys Corporation which directed the West Virginia State Auditor's Office to change the method of payment to the aforementioned legitimate vendors of the State of West Virginia from U.S. Mail to direct deposit by Automated Clearing House (ACH) to the fraudulent accounts established by defendant ANGELLA MUTHONI CHEGGE-KRASZESKI at TCF Bank in Minnesota.

11. It was further part of the conspiracy that between February and April defendant ANGELLA MUTHONI CHEGGE-KRASZESKI, with the assistance and at the direction of persons known and unknown to the grand jury, would and did cause the submission by mail to the West Virginia State Auditor's Office of the aforesaid "Company eVendor Agreement" forms. The intended effect of the submission of the forms was to divert legitimate State of West Virginia vendor

payments to the bank accounts controlled by defendant ANGELLA MUTHONI CHEGGE-KRASZESKI and her co-conspirators.

12. It was further part of the conspiracy that the fraudulent submission of the "Company eVendor Agreement" form in the name of Deloitte Consulting, LLP caused the State of West Virginia to wire \$919,916, which represented payment to Deloitte Consulting, LP for services provided to DHHR, on or about March 19, 2009, and which was deposited into account number XXXXXX9204 at TCF Bank.

13. In furtherance of the conspiracy, defendant ANGELLA MUTHONI CHEGGE-KRASZESKI and her co-conspirators, engaged in and caused others to engage in the following monetary transactions, among others, involving property criminally derived from mail and wire fraud, specified unlawful activities, knowing that such property constituted proceeds of an illegal activity:

a. On or about March 26, 2009, the withdrawal and transfer of \$92,410 of United States Currency from account number XXXXXX9204 at TCF Bank by means of a foreign wire to an account in the name of "Accenture Global Enterprises Limited" at Standard Chartered Bank Kenya Limited in Nairobi, Kenya;

b. On or about March 26, 2009, the withdrawal and transfer of \$89,716 of United States Currency from account number XXXXXX9204 at TCF Bank by means of a foreign wire to an account in the name of "Accenture Global Enterprises Limited" at CFC Stanbick Bank in Nairobi, Kenya;

c. On or about March 30, 2009, the withdrawal and transfer of \$95,994 of United States Currency from account number XXXXXX9204 at TCF Bank by means of a foreign wire to an account in the name of "SRI International Limited" at Diamond Trust (K) Limited in Nairobi, Kenya;

d. On or about March 30, 2009, the withdrawal and transfer of \$95,818 of United States Currency from account number XXXXXX9204 at TCF Bank by means of a foreign wire to NIC Bank Limited in Nairobi, Kenya;

e. On or about March 30, 2009, the withdrawal and transfer of \$93,556 of United States Currency from account number XXXXXX9204 at TCF Bank by means of a foreign wire to an account in the name of "Accenture Global Enterprises Limited" at CFC Stanbick Bank in Nairobi, Kenya;

f. On or about March 31, 2009, the withdrawal and transfer of \$70,082.26 of United States Currency from account number XXXXXX9204 at TCF Bank by means of a check made payable to "Christina Clay";

g. On or about March 31, 2009, the transfer of \$42,517.55 of United States Currency by purchasing an official bank check made payable to an individual known to the Grand Jury as the First Known Person;

h. On or about March 31, 2009, the transfer of \$27,550.71 of United States Currency by purchasing an official bank check made payable to an individual known to the Grand Jury as the Second Known Person;

i. On or about April 1, 2009, the withdrawal and transfer of \$87,686 of United States Currency from account number XXXXXX9204 at TCF Bank by means of a foreign wire to an account in the name of "Accenture Global Enterprises Limited" at Standard Chartered Bank Kenya Limited in Nairobi, Kenya;

j. On or about April 1, 2009, the withdrawal and transfer of \$85,498 of United States Currency from account number XXXXXX9204 at TCF Bank by means of a foreign wire to an account in the name of "Accenture Global Enterprises Limited" at NIC Bank Limited in Nairobi, Kenya;

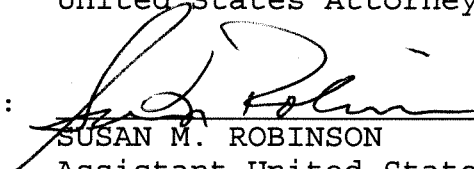
k. On or about April 1, 2009, the withdrawal and transfer of \$89,798 of United States Currency from account number XXXXXX9204 at TCF Bank by means of a foreign wire to an account in the name of "Accenture Global Enterprises Limited" at CFC Stanbic Bank in Nairobi, Kenya; and

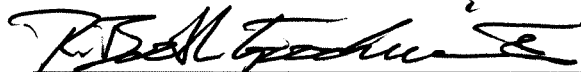
l. On or about April 1, 2009, the withdrawal and transfer of \$42,747 of United States Currency from account number XXXXXX9204 at TCF Bank by means of a foreign wire to an account in the name of "Accenture Global Enterprises Limited" at Standard Chartered Bank Kenya Limited in Nairobi, Kenya.

In violation of Title 18, United States Code, Section 1956(h).

CHARLES T. MILLER  
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By:

  
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