

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in The U.S.  
DISTRICT COURT at Seattle, Washington.

February 20, 2003  
By H. Brent Zachary Deputy Clerk  
BRUCE RIFKIN, Clerk

I hereby certify that the  
annexed instrument is a true  
and correct copy of the original  
on file in my office.  
ATTEST: BRUCE RIFKIN  
Clerk, U. S. District Court  
Western District of Washington  
H. Brent Zachary  
Deputy Clerk

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAURA JEAN MARIE STRUCKMAN,

Defendant.

NO. **CR03 0088C**

INDICTMENT

18 U.S.C. §371  
(Conspiracy to Structure)

INTRODUCTION

1. At all times relevant to this indictment, the defendant, LAURA JEAN MARIE STRUCKMAN was a resident of Renton, Washington.

2. Pursuant to Title 31 U.S.C. § 5313(a) and Federal Regulation 31 C.F.R. § 103.22 (a)(1), a financial institution shall file a currency transaction report (CTR) of each exchange of currency or other payment which involves a transaction of more than \$10,000.

COUNT 1

1. From on or about June 1997, and continuing until on or about August 20, 1998, in the Western District of Washington and elsewhere, the defendant, LAURA JEAN MARIE STRUCKMAN knowingly, intentionally, and unlawfully conspired and agreed with an unindicted co-conspirator known to the grand jury, to violate Title 31 United States Code Section 5324(a)(3), by agreeing to structure, or assist in structuring a currency transaction for purpose of evading the reporting

1 requirements of Title 31 United States Code Section 5313(a) and Title 31, Code of Federal  
2 Regulations, Section 103.22 with one or more domestic financial institutions.

3 2. It was part of the conspiracy that the defendant, LAURA JEAN MARIE STRUCKMAN  
4 and an unindicted co-conspirator known to the grand jury maintained three bank accounts in the  
5 names of Crescent Moon, Alternate Ventures, and Specktrack-Ular Holdings at US Bank of  
6 Washington in Renton, Washington.

7 3. It was further part of the conspiracy that the defendant, LAURA JEAN MARIE  
8 STRUCKMAN and an unindicted co-conspirator known to the grand jury made deposits into the  
9 Crescent Moon, Alternate Ventures, and Specktrack-Ular Holdings bank accounts and conducted  
10 their banking through these three accounts to remain as anonymous as possible.

11 4. It was further a part of the conspiracy that the defendant, LAURA JEAN MARIE  
12 STRUCKMAN, regularly made consecutive-day cash withdrawals from the Crescent Moon,  
13 Alternate Ventures, and Specktrack-Ular Holdings bank accounts in excess of \$10,000 but limited  
14 every daily withdrawal to \$10,000 or less for the purpose of evading the filing of a Currency  
15 Transaction Report.

16 OVERT ACTS

17 5. In furtherance of the conspiracy, and to effect its objectives, the following overt act were  
18 committed in the Western District of Washington, to wit: same day and/or consecutive-day cash  
19 withdrawals from the Crescent Moon, Alternate Ventures, and/or Specktrack-Ular Holdings bank  
20 accounts.

OVERT ACT-	DATE OF WITHDRAWAL	AMOUNT PAYABLE TO CASH	BANK ACCOUNT / CHECK #
1-4	6/3/97 Tuesday 6/4/97 Wednesday 6/5/97 Thursday 6/6/97 Friday	9,000 9,000 9,000 9,000	Crescent Moon #1864 Crescent Moon #1866 Alternate Ventures #1309 Alternate Ventures #1315

1	5-9	6/10/97 Tuesday	3,000	Crescent Moon	#1868
2		6/10/97 Tuesday	6,000	Alternate Ventures	#1321
3		6/11/97 Wednesday	9,000	Crescent Moon	#1869
4		6/12/97 Thursday	9,000	Crescent Moon	#1870
5		6/13/97 Friday	6,000	Crescent Moon	#1871
6	10-13	6/24/97 Tuesday	5,000	Crescent Moon	#1875
7		6/24/97 Tuesday	4,000	Alternate Ventures	#1337
8		6/25/97 Wednesday	5,000	Alternate Ventures	#1338
9		6/26/97 Thursday	9,000	Alternate Ventures	#1343
10	14-17	7/29/97 Tuesday	4,500	Crescent Moon	#1878
11		7/29/97 Tuesday	5,000	Alternate Ventures	#1373
12		7/30/97 Wednesday	4,500	Crescent Moon	#1880
13		7/30/97 Wednesday	5,000	Alternate Ventures	#1378
14	18-21	8/5/97 Tuesday	9,000	Crescent Moon	#1881
15		8/6/97 Wednesday	9,000	Crescent Moon	#1882
16		8/7/97 Thursday	9,000	Crescent Moon	#1883
17		8/8/97 Friday	6,000	Alternate Ventures	#1389
18	22-24	8/11/97 Monday	9,000	Crescent Moon	#1885
19		8/11/97 Monday	5,000	Alternate Ventures	#1390
20		8/12/97 Tuesday	9,000	Crescent Moon	#1886
21	25-28	9/2/97 Tuesday	9,500	Alternate Ventures	#1398
22		9/3/97 Wednesday	9,500	Crescent Moon	#1782
23		9/4/97 Thursday	9,000	Alternate Ventures	#1408
24		9/5/97 Friday	9,000	Crescent Moon	#1783
25	29-36	9/15/97 Monday	4,000	Crescent Moon	#1787
26		9/15/97 Monday	5,000	Alternate Ventures	#1411
27		9/16/97 Tuesday	5,000	Crescent Moon	#1789
28		9/16/97 Tuesday	4,500	Alternate Ventures	#1414
		9/17/97 Wednesday	9,000	Crescent Moon	#1790
		9/18/97 Thursday	5,000	Crescent Moon	#1795
		9/18/97 Thursday	4,000	Alternate Ventures	#1420
		9/19/97 Friday	9,000	Crescent Moon	#1799
	37-40	9/29/97 Monday	9,000	Crescent Moon	#1800
		9/30/97 Tuesday	4,000	Crescent Moon	#1503
		9/30/97 Tuesday	5,000	Alternate Ventures	#1425
		10/1/97 Wednesday	9,000	Crescent Moon	#1504

1	41-45	10/7/97 Tuesday	9,000	Crescent Moon	#1514
2		10/8/97 Wednesday	9,000	Crescent Moon	#1515
3		10/9/97 Thursday	9,000	Crescent Moon	#1516
4		10/10/97 Friday	5,000	Crescent Moon	#1517
5		10/10/97 Friday	4,000	Alternate Ventures	#1436
6	46-49	10/14/97 Tuesday	9,000	Crescent Moon	#1522
7		10/15/97 Wednesday	9,000	Crescent Moon	#1524
8		10/16/97 Thursday	9,000	Crescent Moon	#1525
9		10/17/97 Friday	5,000	Alternate Ventures	#1439
10	50-53	10/21/97 Tuesday	2,000	Crescent Moon	#1889
11		10/21/97 Tuesday	3,000	Alternate Ventures	#1443
12		10/22/97 Wednesday	9,000	Crescent Moon	#1890
13		10/24/97 Friday	9,000	Crescent Moon	#1891
14	54-58	11/4/97 Tuesday	9,000	Crescent Moon	#1898
15		11/5/97 Wednesday	9,000	Crescent Moon	#1899
16		11/6/97 Thursday	9,000	Crescent Moon	#1926
17		11/7/97 Friday	4,000	Crescent Moon	#1927
18		11/7/97 Friday	5,000	Alternate Ventures	#1457
19	59-62	11/10/97 Monday	6,000	Crescent Moon	#1928
20		11/10/97 Monday	6,000	Crescent Moon	#1932
21		11/10/97 Monday	3,000	Alternate Ventures	#1460
22		11/12/97 Wednesday	9,000	Crescent Moon	#1935
23	63-65	12/3/97 Wednesday	9,500	Crescent Moon	#1938
24		12/4/97 Thursday	6,000	Alternate Ventures	#1475
25		12/5/97 Friday	6,000	Alternate Ventures	#1477
26	66-67	1/13/98 Tuesday	9,000	Alternate Ventures	#1512
27		1/14/98 Wednesday	9,000	Alternate Ventures	#1513
28	68-71	1/20/98 Tuesday	1,000	Alternate Ventures	#1518
		1/20/98 Tuesday	9,000	Alternate Ventures	#1519
		1/21/98 Wednesday	5,000	Alternate Ventures	#1522
		1/22/98 Thursday	9,000	Crescent Moon	#1948
	72-73	1/29/98 Thursday	9,000	Crescent Moon	#1903
		1/30/98 Friday	9,000	Crescent Moon	#1904
	74-76	2/2/98 Monday	5,000	Alternate Ventures	#1532
		2/3/98 Tuesday	9,000	Crescent Moon	#1905
		2/4/98 Wednesday	7,000	Alternate Ventures	#1535

INDICTMENT - 4

UNITED STATES ATTORNEY  
601 UNION STREET, SUITE 5100  
SEATTLE, WASHINGTON 98101-3903  
(206) 553-7970

1	77-80	2/10/98 Tuesday	9,000	Crescent Moon	#1907
2		2/11/98 Wednesday	9,000	Crescent Moon	#1908
3		2/12/98 Thursday	6,000	Crescent Moon	#1909
4		2/13/98 Friday	9,000	Crescent Moon	#1910
5	81-82	2/17/98 Tuesday	9,500	Alternate Ventures	#1546
6		2/18/98 Wednesday	9,500	Crescent Moon	#1915
7	83-85	3/4/98 Wednesday	9,500	Crescent Moon	#1918
8		3/5/98 Thursday	9,500	Alternate Ventures	#1554
9		3/6/98 Friday	9,500	Crescent Moon	#1920
10	86-90	3/9/98 Monday	5,000	Alternate Ventures	#1555
11		3/10/98 Tuesday	9,500	Crescent Moon	#1921
12		3/11/98 Wednesday	9,500	Crescent Moon	#1922
13		3/12/98 Thursday	9,500	Crescent Moon	#1924
14		3/13/98 Friday	9,500	Alternate Ventures	#1565
15	91-92	3/16/98 Monday	9,500	Alternate Ventures	#1567
16		3/17/98 Tuesday	9,500	Alternate Ventures	#1575
17	93-95	3/30/98 Monday	5,000	Crescent Moon	#1952
18		3/30/98 Monday	5,000	Crescent Moon	#1954
19		3/31/98 Tuesday	9,500	Crescent Moon	#1955
20	96-98	4/6/98 Monday	5,000	Alternate Ventures	#1611
21		4/7/98 Tuesday	9,500	Alternate Ventures	#1614
22		4/8/98 Wednesday	9,500	Crescent Moon	#1957
23	99-101	5/11/98 Monday	5,000	Crescent Moon	#1962
24		5/11/98 Monday	9,500	Crescent Moon	#1964
25		5/12/98 Tuesday	9,500	Alternate Ventures	#1640
26	101-105	5/18/98 Monday	9,500	Specktrack-Ular Holdings	#1500
27		5/19/98 Tuesday	9,670.80	Crescent Moon	#1965
28		5/20/98 Wednesday	9,500	Specktrack-Ular Holdings	#1502
		5/21/98 Thursday	9,500	Specktrack-Ular Holdings	#1505
		5/22/98 Friday	9,500	Specktrack-Ular Holdings	#1507
	106-107	6/18/98 Thursday	9,500	Specktrack-Ular Holdings	#1511
		6/19/98 Friday	9,500	Alternate Ventures	#1654
	108-110	6/24/98 Wednesday	9,500	Specktrack-Ular Holdings	#1515
		6/25/98 Thursday	9,500	Specktrack-Ular Holdings	#1516
		6/26/98 Friday	9,500	Specktrack-Ular Holdings	#1517

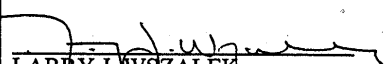
111-112	7/2/98 Thursday 7/3/98 Friday	9,500 9,500	Specktrack-Ular Holdings #1519 Specktrack-Ular Holdings #1520
113-115	7/20/98 Monday 7/21/98 Tuesday 7/22/98 Wednesday	9,500 9,800 9,500	Specktrack-Ular Holdings #1527 Specktrack-Ular Holdings #1531 Specktrack-Ular Holdings #1532
115-116	8/5/98 Wednesday 8/7/98 Friday	9,500 9,500	Specktrack-Ular Holdings #1539 Specktrack-Ular Holdings #1540
117-118	8/13/98 Thursday 8/14/98 Friday	9,500 9,500	Specktrack-Ular Holdings #1541 Specktrack-Ular Holdings #1542
119-120	8/19/98 Wednesday 8/20/98 Thursday	9,500 9,500	Specktrack-Ular Holdings #1545 Specktrack-Ular Holdings #1546

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

A TRUE BILL

  
PRESIDING JUROR

  
JOHN MCKAY  
United States Attorney

  
LARRY J. WSZALEK  
Trial Attorney  
Department of Justice, Tax Division

Indictment returned: 20 Feb 2003

INDICTMENT - 6

UNITED STATES ATTORNEY  
601 UNION STREET, SUITE 5100  
SEATTLE, WASHINGTON 98101-3903  
(206) 553-7970