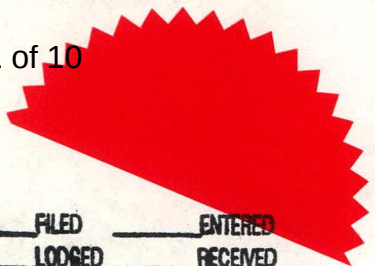


*JCL/RS*  
DIS/LB: USAO2012R00747



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

FILED ENTERED  
LOGGED RECEIVED

UNITED STATES OF AMERICA

v.

TRAVIS WETZEL,  
Defendant

**DKC14 CR 0255** MAY 28 2014

CRIMINAL NO.

AT GREENBELT  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

By

DEPUTY

(Wire Fraud, 18 U.S.C. § 1343; Money  
Laundering, 18 U.S.C. § 1957; Aiding  
and Abetting, 18 U.S.C. § 2; Forfeiture,  
18 U.S.C. § 982)

\*\*\*\*\*

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that at all times relevant to this  
Indictment:

Introduction

1. L.C.W. was a resident of Towson, Maryland.
2. Prudential Financial, Inc., (hereafter "Prudential") was a financial services company with offices in, among other places, Pennsylvania. Prudential Financial, Inc. was the parent company of subsidiaries such as Prudential Annuity Life Assurance Corporation ("PALAC") and Prudential Insurance Company of America ("PICA"). PALAC and PICA administered certain Prudential investment products, including annuities.
3. In or about 2005, L.C.W. purchased from PALAC variable annuity account no. E0411999 (hereafter "the Prudential annuity"). L.C.W. was named trustee of that account. From time to time, L.C.W. supplemented her initial annuity amount with additional investment funds.
4. To support client annuitants like L.C.W., Prudential maintained several operating accounts from which funds could be disbursed for the benefit of those annuitants, including

Prudential Annuity Life Insurance Corporate Account number xxxxxxxx8170 ("the L.C.W. 8170 account"), and PICA Annuities Deposit Account number xxxxxxxx8528 ("the L.C.W. 8528 account").

5. J.W. was the daughter of L.C.W. In or about March 2007, J.W. obtained power of attorney, including power of attorney over L.C.W.'s financial affairs, including L.C.W.'s Prudential annuity.

6. Reutemann Financial Services, Inc., d/b/a Research Financial Strategies (hereafter "RFS") was a financial investment advisory firm located in Rockville, Maryland, which provided brokering services to financial services companies including PALAC.

7. J.F.R. was Chief Executive Officer ("CEO") of RFS.

8. Defendant **TRAVIS WETZEL** ("**WETZEL**") was a citizen of the United States, and a resident of Maryland. Defendant **WETZEL** was employed by RFS, and in or about 2009, was promoted from Services Associate to Branch Operations Manager of RFS. His duties and responsibilities with RFS included, among others, providing financial advice to clients of RFS, including L.C.W.

9. At various times relevant to this Indictment, defendant **WETZEL** maintained, and had access to, the following accounts:

- a. Sovereign Bank account no. xxxxxx3885 in the name of "Nicole Hesse" ("the Hesse 3885 account");
- b. Sovereign Bank account no. xxxxxx8895 in the names of "Nicole Hesse and Travis Wetzel" ("the joint 8895 account");
- c. Sovereign Bank account no. xxxxxx7824 in the name of "Travis Wetzel"

("the Wetzel 7824 account"); and,

- d. Middletown Valley Bank account no. xxxxxx5363 in the name of "Travis Wetzel" ("the Wetzel 5363 account").

#### **The Scheme to Defraud**

10. Between on or about July 20, 2010 and on or about September 10, 2012, in the District of Maryland and elsewhere, defendant **WETZEL** knowingly devised and intended to devise a scheme and artifice to defraud L.C.W. and others, and to obtain money and property from L.C.W. and others, by means of materially false and fraudulent pretenses, representations and promises ("the scheme to defraud").

#### **Manner and Means of the Scheme to Defraud**

The manner and means of committing the scheme to defraud included, among others, the following:

11. Defendant **WETZEL** held himself out as a financial advisor providing financial planning and investment advice.
12. Defendant **WETZEL** learned that L.C.W. maintained the Prudential annuity.
13. Defendant **WETZEL** transferred or caused to be transferred assets from the Prudential annuity by requesting money transfers from the L.C.W. 8170 account to accounts controlled by defendant **WETZEL** for his personal benefit.

#### **Execution of the Scheme to Defraud**

14. On or about December 20, 2010, in the District of Maryland and elsewhere, the defendant,

**TRAVIS WETZEL,**

for purposes of executing and attempting to execute the scheme and artifice to defraud, and to

obtain money and property by means of false and fraudulent pretenses, representations and promises, did knowingly transmit and cause to be transmitted in interstate commerce, by means of wire communication, certain writings, signs, signals and sounds; that is, an e-mail from Travis Wetzel in Maryland to Prudential in Pennsylvania, requesting the transfer of \$8,177.16, more or less, from the L.C.W. Prudential annuity to the Hesse 3885 account, with attached withdrawal request.

18 U.S.C. § 1343

18 U.S.C. § 2

**COUNTS TWO THROUGH EIGHTEEN**

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 13 of Count One are incorporated here.
2. On or about the dates set forth below, in the District of Maryland and elsewhere,  
the defendant,

**TRAVIS WETZEL,**

for the purpose of executing and attempting to execute the scheme to defraud, did knowingly cause to be transmitted in interstate commerce, by means of wire communication, certain writings, signs, signals and sounds, relating to the following:

| COUNT | DATE              | WIRE TRANSMISSION AMOUNT  |
|-------|-------------------|---|
| 2     | December 20, 2010 | Wire transfer of \$8,177.16, more or less, from the L.C.W. 8170 account, through Pennsylvania, to the Hesse 3885 account at Sovereign Bank in Maryland.   |
| 3     | March 8, 2011     | e-mail from Travis Wetzel in Maryland to Prudential in Pennsylvania, requesting the transfer of \$8,784.17, more or less, from the L.C.W. Prudential annuity to the Hesse 3885 account, with attached withdrawal request. |
| 4     | March 9, 2011     | Wire transfer of \$8,784.17, more or less, from the L.C.W. 8170 account, through Pennsylvania, to the Hesse 3885 account at Sovereign Bank in Maryland.   |
| 5     | June 13, 2011     | e-mail from Travis Wetzel in Maryland to Prudential in Pennsylvania, requesting the transfer of \$9,900 from the L.C.W. Prudential annuity to the Hesse 3885 account, with attached withdrawal request.                   |
| 6     | June 13, 2011     | Wire transfer of \$9,900 from the L.C.W. 8170 account, through Pennsylvania, to the Hesse 3885 account at Sovereign Bank in Maryland.   |
| 7     | November 21, 2011 | e-mail from Travis Wetzel in Maryland to Prudential in Pennsylvania, requesting the transfer of \$9,800 from the L.C.W. Prudential annuity to the Hesse 3885 account, with attached withdrawal request.                   |

|    |                   |  |
|----|-------------------|--|
| 8  | November 21, 2011 | Wire transfer of \$9,800 from the L.C.W. 8170 account, through Pennsylvania, to the Hesse 3885 account at Sovereign Bank in Maryland.  |
| 9  | March 16, 2012    | e-mail from Travis Wetzel in Maryland to Prudential in Pennsylvania, requesting the transfer of \$15,000 from the L.C.W. Prudential annuity to the Hesse 3885 account, with attached withdrawal request.                   |
| 10 | March 16, 2012    | Wire transfer of \$15,000 from the L.C.W. 8170 account, through Pennsylvania, to the Hesse 3885 account at Sovereign Bank in Maryland.   |
| 11 | April 3, 2012     | Wire transfer of \$16,000 from the L.C.W. 8170 account, through Pennsylvania, to the Hesse 3885 account at Sovereign Bank in Maryland.   |
| 12 | April 20, 2012    | e-mail from Travis Wetzel in Maryland to Prudential in Pennsylvania, requesting the transfer of \$23,194.28, more or less, from the L.C.W. Prudential annuity to the Hesse 3885 account, with attached withdrawal request. |
| 13 | April 20, 2012    | Wire transfer of \$23,194.28, more or less, from the L.C.W. 8170 account, through Pennsylvania, to the Hesse 3885 account at Sovereign Bank in Maryland.   |
| 14 | May 14, 2012      | Wire transfer of \$35,000 from the L.C.W. 8170 account, through Pennsylvania, to the Hesse 3885 account at Sovereign Bank in Maryland.   |
| 15 | May 24, 2012      | Wire transfer of \$15,000 from the L.C.W. 8170 account, through Pennsylvania, to the Hesse 3885 account at Sovereign Bank in Maryland.   |
| 16 | June 15, 2012     | e-mail from Travis Wetzel in Maryland to Prudential in Pennsylvania, requesting the transfer of \$15,000 from the L.C.W. Prudential annuity to the Hesse 3885 account, with attached withdrawal request.                   |
| 17 | June 15, 2012     | Wire transfer of \$15,000 from the L.C.W. 8170 account, through Pennsylvania, to the Hesse 3885 account at Sovereign Bank in Maryland.   |
| 18 | August 23, 2012   | Wire transfer of \$40,000 from the L.C.W. 8170 account, through Pennsylvania, to the Hesse 3885 account at Sovereign Bank in Maryland.   |

18 U.S.C. § 1343

18 U.S.C. § 2

**COUNTS NINETEEN THROUGH TWENTY-FOUR**

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 13 of Count One, and Counts 9 through 14 and 16 through 18, are incorporated here.
2. On or about the following dates, in the District of Maryland and elsewhere, the defendant,

**TRAVIS WETZEL,**

knowingly engaged and attempted to engage in a monetary transaction in and affecting interstate commerce in criminally derived property that was of a value greater than \$10,000 and was derived from specified unlawful activity – to wit, wire fraud, in violation of Title 18, United States Code, Section 1343 – in the following amounts:

| COUNT | DATE           | TRANSACTION AMOUNT   |
|-------|----------------|--|
| 19    | March 16, 2012 | \$13,792.12, more or less, from the Hesse 3885 account to the joint 8895 account |
| 20    | April 3, 2012  | \$15,000, more or less, from the Hesse 3885 account to the joint 8895 account    |
| 21    | April 20, 2012 | \$18,438.54, more or less, from the Hesse 3885 account to the joint 8895 account |
| 22    | May 14, 2012   | \$15,556.20, more or less, from the Hesse 3885 account to the joint 8895 account |
| 23    | June 15, 2012  | \$13,059.65, more or less, from the Hesse 3885 account to the joint 8895 account |

|    |                 |  |
|----|-----------------|--|
| 24 | August 23, 2012 | \$24,278,84, more or less, from the Hesse 3885 account to the joint 8895 account |
|----|-----------------|--|

18 U.S.C. § 1957  
18 U.S.C. § 2



**FORFEITURE ALLEGATION**

The Grand Jury for the District of Maryland further charges that:

1. Pursuant to Fed. R. Crim. P. 32.2 notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Sections 982(a)(1) and 982(a)(2), in the event of the defendant's convictions under Counts - One through Twenty of this Indictment.

**Wire Fraud Forfeiture**

2. As a result of the offenses set forth in Counts One through Eighteen of the Indictment, the defendant,

**TRAVIS WETZEL,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2), all property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation. The property to be forfeited includes, but is not limited to, the following:

a. \$1,282,224.32, more or less, in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate constitutes proceeds obtained, directly or indirectly, as a result of such violations.

b. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable.

**Money Laundering Forfeiture**

3. As a result of the offenses alleged in Counts Nineteen through Twenty-Four of this Indictment, the defendant,

**TRAVIS WETZEL,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real and

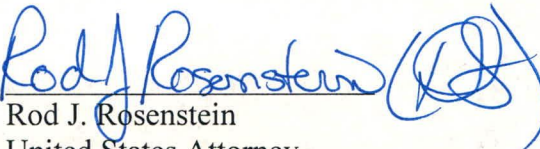
personal, involved in such offense and any property traceable to such offense, including but not limited to \$376,444.28, more or less, in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is property which was involved in the aforementioned offenses or is property traceable to such property, in violation of Title 18, United States Code, Sections 1957 and 982(a)(1) and (a)(4).

4. If any of the property described above in subparagraphs 2(a) and 3 as being subject to forfeiture, as a result of any act or omission of any 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 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendants, including the property described in paragraph 2(a) and 3 above, up to the value of any forfeitable property.

18 U.S.C. § 982(a)(1)  
18 U.S.C. § 982(a)(2)

  
Rod J. Rosenstein  
United States Attorney

A TRUE BILL:

**SIGNATURE REDACTED**

5/28/2014

Date