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U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

1:11-cr-236
Gordon J Quist
U.S. District Judge

UNITED STATES OF AMERICA,

Plaintiff,

No.

v.

Hon.

SUSAN J. MORRISON,

FELONY INFORMATION

Defendant.

_____ /

The United States Attorney's Office charges:

COUNT 1
(Wire Fraud)

From on or about October 7, 2007 until on or about April 28, 2011, in the
Southern Division of the Western District of Michigan,

SUSAN J. MORRISON

did knowingly and unlawfully devise a scheme and artifice to defraud and to obtain
money and property from Munson Regional Healthcare ("Munson") by means of false
and fraudulent pretenses and representations, as set forth below.

1. Defendant, SUSAN J. MORRISON, was an accountant for Munson
Regional Healthcare in Traverse City, Michigan from 2000 until April 28, 2011.
Traverse City is located in Grand Traverse County within the Western District of
Michigan.

2. As part of her duties as an accountant for Munson, Defendant had access to bank accounts of Munson and some of its associated entities.

3. It was part of Defendant's scheme and artifice to defraud that between October 7, 2007 and April 28, 2011, Defendant used her position as an accountant to embezzle approximately \$1,105,000 from Munson. Defendant made unauthorized transfers from Munson bank accounts to her bank account at Traverse City State Bank in the name of "Great Lakes Bear Factory of Traverse." Defendant then used those funds for her own personal enjoyment.

4. Defendant accomplished her scheme and artifice to defraud by affirmatively concealing material facts. Defendant made it appear that her unauthorized withdrawals of funds were authorized by creating a fictitious payee account to receive the funds. Specifically, Defendant created a payee named "Grant" which routed the funds to the bank account and routing number of her Great Lakes Bear Factory of Traverse City account at Traverse City State Bank. Defendant would transfer the funds to that payee (Grant) and the money would automatically be directed to her Great Lakes Bear Factory of Traverse City account. In order to complete some of the transfers, Defendant accessed her co-worker's "identification information account" by stealing her password and user name from her desk when the co-worker was not at work.

5. For the purpose of executing the scheme and artifice, Defendant caused to be transmitted certain writings, signs, signals and sounds in interstate commerce by means of a wire communication. Specifically, on March 1, 2011, Defendant transferred \$30,000 from the "Munson Regional Healthcare Foundation" account at

Fifth Third Bank to her Great Lakes Bear Factory of Traverse account at Traverse City State Bank, which electronic transfer traveled between Michigan and Ohio and elsewhere.

18 U.S.C. § 1343

COUNT 2
(Money Laundering)

On or about March 2, 2011, in the Southern Division of the Western District of Michigan,

SUSAN J. MORRISON

did knowingly engage and attempt to engage in a monetary transaction through a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, in that, MORRISON wire transferred \$15,000 of funds from her Great Lakes Bear Factory of Traverse account at Traverse City State Bank to her partner's account at Huntington National Bank, such property having been derived from a specified unlawful activity, that is, the wire fraud identified in Count 1.

18 U.S.C. § 1957

18 U.S.C. § 1956(c)(7)

(Forfeiture Allegation)

The allegations contained in this Information are hereby realleged and incorporated by reference. Upon conviction of the wire fraud offense identified in Count 1 of this Indictment,

SUSAN J. MORRISON

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. The property to be forfeited includes, but is not limited to, the following:

1. MONEY JUDGMENT: By virtue of the commission of the felony violation alleged in Count 1 of this Information, Defendant shall forfeit to the United States the sum of \$1,068,346.30, which represents, in part, the proceeds from the fraud alleged in the Information.

2. ACCOUNTS:

a. \$30,378.21 in proceeds seized from Traverse City State Bank Account #1080993;

b. \$6,275.57 in proceeds seized from Huntington National Bank Account #02770209171;

3. PERSONAL PROPERTY:

a. (16) Four row cardboard boxes (15 ½" x 13" x 4") containing sports trading cards;

b. (31) Two row cardboard boxes (15 ½" x 7" x 4") containing sports

trading cards;

- c. (1) One row cardboard boxes (12 ½" x 4" x 3") containing sports

jersey trading cards;

- d. (2) Two row cardboard boxes (12 ½" x 4" x 3") containing sports

logo trading cards;

- e. (1) Cardboard box (20" x 13" x 3") containing Press Pass, Inc. lap

cards;

- f. (4) Three row cardboard box (19" x 10 ½" x 4") containing Press

Pass, Inc. lap cards;

- g. (3) Sterilite plastic containers (10 gal) containing sports trading

cards;

- h. (1) Cardboard box (17" x 14" x 10") containing sports trading

cards;

- i. (1) Cardboard box (14" x 10" x 7 ½") containing sports trading

cards;

- j. (3) Clear plastic containers (10" x 7 ½" x 2 ½") containing sports

trading cards;

- k. (1) Cardboard box (13 ½" x 11" x 7 ½") containing sports trading

cards;

- l. (6) Binders (3") containing sports trading cards;

- m. (4) Wood boxes (Press pass brand), containing sports cards;

- n. (1) Cardboard box (17 ½" x 11 ½" x 9") containing sports trading

cards.

4. SUBSTITUTE ASSETS: If any of the property described above, as a result of any act or omission of Defendant:

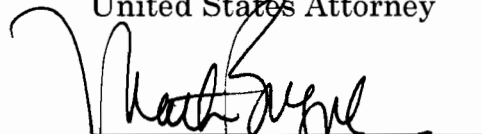
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be

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).

18 U.S.C. § 981(a)(1)(C)
28 U.S.C. § 2461(c)
21 U.S.C. § 853(p)

Date: August 10, 2011

DONALD A. DAVIS
United States Attorney



MATTHEW G. BORGULA
Assistant United States Attorney