

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No: 09-80096-CR-DESKAMP/HOPKINS
18 U.S.C. §§1344(1) and 1344(2)
18 U.S.C. §2

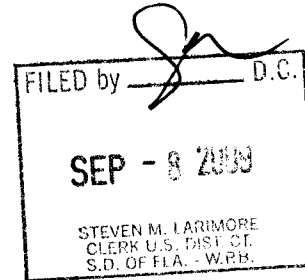
UNITED STATES OF AMERICA

Plaintiff,

vs.

MICHELLE FLETCHER,

Defendant.



INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

GENERAL ALLEGATIONS

1. On or about May 20, 2005, Invictus Consulting Group, Inc., was organized and registered in the State of Nevada, at the Office of the Secretary of State, Commercial Recording Division, having a resident agent located at Legalzoom Nevada, Inc., 500 N. Rainbow Blvd., Suite 300A, Las Vegas, Nevada.

2. On or about October 17, 2007, the articles of incorporation for Invictus Consulting Group, Inc., were restated and the name of the corporation was changed to Certified Consulting Group, Inc., in a document filed in the State of Nevada, at the Office of the Secretary of State, Commercial Recording Division, at the direction of one or more coconspirators.

3. On or about December 17, 2007, the officers and directors of Certified Consulting Group, Inc., were amended to reflect, for the first time, that **MICHELLE FLETCHER** was the president, secretary, treasurer, and director of the corporation, in a document filed in the State of Nevada, at the Office of the Secretary of State, Commercial Recording Division, at the direction of one or more coconspirators.

4. On or about December 18, 2007, articles of incorporation for Certified Consulting Group, Inc., were filed at the Florida Department of State, Division of Corporations, which listed **MICHELLE FLETCHER** as the president of the corporation, having a principal place of business of 433 Plaza Real, 275, Boca Raton, Florida, at the direction of one or more coconspirators.

5. National City Bank, Regions Bank, Peninsula Bank and Sovereign Bank were each insured by the Federal Deposit Insurance Corporation (FDIC) at the time of the incidents described hereafter.

COUNT 1 - 3
(Financial Institution Fraud)
18 U.S.C. §1344)

6. From on or about January 14, 2008 to on or about June 16, 2008, in Palm Beach and Broward Counties, in the Southern District of Florida, and elsewhere, the defendant,

MICHELLE FLETCHER,

and her coconspirators, did knowingly, and with intent to defraud, execute, attempt to execute, and cause the execution of, a scheme and artifice to defraud one or more financial institutions, which scheme and artifice employed one or more material falsehoods, and did knowingly execute, attempt to execute, and cause the execution of, a scheme and artifice to obtain money and funds owned by, and under the custody and control of one or more financial institutions, by means of false and

fraudulent pretenses, representations, and promises relating to a material fact, in violation of Title 18, United States Code, Sections 1344(1), 1344(2) and 2.

OBJECT OF THE ARTIFICE AND SCHEME TO DEFRAUD

7. It was the object of the scheme and artifice to defraud for the defendant, **MICHELLE FLETCHER**, and her coconspirators, to unlawfully enrich themselves by, among other things, providing false and fictitious information to one or more financial institutions, which were insured by the FDIC, in order to obtain business loan proceeds.

MANNER AND MEANS OF THE SCHEME AND ARTIFICE TO DEFRAUD

8. The manner and means by which defendant **MICHELLE FLETCHER** and her coconspirators induced the FDIC insured banks to provide loan proceeds to the defendant, included the following:

a. A coconspirator purchased an existing corporation registered in the State of Nevada, known as Certified Consulting Group, Inc., and placed the corporation in the name of **MICHELLE FLETCHER**.

b. A coconspirator arranged for the defendant to obtain business loans for Certified Consulting Group, Inc., at various banks, including National City Bank, Regions Bank, Peninsula Bank, and Sovereign Bank, by providing applications which included false information about the business.

c. **MICHELLE FLETCHER** signed completed business loan applications for Certified Consulting Group, Inc. at the banks, falsely certifying that she owned Certified Consulting Group, Inc. for two or more years, that the business engaged in medical or financial consulting, and that the business had gross annual sales or revenue in an amount of at least \$1,350,000.

d. **MICHELLE FLETCHER** signed false certifications that the Certified Consulting Group, Inc. had passed resolutions authorizing the corporation to obtain loans.

e. **MICHELLE FLETCHER** opened business checking accounts at the banks in the name of Certified Consulting Group, Inc., to receive the proceeds of the fraudulent loans.


f. **MICHELLE FLETCHER** transferred the proceeds of fraudulently obtained loans to one or more coconspirators.

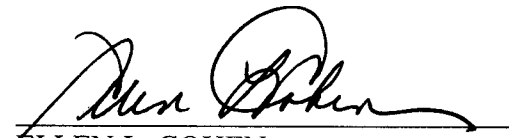
EXECUTION OF THE SCHEME TO DEFRAUD

9. On or about the dates specified as to each Count below in the Southern District of Florida and elsewhere, the defendant did execute the scheme and artifice to defraud, and did cause said scheme and artifice to be executed by making materially false statements as more particularly described in each Count set forth below:

COUNT	DATE	DESCRIPTION OF ACT IN EXECUTION OF THE SCHEME AND ARTIFICE
1	January 14, 2008	The Defendant signed a loan application at National City Bank, located in Tamarac, Florida, for \$100,000.00, which falsely stated that she had been the owner of Certified Consulting Group, Inc. for a period of three years, that the gross annual sales/revenue of Certified Consulting Group, Inc. was \$1,368,074.00, that the business was a medical consulting business, that the business was located in Boca Raton, Florida, and that defendant had a total annual salary of \$196,000.00.
2	January 24, 2008	The Defendant signed a loan application at Regions Bank, located in Tamarac, Florida, for \$100,000.00, which falsely stated that she had been the owner of Certified Consulting Group, Inc. for a period of two years and seven months, that the gross revenue for the prior year for Certified Consulting Group, Inc. was \$1,350,000.00, that the business was a medical consulting business, and that the business was located in Boca Raton, Florida.
3	June 16, 2008	The Defendant signed a statement certifying the truthfulness of the application and supporting financial documents presented to Peninsula Bank, located in Delray Beach, Florida, in support of an application for a loan which was approved in the amount of \$50,000.00.

All in violation of Title 18, United States Code, Sections 1344(1), 1344(2) and 2.


 JEFFERY H. SLOMAN
 ACTING UNITED STATES ATTORNEY


 ELLEN L. COHEN
 ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MICHELLE FLETCHER

Case No: 09-80096-CR. LYSKAMP/HOPKIN'S

Counts #: 1, 2 and 3

Bank Fraud

18 U.S.C. § 1344(1) and 1344(2)

*** Max. Penalty:** Not more than 30 years' Imprisonment; \$1,000,000 fine, or both.
Five years supervised release

Count #:

***Max. Penalty:**

Count #:

***Max. Penalty:**

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 09-80096-CR - By SCAMP/HOPKINS

BOND RECOMMENDATION

DEFENDANT: MICHELLE FLETCHER

\$50,000.00 Personal Surety Bond
(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: 
AUSA: ELLEN L. COHEN

Last Known Address: 8937 NW 45th Court

Pompano Beach, Florida 33065

What Facility: _____

Agent(s): Detective Steven Grenier (FBI)
(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)
FBI/Palm Beach RA, 505 S. Flagler Drive, Ste 500, WPB, FI 33401