

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CAROL JOYCE NOBLE,

a/k/a Carol Joyce Pink; Carol Dickinson
[DOB: 2/8/52]

Defendant.

No. 14-04048-01-CR-C-BP

Counts 1-3:

18 U.S.C. § 1344

NMT 20 years and/or \$250,000 fine

Supervised Release: NMT 3 years

Class C Felony

\$100 mandatory penalty assessment, each count

INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

1. At all times material, Central Trust Bank (“CTB”) was a financial institution, the accounts of which were insured by the Federal Deposit Insurance Corporation (“FDIC”). CTB was located in Jefferson City, Missouri.

2. At all times material, CAROL JOYCE NOBLE, defendant, lived in the Western District of Missouri.

3. From an unknown date, but from at least as early as on or about September 1, 2011, and continuing to September 30, 2011, and after, CAROL JOYCE NOBLE, defendant, devised and executed a scheme and artifice to defraud CTB and to unlawfully obtain and use monies, funds and assets owned by and under the care, custody and control of the CTB by means of false and fraudulent pretenses, representations and promises. Pursuant to the scheme and artifice to defraud, the defendant did unlawfully obtain and use approximately \$185,000 to which she was not entitled.

4. It was an object of the scheme and artifice to defraud that the defendant would unlawfully take and obtain, by deception and fraud, money entrusted to CTB, and then to use the money and funds for her own uses. It was a further object of the scheme and artifice to defraud that the defendant would knowingly conceal facts from CTB and others in order to prevent the detection of the scheme and artifice to defraud.

5. It was part of the scheme and artifice to defraud CTB that the defendant caused false loan documents to be prepared and made to CTB for the purpose of obtaining a commercial loan in the amount of approximately \$185,000 to purchase a convenience store in Stover, Missouri.

6. It was further part of the scheme and artifice to defraud CTB that the defendant caused the fraudulent appraisal of her residence at 33756 Deerfield Road, Gravois Mills, Missouri, thereby fraudulent inflating the value of her pledged collateral by over \$100,000 for purposes of obtaining the commercial loan. As a result of the scheme and artifice to defraud, CTB issued loan proceeds in the amount of approximately \$185,000 for the purchase of the convenience store.

Counts 1-3
(Bank Fraud)

From an unknown date, but from at least as early as September 2011, and continuing until on or about September 30, 2011, and after, CAROL JOYCE NOBLE, defendant, with the intent to defraud, knowingly executed the above described scheme and artifice to defraud CTB, an FDIC insured financial institution, and to obtain monies, funds and assets owned by and under the care, custody and control of CTB by means of false and fraudulent pretenses, representations and promises, and in support of the scheme and artifice to defraud, committed or caused to be committed at least one of the following acts, among others, in execution of the scheme:

Count	Date	Act in Execution of Scheme
1	September 20, 2011	Defendant transferred or caused to be transferred the physical address No. "6" from her residence at 33756 Deercreek Road, Gravois Mills, Missouri to an adjacent residence of her neighbor, unbeknownst to that neighbor, for the fraudulent purpose of having the appraiser appraise the wrong home to effect an appraisal of over \$100,000 in excess of the true value of defendant's home.
2	September 20, 2011	Defendant met the appraiser at her neighbor's home which was adjacent to her home and misrepresented to the appraiser that it was her own, knowing the appraised value would be used as collateral for her commercial loan application.
3	September 30, 2011	Defendant signed and submitted loan documents to CTB knowing that they falsely represented her residence at 33756 Deercreek Road, Gravois Mills, Missouri as collateral valued at \$128,000 for her commercial loan.

A TRUE BILL.

/s/

FOREPERSON OF THE GRAND JURY

/s/

LAUREN KUMMERER
Assistant United States Attorney
Arizona Bar No. 023321

Dated: 8/27/14

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

CRIMINAL CASE COVER SHEET

Division of Filing <input type="checkbox"/> Western <input checked="" type="checkbox"/> Central <input type="checkbox"/> Southwestern	<input type="checkbox"/> St. Joseph <input type="checkbox"/> Southern	Place of Offense <u>Cole</u> County and elsewhere	Matter to be Sealed <input type="checkbox"/> Secret Indictment <input type="checkbox"/> Juvenile
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Defendant Information

Defendant Name Carol Joyce Noble
 Alias Name Carol Joyce Pink; Carol Dickinson
 Birthdate 2/8/52

Related Case Information

Superseding Indictment/Information Yes No if yes, original case number _____
 New Defendant Yes No
 Prior Complaint Case Number, if any _____
 Prior Target Letter Case Number, if any _____

U.S. Attorney Information

AUSA Lauren Kummerer

Interpreter Needed

Yes Language and/or dialect _____
 No

Location Status

Arrest Date _____
 Currently in Federal Custody
 Currently in State Custody
 Currently on Bond

Writ Required Yes No
 Warrant Required Yes No

U.S.C. Citations

Total # of Counts 3

Set	Index Key/Code/Offense Level	Description of Offense Charged	Count(s)
1	18:1344A.F/4601/4	Bank Fraud	1-3
2			
3			
4			
5			

(May be continued on reverse)

Date 8/27/14 Signature of AUSA /s/