

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION
LEXINGTON**

Eastern District of Kentucky
FILED

OCT 20 2022

AT LEXINGTON
ROBERT R. CARR
CLERK U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

INDICTMENT NO. 5:22-cr-131-KKC

JAMIE LEANNE HIGHTOWER

* * * * *

THE GRAND JURY CHARGES:

BACKGROUND

1. At all relevant times, **JAMIE LEANNE HIGHTOWER**, was employed as the Head Teller and Vault Teller for Community Trust Bank, Inc., hereinafter "Community Trust Bank," at the Mt. Sterling branch of operations in Montgomery County, Kentucky, all located in the Eastern District of Kentucky.

2. At all relevant times, the Community Trust Bank of Pikeville, Kentucky, located within the Eastern District of Kentucky, was a banking institution, the deposits of which were insured by the Federal Deposit Insurance Corporation (FDIC).

COUNTS 1-6
18 U.S.C. § 1344(2)

3. Paragraphs 1 and 2 are re-alleged and incorporated by reference as if set forth fully herein.

4. Beginning on or about May 20, 2019, and continuing until on or about September 23, 2019, in Montgomery County, in the Eastern District of Kentucky,

JAMIE LEANNE HIGHTOWER,

participated in a scheme and artifice to defraud Community Trust Bank to obtain monies, funds, credits, assets, or other property owned by or under the custody and control of that financial institution, by means of materially false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

5. It was a part of the scheme and artifice to defraud Community Trust Bank that the defendant routinely violated bank policy, created false entries and altered Community Trust Bank records, and used multiple teller drawers to disguise her scheme.

6. Over the course of the scheme, the defendant obtained approximately \$32,800 owned by and under the custody and control of Community Trust Bank.

EXECUTION OF THE SCHEME

7. On or about the dates listed below, **JAMIE LEANNE HIGHTOWER**, with intent to defraud Community Trust Bank:

Count	Date	Description of Conduct
1	July 1, 2019	knowingly executed and attempted to execute the scheme by tendering a check in her spouse's name to Community Trust Bank, where she collected funds amounting to the full face value of the check, retained the instrument under false pretenses, and subsequently deposited that same instrument into her personal bank account, located in Winchester, Kentucky, in order to recover twice the amount of funds authorized.

2	July 26, 2019	knowingly executed and attempted to execute the scheme by altering business customer deposit documentation and instruments without authorization.
3	July 30, 2019	knowingly executed and attempted to execute the scheme by taking cash from another bank teller and falsely representing that she was taking care and custody of the money as Vault Teller.
4	August 15, 2019	knowingly executed and attempted to execute the scheme by taking cash funds from a Federal Reserve shipment, Brinks armored truck shipment, and the vault and making material misrepresentations.
5	August 16, 2019	knowingly executed and attempted to execute the scheme by extracting money from a bank account, owned by F.A., by fabricating a transaction with the customer.
6	August 20, 2019	knowingly executed and attempted to execute the scheme by extracting money from a bank account, owned by R.T., by fabricating a transaction with the customer.

Each in violation of 18 U.S.C. § 1344(2).

COUNT 7
18 U.S.C. § 1028A

8. Paragraphs 1 through 7 are re-alleged and incorporated by reference as if set forth fully herein.

9. On or about August 20, 2019, in Montgomery County, in the Eastern District of Kentucky,

JAMIE LEANNE HIGHTOWER,

knowingly used, without lawful authority, a means of identification of another person, to wit, R.T.'s name and bank account number, during and in relation to the felony violation of 18 U.S.C. § 1344(2) charged in Count 1, the facts of which are re-alleged and incorporated herein, knowing that the means of identification belonged to another actual

person.

All in violation of 18 U.S.C. § 1028A.

FORFEITURE ALLEGATION

18 U.S.C. § 982(a)(2)

10. Paragraphs 1 through 9 are realleged and incorporated by reference as if fully set forth herein for the purposes of alleging forfeitures pursuant to 18 U.S.C. § 982(a)(2).

11. Upon conviction of the offenses in violation of 18 U.S.C. §§ 1028A and 1344(2) set forth in Counts 1 through 7 of this Indictment, the Defendant, **JAMIE LEANNE HIGHTOWER**, shall forfeit to the United States of America, pursuant to 18 U.S.C. § 982(a)(2), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, the following:

MONEY JUDGMENT:

A forfeiture money judgment in the amount of \$32,800, which represents the gross proceeds in aggregate known to have been obtained by the defendant as a result of the offenses alleged in this Indictment.

If any of the property described above, as a result of any act or omission of the defendant **JAMIE LEANNE HIGHTOWER**:

- 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 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1).

A TRUE BILL



FOREPERSON

Handwritten signature of Carlton S. Shier, IV in cursive.

CARLTON S. SHIER, IV
UNITED STATES ATTORNEY

PENALTIES

COUNTS 1-6: Imprisonment for not more than 30 years, a fine of not more than the greater of \$1,000,000 or twice the gross gain or loss, and supervised release for not more than 5 years.

COUNT 7: Imprisonment for 2 years to run consecutively to any other term of imprisonment imposed, a fine of not more than \$250,000, and supervised release for not more than 1 year.

PLUS: Restitution, as applicable.

PLUS: Forfeiture, as applicable.

PLUS: Mandatory special assessment of \$100 per count.