

UNITED STATES DISTRICT COURT
DISTRICT OF WYOMING

FILED
U.S. DISTRICT COURT
DISTRICT OF WYOMING
2022 NOV 22 AM 11:52
MARGARET BOTKINS, CLERK
CHEYENNE

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARISSA J. DUNN-POLLARD,

Defendant.

CRIMINAL COMPLAINT

Case Number: 22-MJ-59-J

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

Counts 1 - 5 (Wire Fraud)

From on or about September 20, 2020, through and including on or about May 30, 2022, in the District of Wyoming, the Defendant, **CARISSA J. DUNN-POLLARD**, knowingly devised and intended to devise a scheme and artifice to defraud and to obtain money by means of false and fraudulent pretenses, representations, and promises ("scheme"), in an amount totaling approximately \$255,500, which scheme was furthered by the use of interstate wire communications. The Defendant, **CARISSA J. DUNN-POLLARD**, engaged in the scheme substantially as follows:

1. It was a part of the scheme that Defendant, **CARISSA J. DUNN-POLLARD**, was employed as a bookkeeper at Cheyenne Little Theatre Players Inc. (the Theater) in Cheyenne, Wyoming and that as part of her duties, she was responsible for maintaining the financial records, including paying bills, managing payroll, and submitting financial reports to the Board of Directors.

2. It was further a part of the scheme that the Defendant diverted the financial assets of the Theatre for her own personal use and falsified financial records to hide her scheme.

3. On or about the following dates, in the District of Wyoming, the Defendant **CARISSA J. DUNN-POLLARD**, for the purpose of executing and attempting to execute the scheme as described above, caused to be transmitted in interstate commerce by means of wire communication, certain signs, signals, and sounds, described below, each transmission constitution a separate count:

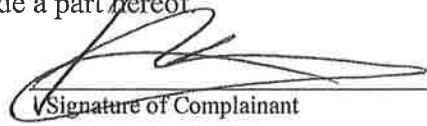
Count	Date	Wire Transmission
1	1/5/2021	Unauthorized ACH "Payroll Deposit" of \$1,000 into the Defendant's bank account from the Theatre's bank account
2	1/6/2021	Unauthorized ACH "Payroll Deposit" of \$1,000 into the Defendant's bank account from the Theatre's bank account
3	1/7/2021	Unauthorized ACH "Payroll Deposit" of \$1,000 into the Defendant's bank account from the Theatre's bank account
4	6/7/2021	Unauthorized ACH "Payroll Deposit" of \$4,000 into the Defendant's bank account from the Theatre's bank account
5	6/9/2021	Unauthorized ACH "Payroll Deposit" of \$4,000 into the Defendant's bank account from the Theatre's bank account

In violation of 18 U.S.C. § 1343.

I further state that I am a Special Agent with the United States Secret Service and that this complaint is based on the following facts:

(See attached Sworn Statement)

Continued on the attached sheet and made a part hereof.



Signature of Complainant
RUSSELL SPARKS

Sworn to before me and subscribed in my presence,

November 22, 2022

Date

at

Cheyenne, Wyoming

City and State

HON. KELLY H. RANKIN
Chief United States Magistrate Judge

Name & Title of Judicial Officer



Signature of Judicial Officer

**SWORN STATEMENT IN SUPPORT OF CRIMINAL COMPLAINT
SPECIAL AGENT RUSSELL SPARKS
U.S. v. CARISSA DUNN-POLLARD**

I, **Russell Sparks** being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the U.S. Secret Service and have been so employed for over 20 years. During my employment with the U.S. Secret Service, I have investigated crimes pertaining to wire fraud, access device fraud, counterfeit Federal Reserve Notes, counterfeit, and forged checks, financial institution fraud, false identification documents, and mail fraud. I have also received training and education in the forensic examination of digital media and hold a Master's Degree in Digital Forensics. I am a certified Electronic Crimes Special Agent Examiner for the Secret Service. I am authorized under Title 18, United States Code, Section 3056(b) to conduct criminal investigations concerning any of the law of the United States relating to access device fraud, counterfeit Federal Reserve Notes, false identification documents or devices, electronic funds transfers and fraud or other criminal or unlawful activity in or against federally insured financial institutions. I am further authorized by Section 3056(c) to execute warrants issued under the laws of the United States and make arrests based on probable cause for any felony cognizable under the laws of the United States.

2. The information contained herein is based upon my personal observations, knowledge, and training, as well as information related to me by other law enforcement officers, investigators, and/or witnesses, as set forth more fully herein. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. In May 2022, representatives of the Cheyenne Little Theatre Players Inc. (the Theatre) based in Cheyenne, Wyoming reported to law enforcement the suspected theft of at least \$255,500, by one of its part-time employees, Carissa J. Dunn-Pollard. Theatre representatives reported that from approximately, May 2016 to May 2022, Dunn-Pollard served as the Theatre's bookkeeper. During her employment, Dunn-Pollard was responsible for maintaining the financial records for the Theater, including paying bills, managing payroll and creating employee W2 forms, including her own. Dunn-Pollard was the person solely responsible for maintaining the Theatre's QuickBooks. Dunn-Pollard was also tasked with providing monthly financial reports to the Board of Directors. These reports included items such as total payroll for the month and balances for the Theater's bank accounts.

4. Theater representatives reported to law enforcement they discovered multiple unusual transfers of funds from September 20, 2020 through May 2022, between the Theater's bank accounts, as well as multiple transfers out of the Theater's general funds account to an outside and unknown bank account. I have identified this unknown bank account to be First Interstate Bank (FIB) bank account belonging to Dunn-Pollard and her husband. My review of bank records indicates this FIB bank account was opened at the FIB branch located at 4612 Rue Terre, Cheyenne, Wyoming.

5. A review of this FIB bank account reflects that between 5/23/2019 and 4/27/2022, 111 ACH "payroll deposits" were made into Dunn-Pollard's FIB bank account from the Theatre's bank account totaling \$278,550. All of these deposits were in round numbers and ranged from \$300.00 to \$6000. On several occasions, large electronic "payroll deposits" were made 2 or 3 days in a row. For instance, \$1,000 in "payroll deposits" were made on 1/5/2021, 1/6/2021 and 1/7/2021 into Dunn-Pollard's FIB account. Similarly, on 6/7/2021 and 6/9/2021, a "payroll deposit" of

\$4,000 was made on both days. I have learned that these ACH “payroll deposits” are routed through the Federal Reserve Bank and, therefore, traveled in interstate commerce.

6. According to Theater representatives, all the above listed “payroll deposits” into Dunn-Pollard’s bank account were not authorized by any member of the Theater and/or Board of Directors. On several occasions between January and May of 2022, Theater management requested access to the Theater’s QuickBooks accounts from Dunn-Pollard via email. The Theater’s multiple email requests for access to their own QuickBooks account were met with delay tactics from Dunn-Pollard, ranging from out of state travel to inability to gain access to the Theater’s account. For instance, in an email exchange between Dunn-Pollard and Theater management dated 03/08/2022, Dunn-Pollard stated: “I have my own QuickBooks account that I log into your account as the bookkeeper so I can do the reconciliations.” In an 04/29/22 email exchange between the Theater and Dunn-Pollard, Dunn-Pollard stated, “My master QB (QuickBooks) file is corrupt... 3 of my personal accounts and yours have scrambled themselves together.” In late May of 2022, Dunn-Pollard eventually gave Theater management a username and password for a QuickBooks account in the name of Cheyenne Little Theater Players. The Theater reports, however, that there is no data for any QuickBooks information/data entry from 2018 to May of 2022.

7. Theater representatives also provided law enforcement with several years of Theater bank account statements and multiple financial reports, where the Theater believes Dunn-Pollard falsified total payroll amounts and balances to the Theater’s bank accounts in an attempt to hide her illegal activities. For instance, in a Profit and Loss report dated July – December 2021, prepared by Dunn-Pollard and submitted to the Theatre’s Board, Dunn-Pollard reported “total wages” of \$41,051.52 paid out by the Theatre to all Theatre employees for this time period. In fact, during

this same time period, Dunn-Pollard made 28 ACH “payroll deposits” into her bank account from the Theatre’s bank account totaling \$94,500.00.

8. Similarly, the Theater provided law enforcement with Dunn-Pollard’s personnel files which included Dunn-Pollard’s 2019 W2 statement, which Dunn-Pollard prepared. This 2019 W2 report reports total wages for 2019 as \$20,670.00, however, my review of her FIB account reveals 54 ACH “payroll deposits” from the Theatre’s bank account totaling \$53,819.86 in 2019.

END OF SWORN STATEMENT

PENALTY SUMMARY

DEFENDANT NAME: **CARISSA J. DUNN-POLLARD**

DATE: November 22, 2022

INTERPRETER NEEDED: No

VICTIM(S): Yes

OFFENSE/PENALTIES:

Cts 1 – 5: 18 U.S.C. § 1343
(Wire Fraud)

0-20 Years Imprisonment
Up To \$250,000 Fine
3 Years Supervised Release
\$100 Special Assessment

TOTALS: 0-100 Years Imprisonment
Up To \$1,250,000 Fine
3 Years Supervised Release
\$500 Special Assessment

AGENT: Russell Sparks, USSS

AUSA: Margaret M. Vierbuchen, Assistant United States Attorney

ESTIMATED TIME OF TRIAL: 1 to 5 days

WILL THE GOVERNMENT SEEK DETENTION IN THIS CASE: No

ARE THERE DETAINERS FROM OTHER JURISDICTIONS: No