



about March, 2013, the exact dates being unknown to the United States Attorney, in the Western District of Tennessee, the defendant,

**GEORGE E. SKOUTERIS, JR.,**

did knowingly execute and attempt to execute a scheme and artifice to defraud Trust One and to obtain moneys, funds, assets and credits owned by and under the custody and control of Trust One by means of false and fraudulent pretenses, representations and promises.

A. The scheme and artifice to defraud was, in substance, that in the course of representing clients defendant **SKOUTERIS** would settle claims a client had against a third party.

B. It was further a part of the scheme and artifice that in connection with such settlements defendant **SKOUTERIS** would receive checks jointly payable to him and his clients.

C. It was further a part of the scheme and artifice that defendant **SKOUTERIS** would forge and cause to be forged the endorsement of clients on said settlement checks.

D. It was further a part of the scheme and artifice that defendant **SKOUTERIS** would deposit the forged settlement checks for credit to one of the Skouteris accounts at Trust One and thereafter use the funds for his personal benefit.

E. It was further a part of the scheme and artifice that in many instances when contacted by a client regarding their cases, defendant **SKOUTERIS** would make false representations to the client regarding the status of their case to conceal his fraudulent scheme.

F. As a result of the scheme and artifice defendant **SKOUTERIS** fraudulently obtained in excess of \$250,000.

3. On or about May 19, 2009, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud Trust One the defendant,

**GEORGE E. SKOUTERIS, JR.,**

deposited and caused to be deposited to the Skouteris account at Trust One ending in #3747 a check issued by State Farm Mutual Automobile Insurance Company payable in the amount of \$12,000 to "Valerie G. Cox, . . . & George E. Skouteris, Jr. her attorney" and bearing the forged endorsement of Valerie G. Cox.

All in violation of Title 18, United States Code, Section 1344.

**COUNT TWO**  
**(BANK FRAUD)**

4. Paragraphs 1 and 2 of Count One of this Indictment are realleged and incorporated by reference as if fully set forth herein.

5. On or about March 16, 2011, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud Trust One the defendant,

**GEORGE E. SKOUTERIS, JR.,**

deposited and caused to be deposited to the Skouteris account at Trust One ending in #0241 a check issued by GEICO General Insurance Company payable in the amount of \$1,550.57 to "Dawn Barnett" and bearing the forged endorsement of Dawn Barnett.

All in violation of Title 18, United States Code, Section 1344.

**COUNT THREE**  
**(BANK FRAUD)**

6. Paragraphs 1 and 2 of Count One of this Indictment are realleged and incorporated by reference as if fully set forth herein.

7. On or about April 5, 2011, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud Trust One the defendant,

**GEORGE E. SKOUTERIS, JR.,**

deposited and caused to be deposited to the Skouteris account at Trust One ending in #0241 a check issued by GEICO General Insurance Company payable in the amount of \$5,300 to "Ernest Jones a single individual and George Skouteris, Jr. Attorney at Law" and bearing the forged endorsement of Ernest Jones.

All in violation of Title 18, United States Code, Section 1344.

**COUNT FOUR**  
**(BANK FRAUD)**

8. Paragraphs 1 and 2 of Count One of this Indictment are realleged and incorporated by reference as if fully set forth herein.

9. On or about October 17, 2011, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud Trust One the defendant,

**GEORGE E. SKOUTERIS, JR.,**

deposited and caused to be deposited to the Skouteris account at Trust One ending in #0241 a check issued by Mid-century Insurance Company payable in the amount of

\$6,500.00 to “Jaquelin Smith-ehrat and George E. Skouteris, Jr.” and bearing the forged endorsement of Jaquelin Smith-ehrat.

All in violation of Title 18, United States Code, Section 1344.

**COUNT FIVE**  
**(BANK FRAUD)**

10. Paragraphs 1 and 2 of Count One of this Indictment are realleged and incorporated by reference as if fully set forth herein.

11. On or about December 1, 2011, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud Trust One the defendant,

**GEORGE E. SKOUTERIS, JR.,**

deposited and caused to be deposited to the Skouteris account at Trust One ending in #0241 a check issued by Mid-century Insurance Company payable in the amount of \$1,700.00 to “Jaquelin Smith-ehrat and George E. Skouteris, Jr.” and bearing the forged endorsement of Jaquelin Smith-ehrat.

All in violation of Title 18, United States Code, Section 1344.

**COUNT SIX**  
**(BANK FRAUD)**

12. Paragraphs 1 and 2 of Count One of this Indictment are realleged and incorporated by reference as if fully set forth herein.

13. On or about July 13, 2010, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud Trust One the defendant,

**GEORGE E. SKOUTERIS, JR.,**

deposited and caused to be deposited to the Skouteris account at Trust One ending in #3747 a check issued by Grange Insurance Companies payable in the amount of \$3,700.00 to "Sheri Wahl . . . and Skouteris Law Firm Her Attorney" and bearing the forged endorsement of Sheri Wahl.

All in violation of Title 18, United States Code, Section 1344.

**COUNT SEVEN**  
**(BANK FRAUD)**

14. Paragraphs 1 and 2 of Count One of this Indictment are realleged and incorporated by reference as if fully set forth herein.

15. On or about January 11, 2012, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud Trust One the defendant,

**GEORGE E. SKOUTERIS, JR.,**

deposited and caused to be deposited to the Skouteris account at Trust One ending in #0241 a check issued by Farmers Insurance Company payable in the amount of \$10,000.00 to "Stuart Smith and Ann Smith and Their Attorney George E. Skouteris, Jr." and bearing the forged endorsements of Stuart Smith and Ann Smith.

All in violation of Title 18, United States Code, Section 1344.



**CRIMINAL FORFEITURE ALLEGATIONS**  
**Forfeiture for Bank Fraud**

1. The allegations contained in Counts 1 through 7 of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A), and Title 28 United States Code, Section 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

2. Upon conviction of bank fraud in violation of Title 18, United States Code, Section 1344 as alleged in Counts 1 through 7 of the indictment the defendant, **GEORGE E. SKOUTERIS, JR.**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 981(a)(1)(C), and 982(a)(2)(A), and Title 28, United States Code, Section 461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure all property, real and personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of such offense, including but not limited to a sum of money, in the amount of \$250,000 representing proceeds obtained as a result of the scheme and artifice to defraud alleged in Counts 1 through 7 of the indictment.

**Substitute Assets**

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (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, pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461(c), shall be entitled to forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

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FOREPERSON

DATE: \_\_\_\_\_

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D. MICHAEL DUNAVANT  
UNITED STATES ATTORNEY