

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

UNITED STATES OF AMERICA)	No.	
	)	
Plaintiff,	)	26 U.S.C. § 7201:
	)	Class D Felony
v.	)	NMT 5 Years Imprisonment
	)	NMT \$250,000 Fine
CORINNE M. CONWAY,	)	Plus Costs of Prosecution
[DOB: 07/03/40]	)	3 Years Supervised Release
	)	\$100 Special Assessment
Defendant.	)	

I N F O R M A T I O N

THE UNITED STATES ATTORNEY CHARGES THAT:

1. At all times material to this Indictment, defendant CORINNE M. CONWAY was a resident of Higginsville, Missouri.

2. During the calendar years 1999 and 2000, defendant CONWAY, in addition to running an organization known as the Virtuous Women International Ministries, was engaged in the selling of automobiles and other motor vehicles on behalf of an estate in the name of John Bowers. Purchasers of automobiles were told that Bowers had left a multi-million dollar estate with a significant number of automobiles and other motor vehicles to be sold at bargain prices, most commonly to individuals of religious faith. In fact, no estate and no vehicles existed.

3. In 1999 and 2000, defendant CONWAY participated in the selling of the automobiles and other motor vehicles as follows:

(a) Defendant CONWAY operated The Virtuous Women International Ministries, which had contacts with churches and religious groups throughout the United States. CONWAY introduced Gwendolyn Baker to individuals in these churches and religious groups to promote the selling of automobiles and other motor vehicles from the estate which was represented to have the vehicles for sale.

(b) CONWAY became what was termed a "finder" for the estate vehicles; that is, she found individuals who wished to purchase the vehicles. CONWAY also had several other finders throughout the United States working through her, and purchase money from these other finders was transmitted to CONWAY. CONWAY then forwarded the purchase money to Gwendolyn Baker in Tennessee.

(c) Initially, CONWAY did not charge additional fees for selling the estate cars. By the fall of 1999, however, she began charging a \$50 administrative fee for each vehicle purchased. The fee was to cover her out of pocket expenses relative to the sale of the vehicles. In 2000, CONWAY began receiving \$1000 in fees or commissions for some of the vehicles purchased. CONWAY instructed purchasers to provide a cashier's check payable to Gwendolyn Baker for the purchase price of the vehicle and a separate cashier's check payable to her for the

payment of fees or commissions in connection with the vehicle sales. If a separate finder was involved and receiving a fee or commission, the purchaser would be required to provide a third cashier's check payable to that finder.

(d) CONWAY deposited the finder's fee or commission checks into personal bank accounts at Firststar Bank, Higginsville, Missouri; an account of The Virtuous Women International Ministries at Firststar Bank, Higginsville, Missouri; or a personal account at SunTrust Bank, Chattanooga, Tennessee. CONWAY paid a number of personal expenses out of the Virtuous Women International Ministries account.

(e) As time went on and the vehicles were not delivered as promised, some individuals requested refunds of their purchase money. CONWAY used some of the funds in her various accounts to pay some refunds to such purchasers.

(f) In 1999 and 2000, CONWAY received taxable finder's fees or commissions from purchasers of the vehicles.

4. During the calendar year 1999, defendant CONWAY, in the Western District of Missouri, received approximately \$99,150.00 in gross finder's fees.

5. During the calendar year 2000, defendant CONWAY, in the Western District of Missouri, received approximately \$991,810.00 in gross finder's fees.

6. During the calendar year 2000, defendant Conway had and received net profit from finder's fees in the sum of approximately \$818,209.00 (based upon gross finder's fees of \$991,810.00 less \$161,222.00 in refunds paid and business expenses) and upon said income there was income tax due and owing to the United States of America of approximately \$320,379.64.

7. Defendant CORINNE M. CONWAY, well knowing the foregoing facts, in the Western District of Missouri, did willfully attempt to evade and defeat the income tax due and owing by her to the United States of America for the calendar year 2000 by failing to make an income tax return for the calendar year 2000 on or before April 15, 2001, as required by law, to any proper officer of the Internal Revenue Service and failing to pay to the Internal Revenue Service the income tax which was due and owing for the calendar year 2000, and by attempting to evade and defeat the income tax due and owing by the following:

(1) instructing purchasers of vehicles to provide separate checks for finder's fees in connection with the sale of estate vehicles so that the finder's fees checks would be deposited into separate accounts from the accounts into which the checks for purchase of the vehicles were deposited;

(2) instructing a finder to tell Gwendolyn Baker, who was collecting the purchase money for the vehicles, that any money

sent to CONWAY by the finder was a "blessing" or charitable contribution to CONWAY's ministry, in an attempt to hide the true nature of the payments as fees or commissions in connection with the sale of the vehicles;

(3) commingling substantial amounts of the finder's fees or commissions with other deposits to the account of The Virtuous Women International Ministries and then using substantial amounts of these funds to pay personal living expenses and other personal expenses;

(4) opening an account on or about September 5, 2000, at SunTrust Bank in Tennessee, depositing approximately \$115,000 in finder's fee or commission checks, and using the funds from this account for personal expenditures;

(5) continuing to charge finder's fees in connection with the sale of estate vehicles after Gwendolyn Baker had informed CONWAY that she was not allowed to charge such fees;

(6) making and keeping her financial records relating to the sale of estate cars and other financial transactions which would make it very difficult for the Internal Revenue Service to compute her income tax liability accurately; and

(7) after being informed that the Internal Revenue Service, Criminal Investigation was investigating her, filing tax returns for the years 1999 and 2000 for herself and her

husband personally and for The Virtuous Women International Ministries which returns did not report all of the finder's fees received in 1999 and 2000 in connection with the vehicle sales.

All in violation of Title 26, United States Code, Section 7201.

Todd P. Graves  
United States Attorney

By /S/

J. Daniel Stewart #32314  
Assistant United States Attorney

Dated: 5/2/2003