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FILED

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Clerk, U S District Court
District Of Montana
Missoula

**ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAMES CAMERON McNEELY,

Defendant.

CR 23- ~~106~~ -GF-BMM

INDICTMENT

**THEFT FROM AN INDIAN TRIBAL
GOVERNMENT RECEIVING FEDERAL
FUNDING**

(Count 1)

Title 18 U.S.C. § 666(a)(1)(A)

**(Penalty: Ten years of imprisonment,
\$250,000 fine, and three years of supervised
release)**

WIRE FRAUD

(Counts 2-11)

Title 18 U.S.C. § 1343

**(Penalty: 20 years of imprisonment,
\$250,000 fine, and three years of supervised
release)**

	THEFT FROM AN INDIAN TRIBAL ORGANIZATION (Count 12) Title 18 U.S.C. § 1163 (Penalty: Five years of imprisonment, \$250,000 fine, and three years of supervised release)
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THE GRAND JURY CHARGES:

At all times relevant to the indictment:

1. The defendant, JAMES CAMERON McNEELY, was an agent of Indian tribal government while working as the Operations Manager for the Blackfeet Tribe.
2. The Blackfeet Tribe is an Indian tribal government that received, in every one-year period of the indictment, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of Federal assistance. Specifically, the Blackfeet Tribe received federal grant funding from the American Rescue Plan Act (“Rescue Funding”). The purpose of the Rescue Funding was to aid public health and economic recovery from the COVID-19 pandemic.
3. While working as the Operations Manager, McNEELY fraudulently submitted false, fictitious, and fake vouchers for reimbursement to the Blackfeet Tribe that resulted in McNEELY receiving money that he was not entitled to receive, in whole and in part.

COUNT 1 –
THEFT FROM A PROGRAM RECEIVING FEDERAL FUNDING

That in or about October 2021, and continuing thereafter until in or about October 2022, at Browning, in Glacier County, in the State and District of Montana, and within the exterior boundaries of the Blackfeet Indian Reservation, and elsewhere, the defendant, JAMES CAMERON McNEELY, an agent of Indian tribal government, that is, the Operations Manager for the Blackfeet Tribe, intentionally misapplied, embezzled, stole, obtained by fraud, and otherwise without authority knowingly converted to the use of any person other than the rightful owner, property valued at more than \$5,000 that was owned by, and was under the care, custody, and control of the Blackfeet Tribe, that is, the defendant, JAMES CAMERON McNEELY, fraudulently submitted requests for repayment to the Blackfeet Tribe, and received such payments, after falsely claiming to purchase COVID-19 supplies on behalf of the Tribe from Amazon, when in truth and in fact, McNEELY did not purchase such supplies, in whole and in part, all in violation of 18 U.S.C. § 666(a)(1)(A).

COUNTS 2-11 –
WIRE FRAUD

That in or about October 2021, and continuing thereafter until in or about October 2022, at Browning, in Glacier County, in the State and District of Montana, and within the exterior boundaries of the Blackfeet Indian Reservation,

and elsewhere, the defendant, JAMES CAMERON McNEELY, having devised and intending to devise a material scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice, knowingly transmitted and caused to be transmitted by means of wire communication, in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice.

THE SCHEME

During the period of the indictment, it was part of the material scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, that the defendant, JAMES CAMERON McNEELY, claimed to purchase COVID-19 supplies, and other items, on behalf of the Tribe from Amazon, when in truth and in fact McNEELY did not purchase such supplies and items, in whole and in part. Despite not purchasing the items as claimed, McNEELY still received money from the Blackfeet Tribe that he was not entitled to receive. To perpetuate the scheme, McNEELY used and submitted photographs of his Amazon online shopping cart and quotes from a local business to make his false claims appear legitimate to any review from the Blackfeet Tribe.

THE INTERSTATE AND FOREIGN WIRE COMMUNICATIONS

During the period of the indictment, JAMES CAMERON McNEELY, having devised and intending to devise a material scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, as described herein, and for the purpose of executing the scheme to defraud, knowingly transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, as outlined in the chart below, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, that is, checks and electronic transmissions from the State and District of Montana to Denver, Colorado, and elsewhere, into the checking account ending in 6844, all in violation of 18 U.S.C. § 1343.

Count	Date	Check Number	Amount
2	February 22, 2022	802890	\$7,264.20
3	May 5, 2022	808228	\$8,091.00
4	May10, 2022	808541	\$7,857.05
5	May18, 2022	809209	\$7,222.65
6	May 24, 2022	809768	\$8,273.00
7	June 6 ,2022	810882	\$8,031.23

Count	Date	Check Number	Amount
8	July 20, 2022	815055	\$8,183.38
9	August 10, 2022	818189	\$7,896.00
10	August 23, 2022	819086	\$7,197.00
11	September 6, 2022	820743	\$8,400.25

COUNT 12 –
THEFT FROM AN INDIAN TRIBAL ORGANIZATION

That in or about October 2021, and continuing thereafter until in or about October 2022, at Browning, in Glacier County, in the State and District of Montana, and within the exterior boundaries of the Blackfeet Indian Reservation, and elsewhere, the defendant, JAMES CAMERON McNEELY, embezzled, stole, knowingly converted to his use and the use of another, willfully misapplied, and willfully permitted to be misapplied, money, funds, assets, and other property belonging to any Indian tribal organization, and entrusted to the custody and care of any officer, employee, and agent of an Indian tribal organization, and the value of such property exceeded \$1,000, that is, the defendant, JAMES CAMERON McNEELY, fraudulently submitted requests for repayment to the Blackfeet Tribe, and received such payments, after falsely claiming to purchase COVID-19 supplies

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on behalf of the Tribe from Amazon, when in truth and in fact, McNEELY did not purchase such supplies, in whole and in part, all in violation of 18 U.S.C. § 1163.

A TRUE BILL.

Foreperson signature redacted. Original document filed
under seal.

FOREPERSON



JESSE A. LASLOVICH
United States Attorney



CYNDEE L. PETERSON
Criminal Chief Assistant U.S. Attorney