UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

FILED
AUG 12 2025
U.S. DISTRICT COURT- WVND
WHEELING, WV 26003

UNITED STATES OF AMERICA,	
v.	**Criminal No.** **1:25-CR-** 41
CHRISTINA NOLTE, **Defendant.**	**Violations:** **18 U.S.C. § 641** **18 U.S.C. § 1001(a)(3)** **20 U.S.C. § 1097**

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Theft of Public Money, Property or Records)

From in or about November 2018 to on or about August 12, 2025, in Harrison County, within the Northern District of West Virginia, the defendant, **CHRISTINA NOLTE**, voluntarily, intentionally and knowingly embezzled, stole, and converted to her own use or the use of another, money of the United States, that is the Department of Veterans Affairs, a value of more than $1,000 in violation of Title 18, United States Code, Section 641.

COUNT TWO

(False Statement)

On or about August 13, 2020, in Harrison County, in the Northern District of West Virginia, in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, the Department of Veterans Affairs, the defendant, **CHRISTINA NOLTE**, did knowingly and willfully make and use a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, that is the defendant submitted a letter to the Department of Veterans Affairs purportedly drafted by R.W., a letter regarding the origin or diagnosis and treatment of the illnesses suffered by **CHRISTINA NOLE** when **CHRISTINA NOLTE** knew that R.W. did not draft such a letter, and did not diagnose or treat **CHRISTINA NOLTE**, in violation of Title 18, United States Code, Section 1001(a)(3).

COUNT THREE

(False Statement)

On or about August 13, 2020, in Harrison County, in the Northern District of West Virginia, in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, the Department of Veterans Affairs, the defendant, **CHRISTINA NOLTE**, did knowingly and willfully make and use a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, that is the defendant submitted a letter to the Department of Veterans Affairs purportedly drafted by A.Z., which discussed the diagnosis and treatment of **CHRISTINA NOLTE** for Posttraumatic Stress Disorder due to Military Sexual Trauma, when **CHRISTINA NOLTE** knew that A.Z. did not draft the letter and did not provide counseling, in violation of Title 18, United States Code, Section 1001(a)(3).

COUNT FOUR

(False Statement)

From on or about January 24, 2024 to on or about January 30, 2024, in Harrison County, in the Northern District of West Virginia, in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, the Department of Veterans Affairs, the defendant, **CHRISTINA NOLTE**, did knowingly and willfully make and use a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, that is the defendant submitted a letter to the Department of Veterans Affairs purportedly from G.H., a nurse practitioner, which opined on the appropriateness of **CHRISTINA NOLTE**'s disability benefit reduction, when **CHRISTINA NOLTE** knew that G.H. did not draft any such letter, in violation of Title 18, United States Code, Section 1001(a)(3).

COUNT FIVE

(Student Loan Fraud)

On or about November 10, 2020, in Harrison County, in the Northern District of West Virginia, the defendant, **CHRISTINA NOLTE**, did knowingly and willfully misapply, steal and obtain by fraud and false statements, any funds, assets, or property from the Department of Education, that is, the defendant submitted an application to discharge her federal student loans due to a finding of Total and Permanent Disability from the U.S. Department of Veterans Affairs, which the defendant obtained, in part, through the submission of false and fraudulent documents to the Department of Veterans Affairs, resulting in a discharge of $242,528.00 of student loans under subchapter IV of Chapter 28 of United States Code, Title 20, based on false and fraudulent statements, in violation of Title 20, United States Code, Section 1097(a).

FORFEITURE ALLEGATION

(Theft of Public Money, Property, or Records)

1. Pursuant to Title 28, United States Code, Section 2461(c), Title 18, United States Code, Sections 981(a)(1)(C), and 1956(c)(7)(D),and Title 21, United States Code, Section 853, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 641, or a conspiracy to violate such offense, including substitute property and a money judgment in the amount of at least $360,466.38.

A true bill,

/s/_____
Foreperson

/s/_____
RANDOLPH J. BERNARD
Acting United States Attorney

Jennifer T. Conklin, AUSA

Morgan McKee, AUSA