

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:19 cr 586 T JB JSS  
18 U.S.C. § 1956(h)  
18 U.S.C. § 1957

LINDA BAGDON

INDICTMENT

SEALED

The Grand Jury charges:

**COUNT ONE**  
**(Money Laundering Conspiracy—18 U.S.C. § 1956(h))**

**A. Introduction**

At times relevant to this Indictment:

1. A “call center” was an organization, typically located abroad, staffed by individuals who called, emailed, or texted potential victims, often residing in the United States, and caused those victims to send money to the defendant and other conspirators by using false and fraudulent means, including, but not limited to, Internal Revenue Service (IRS) Impersonation Fraud, Grant Scams, Lottery Scams, and Tech Support Fraud.

a. IRS Impersonation Fraud: Call centers impersonated IRS officers and misled U.S. residents to believe that they owed money to the IRS

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and would be arrested and fined if they did not pay their alleged back taxes immediately.

b. **Grant Scam:** Call centers impersonated government officials and misled U.S. residents to believe that the residents were eligible for a government grant or other assistance, and induced the U.S. residents to pay an advance fee to receive the grant or assistance. The grant or assistance was never provided.

c. **Lottery Scam:** Call centers impersonated lottery or sweepstakes professionals and misled U.S. residents to believe that the residents had won a sweepstakes or lottery, and induced the U.S. residents to pay an advance fee (usually for taxes) to receive proceeds allegedly won. The U.S. residents never received the proceeds.

d. **Tech Support Fraud:** Call centers misled U.S. residents to believe that they had computer viruses or that their computers had been hacked and their identities stolen, and that the victims needed to purchase software and/or services from the call centers to protect the victims' computers and their personal information.

2. A "money services business" offered various financial services to customers for a fee. Such services included the sale of money orders and the

wire transfer of funds from one location to another, both within the U.S. and abroad.

3. A “Remote Access Service” was a service that allowed a person to connect to another person’s computer over the internet and control that computer remotely.

4. Defendant LINDA BAGDON, who resided in the Middle District of Florida, retrieved and received fraudulently obtained payments made by victims via money services businesses such as Western Union and MoneyGram, deposited fraud proceeds into third-party bank accounts, and returned cash proceeds to other conspirators. BAGDON also created and maintained records relating to victims’ payments.

**B. The Conspiracy**

5. Beginning on an unknown date, but no later than in or around September 1, 2015, and continuing through at least in or around March 2016, in the Middle District of Florida and elsewhere, the defendant,

LINDA BAGDON,

did knowingly combine, conspire, confederate, and agree with others, both known and unknown to the Grand Jury, to commit the following offenses:

a. knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, did

conduct, and attempt to conduct, a financial transaction, which in fact involved the proceeds of specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, with the intent to promote the carrying on of specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A)(i); and

b. knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, did conduct, and attempt to conduct, a financial transaction, which in fact involved the proceeds of specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

**C. Manner and Means of the Conspiracy**

6. The manner and means by which conspirators sought to accomplish the objects of the conspiracy included, among others, the following:

a. It was a part of the conspiracy that conspirators would and did engage in a scheme to extract money from victims by telephoning them and making false and fraudulent—and at times threatening—misrepresentations;

b. It was a further part of the conspiracy that conspirators would and did falsely and fraudulently represent themselves to be U.S. government officials and would and did obtain money from said victims by threatening victims with prosecution and/or arrest for failure to pay taxes purportedly due and owing;

c. It was a further part of the conspiracy that conspirators would and did falsely and fraudulently represent themselves to be U.S. government officials, advise victims that they were eligible to receive government grants or other assistance, and fraudulently persuade victims to pay an advance fee in order to receive the supposed grants or other assistance;

d. It was a further part of the conspiracy that conspirators would and did impersonate sweepstakes professionals, mislead victims to believe that they had won a sweepstakes or lottery, and fraudulently induce victims to pay an advance fee in order to receive proceeds purportedly won;

e. It was a further part of the conspiracy that conspirators would and did falsely and fraudulently represent themselves to be computer technicians and would and did obtain money from said victims by representing to the victims that their computers had been hacked, their identities had been stolen, and/or their computers were infected with viruses

and in need of repair, and that conspirators would resolve the purported computer problems if paid to do so;

f. It was a further part of the conspiracy that, when posing as computer technicians, conspirators would and did use a Remote Access Service to gain access to victims' computers and trick victims into believing that certain normal computer functions were in fact evidence of hacking, identity theft, or viruses, in order to add legitimacy to conspirators' claims and to fraudulently induce victims to purchase software and pay tech support fees;

g. It was a further part of the conspiracy that conspirators would and did direct, instruct, and cause victims to transmit money to the defendant and/or other conspirators via interstate wire transmissions using one or more money services businesses or by other means;

h. It was a further part of the conspiracy that the defendant and/or other conspirators would and did retrieve from the money services businesses or other similar entities the fraudulently obtained proceeds wired by victims;

i. It was a further part of the conspiracy that conspirators would and did convert victims' funds to cash for various purposes, including to conceal and disguise from law enforcement agencies, financial institutions,

and others the identities of the victims, the nature of the financial transactions, and the sources of the fraud proceeds;

j. It was a further part of the conspiracy that the defendant and/or other conspirators would and did dispense fraud proceeds in cash to other conspirators so the proceeds could be concealed and disseminated further as directed by coconspirators and for other purposes;

k. It was a further part of the conspiracy that conspirators would and did transfer, and cause to be transferred, victims' funds utilizing interstate and foreign wire communications;

l. It was a further part of the conspiracy that conspirators would and did share in the fraud proceeds, usually receiving percentages commensurate with their respective roles, for their personal enrichment and entertainment;

m. It was a further part of the conspiracy that conspirators would and did use some of the fraud proceeds to promote and perpetuate the fraud scheme; and

n. It was a further part of the conspiracy that conspirators would and did engage in multiple meetings, perform acts, and make statements to promote and achieve the objects of the conspiracy and to misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and

concealed, the purposes of the conspiracy and the acts committed in furtherance thereof.

All in violation of 18 U.S.C. § 1956(h).

**COUNT TWO**  
**(Illegal Monetary Transactions—18 U.S.C. § 1957)**

1. The Grand Jury realleges and incorporates by reference Part A of Count One of this Indictment as if fully set forth herein.

2. On or about September 1, 2015, in the Middle District of Florida, and elsewhere, the defendant,

LINDA BAGDON,

did knowingly engage and attempt to engage in a monetary transaction, in and affecting interstate and foreign commerce, that is, depositing approximately \$11,030 into the JPMorgan Chase account ending in 5390 in the name of S.S., in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343.

In violation of 18 U.S.C. §§ 1957 and 2.

**FORFEITURE**

1. The allegations contained in Counts One and Two of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 982(a)(1).



2. Upon conviction of a violation of 18 U.S.C. § 1956(h) the defendant, LINDA BAGDON, shall forfeit to the United States of America, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property.

3. Upon a conviction of 18 U.S.C. § 1957, the defendant, LINDA BAGDON, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property.

4. The property to be forfeited includes, but is not limited to, an order of forfeiture in the amount of at least \$62,089.30, which represents the amount involved in the offenses.

5. If any of the property described above, as a result of any act or omission of the defendant:


- 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 of America shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1).


A TRUE BILL,

  
Foreperson

MARIA CHAPA LOPEZ  
United States Attorney

By:   
for Rachel K. Jones  
Assistant United States Attorney

By:   
Rachelle DesVaux Bedke  
Assistant United States Attorney  
Deputy Chief, Economic Crimes Section

By:   
for Jay G. Trezevant  
Assistant United States Attorney  
Chief, Economic Crimes Section

FORM OBD-34  
12/9/19 Revised

No.

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**UNITED STATES DISTRICT COURT**  
Middle District of Florida  
Tampa Division

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THE UNITED STATES OF AMERICA

vs.

LINDA BAGDON

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**INDICTMENT**

Violations: 18 U.S.C. §§ 1956(h) and 1957

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A true bill,

*Mary K. Kieran*

Foreperson

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Filed in open court this 11<sup>th</sup> day of December 2019.

Clerk

Bail \$ \_\_\_\_\_

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