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LONG ISLAND CO.

CCC:CMM  
F. #2017R01994

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

JOHN FICARRA and  
MARA FICARRA,

Defendants.

----- X

THE GRAND JURY CHARGES:

INDICTMENT

Cr. No. **CR 18 679**  
(T. 18, U.S.C., §§ 982(a)(1), 982(a)(2),  
982(b)(1), 1349, 1956(a)(1), 1956(h),  
1957(b) and 3551 et seq.; T. 21, U.S.C.,  
§ 853(p))

SEYBERT, J.

LINDSAY, M.J.

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

I. The Defendants and the Defendants' Businesses

1. The defendants JOHN FICARRA and MARA FICARRA, residents of Southampton, New York, owned and operated various corporations, including, but not limited to, Remington Biographies, Inc., Remington Bookkeepers, Inc., and Mentorship America1, Inc. (collectively, the "Remington Entities"). Defendant JOHN FICARRA was the Chief Executive Officer ("CEO") of Remington Biographies and the President of Mentorship America1. Defendant MARA FICARRA was the CEO of Remington Bookkeepers and the Treasurer and Secretary of Mentorship America1.

2. The Remington Entities purported to publish reference publications generally containing concise biographical information of individuals from across the country. Reference publications included "Inspiring The Youth of America" and "The Remington

Registry of Outstanding Professionals” (the “Remington Registry”). The defendants primarily operated the Remington Entities out of their residence in Southampton, New York.

## II. The Fraudulent Scheme

3. In or about and between January 2013 and December 2018, both dates being approximate and inclusive, the defendants JOHN FICARRA and MARA FICARRA, together with others, engaged in a large-scale mail and check fraud scheme targeting elderly victims across the United States (the “Remington Scheme”). The mailings induced thousands of individuals (the “Victims”) to send checks of nominal value, such as \$14.00, in payment for inclusion in the Remington Entities’ reference publications. Upon receipt of these checks, the defendants then used routing and bank account information from those checks in order to create false and fraudulent checks in larger amounts, which they then deposited into bank accounts controlled by the defendants. Various financial institutions, including, but not limited to, Citibank, Everbank, HSBC, JP Morgan Chase and Wells Fargo, the deposits of which were insured by the Federal Deposit Insurance Corporation (“FDIC”), processed the fraudulent checks (the “Financial Institution Victims”).

4. Specifically, as part of the scheme, the defendants JOHN FICARRA and MARA FICARRA caused letters and pamphlets to be mailed to the Victims, who were predominately elderly, across the country. These mailings indicated that the Victim’s biography would be published in the Remington Registry reference publication produced by Remington Biographies, Inc. The letters, which were addressed to “Dear Nominee,” stated that “Your 2 books and your plaque are paid for in full and ready for delivery. Please send a check for 14.00 dollars for shipping and handling. Make check payable to Remington Biographies. Place check in envelope we provided and mail it to us promptly.”

5. The pamphlet described the Remington Registry reference publication and stated, in pertinent part, that “The Remington Registry of Outstanding Professionals is more than a website, more than a book, more than a Biographical index and certainly more than a who’s who. It is the ultimate expression of achievements, hardships, and dedication that professionals have made in their lives and careers. The Registry is perhaps one of the most powerful inspirational tools in existence today. Each Biography is painstakingly produced with respect and admiration first and foremost.” The pamphlet further stated: “At this point we wish to welcome your inclusion. We encourage you to keep an open mind and fill out the provided questionnaire as best you can. Sit back and be ready for a wonderful experience.” The pamphlet was signed by defendant JOHN FICARRA, as the Managing Director of Remington Biographies, and the address for the Remington Registry on the pamphlet was the defendants’ residence in Southampton, New York.

6. In response to receiving these letters and pamphlets, thousands of Victims sent checks to the defendants as payment for inclusion in the Remington Entities’ reference publications.

7. Upon receipt of these checks for “shipping and handling,” the defendants JOHN FICARRA and MARA FICARRA used the banking and routing information from those checks to create fabricated checks in larger amounts. The fraudulent checks were type-written in similar fonts, and contained a stamp on the signature line that stated as follows: “Signature Not Required. Your depositor has authorized this payment to payee. Payee to hold you harmless for payment of this document. This document shall be deposited only to the credited payee.” The defendants then caused the fabricated, fraudulent checks to be deposited, without authorization, into various bank accounts controlled by the



defendants, by various means, including, but not limited to, mobile deposit interstate wire transactions. The defendants would then withdraw cash from said accounts.

8. In total, the defendants JOHN FICARRA and MARA FICARRA caused the unauthorized deposit and transfer of approximately \$1 million dollars from the Victims' bank accounts to accounts of the defendants and the Remington Entities.

COUNT ONE

(Conspiracy to Commit Mail, Wire and Bank Fraud)

9. The allegations contained in paragraphs one through eight are realleged and incorporated as if fully set forth in this paragraph.

10. In or about and between January 2013 and December 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JOHN FICARRA and MARA FICARRA, together with others, did knowingly and intentionally conspire to:

a. devise a scheme and artifice to defraud the Victims and the Financial Institution Victims, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, to place and cause to be placed one or more matters and things in a post office and authorized depository for mail matter, to be sent and delivered by the United States Postal Service, and to deposit and cause to be deposited one or more matters and things to be sent and delivered by private and commercial interstate carrier, and to take and receive therefrom one or more such matters and things, contrary to Title 18, United States Code, Section 1341;

b. devise a scheme and artifice to defraud the Victims and the

Financial Institution Victims, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce writings, signs, signals, pictures and sounds, contrary to Title 18, United States Code, Section 1343; and

c. execute a scheme and artifice to defraud the Financial Institution Victims, and to obtain moneys and funds under the custody and control of the Financial Institution Victims, the deposits of which were insured by the FDIC, by means of materially false and fraudulent pretenses, representations and promises, contrary to Title 18, United States Code, Section 1344.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

COUNT TWO  
(Conspiracy to Commit Money Laundering)

11. The allegations contained in paragraphs one through eight are realleged and incorporated as if fully set forth in this paragraph.

12. In or about and between January 2013 and December 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JOHN FICARRA and MARA FICARRA, together with others, did knowingly and intentionally conspire to conduct one or more financial transactions in and affecting interstate and foreign commerce, including deposits, transfers and withdrawals of funds and monetary instruments, which in fact involved the proceeds of one or more specified unlawful activities, to wit: mail fraud, wire fraud and bank fraud, in violation of Title 18, United States Code, Sections 1341, 1343 and 1344, respectively, knowing that the property involved in the

financial transactions represented the proceeds of some form of unlawful activity (a) that was of a value greater than \$10,000, contrary to Title 18, United States Code, Section 1957, and (b) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Sections 1956(h), 1956(a)(1), 1957(b) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT ONE

13. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(2), which requires any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

14. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p),



as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(2) and 982(b)(1); Title 21, United States Code, Section 853(p))

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT TWO

15. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(1), which requires any person convicted of such offense to forfeit any property, real or personal, involved in such offense, or any property traceable to such property, including but not limited to: the real property and premises located at 22 Dellaria Avenue, Southampton, New York.

16. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- 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 difficult;


it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this

forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(1) and 982(b)(1); Title 21,  
United States Code, Section 853(p))

A TRUE BILL

FOREPERSON

  
RICHARD P. DONOGHUE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK