

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

RAYMOND ECHAVEZ VILLAMOR

Violation: Title 18, United States Code,
Section 1343

~~UNDER SEAL~~

COUNT ONE

The SPECIAL NOVEMBER 2022 GRAND JURY charges:

1. At times material to this indictment:
 - a. Defendant RAYMOND ECHAVEZ VILLAMOR operated Rainbowork LLC, a limited liability company organized in the state of Wyoming.
 - b. VILLAMOR solicited and received funds from investors through Rainbowork LLC.
 - c. Rainbowork LLC held a bank account for which VILLAMOR was the sole signatory.
 - d. Victim A was an individual residing in Glenview, Illinois.

2. Beginning in or around January 2023 and continuing through in or around July 2023, in the Northern District of Illinois, Eastern Division, and elsewhere,

RAYMOND ECHAVEZ VILLAMOR,

defendant herein, knowingly devised, intended to devise, and participated in a scheme to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described below.

3. It was part of the scheme that VILLAMOR fraudulently solicited, obtained and retained approximately two million dollars from Victim A as an investment based on false representations about the performance and value of the investment.

4. It was further a part of the scheme that VILLAMOR executed an agreement with Victim A wherein he agreed to repay the entirety of Victim A's two million dollar investment with an added return within a specified period of time, when he knew he did not have the capability to do so.

5. It was further a part of the scheme that VILLAMOR told Victim A that Victim A's funds would be invested for Victim A's benefit, knowing that he intended to and did use some of the investment funds for his own personal use.

6. It was further part of the scheme that VILLAMOR knowingly misrepresented and knowingly omitted material facts to Victim A concerning what

he had done with Victim A's two million dollar investment, including whether those funds had been invested at all and how those funds had been invested or used.

7. It was further part of the scheme that VILLAMOR attempted to lull Victim A into a false sense of security by making false statements and omitting material facts meant to conceal his misappropriation of Victim A's investment.

8. It was further part of the scheme that VILLAMOR attempted to lull Victim A into a false sense of security by making false statements about his efforts to return the two million dollar investment.

9. It was further part of the scheme that VILLAMOR used Victim A's investor funds in part for personal expenditures, including vehicle purchases.

10. It was further part of the scheme that VILLAMOR misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the existence, purpose, and acts done in furtherance of the scheme.

11. As a result of the scheme, VILLAMOR fraudulently misappropriated approximately two million dollars from Victim A.

12. On or about January 17, 2023, in the Northern District of Illinois, Eastern Division, and elsewhere,

RAYMOND ECHAVEZ VILLAMOR,

defendant herein, for the purpose of executing the above-described scheme, did knowingly cause to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate wire transfer of

\$2,000,000 from Victim A's bank account into a bank account held by Rainbowwork, LLC;

In violation of Title 18, United States Code, Section 1343.

COUNT TWO

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One are incorporated here.
2. On or about January 14, 2023, in the Northern District of Illinois,

Eastern Division, and elsewhere,

RAYMOND ECHAVEZ VILLAMOR,

defendant herein, for the purpose of executing the above-described scheme, did knowingly cause to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate email communication from VILLAMOR to Victim A;

In violation of Title 18, United States Code, Section 1343.

COUNT THREE

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One are incorporated here.
2. On or about January 16, 2023, in the Northern District of Illinois,

Eastern Division, and elsewhere,

RAYMOND ECHAVEZ VILLAMOR,

defendant herein, for the purpose of executing the above-described scheme, did knowingly cause to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate email communication from VILLAMOR to Victim A;

In violation of Title 18, United States Code, Section 1343.

COUNT FOUR

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One are incorporated here.
2. On or about January 16, 2023, in the Northern District of Illinois, Eastern Division, and elsewhere,

RAYMOND ECHAVEZ VILLAMOR,

defendant herein, for the purpose of executing the above-described scheme, did knowingly cause to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate email communication from VILLAMOR to Victim A;

In violation of Title 18, United States Code, Section 1343.

COUNT FIVE

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One are incorporated here.
2. On or about February 19, 2023, in the Northern District of Illinois,

Eastern Division, and elsewhere,

RAYMOND ECHAVEZ VILLAMOR,

Defendant herein, for the purpose of executing the above-described scheme, did knowingly cause to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate email communication from VILLAMOR to Victim A;

In violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2022 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1343, as set forth in this Indictment, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c). The property to be forfeited includes, but is not limited to, a personal money judgment in the amount of approximately \$2,000,000.

2. If any of the property described above, as a result of any act or omission by the defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or 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, as provided in Title 21, United States Code Section 853(p).

A TRUE BILL:

FOREPERSON

Signed by Jason A. Yonan on behalf of the
ACTING UNITED STATES ATTORNEY