

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

MEAGAN E. SHINE
a/k/a "Meagan Roberts"
a/k/a "Meagan Quinn,"
Defendant.

Cr. No. 1:24CR53MSM-PAS

In violation of :

COUNTS 1-4: Mail Fraud, 18 U.S.C.
§§ 1341 and 2

COUNT 5: Conspiracy, 18 U.S.C. § 1349

INDICTMENT

The Grand Jury charges that:

General Allegations

At all times relevant to this Indictment, unless herein stated:

1. Defendant MEAGAN E. SHINE, also known as "Meagan Roberts" and "Meagan Quinn," was a resident of Rhode Island.
2. Marketing International Management, LLC, d/b/a Global Prize Compendium, Consolidated Awards Group, American Sweepstakes Reporting, and International Award Opportunities, was a limited liability company organized under the laws of the state of Rhode Island on or about August 27, 2008.
3. ORA, LLC, d/b/a Prize Report Commission, Corporate, Cash & Prize Directives, and U.S. Sweeps Reporting, was a limited liability organized under the laws of the state of Rhode Island on or about September 16, 2010.
4. Marketing Advisors, LLC, d/b/a Prize Research Publications, Ultimate Opportunity Disclosures, Winning Opportunities Group, Sweepstakes Made Easy, and

Sweepstakes Drawing Compendium, was a limited liability company organized under the laws of the state of Rhode Island on or about March 21, 2011.

5. Merchandise Incentives, LLC, d/b/a Elite Merchandise and Reporting was a limited liability organized under the laws of the state of Rhode Island on or about August 12, 2011.

6. Lucky Dog, LLC ("Lucky Dog") d/b/a Independent Catalogue Services ("ICS") was a limited liability organized under the laws of the state of Rhode Island on or about January 12, 2012.

7. Premier Caging Services, LLC was a limited liability organized under the laws of the state of Rhode Island on or about June 6, 2012.

8. Merchandise Incentives, LLC was a limited liability company organized under the laws of the state of Rhode Island on or about October 12, 2016.

9. Destiny Merchandise, LLC ("Destiny") d/b/a Premium Opportunities & Incentives ("POI") was a limited liability organized under the laws of the state of Rhode Island on or about October 12, 2016.

10. A prize notice is defined as a mailed solicitation to a victim that contains fraudulent and materially false information designed to induce a victim into believing that they won a prize, award, or sum of money. A prize notice often displays the "prize" prominently and includes a collection of indicia (such as large bold font, stamps, seals, signatures, and check boxes that appeared to have been applied by hand) to convey that the prize notice is legitimate, "official" or sponsored by a government entity. To obtain

the "prize," the solicitation often represents that the victim must pay a fee (often between \$20-\$30) as a "report fee," "transmittal fee," "accounting fee," or similar language. Yet, these prize notices often contain an obscure disclaimer with difficult to read and understand language which states that victims who respond (and pay money) will not receive a prize, but instead receive a near-worthless sweepstakes report or a low value piece of merchandise. Many victims of prize notice schemes are elderly and vulnerable.

11. MEAGAN E. SHINE rented lists of consumer information, and refined the lists to target those most likely to respond. Many of the lists MEAGAN E. SHINE rented contained names, addresses, and other information of victims of other fraudulent and deceptive schemes. A "front end" prize notice is defined as an initial prize notice that is mailed to a list of prospective victims.

12. A "back end" prize notice is defined as part of a series of repetitious prize notices that are mailed to a targeted group of victims deemed highly likely to remit payment in response to a prize notice. These victims are deemed highly likely to remit payment because they often previously remitted payment in response to a prior "front end" or "back end" mailing. These "back end" mailings are often sent to victims at weekly (or at sometimes more frequent) intervals.

COUNTS ONE - FOUR
(*Mail Fraud* - 18 U.S.C. §§ 1341, 2)

13. Paragraphs 1 through 12 are re-alleged and are incorporated by reference as if fully set forth herein.

14. Beginning on an unknown date, but not later than in or around August 2008, and continuing through in or around December 2018, in the District of Rhode Island and elsewhere, the defendant,

MEAGAN E. SHINE,

with others, known and unknown to the Grand Jury, attempted to and did commit the offense of mail fraud as follows: by knowingly and with intent to defraud, devising a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that they were false and fraudulent when made, and did, for the purpose of executing and attempting to execute the scheme, knowingly cause any matter or thing whatever to be delivered by mail and by any private and commercial interstate carrier according to the direction thereon.

Object of the Scheme and Artifice to Defraud and To Obtain Money and Property
("the scheme" or "the Scheme")

15. It was the object of the scheme to unlawfully enrich the defendant, MEAGAN E. SHINE, and others, known and unknown to the United States, by causing victims to remit payments via United States Mail in response to fraudulent and materially

misleading prize notices and then distributing the fraudulently obtained proceeds to themselves and others.

Manner and Means of the Scheme

16. It was part of the scheme that MEAGAN E. SHINE and others created business entities, and fictitious business names for those entities, including, but not limited to:

- a. Destiny Merchandise, LLC, d/b/a Premium Opportunities & Incentives;
- b. Merchandise Incentives, LLC;
- c. Premier Caging Services, LLC;
- d. Lucky Dog, LLC, d/b/a Independent Catalogue Services;
- e. Merchandise Incentives, LLC, d/b/a Elite Merchandise and Reporting;
- f. Marketing Advisors, LLC, d/b/a Prize Research Publications, Ultimate Opportunity Disclosures, Winning Opportunities Group, Sweepstakes Made Easy, and Sweepstakes Drawing Compendium;
- g. ORA, LLC, d/b/a Prize Report Commission, Corporate, Cash & Prize Directives, and U.S. Sweeps Reporting; and
- h. Marketing International Management LLC, d/b/a Global Prize Compendium, Consolidated Awards Group, American Sweepstakes Reporting, and International Award Opportunities.

17. It was part of the scheme that MEAGAN E. SHINE and others used fictitious names for those entities.

18. It was part of the scheme that MEAGAN E. SHINE and others rented lists of consumer information from third parties, created their own lists of consumer information using names of victims who previously paid in response to fraudulent prize notices, and rented their lists to other fraudulent mailers.

19. It was part of the scheme that MEAGAN E. SHINE and others prepared, sent, and caused to be sent a variety of fraudulent prize notices through the United States Postal Service.

20. It was part of the scheme that MEAGAN E. SHINE and others utilized mail schedules to send "front end" and "back end" prize notices, thereby identifying victims who were vulnerable to the scheme and sending to those victims frequent and repeated prize-notice mailings to maximize the number of times a victim would send money.

21. It was part of the scheme that MEAGAN E. SHINE and others mailed prize notices that deceived their victims into believing that they had received an urgent notice of a large cash or other valuable prize. The prize notices often mimicked official or government approval and possessed titles such as "Official Identification Document," "Financial Advisory," "Notification of Payments Pending," and "Notice of Intent to Deliver / Division of Unawarded Prizes." The mailings appeared to be sent by corporate organizations with names such as: "Independent Catalog Services," "Prize Report Commission," "ICS Cash and Prizes Award Department," and "Opportunity Advisory."

Many prize notices purported to come from individuals who possessed official titles such as "Reporting Director," "Executive Director," "Director of Distributions," or "Managing Director."

22. It was part of the scheme that prize notices mailed by MEAGAN E. SHINE and others contained materially false and fraudulent representations intended to deceive their victims into believing they had already won or were close to winning a large cash or other valuable prize.

23. It was part of the scheme that MEAGAN E. SHINE and others used graphics (such as stamps, seals, signatures, and check boxes that appeared to have been applied by hand) with the intent to induce their victims into believing that their prize notice was unique to them and personally handled.

24. It was part of the scheme that MEAGAN E. SHINE and others mailed hundreds and thousands of prizes notices at a given time. Each prize notice appeared to be individually prepared for the victim, often repeating the victim's name throughout and containing unique document and claim numbers and asking the victim to confirm their identity as the person to whom the prize notice was addressed. In reality, these prize notices were form letters intended to induce the victim into believing that they were individually selected for a prize.

25. It was part of the scheme that MEAGAN E. SHINE and others included purported disclaimers in the prize notices stating, among other things, that those who responded would receive a report listing sweepstakes they could enter or a piece of low-

cost merchandise. However, the purported disclosures did not correct the false statements and misrepresentations described elsewhere in the prize notices. That is, in part, because the defendant, MEAGAN E. SHINE and others intentionally hid and obscured the purported disclaimer language in their prize notices and intended for their purported disclaimers to be ineffective.

26. It was part of the scheme that MEAGAN E. SHINE and others instructed their prize notice victims to return a small fee, generally between \$20 and \$30, along with a portion of the prize notice. The mailings contained a return envelope addressed to post office boxes rented, operated, and controlled by the defendant, MEAGAN E. SHINE.

27. It was part of the scheme that MEAGAN E. SHINE and others directed victims to send responses and money through the United States Postal Service to post office boxes located in Rhode Island and elsewhere. One such post office box (among others) was PO Box 6267, Providence, RI 02940.

28. It was part of the scheme that instead of sending paying victims the large cash or other valuable prize represented in their prize notices, MEAGAN E. SHINE and others often used the United States Postal Service to send paying victims a near-worthless booklet containing publicly available sweepstakes rules, a small and inexpensive piece of jewelry or similar merchandise, or both.

29. It was part of the scheme that MEAGAN E. SHINE and others received and responded to frequent letters and notes from victims of their prize notice scheme, government authorities, and consumer advocates, including such correspondence from

victims who inquired about the status of prize money after they paid the requested fees, complained about having not received their prize money after paying fees, and related that they were in fact deceived and that MEAGAN E. SHINE and others were carrying out a “scam” (or similar term). The response often included refunding victims their fees with the intent to deflect suspicion of their activities and conceal their scheme from government authorities and consumer advocates.

30. It was part of the scheme that MEAGAN E. SHINE and others utilized a third-party payment processor located in Canada and utilized financial institutions to deposit, process, and distribute victims’ payments to themselves and others for the purpose of personal enrichment.

31. It was part of the scheme that MEAGAN E. SHINE and others paid individuals known as J.M. and L.M. as consultants to provide advice and support on the operation of the scheme, including advice on lists of potential victims to rent from other mailers.

32. It was part of the scheme that MEAGAN E. SHINE and others utilized a software company operated by J.M. and L.M. to host a database of victims that had responded to the prize notices. The software company also provided data-processing services, including creating mailing files of addresses for back end prize notice mailings.

33. It was a part of the scheme that MEAGAN E. SHINE and others collected more than \$10 million from victims during the course of their scheme.

Acts in Furtherance of the Scheme

34. In furtherance of the scheme, MEAGAN E. SHINE and others, engaged in the following acts, among others.

35. On or about August 27, 2008, MEAGAN E. SHINE, then known as Meagan Roberts, filed articles of organization with the State of Rhode Island to establish Marketing International Management, LLC, listing herself as the sole manager. Between on or about May 5, 2009, and on or about February 24, 2010, MEAGAN E. SHINE filed or caused to be filed fictitious business name statements listing International Award Opportunities, Global Prize Compendium, Consolidated Awards Group, and American Sweepstakes Reporting, as fictitious business names for Marketing International Management, LLC.

36. In or around December 2010, MEAGAN E. SHINE and others caused a prize notice to be delivered throughout the United States via the U.S. Postal Service. The prize notice from "International Award Opportunities" stated "TOTAL IDENTIFIED UNAWARDED PRIZES OVER: * * * * \$3,500,000.00 * * * * ." and on the next line, "OFFICIAL NOTIFICATION OF UNAWARDED CASH AND PRIZES IS HEREBY ACKNOWLEDGED AND PRIZES IN THE AMOUNT OF NO LESS THAN \$3,500,000.00 ARE GUARANTEED AND ON DEPOSIT."

The prize notice then added:

"NOTIFICATION OF AVAILABLE UNAWARDED CASH AND PRIZES" followed by: "[Victim's name and address], has been officially recognized with regards to the amount over \$3,500,000.00 in prizes, and as of 12/16/2010, legally eligible to enter and receive

the FULL amount described herein. This opportunity is reserved for you under Personal Identification number 20065050523. Your prompt payment guarantees immediate reporting of these monies, documented completely with all necessary entry and claim instructions including deadlines." A different page of the prize notice was titled: "PRIZE NOMINATION CERTIFICATE." On this same page, victims were asked to confirm their eligibility and enclose a \$20 fee with their response.

37. On or about September 16, 2010, MEAGAN E. SHINE, then known as Meagan Quinn, filed articles of organization with the State of Rhode Island to establish ORA, LLC, listing herself as the sole manager. On or about September 17, 2010, MEAGAN E. SHINE filed or caused to be filed fictitious business name statements listing Prize Report Commission, Corporate, Cash & Prize Directives, and U.S. Sweeps Reporting, as fictitious business names for ORA, LLC.

38. On or about March 21, 2011, MEAGAN E. SHINE, then known as Meagan Quinn, filed articles of organization with the State of Rhode Island to establish Marketing Advisors, LLC, listing herself as the agent and the sole manager. On or about March 21, 2011, MEAGAN E. SHINE filed or caused to be filed fictitious business name statements listing Prize Research Publications, Ultimate Opportunity Disclosures, Winning Opportunities Group, Sweepstakes Made Easy, and Sweepstakes Drawing Compendium as the fictitious business names for Marketing Advisors, LLC.

39. On or about August 11, 2011, MEAGAN E. SHINE, then known as Meagan Quinn, filed articles of organization with the State of Rhode Island to establish Merchandise Incentives, LLC, listing herself as the manager. On or about September 13,

2011, MEAGAN E. SHINE filed or caused to be filed a fictitious business name statement listing Elite Merchandise and Reporting as the fictitious business name for Merchandise Incentives, LLC.

40. On or about January 12, 2012, an individual known as M.S. filed articles of organization with the State of Rhode Island to establish Lucky Dog, LLC, listing himself as the agent. On or about January 17, 2012, a fictitious business name statement was filed listing Independent Catalogue Services as the fictitious business name for Lucky Dog. On or about April 24, 2013, an amendment was filed to the articles of organization changing the company from member-managed to manager-managed, and adding MEAGAN E. SHINE, then Meagan Roberts Quinn, as a manager. On or about September 28, 2016, MEAGAN E. SHINE filed or caused to be filed a statement of change of agent, changing the agent for Lucky Dog, and listing herself as the new agent for Lucky Dog.

41. In or around April 2014, MEAGAN E. SHINE and others caused a prize notice to be delivered throughout the United States via the U.S. Postal Service. The prize notice from "Independent Catalogue Services" stated "NOTICE OF INTENT TO DELIVER DIVISION OF UNAWARDED PRIZES."

The prize notice then added:

"Dear [Victim's Name], As executive director of Independent Catalogue Services, it brings me great pleasure to inform you of this momentous opportunity that has been bestowed upon you on this day, 04/21/2014. [Victim's Name and Address] you have been guaranteed with no exceptions, full eligibility to over \$3,015,450.00 in cash & prize opportunities by third party sponsors. According to our records ensuing an in depth and complex data verification

process, you have been successfully selected and specifically assigned the following PERSONAL IDENTIFICATION NUMBER: ***** [Victim's Name] PIN: 10001952934 RE \$3,015,450.00***** [Victim's Name], to finalize all the necessary procedures required for complete delivery of your over \$3,015,450.00 in cash directives, simply complete Requisition 15ICS-08 and return it to Independent Catalogue Services in the enclosed envelope with \$20 document fee postmarked by 05/05/2014." A different page of the prize notice stated "THIS FORMAL NOTICE FROM THE WIN-OPPORTUNITIES DIVISION CONTROLLER CONFIRMS THAT RELEASE OF THEIR REPORT OF ENTRY DIRECTIVES AND PROCEDURES FOR THE FULL AMOUNT OF \$3,015,450-00 IN CASH AND PRIZES TO [Victim's Name and Address] IS NOW READY. TO COMPLETE THIS REQUEST AND RECEIVE ENTRY DIRECTIVES REGARDING THE FULL \$3,015,450.00, IT IS REQUIRED THAT YOU RETURN THE PRIZE PAYOUT ENTRY DIRECTIVES AUTHORIZATION BELOW BY MAIL AS FOLLOWS. SIGN, DETACH AND ENCLOSE WITH NOTED REPORT FEE IN THE RETURN ENVELOPE PROVIDED POSTMARKED BY 05/06/2014. [Victim's Name], THE LAW REQUIRES THAT THE FULL \$3,015,450-00 WILL BE DISTRIBUTED BY AN INDEPENDENT SWEEPSTAKES SPONSORS. HOWEVER, OUR POLICIES PROHIBIT US FROM DELIVERING ANY PRIZE ENTRY DATA TO YOU IF YOU DO NOT RESPOND BY 05/06/2014 AS INDEPENDENT SPONSORS STRICTLY ENFORCE ENTRY DEADLINES. THAT WOULD BE YOUR TERRIBLE LOSS. PLEASE TAKE CARE OF THIS NOW BEFORE TIME SLIPS AWAY FROM YOU. WE LOOK FORWARD TO SENDING YOU THE FULLY APPROVED REPORT VERY SOON." On this same page, victims were asked to confirm their eligibility and enclose a \$20 fee with their response.

42. On or about June 6, 2012, an individual known as M.P. filed articles of organization with the State of Rhode Island to establish Premier Caging Services, LLC, listing herself as the agent, at the instruction of MEAGAN E. SHINE.

43. On or about October 12, 2016, MEAGAN E. SHINE filed articles of organization with the State of Rhode Island to establish Merchandise Incentives, LLC, listing herself as the agent.

44. On or about October 12, 2016, MEAGAN E. SHINE filed articles of organization with the State of Rhode Island to establish Destiny Merchandise, LLC, listing herself as the agent. On or about November 16, 2016, MEAGAN E. SHINE filed a fictitious business name statement listing Premium Opportunities and Incentives as the fictitious business name for Destiny Merchandise, LLC.

45. On or about February 3, 2017, MEAGAN E. SHINE sent an e-mail to M.P. In that e-mail, MEAGAN E. SHINE wrote: “[c]an’t try anything new until we get some more cash flow going. I’m not against this idea. I’m not going to just immediately bail on merchandise. We made an investment in it. If we need to keep doing sweeps for a while to get some cash flow so be it. I do plan on doing the 2 sweeps mailing you suggested earlier this week. I just need to figure out when we can do it. Hopefully I’ll know better by Tuesday.”

46. In or around November 2018, MEAGAN E. SHINE and others caused a prize notice to be delivered throughout the United States via the U.S. Postal Service. The prize notice from “Premium, Opportunities & Incentives” stated “PROCEDURE 1: PRE-REGISTRATION” and on the next line, “ON 10/26, [VICTIM’S NAME] WAS PRE-REGISTERED FOR THE OPPORTUNITY TO CLAIM A PRIZE AGENDA REPORT TOTALING \$3,000,000.”

The prize notice then added:

"PROCEDURE 2: MONITORED DELIVERY" followed by: "[VICTIM'S ADDRESS] ADDRESS. THESE OUTGOING DOCUMENTS WERE ASSIGNED A UNIQUE MONITORING & TRACKING CODE 80104875645. THIS CODE WAS ALSO ASSIGNED TO YOUR PREMIER OFFER OF A CULTURED PEARL & SWAROVSKI CRYSTAL BRACELET AT YOUR ACCEPTANCE OF PRIZE AGENDA REPORT. . . YOU ARE NOW ASKED TO COMPLETE THE DOCUMENT BELOW IN ACCORDANCE WITH THE INSTRUCTIONS TO CLAIM THE \$3,000,000 PRIZE AGENDA REPORT DESCRIBED. >>> Use the MONITORED DELIVERY ENVELOPE for your response. Due to importance of this \$3,000,000 opportunity, Premium, Opportunities & Incentives encourages you to return the Acceptance Prize Agenda Form A.S.A.P. >>>This document is non-transferable and is for your use alone to claim \$3,000,000 Prize Agenda eligibility. It is essential you place your response in return mail by 11/16." Below this is the portion of the prize notice that victims were asked to send with payment, which states in large text: "ACCEPTANCE FORM \$ AMOUNT: * * \$3,000,000.00 * * THREE MILLION DOLLARS AND 00/100." Victims were asked to confirm their eligibility and enclose a \$25 fee with their response.

47. On or about November 20, 2018, M.P. sent an e-mail to a representative of COMPANY 1 at the instruction of MEAGAN E. SHINE. In that e-mail, M.P. directed COMPANY 1 to prepare prize notices to be mailed to victims who previously remitted payments to MEAGAN E. SHINE and others in response to earlier prize notices.

48. On or about November 26, 2018, MEAGAN E. SHINE sent an e-mail to M.P. The e-mail contained a reminder from the U.S. Postal Service for MEAGAN E. SHINE to renew the lease for PO Box 6267, Providence, RI 02940. On or about November 26, 2018, M.P. agreed to renew the lease for PO Box 6267, Providence, RI 02940.

49. On or about November 26, 2018, M.P. sent an e-mail to a representative of COMPANY 2 at the instruction of MEAGAN E. SHINE. M.P.'s e-mail authorized COMPANY 2 to prepare and mail prize notices.

50. Between on or about November 26, 2018, and on or about November 28, 2018, M.P. electronically remitted three payments at the instruction of MEAGAN E. SHINE, which totaled \$5,237.70, to COMPANY 2, for the preparation and mailing of prize notices.

51. On or about December 7, 2018, M.P. electronically remitted three payments at the instruction of MEAGAN E. SHINE, which totaled \$4,873.02, to COMPANY 2, for the preparation and distribution of prize notices.

Execution of the Scheme

52. On or about the dates set forth in the chart below, in the District of Rhode Island and elsewhere, MEAGAN E. SHINE, also known as "Meagan Quinn" and "Meagan Roberts," knowingly, and with the intent to defraud, devised a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that they were false and fraudulent when made, and did, for the purpose of executing and attempting to execute the scheme, knowingly cause to be delivered by mail and by any private and commercial interstate carrier according to the direction thereon:

<u>Count</u>	<u>Approximate Date</u>	<u>Means of Executing Scheme to Defraud</u>
1	Between on or about November 19, 2018 and December 2018.	Caused "URGENT MEMO" \$3,000,000.00 prize notice to be sent to addresses in the United States

		and caused Victim responses to be sent to a post office box in Rhode Island, all by U.S. Mail.
2	Between on or about November 20, 2018 and December 2018.	Caused "TIME-SENSITIVE DOCUMENT NOTIFICATION" \$3,000,000.00 prize notice to be sent to addresses in the United States and caused Victim responses to be sent to a post office box in Rhode Island, all by U.S. Mail.
3	Between on or about November 30, 2018 and December 2018.	Caused "CONFIRMATION REQUEST" \$3,000,000.00 prize notice to be sent to addresses in the United States and caused Victim responses to be sent to a post office box in Rhode Island, all by U.S. Mail.
4	Between on or about November 16, 2018 and December 2018.	Caused "VERIFICATION DIVISION" \$3,000,000.00 prize notice to be sent to addresses in the United States and caused Victim responses to be sent to a post office box in Rhode Island, all by U.S. Mail.

Each in violation of 18 U.S.C. §§ 1341 and 2.

COUNT 5

(Conspiracy To Commit Mail Fraud - 18 U.S.C. § 1349)

53. Paragraphs 1 through 52 are re-alleged and are incorporated by reference as if fully set forth herein.

54. Beginning on an unknown date, but not later than in or around August 2008, and continuing through in or around December 2018, in the District of Rhode Island and elsewhere, the defendant,

MEAGAN E. SHINE,

knowingly combined, conspired, and agreed with others, known and unknown to the Grand Jury, to attempt to commit and to commit the offense of mail fraud as follows: by knowingly and with intent to defraud, devising a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that they were false and fraudulent when made, and did, for the purpose of executing and attempting to execute the scheme, knowingly cause any matter or thing whatever to be delivered by mail and by any private and commercial interstate carrier according to the direction thereon.

Object of the Conspiracy

55. The object of the conspiracy was the same as the object of the scheme. Accordingly, paragraph 15 is re-alleged and is incorporated by reference as if fully set forth herein.

Manner and Means of the Conspiracy

56. The manner and means of the conspiracy was the same as the manner and means of the scheme. Accordingly, paragraphs 16-33 are re-alleged and are incorporated by reference as if fully set forth herein.

Acts in Furtherance of the Conspiracy

57. In furtherance of the conspiracy, MEAGAN E. SHINE and others, engaged in at least one of the acts taken in furtherance of the scheme. Accordingly, paragraphs 34-51 are re-alleged and are incorporated by reference as if fully set forth herein.

All in violation of 18 U.S.C. § 1349.

FORFEITURE ALLEGATION

18 U.S.C. §§ 981(a)(1)(c), 982(a)(3) and 28 U.S.C. § 2461(c)

Upon conviction of any of Counts 1 through 5 of this Indictment, MEAGAN E. SHINE, also known as "Meagan Quinn" and "Meagan Roberts," shall forfeit to the United States, pursuant to 18 U.S.C. §§ 981(a)(1)(c), 982(a)(3), and 28 U.S.C. § 2461(c), all right, title, and interest in any and all property, real or personal, which constitutes or is derived from proceeds traceable to the defendant's violations of 18 U.S.C. §§ 1341 and 1349, and a sum of money equal to the total amount of proceeds obtained as a result of the offenses, including but not limited to:

- the real property known as 35 Westford Avenue, Warwick, Rhode Island, 02889;
- \$19,990.91 in funds from Pawtucket Credit Union Acct. #xxxx0401) obtained pursuant to seizure warrant Case No. 1:18MJ439LDA;
- \$100,768.00 in funds from Pawtucket Credit Union Acct. #xxxx0371) obtained pursuant to seizure warrant Case No. 1:18MJ 440LDA;

- \$11,409.39 in funds from Pawtucket Credit Union Acct. #xxxx9035) obtained pursuant to seizure warrant Case No. 1:18MJ 441LDA;
- \$202,885.14 in funds from Pawtucket Credit Union Acct. #xxxx8145) obtained pursuant to seizure warrant Case No. 1:18MJ 442LDA; and
- \$100,000.00 in funds from Washington Trust Acct. #xxxx7840) obtained pursuant to seizure warrant Case No. 1:18MJ447LDA;
- The following items that were seized from MEAGAN SHINE's residence in Warwick, Rhode Island on December 11, 2011:
 - Three stone ring, diamond, platinum and 18K yellow gold;
 - Diamond ring with a 2.5 ctw radiant cut natural diamond;
 - 1.5ctw Asscher cut natural diamond with HI color and SI clarity set in a platinum halo style ring ;
 - 10mm cultured pearl with white color set in an 18k Solari Station David Yurman ring; and
 - David Yurman split shank design ring with (42) 0.01ctw round cut natural diamonds.

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 subdivided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. §2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in paragraph above.

All pursuant to 18 U.S.C. §§ 981(a)(1)(c), 982(a)(3), as incorporated by 28 U.S.C. § 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL:



GRAND JURY FOREPERSON

Dated: 6.17.2024

ZACHARY A. CUNHA
United States Attorney

Handwritten signature of Sarah Miron Bloom in cursive.

SARAH MIRON BLOOM
First Assistant U.S. Attorney

AMANDA M. LISKAMM
Director
Consumer Protection Branch

Handwritten signature of Charles B. Dunn in cursive, written over a horizontal line.

CHARLES B. DUNN
COLIN W. TRUNDLE
ANN F. ENTWISTLE
Trial Attorneys
Consumer Protection Branch

Handwritten signature of Lee H. Vilker in cursive.

LEE H. VILKER
Assistant U.S. Attorney
Criminal Division Chief

Handwritten signature of Denise Marie Barton in cursive, written over a horizontal line.

DENISE MARIE BARTON
PETER ROKLAN
Assistant U.S. Attorneys

DATE: JUNE 17, 2024

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: INFORMATION INDICTMENT COMPLAINT

CASE NO. 1:24CR53MSM-PAS

Matter Sealed: Juvenile Other than Juvenile

Pre-Indictment Plea Superseding Defendant Added
 Indictment Charges/Counts Added
 Information

USA vs.

Defendant: MEAGAN E. SHINE
a/k/a "Meagan Roberts", a/k/a "Meagan Quinn"

Address: [REDACTED]

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND
 DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person Furnishing Information on THIS FORM ZACHARY A. CUNHA
 U.S. Atty Other U.S. Agency
 Phone No. (401) 709-5000

Interpreter Required Dialect: _____

Name of Asst. U.S. Attorney (if assigned) Denise Barton

Birth Date [REDACTED] Male Alien
 Female (if applicable)

PROCEEDING

Social Security Number [REDACTED]

Name of Complainant Agency, or Person (& Title, if any)
United States Postal Inspection Service

person is awaiting trial in another Federal or State Court (give name of court)

this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:
 U.S. Atty Defense

this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.

MAG. JUDGE CASE NO.

Place of offense RHODE ISLAND County

DEFENDANT

Issue: Warrant Summons

Location Status:

Arrest Date _____ or Date Transferred to Federal Custody _____

Currently in Federal Custody
 Currently in State Custody
 Writ Required
 Currently on bond
 Fugitive

Defense Counsel (if any): _____

FPD CJA RET'D
 Appointed on Target Letter

This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 5

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	See attached cover sheet		<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 3	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

Submit

Go

1:24CR53MSM-PAS

UNITED STATES v. MEAGAN E. SHINE, a/k/a “Meagan Roberts” and “Meagan Quinn”

INDICTMENT COVER SHEET ATTACHMENT

Counts 1-4: **(Mail Fraud, 18 U.S.C. §§ 1341, 2)**

MAX PENALTY

- a. 20 years imprisonment;
- b. \$250,000 fine or twice the gross gain or loss;
- c. 3 years supervised release; and
- d. \$100 special assessment.

Count 5: **(Conspiracy to Commit Mail Fraud, 18 U.S.C. § 1349)**

MAX PENALTY

- e. 20 years imprisonment;
- f. \$250,000 fine or twice the gross gain or loss;
- g. 3 years supervised release; and
- h. \$100 special assessment.

FORFEITURE ALLEGATION