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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY s/ emilybl DEPUTY

s/ SuzanneA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

December 2020 Grand Jury

UNITED STATES OF AMERICA,
Plaintiff,

v.

TRACY ADRINE KNOWLES (1),
ADONIS ALEXIS BUTLER WONG (2),
TIMOTHY INGRAM (3),
aka "Bleezy",
ANAJAH GIFFORD (4),
LYDA HARRIS (5),
JOAQUIN LOPEZ (6),
JACK OWUOR (7),
TRACY GLINTON (8)

Defendants.

Case No. '21 CR2216 CAB

INDICTMENT

Title 18, U.S.C., Sec. 1962(d) – Conspiracy to
Conduct or Participate in an Enterprise
Through a Pattern of Racketeering Activity;
Title 18, U.S.C., Sec. 1963 – Criminal
Forfeiture

ORDERED UNSEALED on 08/24/2021 s/ SuzanneA

The grand jury charges:

At all times material to this Indictment:

Count 1

(Conspiracy to Conduct or Participate in an Enterprise
Through a Pattern of Racketeering Activity)

THE ENTERPRISE

1. Defendants TRACY ADRINE KNOWLES, ADONIS ALEXIS BUTLER WONG,
TIMOTHY INGRAM, aka "Bleezy," ANAJAH GIFFORD, LYDA HARRIS, JOAQUIN
LOPEZ, JACK OWUOR, and TRACY GLINTON, and others known and unknown to the
grand jury, were members and associates of a criminal organization referred to hereinafter
as "THE ENTERPRISE." In furtherance of a nationwide "grandparent scam" that targeted
elderly Americans, members and associates of THE ENTERPRISE engaged in extortion,

1 fraud, and money laundering. At all relevant times, THE ENTERPRISE operated
2 throughout the United States, including in the Southern District of California.

3 2. THE ENTERPRISE, including its leaders, members, and associates,
4 constituted an "enterprise," as defined in Title 18, United States Code, Section 1961(4), that
5 is, a group of individuals associated in fact, although not a legal entity. The enterprise
6 constituted an ongoing organization whose members functioned as a continuing unit for a
7 common purpose of achieving the objectives of the enterprise. The enterprise engaged in,
8 and its activities affected, interstate and foreign commerce.

9 3. Members and associates of THE ENTERPRISE played different roles in the
10 enterprise at different times:

11 a. At various times relevant to this Indictment, members and associates
12 acted as mules for THE ENTERPRISE. Mules, or couriers, received and transferred money
13 obtained from victims. Mules generally received or transferred victim-sourced funds through
14 in-person cash pick-ups, mailed cash payments, peer-to-peer transfers, and wire transfers
15 into bank accounts associated with the mules. After receiving funds, mules transferred the
16 criminal proceeds to other members or associates of the enterprise. At times, mules recruited
17 others to serve as mules for THE ENTERPRISE.

18 b. At various times relevant to this Indictment, members and associates
19 acted as crew leaders for THE ENTERPRISE. Crew leaders recruited, organized, and
20 directed groups of mules. Crew leaders collected, transferred, and tracked victim money as
21 it moved from mules to others within THE ENTERPRISE. Crew leaders generally received
22 information regarding victim identification and contact from nationwide organizers, which
23 crew leaders then provided to mules for money pick-ups.

24 c. At various times relevant to this Indictment, members and associates
25 acted as nationwide organizers for THE ENTERPRISE. Nationwide organizers provided
26 information to crew leaders regarding, among other things, identification and location of
27 victims, timing and amounts of cash pickups, and incoming wire transfers.

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MEMBERS AND ASSOCIATES OF THE ENTERPRISE

4. The following defendants were members and associates of THE ENTERPRISE:

- a. TRACY ADRINE KNOWLES (“KNOWLES”), a resident of Florida;
- b. ADONIS ALEXIS BUTLER WONG (“BUTLER”), a resident of Florida;
- c. TIMOTHY INGRAM, aka Bleezy, (“INGRAM”), a resident of California;
- d. ANAJAH GIFFORD (“GIFFORD”), a resident of California;
- e. LYDA HARRIS (“HARRIS”), a resident of Arizona;
- f. JOAQUIN LOPEZ (“LOPEZ”), a resident of Florida;
- g. JACK OWUOR (“OWUOR”), a resident of California; and
- h. TRACY GLINTON (“GLINTON”), a resident of Florida.

5. The following persons, each of whose identity is known to the Grand Jury, were mules for THE ENTERPRISE:

- a. “Mule-1,” a resident of California;
- b. “Mule-2,” a resident of California;
- c. “Mule-3,” a resident of California;
- d. “Mule-4,” a resident of Florida;
- e. “Mule-5,” a resident of California;
- f. “Mule-6,” a resident of Florida;
- g. “Mule-7,” a resident of Florida;
- h. “Mule-8,” a resident of California;
- i. “Mule-9,” a resident of California;
- j. “Mule-10,” a resident of California;
- k. “Mule-11,” a resident of California; and
- l. “Mule-12,” a resident of Florida.

PURPOSES OF THE ENTERPRISE

6. The purposes of the enterprise included the following, among others:

- a. To enrich the members and associates of the enterprise through, among other things, fraud and extortion;

1 b. To obtain, preserve, and protect the proceeds of the enterprise through
2 acts of money laundering; and

3 c. To protect the enterprise and its members and associates from detection,
4 apprehension, and prosecution by law enforcement.

5 MANNER AND MEANS OF THE ENTERPRISE

6 7. The means and methods by which members and associates of the enterprise
7 agreed to conduct and participate in the conduct of the affairs of the enterprise included, but
8 were not limited to, the following:

9 a. Members and associates contacted elderly victims, usually by telephone,
10 and impersonated a grandchild, other close relative, or friend of the victim. Members and
11 associates falsely convinced the victims their relatives were in legal trouble and needed
12 money to pay for bail, pay medical expenses for car accident victims, or prevent additional
13 charges from being filed.

14 b. To convince the victims of their legitimacy, members and associates
15 impersonated attorneys and employees of security and courier services. Members and
16 associates also provided victims with false file or case numbers, and used nicknames known
17 to the victims.

18 c. To increase the likelihood of successfully obtaining money from the
19 victims, members and associates instructed the victims to lie to family, friends, and
20 representatives of financial institutions. Specifically, at times during the conspiracy:

21 i. Members and associates instructed victims not to tell family
22 members.

23 ii. Members and associates told victims that a judge had entered a
24 gag order in their relative's court case, prohibiting the victim from discussing the existence
25 of the case with anyone, including family or friends. Victims were further instructed that, if
26 they violated the gag order, they or their relative would face increased penalties, including
27 criminal charges and imprisonment.

28

1 iii. Members and associates instructed victims to provide false
2 information to financial institutions when withdrawing or transferring money, including
3 providing false reasons for the withdrawal or transfer.

4 d. Through such extortion and fraud, members and associates induced
5 elderly victims to each provide thousands to tens of thousands of dollars to purportedly help
6 their grandchild, close relative, or friend. Members and associates obtained money from
7 victims generally through in-person cash pick-ups, use of the mail and commercial carriers,
8 cashier's checks, and wire transfers.

9 e. Members and associates took steps to conceal their true identities from
10 victims and law enforcement, including using false names, renting residences for the purpose
11 of receiving cash sent through the mail and commercial carriers, and using rental cars or
12 ride share vehicles to pick up funds from victims.

13 f. Members and associates transferred funds obtained from victims among
14 members and associates of THE ENTERPRISE using various means. Specifically:

15 i. Members and associates arranged for the in-person transfer of
16 cash from mules to crew leaders and others.

17 ii. In the case of wire transfers sent by victims, members and
18 associates quickly withdrew or transferred the funds from the receiving account.

19 iii. To ensure that each member of the enterprise obtained his or her
20 "cut" of the proceeds, members and associates transferred money in cash, wire transfers, and
21 through various peer-to-peer mobile applications, including through the accounts of
22 associates.

23 iv. Members and associates converted victim proceeds from fiat
24 currency to cryptocurrency.

25 g. Members and associates traveled throughout the United States to pick
26 up cash in person from victims, collect cash mailed by victims, and transfer money to other
27 members of the enterprise.

1 h. Members and associates recruited additional individuals to serve as
2 mules through various means, including social media platforms.

3 i. Members and associates used various means to communicate with each
4 other regarding victims and the transfer of money, including text messages and encrypted
5 messaging applications.

6 **THE RACKETEERING CONSPIRACY**

7 8. Beginning on or before November 1, 2019, the exact date being unknown to the
8 grand jury, and continuing until on or about October 14, 2020, within the Southern District
9 of California and elsewhere, defendants TRACY ADRINE KNOWLES, ADONIS ALEXIS
10 BUTLER WONG, TIMOTHY INGRAM, aka "Bleezy," ANAJAH GIFFORD, LYDA HARRIS,
11 JOAQUIN LOPEZ, JACK OWUOR, and TRACY GLINTON, and others known and unknown
12 to the grand jury, being persons employed by and associated with THE ENTERPRISE, which
13 enterprise was engaged in, and the activities of which affected, interstate and foreign
14 commerce, did knowingly, willfully, and unlawfully combine, conspire, confederate, and
15 agree with each other, and with others, to violate Title 18, United States Code,
16 Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of
17 the affairs of the enterprise through a pattern of racketeering activity, as that term is defined
18 in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of:

19 a. Multiple acts involving extortion, which is chargeable under California
20 Penal Code, Sections 182(a)(1), 518(a), and 524;

21 b. Multiple acts indictable under:

22 i. Title 18, United States Code, Section 1341 (relating to mail fraud);
23 ii. Title 18, United States Code, Section 1343 (relating to wire fraud);
24 iii. Title 18, United States Code, Section 1344 (relating to financial
25 institution fraud);

26 iv. Title 18, United States Code, Section 1956 (relating to the
27 laundering of monetary instruments); and
28

1 v. Title 18, United States Code, Section 1957 (relating to engaging in
2 monetary transactions in property derived from specified unlawful activity).

3 9. It was a part of the conspiracy that each defendant agreed that a conspirator
4 would commit at least two acts of racketeering activity in the conduct of the affairs of the
5 enterprise.

6 **OVERT ACTS**

7 10. In furtherance of the conspiracy and to achieve the object thereof, defendants,
8 and others known and unknown, committed and caused to be committed overt acts, among
9 others, within the Southern District of California and elsewhere, including, but not limited
10 to, the following:

11 **Victim N.G.**

12 10.1. On or about November 1, 2019, an unknown male contacted N.G., an 82-
13 year-old woman residing in Richardson, Texas, claiming to be her grandson. The “grandson”
14 stated that he was in jail in California and needed N.G. to send money to help him get out.

15 10.2. On or about November 1, 2019, a second unknown male contacted N.G.,
16 claiming to be the attorney for her “grandson,” and provided N.G. with wire instructions for
17 the payment. That same day, N.G. went to her bank and sent a wire transfer to the account
18 provided to her by the “attorney.”

19 10.3. On or about November 1, 2019, Mule-1 received a wire transfer from N.G.
20 in the amount of \$20,000.

21 10.4. On or about November 2, 2019, INGRAM directed Mule-2 to instruct
22 Mule-1 to withdraw N.G.’s money from her bank account using multiple transactions, bank
23 locations, and withdrawal amounts of \$8,500 or less.

24 10.5. On or about November 5, 2019, Mule-1 received a second wire transfer
25 from N.G. in the amount of \$30,000.

26 10.6. Beginning on or about November 5, 2019, and continuing until on or
27 about November 14, 2019, INGRAM and Mule-2 exchanged messages relating to Mule-1’s
28

1 disposition of the funds received from N.G. INGRAM also instructed Mule-2 to delete the
2 messages between INGRAM and Mule-2.

3 Victim G.W.

4 10.7. On or about November 21, 2019, INGRAM exchanged a series of
5 messages with Mule-3, recruiting Mule-3 to receive a wire transfer into Mule-3's bank
6 account.

7 10.8. On or about December 17, 2019, an unknown male claiming to be an
8 assistant to an attorney in Florida contacted G.W., a 75-year-old man residing in Paso
9 Robles, California. The unknown male claimed that the son of G.W.'s friend was in jail in
10 Florida.

11 10.9. On or about December 17, 2019, a second unknown male pretending to
12 be the son of G.W.'s friend told G.W. by phone that he had been arrested after police pulled
13 him over for speeding and found a weapon in his car. The unknown male asked G.W. to pay
14 \$12,500 for his bail. On or about December 17, 2019, at the instruction of the two unknown
15 males, G.W. told bank employees that he was helping a friend with funeral expenses, and
16 sent a \$12,580 wire transfer to Mule-3's bank account.

17 10.10. On or about December 17, 2019, Mule-3 received the \$12,580 wire
18 transfer from G.W., then made two cash withdrawals in the amounts of \$8,500 and \$4,000.

19 10.11. On or about December 17, 2019, INGRAM met with Mule-3 in person to
20 collect the funds received from G.W.

21 10.12. On or about December 17, 2019, BUTLER directed INGRAM to deposit
22 \$11,322 to a bank account associated with Mule-4.

23 10.13. On or about December 17, 2019, INGRAM messaged BUTLER with an
24 image depicting a deposit receipt for \$11,300 into Mule-4's bank account.

25 10.14. On or about December 18, 2019, Mule-4's bank account originated a wire
26 transfer of \$8,770 to a bank account associated with HARRIS.

27 10.15. On or about December 20, 2019, HARRIS's bank account originated a
28 wire transfer of \$14,500 to a cryptocurrency exchange.

Victim A.H.

1
2 10.16. On or about January 5, 2020, INGRAM solicited Mule-5 for Mule-5's
3 bank account information.

4 10.17. On or about January 9, 2020, an unknown male contacted A.H, an 83-
5 year-old woman residing in La Quinta, California, by telephone, claiming to be her grandson.
6 Her "grandson" stated that he had been arrested in Florida for drug possession, and needed

7 A.H. to obtain a \$16,000 cashier's check and deposit it to a bank account. That same day,
8 A.H. deposited a \$16,000 cashier's check to Mule-5's bank account.

9 10.18. On or about January 9, 2020, BUTLER messaged INGRAM information
10 regarding a transfer to be sent from A.H. to Mule-5. Among other things, BUTLER provided
11 INGRAM with A.H.'s name, location, wire transfer amount, purported reason for transfer:
12 "Helping with funeral arrangements," and purported relation to Mule-5: "Very close friend."

13 10.19. On or about January 10, 2020, BUTLER directed INGRAM to send
14 \$1,600 each to Mule-4 for BUTLER and to GLINTON for KNOWLES.

15 10.20. On or about January 10, 2020, INGRAM instructed Mule-5 to send
16 \$1,600 each to Mule-4 and GLINTON using various peer-to-peer money transferring
17 services.

18 10.21. On or about January 10, 2020, Mule-5 sent \$1,600 to Mule-4 and \$1,600
19 to GLINTON.

Victim P.F.

20
21 10.22. On or about January 9, 2020, BUTLER messaged INGRAM that
22 unidentified co-conspirators wanted to send a wire transfer to Mule-3's account the following
23 day.

24 10.23. On or about January 10, 2020, an unknown female contacted P.F., an 81-
25 year-old woman residing in North Babylon, New York, by phone claiming to be P.F.'s
26 "granddaughter." The "granddaughter" stated that she had been arrested following a car
27 accident, and directed P.F. to speak to her attorney, "Robert Cole."
28

1 10.24. On or about January 10, 2020, an unknown male claiming to be attorney
2 "Robert Cole" told P.F. he needed \$12,000 in cash for her granddaughter.

3 10.25. On or about January 10, 2020, an unknown male picked up \$12,000 in
4 cash from P.F.

5 10.26. On or about January 10, 2020, "Robert Cole" again contacted P.F. and
6 told her that an additional \$26,000 was needed for her "granddaughter" to get a court date.

7 That same day, P.F. sent a \$26,000 wire transfer to a bank account belonging to Mule-3.

8 10.27. On or about January 10, 2020, INGRAM provided Mule-3 with the wire
9 sender's information, including P.F.'s name and address. INGRAM instructed Mule-3 to go
10 to two banks and withdraw \$8,500 from each.

11 Victims J.E. and H.A.

12 10.28. On or about January 16, 2020, an unknown female contacted J.E., a 76-
13 year-old man residing in Burbank, California, by phone, claiming to be his daughter-in-law.
14 She stated that she had been arrested following a traffic accident and needed \$14,000 for
15 bail.

16 10.29. On or about January 16, 2020, an unknown male contacted J.E. by
17 phone, claiming to be "Robert Cole," the attorney for J.E.'s daughter-in-law. "Cole" stated
18 that there was a gag order associated with the case prohibiting him from speaking with
19 anyone about it, and that, unless J.E. paid \$42,000 in cash that day, his daughter-in-law
20 would need to stay in jail for approximately one month. "Cole" further stated that a bail
21 bondsman named "James Taylor" would pick up the funds.

22 10.30. On or about January 16, 2020, an unknown male contacted H.A., a 77-
23 year-old man residing in Pasadena, California, by phone, claiming that H.A.'s grandson had
24 been arrested following a traffic collision. The unknown male, who identified himself as
25 "Walter Baker," stated that he needed \$23,700 for bail, that a gag order was in effect
26 prohibiting H.A. from discussing the accident, and that an individual named "James Taylor"
27 would pick up the money from H.A.'s residence.
28

1 10.31. On or about January 16, 2020, INGRAM and OWUOR drove together to
2 pick up money from J.E. and H.A. Specifically:

3 i. On or about January 16, 2020, INGRAM collected \$42,000 in cash
4 from J.E. in Burbank, California.

5 ii. On or about January 16, 2020, INGRAM sent OWUOR a message
6 containing the name of H.A., as well as the fictitious name "James Taylor."

7 iii. On or about January 16, 2020, OWUOR collected \$23,700 in cash
8 from H.A.

9 Victim P.T.

10 10.32. On or about February 2, 2020, an unknown male contacted P.T., a 73-
11 year-old woman residing in San Francisco, California, claiming to be her grandson. Her
12 "grandson" stated that he had been arrested.

13 10.33. On or about February 2, 2020, a second unknown male contacted P.T.
14 claiming to be the attorney for her grandson. The "attorney" asked P.T. to deposit bail money
15 to release her "grandson" from jail. On or about February 3, 2020, P.T. transferred \$27,000
16 to a bank account provided to her by the "attorney."

17 10.34. On or about February 6, 2020, a third unknown male contacted P.T.,
18 claiming to be an attorney representing P.T.'s "grandson" in a civil settlement related to his
19 arrest. At the instruction of the unknown male, P.T. transferred an additional \$150,000 to
20 a bank account provided to her by the unknown male.

21 10.35. On or about February 10, 2020, the third unknown male contacted P.T.
22 to transfer an additional \$40,000 to settle the "civil lawsuit." On or about February 11, 2020,
23 at the instruction of the "attorney," P.T. sent a \$40,000 wire transfer to a business bank
24 account associated with LOPEZ.

25 10.36. Beginning on or about February 11, and continuing until on or about
26 February 12, 2020, KNOWLES and LOPEZ exchanged a series of messages regarding an
27 incoming wire transfer to LOPEZ's business account. Specifically:
28

1 ii. On or about March 21, 2020, KNOWLES sent to GLINTON a copy
2 of the FBI criminal complaint affidavit charging Mule-7.

3 iii. On or about March 21, 2020, GLINTON messaged KNOWLES to
4 ask if he got rid of both SIM cards in his phone or only one. GLINTON also commented
5 regarding the arrest, "I would never go to the same place twice. . . . you asking to get caught."

6 iv. On or about March 21, 2020, in response to KNOWLES stating
7 "Ima send his people some bread," GLINTON wrote, "Well don't send them all. We need to
8 pay bills too."

9 10.53. On or about March 20, 2020, KNOWLES sent a \$19,000 wire transfer to
10 HARRIS.

11 10.54. On or about March 20, 2020, HARRIS sent a \$32,000 wire transfer to a
12 cryptocurrency exchange.

13 Victims L.L., K.B., and J.H.

14 10.55. On or about March 25, 2020, KNOWLES and BUTLER directed
15 INGRAM, through a series of messages, to arrange for cash to be picked up from multiple
16 victims located in the Los Angeles area.

17 10.56. On or about March 25, 2020, INGRAM exchanged a series of messages
18 with OWUOR, in which INGRAM provided OWUOR with instructions for picking up money
19 from victims L.L., K.B., and J.H. Among other things, INGRAM provided OWUOR with the
20 addresses for L.L., K.B., and J.H.; provided OWUOR with "file numbers" to reference with
21 each victim; instructed OWUOR to use the name "Alex Wafer" when picking up the cash
22 from L.L. and K.B.; and used a ride-sharing application to arrange for a car to drive OWUOR
23 to the victims' homes.

24 10.57. In March 2020, unknown males contacted L.L., K.B., and J.H. by
25 telephone. Specifically:

26 i. On or about March 25, 2020, an unknown male contacted L.L., an
27 89-year-old woman residing in Downey, California, by telephone. The unknown male
28

1 claimed to be L.L.'s nephew, and stated that he had been arrested and needed money for
2 bond.

3 ii. On or about March 25, 2020, OWUOR picked up approximately
4 \$8,000 in cash from L.L. using the name "Alex Wafer."

5 iii. On or about March 26, 2020, an unknown male claiming to be the
6 attorney for L.L.'s nephew called L.L., asking for additional money for bail. At the
7 instruction of the male, L.L. sent approximately \$10,000 in cash via FedEx to an address in
8 Middletown, Delaware.

9 iv. On or about March 25, 2020, an unknown male contacted K.B., a
10 77-year-old woman residing in Long Beach, California, by phone, claiming to be the nephew
11 of K.B.'s daughter, J.B. The "nephew" stated that he had been arrested for driving under
12 the influence and was in jail. He told K.B. not to tell his parents.

13 v. On or about March 25, 2020, an unknown individual spoke to K.B.
14 on the phone, claiming to be the attorney for the "nephew," and stated that the "nephew"
15 needed \$8,000 for bail.

16 vi. On or about March 25, 2020, OWUOR picked up approximately
17 \$8,000 in cash from J.B. Before J.B. gave OWUOR the funds, OWUOR showed J.B. a code
18 on his telephone, which matched a code J.B. had previously received from the individual
19 claiming to be an attorney for the "nephew."

20 vii. On or about March 25, 2020, J.H., a 76-year-old woman residing
21 in Arcadia, California, received a telephone call from a female claiming to be a close family
22 friend. The female stated that she had been in an accident and needed money to get out of
23 jail.

24 viii. On or about March 25, 2020, an unknown male who introduced
25 himself as attorney "Jack Goodman" told J.H. that her friend needed \$17,500 for bail money.
26 "Goodman" explained that he would send a courier to pick up the money from J.H.

27 ix. On or about March 25, 2020, OWUOR picked up approximately
28 \$17,500 in cash from J.H.

1 10.58. On or about March 25, 2020, BUTLER instructed INGRAM to send funds
2 to KNOWLES. Between March 25 and March 26, 2020, a total of \$3,900 was transferred to
3 KNOWLES from a bank account belonging to GIFFORD.

4 Victim J.D.

5 10.59. On or about May 11, 2020, unknown individuals contacted J.D., an 87-
6 year-old woman residing in Oceanside, California, within the Southern District of California,
7 by telephone. Specifically:

8 i. On or about May 11, 2020, an unknown female called J.D.,
9 claiming to be J.D.'s granddaughter. The female stated that she had been arrested following
10 a vehicle collision, needed \$9,000 for bail, and asked J.D. to talk to her lawyer, "Matthew
11 Halloway."

12 ii. On or about May 11, 2020, an unknown male claiming to be
13 "Matthew Halloway" told J.D. that a judge entered a gag order in the case preventing J.D.
14 from speaking with anyone about her granddaughter's situation. "Halloway" told J.D. that
15 a courier from Brinks named "Ashley Sutton" would pick up the \$9,000 in cash from J.D.

16 10.60. On or about May 11, 2020, INGRAM exchanged a series of messages with
17 Mule-8 to arrange for money to be picked up from J.D. Among other things, INGRAM
18 provided Mule-8 with J.D.'s address, the name of J.D.'s granddaughter, and a false name,
19 "Ashley Sutton," to use when picking up cash from J.D.

20 10.61. On or about May 11, 2020, Mule-8 drove to J.D.'s residence and collected
21 \$9,000 in cash.

22 10.62. On or about May 12, 2020, an unknown male claiming to be accident
23 specialist "Dennis Reynolds" called J.D. and stated that the other party in the vehicle
24 collision had lost her baby as a result of the accident. "Reynolds" stated that he needed an
25 additional \$42,000, or else J.D.'s granddaughter would be charged with first degree
26 manslaughter and spend 15-20 years in prison. "Reynolds" further advised J.D. to tell her
27 bank and any family members who asked that the \$42,000 was for a real estate investment.
28

1 At the instruction of the unknown male, J.D. sent a wire transfer in the amount of \$42,000
2 to an account associated with THE ENTERPRISE.

3 10.63. On or about May 19, 2020, "Reynolds" called J.D. and advised her that
4 she and her granddaughter had broken the gag order. As a result, J.D. needed to pay an
5 additional \$57,000, or her granddaughter would go to jail. At the instruction of the unknown
6 male, J.D. sent a wire transfer in the amount of \$57,000 to an account associated with THE
7 ENTERPRISE.

8 Victim J.A.

9 10.64. On or about May 19, 2020, an unknown male contacted J.A., a 78-year-
10 old woman residing in El Cajon, California, within the Southern District of California, by
11 telephone, claiming to be her grandson. He stated that he needed \$7,600 to pay for damages
12 resulting from a DUI collision.

13 10.65. On or about May 19, 2020, INGRAM exchanged a series of messages with
14 Mule-8 to arrange for cash to be picked up from J.A. Among other things, INGRAM provided
15 Mule-8 with J.A.'s name, address, and grandson's name. INGRAM told Mule-8 that the
16 money was to pay for damages to a car, and that Mule-8 was a "bailiff."

17 10.66. On or about May 19, 2020, Mule-8 picked up \$7,600 in cash from J.A.

18 Victim D.P.

19 10.67. On or about May 20, 2020, an unknown male contacted D.P., a 79-year-
20 old man residing in Carlsbad, California, within the Southern District of California, by
21 telephone, claiming to be attorney "Jerry Rosen." "Rosen" told D.P. that his grandson was
22 in legal trouble following a traffic collision. "Rosen" told D.P. that a clerk would go to D.P.'s
23 residence to collect bail money for his grandson.

24 10.68. On or about May 20, 2020, an unknown male called D.P., claiming to be
25 D.P.'s grandson. The male confirmed "Rosen's" story regarding a traffic collision, stated that
26 he needed \$20,000 to be bailed out of jail, and told D.P. not to tell anyone that he was in legal
27 trouble.

1 10.69. On or about May 20, 2020, INGRAM exchanged a series of messages with
2 Mule-8 to arrange for cash to be picked up from D.P. Among other things, INGRAM provided
3 Mule-8 with D.P.'s name, address, and grandchild's name. INGRAM told Mule-8 that the
4 money to be picked up, totaling \$20,000, was for a bail payment.

5 10.70. On or about May 20, 2020, Mule-8 collected \$20,000 in cash from D.P.

6 Victim B.M.

7 10.71. Beginning on or about May 28, 2020, and continuing through May 29,
8 2020, INGRAM and Mule-9 exchanged a series of messages relating to an incoming wire
9 transfer of \$30,000 from B.M., a 75-year-old woman residing in Rocky Face, Georgia.

10 10.72. On or about May 28, 2020, an unknown male contacted B.M. by
11 telephone, claiming to be her grandson. Her "grandson" stated that he had been taken to
12 jail for driving under the influence after a car accident, had broken his nose, and needed
13 \$30,000. He also asked B.M. not to tell his parents.

14 10.73. On or about May 28, 2020, an unknown male claiming to be the attorney
15 for B.M.'s grandson spoke to B.M. by telephone and stated that he needed \$30,000 for bail to
16 get her grandson out of jail. That same day, B.M. made a wire transfer to a bank account
17 belonging to Mule-9.

18 10.74. Beginning on or about May 28, 2020, and continuing through May 29,
19 2020, INGRAM exchanged messages with Mule-8 and Mule-9 regarding attempts to
20 withdraw the wired funds from Mule-9's bank account.

21 Victim C.N.

22 10.75. On or about May 28, 2020, an unknown male contacted C.N., an 86-year-
23 old man residing in Bonita, California, within the Southern District of California, claiming
24 to be C.N.'s grandson. The male stated he had been in a bad car collision in Texas, and
25 needed several thousands of dollars in cash to get out of jail. The male further told C.N. he
26 did not want his parents to know about the accident.

27 10.76. On or about May 28, 2020, INGRAM and Mule-8 exchanged a series of
28 messages to arrange for the pick-up of cash from C.N. Among other things, INGRAM

1 provided Mule-8 with C.N.'s name, the names of two possible grandchildren, and the amount
2 of money to be picked up.

3 10.77. On or about May 28, 2020, Mule-8 drove to the vicinity of C.N.'s residence
4 in Bonita, California.

5 10.78. On or about May 28, 2020, as Mule-8 was circling the block in the vicinity
6 of C.N.'s residence and after it appeared that the attempt to extort and defraud C.N. had
7 failed, INGRAM sent Mule-8 a message telling Mule-8 to leave, stating, "it jus burnt."

8 Victim G.P.

9 10.79. On or about May 31, 2020, an unknown male identifying himself as
10 attorney "Jerry Roson" called G.P., an 86-year-old man residing in Spring Valley, California,
11 within the Southern District of California, by telephone. "Roson" told G.P. that G.P.'s
12 grandson had been involved in a traffic collision and was arrested on suspicion of driving
13 under the influence, and needed cash for bail. "Roson" and G.P. subsequently exchanged
14 multiple phone calls to arrange for the cash to be picked up.

15 10.80. On or about June 4, 2020, INGRAM messaged Mule-8 the address of
16 G.P., then messaged Mule-8 the address of a different victim in Oak Park, California.

17 10.81. On or about June 4, 2020, INGRAM and OWUOR discussed OWUOR
18 making the pickup from G.P.'s address with a female to make "it more smooth."

19 10.82. On or about June 4, 2020, OWUOR and Mule-10 traveled together to
20 Spring Valley.

21 10.83. On or about June 4, 2020, Mule-10 picked up \$18,000 in cash from G.P.

22 Victim B.S.

23 10.84. On or about June 9, 2020, GIFFORD messaged INGRAM a screenshot of
24 an online bank account belonging to Mule-11.

25 10.85. On or about June 12, 2020, an unknown male contacted B.S., an 87-year-
26 old woman residing in Fawn River, Michigan, pretending to be her grandson. He stated that
27 he was in jail after getting pulled over for speeding, and needed \$10,000 for bail.

1 10.86. On or about June 12, 2020, Mule-11 received an incoming wire transfer
2 to her bank account from B.S. for \$10,000.

3 10.87. On or about June 12, 2020, Mule-11 withdrew \$10,000 from her bank
4 account.

5 10.88. On or about June 13, 2020, an unknown male again contacted B.S.,
6 claiming to be "William Beck," an attorney for her "grandson." "Beck" stated that a handgun

7 used in a murder had been found under her grandson's seat during the traffic stop. As a
8 result, "Beck" claimed to need an additional \$30,000 from B.S. to get her grandson out of jail.

9 10.89. On or about June 15, 2020, Mule-11 received a second wire transfer to
10 her bank account from B.S. for \$30,000.

11 10.90. On or about June 15, 2020, Mule-11 made two cash withdrawals from
12 her bank account in the amounts of \$8,500 each.

13 10.91. On or about June 16, 2020, Mule-11 withdrew \$12,000 in cash from her
14 bank account.

15 Victim J.S.

16 10.92. On or about June 17, 2020, an unknown male contacted J.S., an 84-year-
17 old woman residing in San Diego, California, within the Southern District of California, by
18 telephone, claiming to be her grandson. Her "grandson" stated that he had been in an
19 accident and needed \$20,000 for bail. After J.S. and her 84-year-old husband, R.S., stated
20 that they could not afford \$20,000, their "grandson" said \$16,000 would be enough, and
21 offered to pay it back.

22 10.93. On or about June 17, 2020, at approximately 10:39 a.m., INGRAM sent
23 Mule-8 messages attempting to arrange for Mule-8 to pick up cash from J.S. and R.S.

24 10.94. On or about June 17, 2020, at approximately 11:43 a.m., Mule-8
25 messaged INGRAM that she was "not mobile."

26 10.95. On or about June 17, 2020, at approximately 11:44 a.m., INGRAM called
27 GIFFORD.

1 10.96. On or about June 17, 2020, GIFFORD picked up \$16,000 in cash from
2 J.S.

3 10.97. On or about June 18, 2020, an unknown individual contacted J.S. stating
4 that the driver of the other vehicle involved in the collision was injured and needed additional
5 money as settlement for injuries. At the instruction of the unknown individual, on or about
6 June 18, 2020, J.S. and R.S. wired \$5,500 to a bank located in Mexico City.

7 Victim A.C.

8 10.98. On or about February 14, 2020, LOPEZ messaged to KNOWLES
9 information for a bank account associated with LOPEZ.

10 10.99. On or about June 26, 2020, an unknown male contacted A.C., an 80-year-
11 old man residing in Tupper Lake, New York, by phone claiming to be an attorney for A.C.'s
12 grandson named "William Beck." "Beck" explained that A.C.'s grandson had been arrested
13 and needed money for bail. On or about June 29, 2020, at the instruction of "Beck," A.C. sent
14 a \$50,000 wire transfer to the LOPEZ bank account.

15 10.100. On or about June 29, 2020, LOPEZ received a \$50,000 wire
16 transfer from A.C.

17 10.101. On or about June 30, 2020, LOPEZ sent a \$4,110 wire transfer to
18 KNOWLES.

19 Victim P.M.

20 10.102. On or about August 31, 2020, Mule-12 rented lodging at an
21 address in Irving, Texas, through at least September 2, 2020.

22 10.103. On or about September 1, 2020, an unknown male contacted P.M.,
23 an 80-year-old man residing in Jacksonville, Alabama, by phone claiming to be his nephew.
24 The "nephew" stated that he had been jailed after an accident, needed bail money, and would
25 have his attorney call P.M.

26 10.104. On or about September 1, 2020, a second unknown male contacted
27 P.M., claiming to be "Steve Young," the attorney representing P.M.'s "nephew." At the
28

1 instruction of "Steve Young," P.M. overnighted \$10,000 in cash via FedEx to Mule-12's rental
2 address in Irving, Texas.

3 10.105. On or about September 2, 2020, KNOWLES messaged Mule-12
4 regarding an incoming FedEx package sent to "Steve Young" at the Irving rental, including
5 the FedEx tracking number, the name and address of sender P.M., and the amount: "10k."

6 10.106. On or about September 2, 2020, Mule-12 received a package
7 containing \$10,000 from P.M.

8 All in violation of Title 18, United States Code, Section 1962(d).

9 **Forfeiture Allegations**

10 11. The allegations contained in Paragraphs 1 through 10 are re-alleged and their
11 reference fully incorporated herein for the purpose of alleging forfeiture to the United States
12 of America under Title 18, United States Code, Section 1963.

13 12. Upon conviction of the racketeering conspiracy offense charged in Count 1 of
14 this Indictment, defendants shall forfeit to the United States any and all right, title, and
15 interest they have in any property, real and personal, which the defendants have acquired
16 or maintained in violation of Title 18, United States Code, Section 1962, or which constitutes,
17 or is derived from, any proceeds obtained, directly or indirectly, from racketeering activity
18 in violation of Title 18, United States Code, Section 1962.

19 13. If any of the above-described forfeitable property, as a result of any act or
20 omission of the defendants —

- 21 A. cannot be located upon the exercise of due diligence;
22 B. has been transferred or sold to, or deposited with, a third party;
23 C. has been placed beyond the jurisdiction of the Court;
24 D. has been substantially diminished in value; or
25 E. has been commingled with other property which cannot be subdivided
26 without difficulty;

1 it is the intent of the United States, pursuant to Title 18, United States Code,
2 Section 1963(m), to seek forfeiture of any other substitute property of the defendants up to
3 the value of the forfeitable property described above.

4 All pursuant to Title 18, United States Code, Section 1963.

5 DATED: July 28, 2021.
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9
10 GUSTAV W. EYLER
11 Director, Consumer Protection Branch

RANDY S. GROSSMAN
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12
13 By: 

14 LAUREN M. ELFNER
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16 Trial Attorneys

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