

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

UNITED STATES OF AMERICA )  
 )  
 v. ) No. \_\_\_\_\_  
 )  
 MICHAEL S. MACKAY ) Violation: Title 18, United States  
 ) Code, Section 1341

**COUNT ONE**

The MARCH 2013 GRAND JURY charges:

1. At times material to this indictment:
  - a. Defendant Michael S. Mackay lived in Crystal Lake, Illinois.
  - b. Yahoo! email account, “mick00750@yahoo.com” was registered to and utilized by defendant Michael S. Mackay.
  - c. A “secret shopper scheme” involved victims applying to work-at-home advertisements on the Internet and believing they were hired by a company to work as a “secret shopper” or payment processor. After applying, the victims received a letter asking them to send an email to the email address contained in the letter. Additionally, with the letter, the victims received at least one counterfeit negotiable instrument, such as a counterfeit money order. After emailing the contact, the victims were instructed to deposit the counterfeit negotiable instrument(s) in their financial

institution, withdraw a certain percentage, retain a certain percentage as payment for their services, and go the nearest Western Union and wire transfer the proceeds as instructed. The victims were then instructed to document their experience, rating such things as the cleanliness of the facility and the service they received, and send their report via email to the email address contained on the letter they initially received. The participants in the scheme would receive the proceeds via wire transfer before the victims would learn that the negotiable instruments were counterfeit.

2. From at least as early as September 2011, and continuing to at least May 16, 2012, at Crystal Lake, in the Northern District of Illinois, Western Division, and elsewhere,

MICHAEL S. MACKAY,

defendant herein, knowingly participated in a scheme with other individuals to defraud victim individuals throughout the United States, and to obtain money, funds, credit, and property belonging to victim individuals by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described below.

3. It was the object of this scheme that defendant MICHAEL S. MACKAY and others enriched themselves through monies received from victim individuals throughout the United States by mailing through the

United States Postal Service over \$1,000,000 in counterfeit negotiable instruments.

4. It was a part of the scheme that defendant MICHAEL S. MACKAY and others defrauded victim individuals into falsely believing that they were hired as “secret shoppers” to evaluate and report their experiences with local businesses, including but not limited to Wal-Mart and Western Union.

5. It was further a part of the scheme that defendant used the Yahoo! email account, “mick00750@yahoo.com,” to communicate with others involved in the scheme.

6. It was further a part of the scheme that defendant would receive by United States Mail and by commercial interstate and international carriers packages from New York, Nigeria, Ghana, and other domestic and international locations, each package containing counterfeit negotiable instruments with denominations ranging from \$900 to \$2,000. These counterfeit negotiable instruments appeared to be issued by, among others, the United States Postal Service, American Express, Capital One Bank, Citizens National Bank of Texas, First National Bank, and Navy Federal Credit Union. The defendant received at least an estimated \$2,000,000 in counterfeit negotiable instruments.

7. It was further a part of the scheme that defendant would receive email instructions with attachments containing a “secret shopper” letter and United States Postal Service Express mailing labels.

8. It was further a part of the scheme that defendant would use the United States Postal Service to send an Express Mail envelope containing a “secret shopper” letter and at least two counterfeit money orders to at least 665 victim individuals throughout the United States by affixing a Postal Service Express label defendant received via email to the outside of the envelope.

9. It was further a part of the scheme that defendant would receive wire transfers from victims and others involved in the scheme totaling more than \$10,000 as payment for his role in the scheme before the victims learned that the negotiable instruments were counterfeit.

10. On or about February 11, 2012, at Crystal Lake, in the Northern District of Illinois, Western Division

MICHAEL S. MACKAY,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be deposited for delivery by the United States Postal Service, according to the direction thereon, an envelope containing eight counterfeit United States Postal Service negotiable

instruments to Individual A at an address in San Francisco, CA 94112;

In violation of Title 18, United States Code, Section 1341.

**COUNT TWO**

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count One of this Indictment are re-alleged and incorporated herein as if fully set forth.

2. On or about March 7, 2012, at Crystal Lake, in the Northern District of Illinois, Western Division

MICHAEL S. MACKAY,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be deposited for delivery by the United States Postal Service, according to the direction thereon, an envelope containing three counterfeit United States Postal Service negotiable instruments to Individual B at an address in Desert Hot Springs, CA 92240;

In violation of Title 18, United States Code, Section 1341.

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
UNITED STATES ATTORNEY