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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KIMBERLY STAMPS,

JOHN KYLE MULLER, and

BARBARA TRICKLE,

Defendants.

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**CRIMINAL INDICTMENT**

Case No. 2:23-cr-0015-JCM-VCF

**VIOLATIONS:**

Conspiracy (18 U.S.C. § 1349)

Mail Fraud (18 U.S.C. § 1341)

Wire Fraud (18 U.S.C. § 1343)

**THE GRAND JURY CHARGES THAT:**

At all times relevant to this indictment:

**INTRODUCTORY ALLEGATIONS**

1  
2       1. Defendants KIMBERLY STAMPS, JOHN KYLE MULLER, and  
3 BARBARA TRICKLE, together with others, engaged in a direct-mail scheme that sent  
4 fraudulent prize-notification mailings to millions of consumers across the United States and  
5 abroad. The mailings contained false statements that led victims to believe they would  
6 receive a large cash prize if they paid a “fee” between approximately \$20 and \$50. Instead  
7 of a large cash prize, victims typically received a booklet containing publicly available  
8 information about sweepstakes or a trinket of little to no value. The scheme caused  
9 approximately \$15.5 million in losses to victims, many of whom were elderly and  
10 vulnerable.

11       2. Defendant KIMBERLY STAMPS, who resided in Gilbert, Arizona, was the  
12 owner and operator of a mass-mailing prize notice scheme that operated under the names  
13 JKS Ventures, LLC, JJMK Enterprises, LLC, KPS Productions, LLC, and many others.  
14 STAMPS was one of the partners behind the scheme and received a share of the profits. In  
15 furtherance of the scheme, STAMPS purchased consumer mailing lists, chose fraudulent  
16 prize notices for the mail schedule, coordinated with printers and translators, ordered cheap  
17 fulfillment items, supervised the processing of victim responses, tracked victim response  
18 rates, and performed many other tasks. KIMBERLY STAMPS is the sister-in-law of JOHN  
19 KYLE MULLER.

20       3. Defendant JOHN KYLE MULLER, who resided in Boulder, Colorado, was  
21 also a partner in the scheme and received a share of the profits. MULLER reviewed, edited,  
22 and approved the fraudulent prize notices before they were mailed. He also directed  
23 STAMPS and other co-conspirators to analyze victim response data and perform other tasks  
24 in furtherance of the scheme. MULLER is the brother-in-law of KIMBERLY STAMPS.

1           4. Defendant BARBARA TRICKLE, who resided in Las Vegas, Nevada, was  
2 the owner and operator of a printing and mailing business that produced the fraudulent  
3 prize notice mailings for the scheme. TRICKLE supervised the lasering, printing, and  
4 mailing of the fraudulent prize notices. She also directed her employees to analyze victim  
5 response data in furtherance of the scheme. TRICKLE was paid by her co-conspirators for  
6 these services.

7                                   **COUNT ONE**  
8                                   Conspiracy to Commit Mail Fraud and Wire Fraud  
9                                   (18 U.S.C. § 1349)

10           5. Paragraphs 1–4 of this Indictment are hereby realleged and incorporated  
11 herein by reference.

12           6. Beginning in or around 2012 and continuing until a date unknown but no  
13 earlier than on or about February 21, 2018, within the State and Federal District of Nevada  
14 and elsewhere,

15                                   **KIMBERLY STAMPS,  
16                                   JOHN KYLE MULLER, and  
17                                   BARBARA TRICKLE,**

18 defendants herein, did knowingly and willfully combine, conspire, confederate, and agree  
19 with each other and with others known and unknown to the Grand Jury to commit mail  
20 fraud, in violation of 18 U.S.C. § 1341, and wire fraud, in violation of 18 U.S.C. § 1343.

21                                   **The Object of the Conspiracy**

22           7. The object of the conspiracy was for defendants KIMBERLY STAMPS,  
23 JOHN KYLE MULLER, BARBARA TRICKLE, and other co-conspirators to enrich  
24 themselves by causing victims to send payments in response to materially misleading prize  
notifications and distributing those payments to themselves and others.

The Manner and Means of the Conspiracy

*The Fraudulent Prize-Notification Mailings*

8. Defendants KIMBERLY STAMPS, JOHN KYLE MULLER, and BARBARA TRICKLE, together with others, sent and caused to be sent a variety of fraudulent prize-notification mailings. Most looked like official notices and had titles such as "ATTENTION: [VICTIM NAME] OUR PRIZE SEARCH COMMITTEE IS TRYING TO LOCATE YOU," "ALLOCATIONS AND NOTICE – OFFICE OF DIRECT REPORTING – AWARDS DIVISION," and "OFFICIAL WINNERS SEARCH NOTIFICATION." The mailings appeared to be sent by corporate organizations with names like "Winners Search Advisory," "Office of the Registrar Funding Division," "Premium Award Center," and "Prize Search Committee." Many of the mailings purported to be signed by individuals with official titles such as "Board Chairman," "Chief of Administration," or "Comptroller." These individuals did not exist.

9. The mailings were designed to lead victims to believe that they were receiving an urgent notice that they had won a large cash prize. For example, a mailing from "Report Notification Service" stated, "[VICTIM NAME], I have been instructed by the independent reporting and monitoring agency National Review Network to inform you that it is essential for you to complete and return the Required Response form promptly. My assistant will be checking the mail daily for your reply. We cannot proceed with order delivery of \$1,500,000.00 Sweepstakes Cash and Prizes entry advisement report until we hear from you." Similarly, a mailing from "Department of Global Response" stated that the reason for the notification is "Transmittal Report Documentation; Cash & Awards" and falsely indicated that the recipient was a "Beneficiary." The mailing further stated, "You are holding actual transmittal papers sent directly to you at your record of address. Please read



1 carefully – your [identification number] hereby **\*\*CONFIRMS\*\*** your status as Receiver  
2 designated and named...” The mailing urged the recipient, “YOU ARE REQUIRED TO  
3 COMPLETE AND RETURN THE ACCOMPANYING... FORM ISSUED  
4 EXCLUSIVELY IN YOUR NAME, AS YOUR IDENTIFICATION AS CANDIDATE -  
5 OF-RECORD REGARDING CERTIFIED CASH AND PRIZE ENTRY DATA  
6 REPORT \*\*\*\* SEVEN HUNDRED FORTY NINE THOUSAND TWO HUNDRED  
7 FIFTY ONE DOLLARS IN SWEEPSTAKES CASH & AWARDS\*\*\* IS 100%  
8 CONFIRMED.” The mailings often stated that recipients were “confirmed,” “validated,”  
9 “guaranteed,” or “approved.”

10 10. The mailings appeared to be personalized to the individual recipient, with his  
11 or her name appearing multiple times throughout, when in fact the mailings were form  
12 letters. They frequently included unique identification numbers or claim numbers and  
13 asked the recipient to confirm that he or she is in fact the person identified as the winner or  
14 guaranteed recipient of the promised prizes. The mailings also contain official-looking seals  
15 and stamps, which appeared to have been applied by hand.

16 11. To receive the award, the mailings instructed recipients to return a small fee,  
17 generally between \$20 and \$50, along with a response card. The mailings contained a  
18 return envelope addressed to one of several post office (“P.O.”) boxes outside of the State of  
19 Nevada and rented by defendants.

20 12. The mailings contained disclosures stating that those who responded would  
21 receive a report listing publicly available sweepstakes they could enter. Other prize notices  
22 contained disclosures stating that those who responded were entering a sweepstakes or  
23 would receive either a large sum of cash or a valuable piece of merchandise, such as an  
24 “Ultra HD Smart TV,” a “Kenmore Elite Washer & Dryer,” or “heirloom” jewelry. The

1 disclosures did not correct the false statements and misrepresentations described on the  
2 fronts of the notices.

3 *The Direct-Mail Operation*

4 13. Defendants KIMBERLY STAMPS, JOHN KYLE MULLER, and  
5 BARBARA TRICKLE, together with others, sent millions of fraudulent prize-notification  
6 mailings during the conspiracy. STAMPS and MULLER, together with others, designed  
7 the fraudulent prize notice mailings. STAMPS also ordered lists of consumers who would  
8 receive the fraudulent mailings. STAMPS, together with others, chose the fraudulent prize  
9 notices, set the mailing schedule, opened P.O. boxes to collect victim responses, purchased  
10 cheap fulfillment items to mail to victims, and opened bank accounts to be used by the  
11 fraudulent scheme, among other tasks. MULLER, together with others, reviewed, edited,  
12 and approved the fraudulent prize notices before they were mailed. He also analyzed victim  
13 response data and advised STAMPS on how to handle inquiries and complaints from  
14 victims, the Better Business Bureau, and other people and entities. Despite the frequent  
15 receipt of such inquiries and complaints and an enforcement action by the U.S. Postal  
16 Service against the prize-notice scheme, the defendants continued the scheme and did not  
17 meaningfully alter their practices.

18 14. BARBARA TRICKLE owned and operated the print and mail shop, located  
19 within the State and Federal District of Nevada, where she and her employees printed,  
20 folded, and inserted the mailings into envelopes, then put them in the mail. TRICKLE also  
21 directed her employees to analyze victim response data. Amongst other things, the data was  
22 used to target victims for follow-up mailings and to assess which prize notices were most  
23 effective.  
24

1           15.    The defendants operated the scheme using interstate email communications,  
2 text message communications, and other forms of interstate wires to coordinate their actions  
3 and conduct financial transactions.

4           16.    Using the return envelopes contained in the mailings, victims sent their  
5 payments to P.O. boxes located in Arizona. From these mailboxes, defendant KIMBERLY  
6 STAMPS, together with others, collected the victim mail, opened the victim responses, and  
7 sorted them at her home and her office space.

8           17.    Victim response mail often contained cash sent by victims, which STAMPS  
9 distributed to herself and other co-conspirators. Victim response mail also contained checks  
10 written by victims to the various company names that were printed on the prize-notification  
11 mailings. Until September 2016, STAMPS sent these checks to a Canadian payment  
12 processor that deposited the checks into its own accounts and then wired the proceeds to  
13 bank accounts controlled by STAMPS upon her request. STAMPS then distributed the  
14 money from these bank accounts to herself, the other defendants, and others. After  
15 September 2016, STAMPS deposited victim checks into her own local bank accounts.  
16 STAMPS distributed part of these proceeds to her co-conspirators.

17           18.    Next, STAMPS and her employees scanned the bar code at the bottom of  
18 each paying victim's response slip, causing information about that victim to be uploaded  
19 into a database maintained by TRICKLE. STAMPS was able to access the database  
20 remotely. Defendants STAMPS, MULLER, and TRICKLE, together with others, used the  
21 database to target the same victims repeatedly with more prize-notification mailings and to  
22 mail small booklets of publicly available sweepstakes information or trinkets of little to no  
23 value instead of the promised cash prizes.  
24

All in violation of Title 18, United States Code, Section 1349.

**COUNTS TWO TO SIX**

Mail Fraud  
(18 U.S.C. § 1341)

19. Paragraphs 1–18 of this Indictment are hereby realleged and incorporated herein by reference.

20. Beginning in or around 2012 and continuing until a date unknown but no earlier than on or about February 21, 2018, within the State and Federal District of Nevada and elsewhere,

**KIMBERLY STAMPS,  
JOHN KYLE MULLER, and  
BARBARA TRICKLE,**

defendants herein, aiding and abetting one another and together with others known and unknown to the Grand Jury, did devise and intend to devise and participate in a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, as set forth above in Paragraphs 1-18, and, on or about the dates below, within the State and Federal District of Nevada and elsewhere, for the purpose of executing such scheme and artifice, and attempting to do so, did cause to be delivered by United States Postal Service any matter and thing according to the direction thereon, as follows:

COUNT	APPROXIMATE DATE	DESCRIPTION
2	February 2018	“Premium Award Center” \$950,725 prize notice sent by U.S. Mail from Nevada to addresses in the United States and Victim responses thereto.
3	February 2018	“National Review Network” \$1,500,000 prize notice sent by U.S. Mail from Nevada to addresses in the United States and Victim responses thereto.



COUNT	APPROXIMATE DATE	DESCRIPTION
4	February 2018	"Department of Global Response" \$450,000 prize notice sent by U.S. Mail from Nevada to addresses in the United States and Victim responses thereto.
5	February 2018	"Department of Global Response" \$1,550,750 prize notice sent by U.S. Mail from Nevada to addresses in the United States and Victim responses thereto.
6	February 2018	"Department of Global Response" \$749,251 prize notice sent by U.S. Mail from Nevada to addresses in the United States and Victim responses thereto.

All in violation of Title 18, United States Code, Section 1341 and 2.

**COUNTS SEVEN TO TWELVE**

Wire Fraud  
(18 U.S.C. § 1343)

21. Paragraphs 1–18 of this Indictment are hereby realleged and incorporated herein by reference.

22. Beginning in or around 2012 and continuing until a date unknown but no earlier than on or about February 21, 2018, within the State and Federal District of Nevada and elsewhere,

**KIMBERLY STAMPS,  
JOHN KYLE MULLER, and  
BARBARA TRICKLE,**

defendants herein, aiding and abetting one another and together with others known and unknown to the Grand Jury, did devise and intend to devise and participate in a scheme and artifice to defraud for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, as set forth above in Paragraphs 1-18, and, on or about the dates below, for the purpose of executing such scheme and artifice, and attempting to do so, did transmit and cause to be transmitted, by means of wire

communication in interstate commerce, one or more writings, signs, pictures, and sounds,  
as set forth below:

COUNT	APPROXIMATE DATE	DESCRIPTION
7	February 5, 2018	Email from defendant MULLER in Colorado to defendant TRICKLE's business in Nevada concerning victim data.
8	February 5, 2018	Email from defendant MULLER in Colorado to defendant TRICKLE's business in Nevada regarding a mailing list.
9	February 8, 2018	A text message from defendant TRICKLE in Nevada to defendant STAMPS in Arizona regarding an invoice for \$32,998.59.
10	February 8, 2018	A text message from defendant STAMPS in Arizona to defendant TRICKLE in Nevada regarding a payment of \$35,000.
11	February 15, 2018	A text message from defendant TRICKLE in Nevada to defendant STAMPS in Arizona regarding an invoice for \$25,911.00.
12	February 16, 2018	A text message from defendant STAMPS in Arizona to defendant TRICKLE in Nevada regarding a payment of \$26,000.

All in violation of Title 18, United States Code, Section 1343 and 2.

### **FORFEITURE ALLEGATION**

1. The allegations contained in Counts 1–12 of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture under 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts 1–12 of this Criminal Indictment,

**KIMBERLY STAMPS,  
JOHN KYLE MULLER, and  
BARBARA TRICKLE,**

defendants herein, shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. §§ 1341 and 1343, a specified unlawful activity as defined in 18 U.S.C. §§ 1956(c)(7)(A) and 1961(1)(B), or 18 U.S.C. § 1349, conspiracy to commit such offenses:

1. any and all property with the requisite nexus to violations of 18 U.S.C. §§ 1341, 1343, and 1349 under the forfeiture statute in this forfeiture allegation and Fed. R. Crim. P. 32.2(b)(2)(C); and
2. an in personam criminal forfeiture money judgment including, but not limited to, at least an amount to be calculated pursuant to the forfeiture statute in this forfeiture allegation and Fed. R. Crim. P. 32.2(b)(2)(C)
3. If any of the property being subject to forfeiture under 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c), 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 of America, under 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants for the property listed above.

1 All under 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c); 18 U.S.C. §§ 1341, 1343,  
2 and 1349; and 21 U.S.C. § 853(p).

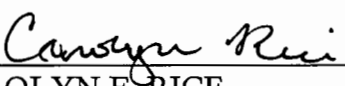
3 **DATED:** this 1st day of February, 2023


4 **A TRUE BILL:**

5  
6 /S/  
7 FOREPERSON OF THE GRAND JURY  
8

9 AMANDA N. LISKAMM  
10 Director  
11 Consumer Protection Branch  
12 U.S. Department of Justice

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