

**Oct 8, 2019**

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**19-20658-CR-SCOLA/TORRES**  
CASE NO.

18 U.S.C. § 1349  
18 U.S.C. § 2326(2)(A)  
18 U.S.C. § 1341  
18 U.S.C. § 1343  
18 U.S.C. § 1951(a)  
18 U.S.C. § 2  
18 U.S.C. § 981(a)(1)(C)

**UNITED STATES OF AMERICA**

**vs.**

**ANGEL ARMANDO ADRIANZEN,**

**Defendant.**

**INDICTMENT**

The Grand Jury charges that:

**GENERAL ALLEGATIONS**

1. AAD Learning Center ("AAD") was a fictitious name for a business entity registered in the State of California. AAD did business throughout the United States, including in the Southern District of Florida.

2. Defendant **ANGEL ARMANDO ADRIANZEN** was the owner and corporate officer for AAD.

**COUNT 1**  
**Conspiracy to Commit Mail and Wire Fraud**  
**(18 U.S.C. § 1349)**

From at least as early as in or around April 2011 until at least as late as in or around March 2019, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**ANGEL ARMANDO ADRIANZEN,**

did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to commit certain offenses against the United States, that is:

(a) to knowingly, and with intent to defraud, devise, and intend to devise, 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, for the purpose of executing such scheme and artifice, did cause to be delivered certain mail matter by a private or commercial interstate carrier according to the direction thereon, in violation of Title 18, United States Code, Section 1341; and

(b) to knowingly, and with intent to defraud, devise, and intend to devise, 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, for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted, by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

**PURPOSE OF THE CONSPIRACY**

3. It was a purpose of the conspiracy for the defendant and his co-conspirators to unlawfully enrich themselves by: (a) falsely informing victims that they had won raffles and various free consumer products; (b) falsely claiming that the victims had agreed to accept delivery of the free consumer products and pay shipping and insurance fees; (c) fraudulently inducing and

coercing the victims to pay the fees by threatening the victims; and (d) thereafter keeping the victims' money for the defendant's and his co-conspirators' personal use and benefit.

**MANNER AND MEANS OF THE CONSPIRACY**

The manner and means by which the defendant and his co-conspirators sought to accomplish the objects and purpose of the conspiracy included, among others, the following:

4. **ANGEL ARMANDO ADRIANZEN** assisted his co-conspirators in Peru in setting up and staffing call centers that contacted victims in the United States.

5. **ANGEL ARMANDO ADRIANZEN** also operated AAD, a product distribution and payment processing operation, from his location in the United States that worked in partnership with the Peruvian call centers.

6. **ANGEL ARMANDO ADRIANZEN's** co-conspirators, acting directly and indirectly under his direction, placed telephone calls to victims throughout the United States, including in the Southern District of Florida, claiming that they were eligible to receive free products such as computer tablets with English courses through a raffle. On later calls, **ADRIANZEN's** co-conspirators falsely informed victims that they needed to provide the names of references to qualify for the purported raffle and make large payments to receive the supposedly free products. **ADRIANZEN's** co-conspirators also falsely and fraudulently told victims that they had failed to pay for products that they had agreed to purchase and receive, and therefore, the victims were liable for costs and fines. In reality, there were no raffles, no free products, no requirements to receive and pay for products, and no storage fees accrued.

7. As part of the conspiracy, **ANGEL ARMANDO ADRIANZEN** received and shared scripts used by his call center co-conspirators when placing calls to victims. The scripts incorporated various false statements, including fraudulent claims about the callers' identities. For

example, one script directed callers to falsely and fraudulently claim to be attorneys with the U.S. Department of Education. In other scripts, the callers were directed to falsely and fraudulently claim to be associated with Spanish language television channels, Latin radio stations, or toothpaste companies.

8. At times during the conspiracy, **ANGEL ARMANDO ADRIANZEN's** co-conspirators falsely and fraudulently claimed during calls with victims that they were lawyers, sometimes calling from a "legal department" of a company, or from a supposed "minor crimes court."

9. At times during the conspiracy, **ANGEL ARMANDO ADRIANZEN's** co-conspirators falsely and fraudulently threatened to have victims deported, arrested and charged with crimes, and have negative marks placed on their credit reports if they failed to pay the fees totaling hundreds of dollars.

10. As a result of these threats, **ANGEL ARMANDO ADRIANZEN** and his co-conspirators induced at least 10 victims who were over the age of 55 to pay the demanded fees to AAD using prepaid cards, money orders, and cash on delivery ("C.O.D.").

11. **ANGEL ARMANDO ADRIANZEN** processed victims' payments and caused packages to be sent to victims via FedEx.

12. **ANGEL ARMANDO ADRIANZEN** monitored operations and provided strategic advice to his call center co-conspirators on what to say to the victims and how best to ensure that their payments were received and kept in bank accounts he controlled. Ultimately, the victims' payments were delivered to AAD's bank accounts and other bank accounts controlled by **ADRIANZEN**. Through advice to his co-conspirators, **ADRIANZEN** limited the ability of

victims to obtain chargebacks and refunds of fraudulently obtained funds, despite the many complaints made about the threats and lies used by the call centers with whom he worked.

13. To fraudulently induce victims to pay money, **ANGEL ARMANDO ADRIANZEN** and his co-conspirators made, and caused others to make, materially false statements including, among other things, the following:

**Materially False Statements**

- a. That certain victims had qualified for and been selected to receive a free prize;
- b. That the callers were calling on behalf of universities, and, at other times, were calling on behalf of Spanish language radio or television entities, unaffiliated private companies, and shipping companies, such as FedEx;
- c. That victims had agreed to pay for products, but failed to do so;
- d. That victims had agreed to pay for and receive delivery of product shipments but failed to do so;
- e. That the victims' failure to receive and pay for product shipments had resulted in costs;
- f. That callers were attorneys and were associated with the U.S. government; and
- g. That victims who failed to make payments could ultimately face negative marks on their credit records, immigration consequences, criminal charges, arrest, and imprisonment.

All in violation of Title 18, United States Code, Sections 1349 and 2326(2)(A).

**COUNTS 2-6  
Mail Fraud  
(18 U.S.C. § 1341)**

1. The General Allegations section of this Indictment is re-alleged and incorporated by reference as though fully set forth herein.

2. On or about the dates specified below as to each count, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**ANGEL ARMANDO ADRIANZEN,**

did knowingly, and with intent to defraud, devise, and intend to devise, 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, for the purpose of executing such scheme and artifice, did knowingly cause to be delivered certain mail matter by a private or commercial interstate carrier according to the direction thereon.

**PURPOSE OF THE SCHEME AND ARTIFICE**

3. It was the purpose of the scheme and artifice for the defendant and his accomplices to unlawfully enrich themselves by: (a) falsely informing victims that they had won raffles and various free consumer products; (b) falsely claiming that the victims had agreed to accept delivery of the free consumer products and pay shipping and insurance fees; (c) fraudulently inducing and coercing the victims to pay the fees by threatening the victims; and (d) thereafter keeping the victims' money for the defendant's and his co-conspirators' personal use and benefit.

**THE SCHEME AND ARTIFICE**

4. The Manner and Means section of Count 1 of this Indictment is re-alleged and incorporated by reference as though fully set forth herein as a description of the scheme and artifice.

**USE OF THE MAILS**

5. On or about the dates specified as to each count below, the defendant, **ANGEL ARMANDO ADRIANZEN**, for the purpose of executing and in furtherance of the aforesaid scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did knowingly cause to be delivered certain mail matter by a private or commercial interstate carrier according to the direction thereon, as more particularly described below:

<b>COUNT</b>	<b>APPROX. DATE</b>	<b>DESCRIPTION OF MAILING</b>
2	May 2017	Package sent via FedEx to victim H.C. in the Southern District of Florida
3	June 2017	Package sent via FedEx to victim R.T. in the Southern District of Florida
4	June 2017	Package sent via FedEx to victim V.L. in the Southern District of Florida
5	August 2017	Package sent via FedEx to victim O.D in the Southern District of Florida
6	September 2018	Package sent via FedEx to victim R.L in the Southern District of Florida

In violation of Title 18, United States Code, Sections 1341, 2326(2)(A), and 2.

**COUNTS 7-11,  
Wire Fraud  
(18 U.S.C. § 1343)**

1. The General Allegations section of this Indictment is re-alleged and incorporated by reference as though fully set forth herein.

2. On or about the dates specified below as to each count, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**ANGEL ARMANDO ADRIANZEN,**

did knowingly, and with intent to defraud, devise, and intend to devise, 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, for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted, by means of wire communication, in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds.

### **PURPOSE OF THE SCHEME AND ARTIFICE**

3. It was the purpose of the scheme and artifice for the defendant and his accomplices to unlawfully enrich themselves by: (a) falsely informing victims that they had won raffles and various free consumer products; (b) falsely claiming that the victims had agreed to accept delivery of the free consumer products and pay shipping and insurance fees; (c) fraudulently inducing and coercing the victims to pay the fees by threatening the victims; and (d) thereafter keeping the victims' money for the defendant's and his co-conspirators' personal use and benefit.

### **THE SCHEME AND ARTIFICE**

4. The Manner and Means section of Count 1 of this Indictment is re-alleged and incorporated by reference as though fully set forth herein as a description of the scheme and artifice.

### **USE OF THE WIRES**

5. On or about the dates listed as to each count below, **ANGEL ARMANDO ADRIANZEN**, for the purpose of executing and in furtherance of the aforesaid scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted, by means of wire



communication in interstate and foreign commerce, certain writings, signs, signals, pictures and sounds, as more particularly described below:

<b>COUNT</b>	<b>APPROX. DATE</b>	<b>DESCRIPTION OF WIRE COMMUNICATION</b>
7	May 2017	Telephone call between caller in Peru and victim H.C. in the Southern District of Florida
8	June 2017	Telephone call between caller in Peru and victim R.T. in the Southern District of Florida
9	June 2017	Telephone call between caller in Peru and victim V.L. in the Southern District of Florida
10	August 2017	Telephone call between caller in Peru and victim O.D in the Southern District of Florida
11	September 2018	Telephone call between caller in Peru and victim R.L in the Southern District of Florida

In violation of Title 18, United States Code, Sections 1343, 2326(2)(A), and 2.

**COUNTS 12-15**  
**Extortion**  
**(18 U.S.C. § 1951(a))**

1. The General Allegations section of this Indictment is re-alleged and incorporated by reference as though fully set forth herein.

2. On or about the dates specified as to each count below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**ANGEL ARMANDO ADRIANZEN,**

did knowingly obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by means of extortion, as the terms “commerce” and “extortion” are defined in Title 18, United States Code, Section 1951(b)(2) and (b)(3), in that the defendant did obtain money and other property not due to him from another, with his consent, induced by the wrongful use of actual or threatened force, violence or fear, as more particularly described below:

COUNT	APPROX. DATE	DESCRIPTION OF PAYMENT AND THREAT
12	May 2017	Payment sent from victim H.C. in the Southern District of Florida, to <b>ANGEL ARMANDO ADRIANZEN</b> , based, in part, on threat of arrest
13	June 2017	Payment sent from victim R.T. in the Southern District of Florida, to <b>ANGEL ARMANDO ADRIANZEN</b> , based, in part, on threat of criminal charges
14	June 2017	Payment sent from victim V.L. in the Southern District of Florida, to <b>ANGEL ARMANDO ADRIANZEN</b> , based in part, on threat of criminal charges
15	September 2018	Payment sent from victim R.L. in the Southern District of Florida, to <b>ANGEL ARMANDO ADRIANZEN</b> , based in part, on threat of harm to credit rating

In violation of Title 18, United States Code, Sections 1951(a) and 2.

**FORFEITURE**  
**(18 U.S.C. § 981(a)(1)(C))**

1. The allegations of this Indictment are re-alleged and incorporated by reference as though fully set forth herein for alleging criminal forfeiture to the United States of certain property in which the defendant, **ANGEL ARMANDO ADRIANZEN**, has an interest.

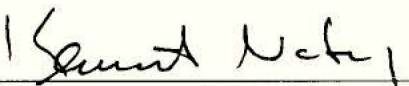
2. Upon conviction of a violation, or a conspiracy to violate, Title 18, United States Code, Section 1341 or Section 1343, as alleged in this Indictment, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C), any property, real or personal, which constitutes, or is derived from proceeds traceable to such violation.

3. Upon conviction of a violation of Title 18, United States Code, Section 1951, as alleged in this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), any property, real or personal, which constitutes, or is derived from proceeds traceable to such violation.


All pursuant to Title 18, United States Code, Section 982(a)(1)(C), and the procedures set forth at Title 21, United States Code, Section 853, as incorporated by Title 28, United States Code, Section 2461.

A TRUE BILL

FOREPERSON

  
\_\_\_\_\_  
ARIANA FAJARDO ORSHAN  
UNITED STATES ATTORNEY  
SOUTHERN DISTRICT OF FLORIDA

GUSTAV W. EYLER  
DIRECTOR  
U.S. DEPARTMENT OF JUSTICE  
CONSUMER PROTECTION BRANCH

  
\_\_\_\_\_  
PHILIP TOOMAJIAN  
JOSHUA D. ROTHMAN  
TRIAL ATTORNEYS  
U.S. DEPARTMENT OF JUSTICE  
CONSUMER PROTECTION BRANCH

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. \_\_\_\_\_

v.

**CERTIFICATE OF TRIAL ATTORNEY\***

ANGEL ARMANDO ADRIANZEN,

Defendant.

**Superseding Case Information:**

**Court Division:** (Select One)

☒ Miami ☐ Key West  
☐ FTL ☐ WPB ☐ FTP

New defendant(s) Yes ☐ No ☐  
Number of new defendants \_\_\_\_\_  
Total number of counts \_\_\_\_\_

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161e
3. Interpreter: (Yes or No) Yes \_\_\_\_\_  
List language and/or dialect Spanish
4. This case will take 10 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)

- I 0 to 5 days \_\_\_\_\_  
II 6 to 10 days ☒ \_\_\_\_\_  
III 11 to 20 days \_\_\_\_\_  
IV 21 to 60 days \_\_\_\_\_  
V 61 days and over \_\_\_\_\_

(Check only one)

- Petty \_\_\_\_\_  
Minor \_\_\_\_\_  
Misdem. \_\_\_\_\_  
Felony ☒ \_\_\_\_\_

6. Has this case previously been filed in this District Court? (Yes or No) No \_\_\_\_\_

If yes: Judge

Case No. \_\_\_\_\_

(Attach copy of dispositive order)

Has a complaint been filed in this matter?

(Yes or No) Yes \_\_\_\_\_

If yes: Magistrate Case No.

19-mj-03478-Torres

Related miscellaneous numbers:

SEE ATTACHED

Defendant(s) in federal custody as of

09/16/2019

Defendant(s) in state custody as of

Rule 20 from the District of

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia O. Valle)? Yes \_\_\_\_\_ No ☒
8. Does this case originate from a matter pending in the Northern Region U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? Yes \_\_\_\_\_ No ☒

  
PHILIP TOOMAJIAN

DOJ TRIAL ATTORNEY

COURT ID NO. A5501275

\*Penalty Sheet(s) attached

REV 8/13/2018

**UNITED STATES of AMERICA**

**CASE NO.** \_\_\_\_\_

**v.**

**ANGEL ARMANDO ADRIANZEN,**  
**Defendant.**

**CERTIFICATE OF TRIAL ATTORNEY  
ATTACHMENT**

**6. Related Miscellaneous Numbers:**

19-mj-03143-EGT	18-mj-03400-CMM
19-mj-03144-EGT	18-mj-03180-LL
19-mj-03479-EGT	18-mj-03181-LL
19-mj-03480-EGT	18-mj-02548-JG
	18-mj-02549-JG
	18-mj-02550-JG
	18-mj-02551-JG
17-mj-03618-BLG	16-mj-03126-JG
17-mj-3198-CMM	16-mj-03128-JG
17-mj-3199-CMM	16-mj-03298-JJO
17-mj-02653-BLG	16-mj-03299-JJO
17-mj-02654-BLG	
17-mj-02655-BLG	
17-mj-02035-WCT	
17-mj-02319-AOR	
17-mj-02971-BLG	
17-mj-02972-BLG	
17-mj-02973-BLG	
17-mj-02372-BLG	
17-mj-02373-BLG	

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ANGEL ARMANDO ADRIANZEN

Case No: \_\_\_\_\_

Counts#: 1

Conspiracy to Commit Mail and Wire Fraud

Title 18, United States Code, Section 1349 and 2326(2)(A)

\*Max Penalty: Twenty (20) years' imprisonment and up to five (5) years' consecutive  
imprisonment

Counts #: 2 – 6

Mail Fraud

Title 18, United States Code, Section 1341

\*Max Penalty: Twenty (20) years' imprisonment and up to five (5) years' consecutive  
imprisonment as to each count

Counts #: 7 – 11

Wire Fraud

Title 18, United States Code, Section 1343

\*Max Penalty: Twenty (20) years' imprisonment and up to five (5) years' consecutive  
imprisonment as to each count

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**PENALTY SHEET**

**Defendant's Name:** ANGEL ARMANDO ADRIANZEN

**Case No:** \_\_\_\_\_

**Countst#:** 12 – 15

Extortion

Title 18, United States Code, Section 1951(a)

**\*Max Penalty:** Twenty (20) years' imprisonment as to each count

**\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**