

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
AT LOUISVILLE

**FILED**  
VANESSA L. ARMSTRONG, CLERK  
MAY 22 2019

U.S. DISTRICT COURT  
WEST'N. DIST. KENTUCKY

UNITED STATES OF AMERICA

INDICTMENT

v.

NO. 3:19-CR-94-RGJ

**WENDY N. WILLIAMS**  
**JEFFERY O. CAMPBELL**  
**ANNA-KAYE A. CAMPBELL**  
**JANIEL N. CALVIN-WATSON**

18 U.S.C. § 2  
18 U.S.C. § 981  
18 U.S.C. § 982  
18 U.S.C. § 1341  
18 U.S.C. § 1343  
28 U.S.C. § 2461

The Grand Jury charges:

COUNT 1  
*(Mail Fraud)*

1. From in or about January 2015, through in or about March 2019, in the Western District of Kentucky, Jefferson County, Kentucky, and elsewhere, the defendants, **WENDY N. WILLIAMS, JEFFERY O. CAMPBELL, ANNA-KAYE A. CAMPBELL, and JANIEL N. CALVIN-WATSON**, aided and abetted by each other and others known and unknown to the Grand Jury, with the intent to defraud, willfully participated in, with knowledge of its fraudulent nature, a scheme and artifice to defraud and obtain money by materially false and fraudulent pretenses, representations, and promises.

2. As part of the scheme and artifice to defraud, defendants **WENDY N. WILLIAMS, JEFFERY O. CAMPBELL, ANNA-KAYE A. CAMPBELL, JANIEL N. CALVIN-WATSON**, and others, contacted elderly victims around the United States and falsely informed the victims they had won a lottery or sweepstakes. They also informed victims they

would need to pay “taxes” or “fees” in order to claim their prizes. They instructed victims to send money to pay these fees through direct deposits, wires, and mailings. At times, they also instructed victims to send other items of value, such as clothing or other goods, through the mail. In reality, there was no lottery or sweepstakes, no actual winnings to be paid out to the victims, and the defendants simply took the money and items of value sent to them by the victims without ever sending or intending to send anything of value in return.

3. As part of the scheme and artifice to defraud, defendants **WENDY N. WILLIAMS, JEFFERY O. CAMPBELL, ANNA-KAYE A. CAMPBELL, JANIEL N. CALVIN-WATSON**, and others, also used victims as “money mules.” When a victim’s funds were depleted and the victim was unable to provide additional money to pay the “taxes” or “fees,” the victim was told he or she could be “sponsored” in order to continue payments towards prize collection. The victim was told he or she would receive funds or goods from others and would be required to send those items as directed.

4. On or about May 15, 2018, in the Western District of Kentucky and elsewhere, for the purpose of executing and attempting to execute the above-described scheme and artifice to defraud, defendants **WENDY N. WILLIAMS, JEFFERY O. CAMPBELL, ANNA-KAYE A. CAMPBELL, JANIEL N. CALVIN-WATSON**, and others knowingly caused to be delivered by mail and a private and commercial interstate carrier, according to the direction thereon, a package from E.B., sent by UPS from a location in Louisville, Kentucky, to **WENDY N. WILLIAMS** at an address in Lauderhill, Florida.

In violation of Title 18, United States Code, Sections 2 and 1341.

The Grand Jury further charges:

COUNTS 2-3  
(Wire Fraud)

5. Paragraphs 1 through 3 of this Indictment are incorporated here by reference.

6. From in or about January 2015, through in or about March 2019, in the Western District of Kentucky, Jefferson County, Kentucky, and elsewhere, the defendants, **WENDY N. WILLIAMS, JEFFERY O. CAMPBELL, ANNA-KAYE A. CAMPBELL, and JANIEL N. CALVIN-WATSON**, aided and abetted by each other and others known and unknown to the Grand Jury, devised a scheme to obtain money from elderly victims by false representations, pretenses, and promises. For the purpose of executing said scheme, defendants **WENDY N. WILLIAMS, JEFFERY O. CAMPBELL, ANNA-KAYE A. CAMPBELL, and JANIEL N. CALVIN-WATSON** knowingly caused the following wire communications to be transmitted in interstate commerce, that is:

Count No.	Date	Description of Wire
2	February 20, 2018	E.B. deposited \$1,000 into <b>WENDY N. WILLIAMS's</b> BB&T bank account ending in 2777, causing an interstate wire transaction from Louisville, Kentucky, to outside Kentucky.
3	March 19, 2018	E.B. deposited \$1,500 into <b>WENDY N. WILLIAMS's</b> BB&T bank account ending in 2777, causing an interstate wire transaction from Louisville, Kentucky, to outside Kentucky.

In violation of Title 18, United States Code, Sections 2 and 1343.

NOTICE OF FORFEITURE

7. If convicted of any violation of Title 18, United States Code, Sections 1341 and 1343, as alleged in Counts 1, 2 and 3 of this Indictment, defendants **WENDY N. WILLIAMS,**

**JEFFERY O. CAMPBELL, ANNA-KAYE A. CAMPBELL, and JANIEL N. CALVIN-WATSON** shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds obtained, directly or indirectly, as the result of the offenses alleged in Counts 1, 2 and 3.

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a), and Title 28, United States Code, Section 2461.

A TRUE BILL.



FOREPERSON

  
\_\_\_\_\_  
RUSSELL M. COLEMAN  
UNITED STATES ATTORNEY

RMC:AEG

UNITED STATES OF AMERICA v. WENDY N. WILLIAMS et al.  
PENALTIES

Counts 1-3: NM 20 yrs./\$250,000/both/NM 3 yrs. Supervised Release  
Notice of Forfeiture

NOTICE

ANY PERSON CONVICTED OF AN OFFENSE AGAINST THE UNITED STATES SHALL BE SUBJECT TO SPECIAL ASSESSMENTS, FINES, RESTITUTION & COSTS.

SPECIAL ASSESSMENTS

18 U.S.C. § 3013 requires that a special assessment shall be imposed for each count of a conviction of offenses committed after November 11, 1984, as follows:

Misdemeanor:	\$ 25 per count/individual	Felony:	\$100 per count/individual
	\$125 per count/other		\$400 per count/other

FINES

In addition to any of the above assessments, you may also be sentenced to pay a fine. Such fine is due immediately unless the court issues an order requiring payment by a date certain or sets out an installment schedule. You shall provide the United States Attorney's Office with a current mailing address for the entire period that any part of the fine remains unpaid, or you may be held in contempt of court. 18 U.S.C. § 3571, 3572, 3611, 3612

Failure to pay fine as ordered may subject you to the following:

1. **INTEREST** and **PENALTIES** as applicable by law according to last date of offense.

For offenses occurring after December 12, 1987:

No **INTEREST** will accrue on fines under \$2,500.00.

**INTEREST** will accrue according to the Federal Civil Post-Judgment Interest Rate in effect at the time of sentencing. This rate changes monthly. Interest accrues from the first business day following the two week period after the date a fine is imposed.

**PENALTIES** of:

10% of fine balance if payment more than 30 days late.

15% of fine balance if payment more than 90 days late.

2. Recordation of a **LIEN** shall have the same force and effect as a tax lien.
3. Continuous **GARNISHMENT** may apply until your fine is paid.

18 U.S.C. §§ 3612, 3613

If you **WILLFULLY** refuse to pay your fine, you shall be subject to an **ADDITIONAL FINE** of not more than the greater of \$10,000 or twice the unpaid balance of the fine; or **IMPRISONMENT** for not more than 1 year or both. 18 U.S.C. § 3615



#### RESTITUTION

If you are convicted of an offense under Title 18, U.S.C., or under certain air piracy offenses, you may also be ordered to make restitution to any victim of the offense, in addition to, or in lieu of any other penalty authorized by law. 18 U.S.C. § 3663

#### APPEAL

If you appeal your conviction and the sentence to pay your fine is stayed pending appeal, the court shall require:

1. That you deposit the entire fine amount (or the amount due under an installment schedule during the time of your appeal) in an escrow account with the U.S. District Court Clerk, or
2. Give bond for payment thereof.

18 U.S.C. § 3572(g)

#### PAYMENTS

If you are ordered to make payments to the U.S. District Court Clerk's Office, certified checks or money orders should be made payable to the Clerk, U.S. District Court and delivered to the appropriate division office listed below:

LOUISVILLE:	Clerk, U.S. District Court 106 Gene Snyder U.S. Courthouse 601 West Broadway Louisville, KY 40202 502/625-3500
BOWLING GREEN:	Clerk, U.S. District Court 120 Federal Building 241 East Main Street Bowling Green, KY 42101 270/393-2500
OWENSBORO:	Clerk, U.S. District Court 126 Federal Building 423 Frederica Owensboro, KY 42301 270/689-4400
PADUCAH:	Clerk, U.S. District Court 127 Federal Building 501 Broadway Paducah, KY 42001 270/415-6400

If the court finds that you have the present ability to pay, an order may direct imprisonment until payment is made.

FORM DBD-34  
JUN 85

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

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**UNITED STATES DISTRICT COURT**

Western District of Kentucky  
At Louisville

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THE UNITED STATES OF AMERICA

vs.

**WENDY N. WILLIAMS  
JEFFERY O. CAMPBELL  
ANNA-KAYE A. CAMPBELL  
JANIEL N. CALVIN-WATSON**

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**INDICTMENT**

**Count 1**

*Mail Fraud*

18 U.S.C. §§2 and 1341

**Counts 2 and 3**

*Wire Fraud*

18 U.S.C. §§2 and 1343

**Forfeiture**

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*A true bill.*

\_\_\_\_\_  
*Foreperson*

*Filed in open court this 22<sup>nd</sup> day of May, 2019.*

**FILED**

VANESSA L. ARMSTRONG, CLERK

MAY 22 2019

*Bail, \$* \_\_\_\_\_

U.S. DISTRICT COURT  
WEST'N. DIST. KENTUCKY

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