

**FILED**

2019 NOV -6 PM 4: 23  
CLERK US DISTRICT COURT  
DISTRICT OF ARIZONA

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**CR19-02868 TUC-JAS(JR)**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States America,

Plaintiff,

vs.

Ruby Hall,

Defendants.

**INDICTMENT**

Violation:

18 U.S.C. § 1956(h)  
(Conspiracy to Commit Money Laundering)  
Count 1

18 U.S.C. § 1349  
(Conspiracy to Commit Mail and Wire  
Fraud)  
Count 2

**WORTH CASE**

**GRAND JURY CHARGES:**

**COUNT 1**  
**Conspiracy to Commit Money Laundering**  
**[Title 18 U.S.C. § 1956(h)]**

1. From a time unknown through at least August 10, 2018, within the District of Arizona and elsewhere, defendant, RUBY HALL and others known and unknown to the grand jury, did knowingly and willfully combine conspire and agree together, with each other and others to commit the following offense against the United States:

**Objects of the Conspiracy**

a. Concealment money laundering in violation of Title 18, United States Code, § 1956(a)(1)(B)(i).

**Manner/Means of the Money Laundering**

2. The defendants entered into a conspiracy to receive proceeds derived from the lottery fraud scheme to disguise the nature, location, source, ownership and control of the fraudulent proceeds. The defendant entered into a conspiracy to launder the fraudulent proceeds from the lottery fraud scheme from the United States to Jamaica, in part, to disguise the nature, location, source, ownership, and control of such fraudulent proceeds.

3. This scheme targeted the elderly. The primary purpose of the conspiracy and scheme to defraud was for the defendant and other co-conspirators in the conspiracy to fraudulently obtain money from various victims through a fraudulent sweepstakes or lottery scheme. In furtherance of the conspiracy and scheme to defraud, the co-conspirators fraudulently communicated to individuals that they had won a lottery or a prize. These communications also fraudulently represented that in order to obtain these winnings, the victims were required to make arrangements to pay taxes or other fees. These representations were false and fraudulent. In reality, the co-conspirators merely made these false and fraudulent representations with the intent to defraud solely to obtain the victims' money and without any intent to provide any prize winnings.

4. As an example of how the conspiracy and scheme to defraud operated, victim A.B. at the time was approximately 85 years old when A.B. received the fraudulent communications from the co-conspirators. A.B. communicated with one or more of the co-conspirators by phone and made arrangements to provide the "fees" believing that A.B. had won and would receive the prize winnings in return. A.B. was instructed to mail money to HALL in Bethlehem, GA, and others. HALL opened several checking accounts and sent an estimated \$200,000 to various co-conspirators.

5. As an essential part of the conspiracy, as indicated above, the co-conspirators caused to be issued mailings and interstate wire communications in furtherance of the conspiracy.

**All in violation of Title 18 United States Code, Section 1956(h).**

**Count 2**  
**Conspiracy to Commit Mail Fraud and Wire Fraud**  
**[18 U.S.C. §1349]**

1. From a time unknown and continuing through at least August 10, 2018, in the District of Arizona, and elsewhere, the defendant, RUBY HALL and others known and unknown to the grand jury, knowingly and voluntarily did unlawfully combine, conspire, confederate and agree together and with each other to knowingly execute and attempt to execute a scheme or artifice to defraud and a scheme or plan to obtain money or property by means of material false or fraudulent representations, promises and the intentional concealment of material facts, in violation of Title 18, United States Code, Section 1341 (Mail Fraud) and Title 18, United States Code, Section 1343 (Wire Fraud).

**Manner/Mean of the Conspiracy/Scheme to Defraud**

2. This scheme targeted the elderly. The primary purpose of the conspiracy and scheme to defraud was for the defendant and other co-conspirators in the conspiracy to fraudulently obtain money from various victims through a fraudulent sweepstakes or lottery scheme. In furtherance of the conspiracy and scheme to defraud, the co-conspirators fraudulently communicated to individuals that they had won a lottery or a prize. These communications also fraudulently represented that in order to obtain these winnings, the victims were required to make arrangements to pay taxes or other fees. These representations were false and fraudulent. In reality, the co-conspirators merely made these false and fraudulent representations with the intent to defraud solely to obtain the victims' money and without any intent to provide any prize winnings.

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3 A.B. was instructed to mail money to HALL in Bethlehem, GA, and others. HALL  
4 opened several checking accounts and sent an estimated \$200,000 to various co-  
5 conspirators.

6 4. RUBY HALL would wire money received from the lottery fraud victims  
7 to Jamaica.

8 5. As an essential part of the conspiracy, as indicated above, the co-  
9 conspirators caused to be issued mailings and interstate wire communications in  
10 furtherance of the conspiracy all in violation of Title 18, United States Code, Section  
11 1349, enhanced by Title 18, U.S.C. § 2326, telemarketing fraud targeting persons  
12 over the age of 55.

13  
14  
15 A TRUE BILL

16 /s/

17 \_\_\_\_\_  
Presiding Juror

18 MICHAEL BAILEY  
19 United States Attorney  
20 District of Arizona

/s/

21 Assistant U.S. Attorney  
22 Dated: November 6, 2019

REDACTED FOR  
PUBLIC DISCLOSURE