

JAN 23 2014

US DISTRICT COURT
WESTERN DISTRICT OF NC

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA,)
)
)
v.)
)
)
GEOFFREY ALEXANDER RAMER)
a/k/a GEOFFREY ALEXANDER RAMER-)
MESEN)
Defendant.)
_____)

DOCKET NO. 3:14CR22-MOC
BILL OF INDICTMENT
Vio: 18 U.S.C. § 1349
18 U.S.C. § 2326
18 U.S.C. § 1343
18 U.S.C. § 1956(h)
18 U.S.C. § 1956(a)(2)(A)
18 U.S.C. § 982(a)(1) & (a)(8)
18 U.S.C. § 2

THE GRAND JURY CHARGES:

At all times relevant to this Indictment:

COUNT ONE
(CONSPIRACY - 18 U.S.C. SECTION 1349)

Introduction

1. Defendant GEOFFREY ALEXANDER RAMER, a/k/a GEOFFREY ALEXANDER RAMER-MESEN (RAMER), was a dual citizen of the United States and Costa Rica who owned, managed and actively participated in the operations of telemarketing call centers, in and around San Jose, Costa Rica.

1. As used in this indictment, a "call center" was a business that RAMER and his co-conspirators used in connection with a telemarketing scheme designed to defraud U.S. residents by misleading U.S. residents into believing that they had won a large monetary prize in a sweepstakes contest.

3. **RAMER** and his co-conspirators used identical or similar "pitches." A pitch was a script designed to be used over the telephone with a prospective victim. For example, a typical pitch included a request for money to cover fees associated with sending a prospective victim the purported sweepstakes prize. A "reload" was a pitch to victims who previously sent money to claim a sweepstakes prize. A typical reload included a request for additional money to cover additional fees associated with an increase in the purported sweepstake prize.

4. In many instances victims were contacted by both an "opener" and a "loader." An opener was a telemarketer who had the initial contact with a prospective victim. A loader was a telemarketer who took over the contact with a victim after the victim had made an initial payment as a result of misrepresentations made by the opener. The loader typically falsely informed such victims that the prize amount they were previously told they had won had increased, either because of a clerical error or because another prize winner had been disqualified. The loader would then attempt to induce the victim to send additional money to allegedly pay for various fees, duties, and insurance to retrieve the larger sweepstakes prize.

5. The name, address, and telephone number of the victim was known as a "lead." The name, address, and telephone numbers of the victims were purchased from lead or list brokers.

6. **RAMER** and his co-conspirators in the call centers, when acting as openers and loaders, often used aliases, concealed and frequently changed the location of the call centers, and conducted operations from Costa Rica for the purpose of, among other things, avoiding investigation by United States law enforcement authorities and victims.

The Conspiracy

7. Beginning in or about 2008, the exact date being unknown, and continuing until late 2013, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

GEOFFREY ALEXANDER RAMER,
a/k/a
GEOFFREY ALEXANDER RAMER-MESEN,

together with other conspirators, both known and unknown to the Grand Jury, knowingly and intentionally, combined, conspired, confederated and agreed together, and with each other, 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, and to transmit and cause to be transmitted, by means of wire, radio and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice and attempting to do so, contrary to Title 18, United States Code, Section 1343.

Purpose of the Conspiracy

8. A purpose of the conspiracy was for **RAMER** and his co-conspirators to unjustly enrich themselves by fraudulently inducing victims to pay **RAMER** and his co-conspirators “fees” associated with the purported sweepstakes prizes.

Manner and Means Used in the Conspiracy

9. Among the manner and means by which **RAMER** and his co-conspirators carried out the purpose of the conspiracy were the following:

10. **RAMER** and his co-conspirators would target residents of the United States, typically, although not exclusively, over the age of 55. **RAMER** and his co-conspirators, acting

as openers, would inform prospective victims that they had won second prize in a sweepstakes. **RAMER** and his co-conspirators would tell their victims that in order to receive the prize, the victims had to pay up to several thousand dollars for a purported "refundable insurance fee," via Western Union or MoneyGram money wire transfers, to an alleged "insurance entity." The sweepstakes were a ruse and did not exist, and **RAMER** and his co-conspirators kept the "refundable insurance fees" for their own personal benefit.

11. In order to induce their victims to wire money, **RAMER** and his co-conspirators, as openers and loaders, would often falsely represent themselves as being agents of the "Federal Trade Commission," or another United States government agency. **RAMER** and his co-conspirators would falsely represent to the victims that they were a governmental agency charged with ensuring that sweepstakes winners received their money. Frequently, **RAMER** and his co-conspirators would inform their victims that it was the job of the "Federal Trade Commission" to see that the victims received their prize money.

12. **RAMER** and his co-conspirators, as openers and loaders, would call their victims from Costa Rica using Voice over Internet Protocol (VoIP), which utilized computers to make telephone calls over the Internet. This practice permitted **RAMER** and his co-conspirators to use recognizable United States area codes, such as the Washington, D.C. area code, to make it appear on the victims' caller identification devices that the calls were made from somewhere within the United States when, in fact, **RAMER** and his co-conspirators would call from Costa Rica.

13. When an intended victim asked to validate the legality of the sweepstakes company that purportedly had awarded the prize, **RAMER** and his co-conspirators would give the intended victim telephone numbers with United States area codes, but which actually were

answered by **RAMER** and his co-conspirators. As openers, **RAMER** and his co-conspirators, would pose as representatives of the non-existent sweepstakes company, would answer these telephone calls, and would falsely reassure victims that they had indeed won a sweepstakes prize.

14. After a victim had been induced to send money, **RAMER** and his co-conspirators would act as loaders and call that victim and tell the victim that: 1) a mistake had been made; 2) the victim had actually won first prize; and 3) the victim had to wire thousands of additional dollars for additional fees to ensure the safe delivery of the winning proceeds. **RAMER** and his co-conspirators would continue to contact and reload each victim and would provide him/her with additional false reasons as to why the victim had to wire additional money to receive their prize. Typically, this reloading practice would continue so long as the victim continued to wire money.

15. **RAMER** and his co-conspirators caused funds to be wired through Western Union by victims. These funds were electronically routed to and processed in Charlotte, Mecklenburg County, North Carolina prior to being sent to their ultimate destination in Costa Rica.

16. **RAMER** and his co-conspirators would unjustly enrich themselves by retaining the proceeds of this fraud.

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

**COUNTS TWO THROUGH NINE
(WIRE FRAUD - 18 U.S.C. SECTION 1343)**

Introduction

17. The allegations in paragraphs 1 through 7 of Count 1 of this Indictment are hereby

realleged and incorporated by reference as if fully set forth herein.

The Scheme and Artifice

18. The allegations in paragraphs 10 through 16 of Count 1 of this Indictment are hereby realleged and incorporated by reference as if fully set forth herein, as describing the defendant's scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

19. On or about the dates set forth below, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant,

GEOFFREY ALEXANDER RAMER,
a/k/a
GEOFFREY ALEXANDER RAMER-MESEN,

and others known and unknown to the Grand Jury, aiding and abetting one another, with the intent to defraud, did knowingly and intentionally devise a 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, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice and attempting to do so:

Count	Victim Initials	Sent From	Received	Date	Amount
2	RM	Parkersburg, WV	Costa Rica	5/20/2010	\$4,725
3	JVH	Newburgh, New York	Costa Rica	6/1/2010	\$2,350
4	JVH	Newburgh, New York	Costa Rica	6/7/2010	\$2,150
5	JVH	Newburgh, New York	Costa Rica	7/1/2010	\$4,500

Count	Victim Initials	Sent From	Received	Date	Amount
6	GC	Winchester, Kentucky	Costa Rica	7/29/2010	\$4,020
7	GC	Winchester, Kentucky	Costa Rica	7/29/2010	\$4,500
8	FG	Mt. Airy, North Carolina	Costa Rica	8/24/2010	\$1,550
9	FG	Mt. Airy, North Carolina	Costa Rica	8/27/2010	\$1,500

All in violation of Title 18, United States Code, Sections 1343, 2326(2)(A) & (B), and 2.

**COUNT 10
(CONSPIRACY TO COMMIT MONEY LAUNDERING - 18 U.S.C. § 1956(h))**

20. The allegations in paragraphs 1 through 7 and 10 through 16 of Count 1 of this Indictment are hereby realleged and incorporated by reference as if fully set forth herein.

21. Beginning in or about 2008, the exact date being unknown, and continuing until in or about late 2013, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant

GEOFFREY ALEXANDER RAMER,
a/k/a
GEOFFREY ALEXANDER RAMER-MESEN,

did unlawfully, willfully, and knowingly combine, conspire, confederate, and agree with others both known and unknown to the Grand Jury, to transport, transmit, and transfer monetary instruments and funds from a place in the United States to a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, namely, wire fraud, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

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

COUNTS 11 THROUGH 17
(MONEY LAUNDERING – INTERNATIONAL - 18 U.S.C. SECTION
1956(a)(2)(A))

22. The allegations in paragraphs 1 through 7 and 10 through 16 of Count 1 of this Indictment are hereby realleged and incorporated by reference as if fully set forth herein.

23. On or about the dates set forth below, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendant,

GEOFFREY ALEXANDER RAMER,
a/k/a
GEOFFREY ALEXANDER RAMER-MESEN,

did transport, transmit and transfer, and caused to be transported, transmitted and transferred, monetary instruments, and funds from and through a place in the United States to a place outside of the United States with the intent to promote the carrying on of specified unlawful activity, specifically, wire fraud, on or about the dates indicated and in the approximate amounts indicated:

Count	Victim Initials	Sent From	Received	Date	Amount
11	DW	Fontana, CA	Costa Rica	5/22/2009	\$4901.96
12	AB	Honolulu, HI	Costa Rica	7/28/2009	\$4,500
13	AB	Honolulu, HI	Costa Rica	7/30/2009	\$2,900
14	DW	Colton, CA	Costa Rica	8/28/2009	\$4,660
15	DW	Rocklin, CA	Costa Rica	9/02/2009	\$5,000
16	NB	Rocklin, CA	Costa Rica	9/14/2010	\$3,800

Count	Victim Initials	Sent From	Received	Date	Amount
17	NB	Rocklin, CA	Costa Rica	9/27/2010	\$4,500

All in violation of Title 18, United States Code, Section 1956(a)(2)(A), and 2.

NOTICE OF FORFEITURE
18 U.S.C. SECTION 982(a)(1) and (a)(8)

1. The allegations in paragraphs 1 through 7, and 10 through 16 of Count 1 of this Indictment are hereby realleged and incorporated by reference as if fully set forth herein.
2. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 1349 and 1343 set forth in Counts 1 through 9 of this Indictment, which involved telemarketing as that term is used in Title 18, United States Code, Section 2325, the defendant,

GEOFFREY ALEXANDER RAMER,
a/k/a
GEOFFREY ALEXANDER RAMER-MESEN,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(8),

- (A) any real or personal property used or intended to be used to commit, to facilitate, or to promote the commission of such offenses;
- (B) any real or personal property, constituting, derived from, or traceable to the gross proceeds obtained directly or indirectly as a result of the offenses; and
- (C) a sum of money representing the amount of proceeds obtained as a result of the offense for which defendants are convicted up to a value of \$1,886,018.

3. A money judgment of at least (\$1,886,018) one million, eight hundred eighty-six thousand, eighteen dollars and No/00 in United States currency, for which the defendants are jointly and severally liable.

4. If any of the property described above, as a result of any act or omission of the defendant:

- (A) cannot be located upon 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

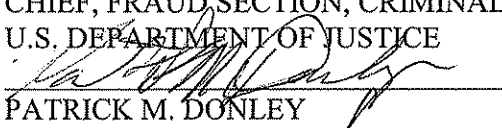
without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982 (b)(1).

A TRUE BILL D 00

ANNE M. TOMPKINS
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U.S. DEPARTMENT OF JUSTICE


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NEW CRIMINAL CASE COVER SHEET

U. S. DISTRICT COURT

(To be used for all new Bills of Indictments and Bills of Information)

CASE SEALED: YES NO

DOCKET NUMBER:

3:14CR22

If case is to be sealed, a Motion to Seal and proposed Order **must** be attached.)

CASE NAME

:US vs GEOFFREY ALEXANDER RAMER

[Empty box for case name details]

COUNTY OF OFFENSE

: Mecklenburg

[Empty box for county of offense]

RELATED CASE INFORMATION

:

[Empty box for related case information]

Magistrate Judge Case Number

:

[Empty box for Magistrate Judge Case Number]

Search Warrant Case Number

:

[Empty box for Search Warrant Case Number]

Miscellaneous Case Number

:

[Empty box for Miscellaneous Case Number]

Rule 20b

:

[Empty box for Rule 20b]

SERVICE OF PROCESS

:

Already in Custody

[Empty box for service of process details]

U.S.C. CITATIONS (Mark offense carrying greatest weight):

Petty

Misdemeanor

Felony

18 USC 1349, 2326, 1343, 1956(h), 1956(a)(2)(A), 982(a)(1), 982(a)(8), 2

[Empty box for U.S.C. citations]

JUVENILE:

Yes

No

ASSISTANT U. S. ATTORNEY

:

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VICTIM/WITNESS COORDINATORS:

[Empty box for victim/witness coordinators]

INTERPRETER NEEDED

:

[Empty box for interpreter needed]

LIST LANGUAGE AND/OR DIALECT:

[Empty box for language and/or dialect]

REMARKS AND SPECIAL INSTRUCTIONS:

[Large empty box for remarks and special instructions]

(Maintain form in the Attorney Work Product folder / purge before archiving)