

UNITED STATES DISTRICT COURT

FILED 08 JAN 19 13 57 USDC-ORP

DISTRICT OF OREGON

PORTLAND DIVISION

**UNDER
SEAL**

UNITED STATES OF AMERICA,

3:19-cr- 00010-MO

v.

INDICTMENT

RONNIE STEVENS (aka TIM EPHREM)
and
TINA EPHREM (aka LISA ANN
PETERSON),

18 U.S.C. §§ 1349
18 U.S.C. §§ 1343
18 U.S.C. § 2

Defendants.

Forfeiture Allegation

UNDER SEAL

THE GRAND JURY CHARGES:

COUNT 1

(Conspiracy to Commit Wire Fraud)
(18 U.S.C. § 1349)

At all times relevant to this Indictment:

A. General Allegations

1. Defendant **RONNIE STEVENS** aka **TIM EPHREM** (herein after referred to as **STEVENS**), was a resident of the State and District of Oregon. **STEVENS** held himself out as a buyer and seller of vehicles, but is not employed.

2. Defendant **TINA EPHREM** aka **LISA ANN PETERSON** (herein after referred to as **EPHREM**), was a resident of the State and District of Oregon. **EPHREM** is not employed. **STEVENS** and **EPHREM** presented as husband and wife.

3. AV1 and AV2, a married couple, were residents of the State and District of Oregon. AV1 and AV2 had amassed savings from successful business ventures and investments. AV1 is currently 78 years old. AV2 is currently 74 years old.

B. The Conspiracy to Commit Wire Fraud

4. From on or about September 2016 through on or about December 2018, in the District of Oregon and elsewhere, defendants **RONNIE STEVENS and TINA EPHREM**, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with each other, and with others, both known and unknown to the Grand Jury, to devise a material scheme and artifice to defraud AV1 and AV2 and to obtain money and property from AV1 and AV2 by means of material false and fraudulent pretenses, representations, and promises, and omissions of material fact and knowingly transmit and cause to be transmitted by means of wire communications in interstate commerce, writings, signs, signals, pictures, and sounds in furtherance and execution of the material scheme or artifice, in violation of Title 18, United States Code, Section 1343.

C. Manner and Means of the Conspiracy

5. The object and purpose of the defendants' conspiracy was to fraudulently obtain money from AV1 and AV2.

6. As part of the conspiracy, **STEVENS** approached AV1 in September 2016. AV1 offered a commercial trailer for sale at his business location in Oregon. **STEVENS** told AV1 that **STEVENS** brokered vehicle sales and could sell the trailer for AV1 in exchange for a cut of the profit. A woman accompanied **STEVENS** during this first interaction. **STEVENS** did not sell the trailer.

7. As part of the conspiracy, **STEVENS** quickly ingratiated himself with AV1 and gained AV1's trust. AV1 later described **STEVENS** as "humble and honest" but "down on his luck." **STEVENS** told AV1 that **STEVENS** supported a wife and teenage daughter, and that **STEVENS** suffered with health issues.

8. As part of the conspiracy, in October 2016, **STEVENS** initially asked AV1 to advance **STEVENS** \$5,200 to buy and sell cars, with the promise that **STEVENS** would return \$6,700 to AV1. **STEVENS** never returned any funds to AV1 in conjunction with this promise.

9. As part of the conspiracy, **STEVENS** approached AV1 with an alleged lucrative investment opportunity. **STEVENS** stated a friend named Tammy Ward was set to inherit a valuable estate from her recently deceased father. **STEVENS** claimed the estate was valued in excess of \$100 million dollars and included real properties, classic cars, and vans, among other items. According to **STEVENS**, the estate could not be released to Tammy Ward due to estate fees and legal costs. **STEVENS** told AV1 that if AV1 could advance the funds to release the estate, AV1 would be given title to the classic cars and vans. **STEVENS** assured AV1 that the value of the classic cars and vans far exceeded the funds needed to release the estate. **STEVENS** told AV1 that they needed to be secretive about the deal to protect Tammy Ward.

10. As part of the conspiracy, **STEVENS** fabricated the Tammy Ward estate story. In truth and fact, no such person and no such estate exists.

11. As part of the conspiracy, **STEVENS** told AV1 that **STEVENS** could only accept cash for the estate costs. **STEVENS** would ask AV1 for a specific amount and would arrange a time and place for AV1 to provide **STEVENS** with the cash. **STEVENS** would typically ask AV1 to meet at an Elmer's Restaurant or in parking lots. In conjunction with the estate story,

AV1 first gave Stevens approximately \$15,000.00 in cash and then an additional approximately \$25,000.00 two weeks after the first payment. The amounts escalated over time.

12. As part of the conspiracy, **STEVENS** told AV1 various stories regarding delays and increased costs associated with the release of the alleged estate to Tammy Ward.

13. As part of the conspiracy, once AV2 found out about her husband's cash expenditures, **STEVENS** spoke with AV2, primarily over the phone. **STEVENS** relayed the Tammy Ward estate story directly to AV2 and began speaking with both AV1 and AV2.

14. As part of the conspiracy, AV1 and AV2 both spoke to a woman on the phone who claimed to be Tammy Ward. Tammy Ward told AV1 and AV2 that she appreciated the financial help from AV1 and AV2. Tammy Ward reiterated the estate story told by **STEVENS**. Tammy Ward further told AV2 that Tammy Ward suffered from heart troubles, had two small children, and wanted AV2 to care for her children if she passed. AV1 described Tammy Ward's voice as "course." AV2 described Tammy Ward's voice as a sounding like an uneducated woman in her mid-forties. Based on the investigation, the victims' description of Tammy Ward's voice is consistent with the voice of **EPHREM**.

15. As part of the conspiracy, **STEVENS** would call AV1 and AV2 and occasionally hand the phone directly to a person claiming to be Tammy Ward to speak with AV1 and AV2. AV2 asked to meet Tammy Ward in person, but the meeting never took place.

16. As part of the conspiracy, **STEVENS** frequently called AV1. From approximately September of 2016 until June of 2018, **STEVENS**' cell phone number placed over 5,000 outgoing calls to AV1 and AV2. **STEVENS**' calls to AV1 and AV2 exceeded 400 calls per month in March, April, and May of 2018.

17. As part of the conspiracy, when **STEVENS** called AV1 and AV2, **STEVENS** frequently promised AV1 and AV2 the estate would soon close, followed by claims of delay and a request for additional funds.

18. As part of the conspiracy, **STEVENS** did not maintain a bank account. **EPHREM** maintained a Bank of America account xx1836 for the benefit of both **STEVENS** and **EPHREM**. **EPHREM** funded the Bank of America account with the cash proceeds of the conspiracy. **EPHREM** spent the proceeds of the conspiracy on joint expenses for **STEVENS** and **EPHREM** including but not limited to: utility bills for their shared residence, restaurants, cigars, retail, and travel to locations including Hawaii, Anaheim, Las Vegas, and Spirit Mountain Lodge.

19. As part of the conspiracy, **STEVENS** continued to solicit additional funds from AV1 and AV2 to release the alleged estate. At **STEVENS**' request and based on **STEVENS**' promises, AV1 provided **STEVENS** with cash in excess of \$1,500,000.00 since the inception of the conspiracy.

20. As part of the conspiracy, **STEVENS** never provided AV1 or AV2 with any payment or return of funds.

COUNTS 2 THROUGH 6
(Wire Fraud)
(18 .S.C. § 1343 and 18 U.S.C. § 2)

21. The Grand Jury incorporates paragraphs 1–20 as if set forth fully herein and re-alleges the material scheme and artifice to defraud and to obtain money and property from AV1 and AV2 by means of false and fraudulent pretenses, representations, and promises, and materials omission of material fact, as described in those paragraphs.

22. On or about the dates set forth below, in the District of Oregon and elsewhere, **RONNIE STEVENS and TINA EPHREM**, for the purpose of executing the aforementioned material scheme and artifice to defraud, did knowingly transmit and cause to be transmitted in interstate commerce by means of wire communications, signals, and sounds, that is cell phone calls across state lines, as set forth below, each such use of the wires being a separate count of this Indictment:

COUNT	DATE	ORIGINATION	DESTINATION	DESCRIPTION OF WIRE
2	12/31/2016	NEVADA	OREGON	Call from STEVENS' cell phone to cell phone for AV1; approximately 3 minutes and 40 seconds in length.
3	2/05/2017	NEVADA	OREGON	Call from STEVENS' cell phone to cell phone for AV1; approximately 2 minutes and 45 seconds in length.
4	2/04/2018	NEVADA	OREGON	Call from STEVENS' cell phone to cell phone for AV1; approximately 5 minutes and 50 seconds in length.
5	7/10/2018	NEVADA	OREGON	Call from STEVENS' cell phone to cell phone for AV1; approximately 4 minutes and 40 seconds in length.
6	7/10/2018	NEVADA	OREGON	Call from STEVENS' cell phone to cell phone for AV2; approximately 4 minutes and 30 seconds in length.

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

FORFEITURE ALLEGATION
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

Upon conviction of one or more of the offenses alleged in Counts 1-6 of the Indictment, **RONNIE STEVENS** and **TINA EPHREM**, shall forfeit to the United States of America pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) any property constituting or derived from proceeds traceable to the violations, including, but not limited to the following:

A sum of money equal to the amount of proceeds obtained as a result of the offenses alleged in Counts 1-6 in the form of a money judgment.

SUBSTITUTE ASSETS

If any of the above-described forfeitable property listed in Counts 1 – 6, as a result of any act or omission of the defendant(s):

- (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, pursuant to 21 U.S.C. § 853(p) as incorporated by 28 U.S.C.

///

///

///

§ 2461(c), to seek forfeiture of any other property of said defendant(s) up to the value of the forfeitable property described in these forfeiture allegations.

Dated: January 8, 2019.

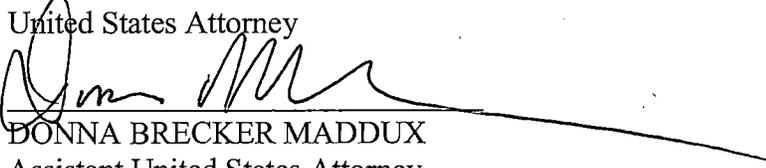
A TRUE BILL



OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS
United States Attorney


DONNA BRECKER MADDUX
Assistant United States Attorney