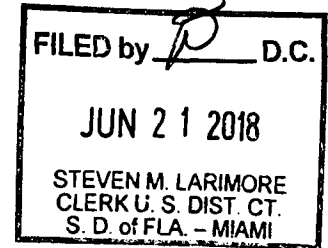


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: **18-60174 CR-BLOOM**  
**VALLE**

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



UNITED STATES OF AMERICA

vs.

THOMAS MICHAEL WHITE,  
JOHN KEVIN REECH, and  
JOSEPH MARIO GENZONE,

Defendants.

\_\_\_\_\_ /

**INDICTMENT**

The Grand Jury charges that:

**GENERAL ALLEGATIONS**

At all times relevant to this Indictment:

1. First Call Ventures, LLC ("First Call Ventures") was incorporated in the State of Florida in December 2011, with its principal place of business in Broward County, Florida. First Call Ventures was purportedly a direct-to-consumer marketing firm engaged in sales lead generation for both its own products and services as well as those of third parties throughout the moving and transport industries.

2. First Call Movers & Transport of Florida, LLC ("First Call Movers") was incorporated in the State of Florida in July 2012, with its principal place of business in Broward County, Florida. First Call Movers was a subsidiary of First Call Ventures and was purportedly a moving brokerage and household goods transport company.

3. First Call Auto Transport was a subsidiary of First Call Ventures and purportedly an automobile transport company.

4. First Call Freight was a subsidiary of First Call Ventures and purportedly a freight transportation company.

5. First Call List was a subsidiary of First Call Ventures and purportedly a sales lead list generating company.

6. Defendant **THOMAS MICHAEL WHITE** resided in Broward County, Florida, and was president and Chief Executive Officer of First Call Ventures and its subsidiary companies, First Call Movers, First Call Auto Transport, First Call Freight, and First Call List. **WHITE** ran these companies and also sold shares and ownership units to investors.

7. Defendant **JOHN KEVIN REECH** resided in Broward County, Florida, and was a sales agent who sold shares and ownership units in First Call Ventures to investors. His title was Director of Business Development.

8. Defendant **JOSEPH MARIO GENZONE** resided in Palm Beach County, Florida, and was a sales agent who sold shares and ownership units in First Call Ventures to investors. His title was Business Development Manager.

**COUNT 1**  
**CONSPIRACY TO COMMIT MAIL AND WIRE FRAUD**  
**(18 U.S.C. § 1349)**

1. Paragraphs 1 through 8 of the General Allegations section of this Indictment are realleged and fully incorporated herein by reference.

2. From in or around December 2011, through in or around November 2014, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

**THOMAS MICHAEL WHITE,**  
**JOHN KEVIN REECH, and**

**JOSEPH MARIO GENZONE,**

did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate, and agree with each other and others known and unknown to the Grand Jury, to:

(a) knowingly, and with the 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 the pretenses, representations, and promises were false and fraudulent when made, and for the purpose of executing such scheme and artifice to defraud, did knowingly cause to be delivered certain mail matter by the United States Postal Service and by private or commercial interstate carrier, according to the directions thereon, in violation of Title 18, United States Code, Section 1341; and

(b) knowingly, and with the 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 the pretenses, representations, and promises were false and fraudulent when made, and for the purpose of executing such scheme and artifice, did knowingly transmit and cause to be transmitted in interstate and foreign commerce, by means of wire communication, 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 defendants and their co-conspirators to unjustly enrich themselves by misappropriating investor money for their personal use and benefit by making material false and fraudulent representations, and concealing and failing to state material facts concerning, among other things, the profitability and safety of investing in First Call

Ventures and its subsidiaries, through the purchase of shares and ownership units in these companies, and the defendants' and their co-conspirators' excessive salaries, fees, commissions and other monetary distributions.

**MANNER AND MEANS OF THE CONSPIRACY**

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

4. In or around December 2011, **THOMAS MICHAEL WHITE** incorporated First Call Ventures, and later First Call Movers. **WHITE** subsequently founded or acquired First Call Auto Transport, First Call Freight, and First Call List.

5. From in or around January 2012, to in or around November 2014, **THOMAS MICHAEL WHITE** opened and maintained bank accounts in his name and in the names of his companies at financial institutions located in Broward County, Florida. **WHITE** and some of his co-conspirators had signing authority on the bank accounts, but **WHITE** maintained control of at least four separate bank accounts linked to his companies.

6. From in or around January 2012, to in or around November 2014, **THOMAS MICHAEL WHITE** offered investors shares of stock and units in First Call Ventures to raise capital for his company. These "investments" often were made through private placement offerings and claimed fractionalized ownership interest in First Call Ventures. **WHITE** personally solicited First Call Ventures investors throughout the United States.

7. Beginning in 2012, **THOMAS MICHAEL WHITE** hired sales agents, including **JOHN KEVIN REECH** and **JOSEPH MARIO GENZONE**, to solicit, offer and sell shares in First Call Ventures. **WHITE** hired the sales agents to solicit potential investors from a "phone room" that he oversaw. In this phone room, **REECH**, **GENZONE**, and others, acting as

"fronters," called potential investors whose names and other contact information appeared on "lead lists." Using telemarketing techniques and "lead lists," the defendants and their co-conspirators contacted potential investors, and solicited, offered, and sold shares of stock in First Call Ventures to people located throughout the United States.

8. Once a person showed interest in First Call Ventures, the fronting sales person, including **JOHN KEVIN REECH** and **JOSEPH MARIO GENZONE**, referred the potential investor to **THOMAS MICHAEL WHITE** so that **WHITE** could "close" the deal. **WHITE** acted as the "closer" on nearly all of the investor sales.

9. **THOMAS MICHAEL WHITE, JOHN KEVIN REECH, JOSEPH MARIO GENZONE** and their co-conspirators directed investors to make payments for First Call Ventures' stock shares transactions by: (a) transferring funds electronically via interstate wires to bank accounts in Broward County, Florida, that **WHITE** controlled; or (b) mailing checks to First Call Ventures' offices in Broward County, Florida.

10. **THOMAS MICHAEL WHITE, JOHN KEVIN REECH, and JOSEPH MARIO GENZONE** told investors they could expect a 100% return on their investment in First Call Ventures. On more than one occasion, **WHITE, REECH, and GENZONE** told investors they expected First Call Ventures to make over \$15 million in annual sales. When investors told **WHITE, REECH, and GENZONE** that they lacked sufficient liquid assets to make an investment, **WHITE, REECH, and GENZONE** encouraged the investors to withdraw funds from their individual retirement accounts in order to invest. **WHITE, REECH, and GENZONE** made these representations even though they knew First Call Ventures was on the verge of complete failure.

11. **THOMAS MICHAEL WHITE, JOHN KEVIN REECH, and JOSEPH MARIO GENZONE** made false statements to investors regarding the use of investor funds. For example, **WHITE, REECH, and GENZONE** asserted to investors, both orally and in writing, that investor proceeds would be used for First Call Ventures business purposes, such as marketing, business growth, and information technology. In fact, over 80% of all First Call Ventures' investor funds went to **WHITE** for salaries, commissions, and other monetary distributions to himself, **REECH, GENZONE,** and others.

12. To create the illusion of success, **THOMAS MICHAEL WHITE** paid prior investors' "interest payments" with new investors' money.

13. To induce investors to provide money to the defendants and their co-conspirators, the defendants and their co-conspirators made and caused others to make, materially false and fraudulent statements to investors, and concealed and omitted to state, and caused others to conceal and omit to state, material facts to investors, including, among other things, the following:

**Materially False Statements**

- (a) that no fees would be charged to investors unless First Call Ventures turned a profit;
- (b) that First Call Ventures was a "safe investment," "profitable investment," and one where "you won't lose money;"
- (c) that the value of the First Call Ventures shares would increase significantly;
- (d) that investors would receive a guaranteed return on investment;
- (e) that First Call Ventures was successful and profitable;
- (f) that First Call Ventures had established contracts that would generate millions of dollars in revenue;
- (g) that investor funds would be used for sales and marketing, working capital and

general corporate purposes;

- (h) that the defendants personally invested in First Call Ventures;

**Concealment and Omission of Material Facts**

(i) that the defendants and their co-conspirators used over 80% of investor proceeds to pay themselves and their co-conspirators undisclosed excessive salaries, fees, commissions and other monetary distributions; and

(j) that First Call Ventures was on the verge of complete financial failure, unsuccessful, and unprofitable.

14. Over the course of the scheme, **THOMAS MICHAEL WHITE, JOHN KEVIN REECH, and JOSEPH MARIO GENZONE**, and their co-conspirators, falsely and fraudulently caused approximately thirteen individuals to invest in First Call Ventures, and raised approximately \$2 million dollars through the sale of shares in First Call Ventures.

All in violation of Title 18, United States Code, Section 1349.

**COUNTS 2-5**  
**MAIL FRAUD**  
**(18 U.S.C. § 1341)**

1. Paragraphs 1 through 8 of the General Allegations section of this Indictment are realleged and fully incorporated herein by reference.

2. From in or around January 2012, through in or around November 2014, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

**THOMAS MICHAEL WHITE,**  
**JOHN KEVIN REECH, and**  
**JOSEPH MARIO GENZONE,**

did knowingly, and with the 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 the pretenses, representations, and promises 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 the United States Postal Service and by private and commercial interstate carrier, according to the directions thereon, in violation of Title 18, United States Code, Section 1341.

**PURPOSE OF THE SCHEME AND ARTIFICE**

3. It was a purpose of the scheme and artifice for the defendants and their accomplices to unlawfully enrich themselves by misappropriating investor money for their personal use and benefit by making material false and fraudulent representations, and concealing and failing to state material facts concerning, among other things, the safety and profitability of investing in First Call Ventures and its subsidiaries, through the purchase of shares and ownership units in these companies, and the defendants' and their accomplices' excessive salaries, fees, commissions and other monetary distributions.

**THE SCHEME AND ARTIFICE**

4. Paragraphs 4 through 14 of the Manner and Means of the Conspiracy section of Count 1 are repeated, realleged, and fully incorporated herein as a description of the scheme and artifice.

**USE OF THE MAILS**

5. On or about the dates enumerated as specified in each count below, the defendants, for the purpose of executing and in furtherance of the scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, did knowingly cause to be delivered certain mail matter by the United States Postal



Service and by private and commercial interstate carrier, according to the directions thereon, as more particularly described below:

<b>COUNT</b>	<b>DEFENDANTS</b>	<b>APPROXIMATE DATE</b>	<b>DESCRIPTION OF MAILING</b>
2	<b>THOMAS MICHAEL WHITE, JOHN KEVIN REECH, and JOSEPH MARIO GENZONE</b>	June 25, 2013	First Call Ventures, LLC Confidential Equity Offer for investor G.T. sent via United States Postal Service from the Southern District of Florida to Plymouth, IN
3	<b>THOMAS MICHAEL WHITE and JOHN KEVIN REECH</b>	June 25, 2013	First Call Ventures, LLC, Investor Report for investor M.J.A. sent via United States Postal Service from the Southern District of Florida to Darien, CT
4	<b>THOMAS MICHAEL WHITE, JOHN KEVIN REECH, and JOSEPH MARIO GENZONE</b>	August 1, 2013	First Call Ventures, LLC, Letter regarding First Call Notes for investor M.N. sent via United States Postal Service from the Southern District of Florida to Winona Lake, IN
5	<b>THOMAS MICHAEL WHITE, JOHN KEVIN REECH, and JOSEPH MARIO GENZONE</b>	October 6, 2014	Uncollectible Unsecured Note Form for Self-Directed Accounts for investor M.N. for account ending in xxx352 sent via United States Postal Service from Winona Lake, IN to Equity Trust Company, Westlake, OH

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

**COUNT 6**  
**WIRE FRAUD**  
**(18 U.S.C. § 1343)**

1. Paragraphs 1 through 6 of the General Allegations section of this Indictment are realleged and fully incorporated herein by reference.

2. From in or around December 2011, through in or around November 2014, in

Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**THOMAS MICHAEL WHITE,**

did knowingly, and with the 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 the pretenses, representations, and promises were false and fraudulent when made, and for the purpose of executing such scheme and artifice, did knowingly transmit and cause to be transmitted in interstate and foreign commerce by means of wire communication, certain writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343.

**PURPOSE OF THE SCHEME AND ARTIFICE**

3. It was a purpose of the scheme and artifice for the defendant and his accomplices to unlawfully enrich themselves by misappropriating investor money for their personal use and benefit by making material false and fraudulent representations, and concealing and failing to state material facts concerning, among other things, the profitability and safety of investing in First Call Ventures and its subsidiaries, through the purchase of shares and ownership units in these companies, and the defendant's and his accomplices' excessive salaries, fees, commissions and other monetary distributions.

**THE SCHEME AND ARTIFICE**

4. Paragraphs 4 through 14 of the Manner and Means of the Conspiracy section of Count 1, only as to defendant **THOMAS MICHAEL WHITE**, are repeated, realleged, and fully incorporated herein as a description of the scheme and artifice.

**USE OF THE WIRES**

5. On or about the dates enumerated below, the defendant, for the purpose of executing and in furtherance of the scheme and artifice to defraud and to obtain money and property by means of materially and false and fraudulent pretenses, representations, and promises, knowing the pretenses, representations, and promises were false and fraudulent when made, did knowingly transmit and caused to be transmitted by wire communication in interstate and foreign commerce certain writings, signs, signals, pictures and sounds, as more particularly described below:

<b>COUNT</b>	<b>APPROXIMATE DATE</b>	<b>DESCRIPTION OF WIRE COMMUNICATION</b>
6	July 12, 2013	Investor S.M. wired \$150,000 from a bank account located in Wilson, N.C. to a First Call Ventures, LLC bank account located in Fort Lauderdale, Florida

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

**FORFEITURE**  
**(18 U.S.C. § 982(a)(1)(C))**

1. The allegations of this Indictment are re-alleged, and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of certain property in which the defendants, **THOMAS MICHAEL WHITE**, **JOHN KEVIN REECH**, and **JOSEPH MARIO GENZONE**, have an interest.

2. Upon conviction of a violation of, or conspiracy to violate, Title 18, United States Code, Sections 1341 and/or 1343, as alleged in Counts 1 through 6 of this Indictment, the defendants, **THOMAS MICHAEL WHITE**, **JOHN KEVIN REECH**, and **JOSEPH MARIO GENZONE**, shall each forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such violation.

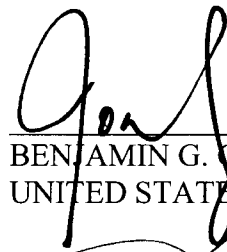
All pursuant to Title 18, United States Code, Section 981(a)(1)(C), as made criminally applicable by Title 28, United States Code, Section 2461(c), and the procedures set forth at Title 21, United States Code, Section 853.

A TRUE BILL



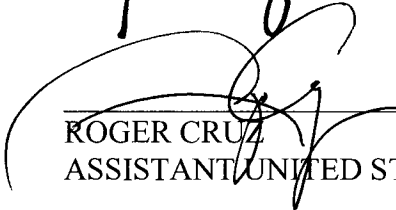
---

FOREPERSON



---

BENJAMIN G. GREENBERG  
UNITED STATES ATTORNEY



---

ROGER CRUZ  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

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

v.

**CERTIFICATE OF TRIAL ATTORNEY\***

THOMAS MICHAEL WHITE, et al.  
Defendants.  
\_\_\_\_\_ /

**Superseding Case Information:**

**Court Division:** (Select One)

X  Miami \_\_\_\_\_ Key West  
FTL \_\_\_\_\_ WPB \_\_\_\_\_ FTP

New Defendant(s) Yes \_\_\_\_\_ No \_\_\_\_\_  
Number of New Defendants \_\_\_\_\_  
Total number of counts \_\_\_\_\_

I do hereby certify that:

- 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.
- 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 3161.
- Interpreter: (Yes or No)  No   
List language and/or dialect \_\_\_\_\_
- This case will take  7  days for the parties to try.
- Please check appropriate category and type of offense listed below:

(Check only one)	(Check only one)
I 0 to 5 days _____	Petty _____
II 6 to 10 days <u> X </u>	Minor _____
III 11 to 20 days _____	Misdem. _____
IV 21 to 60 days _____	Felony <u> X </u>
V 61 days and over _____	

6. Has this case been previously 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)  No

If yes: Magistrate Case No. \_\_\_\_\_

Related Miscellaneous numbers: \_\_\_\_\_

Defendant(s) in federal custody as of \_\_\_\_\_

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 Northern Region of the U.S. Attorney's Office prior to October 14, 2003? Yes \_\_\_\_\_ No  X

  
\_\_\_\_\_  
ROGER CRUZ  
ASSISTANT UNITED STATES ATTORNEY  
FL Bar/Court I.D. No. 157971

\*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** THOMAS MICHAEL WHITE

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

Count #: 1

Conspiracy to Commit Mail and Wire Fraud

Title 18, United States Code, Section 1349

**\*Max. Penalty:** Twenty (20) years' imprisonment

Counts #: 2-5

Mail Fraud

Title 18, United States Code, Section 1341

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

Count #: 6

Wire Fraud

Title 18, United States Code, Section 1343

**\*Max. Penalty:** Twenty (20) years' imprisonment

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

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** JOHN KEVIN REECH

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

Count #: 1

Conspiracy to Commit Mail and Wire Fraud

Title 18, United States Code, Section 1349

**\*Max. Penalty:** Twenty (20) years' imprisonment

Counts #: 2-5

Mail Fraud

Title 18, United States Code, Section 1341

**\*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.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** JOSEPH MARIO GENZONE

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

Count #: 1

Conspiracy to Commit Mail and Wire Fraud

Title 18, United States Code, Section 1349

**\*Max. Penalty:** Twenty (20) years' imprisonment

Counts #: 2, 4-5

Mail Fraud

Title 18, United States Code, Section 1341

**\*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.**