

CCC:JWB
F.# 2018R00971

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

MARIA THANOS,

Defendant.

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INFORMATION

Cr. No. _____
(T. 18, U.S.C., §§ 981(a)(1)(C),
1349 and 3551 et seq.; T. 21,
U.S.C., § 853(p); T. 28,
U.S.C., § 2461(c))

THE UNITED STATES CHARGES:

INTRODUCTION

At all times relevant to this Information, unless otherwise indicated:

1. The defendant MARIA THANOS worked for a direct mail operation based in Montreal, Canada. A co-conspirator (“CC1”), an individual whose identity is known to the United States, owned and controlled the direct mail operation. At times, the direct mail operation used the names Direct Marketing Concepts and Infogest Direct Marketing.

2. At the direction of CC1, the defendant MARIA THANOS worked with a co-conspirator (“CC2”), an individual whose identity is known to the United States, and others to manage the daily operations of the direct mail operation, which mailed solicitation letters to individuals in the United States and Canada. The defendant handled multiple aspects of the operation, including overseeing relationships with printing companies and other vendors. At times, at the direction of CC1, the defendant edited and proofread solicitation letters.

3. CC1 created shell companies registered in Canada and Hong Kong, including Zodiac Zone, Destiny Research Group, and Destiny Research Center (the “shell companies”), to conduct the direct mail operation and to conceal CC1’s involvement in that operation.

The Fraudulent Scheme

4. In or about and between January 1994 and November 2014, the defendant MARIA THANOS, together with others, devised, implemented and executed a scheme through the direct mail operation to defraud individuals throughout the United States and Canada (the “Victims”) and to induce the Victims to send money to the direct mail operation by falsely telling the Victims that they were receiving specific, individualized communications and advice from one or more purportedly world-renowned psychics. The fraudulent scheme generally worked as follows:

(a) CC1 and other co-conspirators created direct mail solicitations purporting to be individualized letters to the Victims from one or more purportedly world-renowned psychics. The letters fraudulently represented that the psychic had visions and otherwise determined through the use of psychic powers that the recipient had the opportunity to achieve great wealth and happiness with the psychic’s assistance. The letters appeared personalized, repeatedly referring to the recipient by name and often containing portions that appeared handwritten. In truth and in fact, the letters were mass-produced form letters that were not sent by the psychics, who had no involvement in writing the letters.

(b) CC1 worked with the defendant MARIA THANOS's co-conspirators to identify new recipients of the mass-mailed letters by renting and trading mailing lists with other direct mailers, including other mailers sending psychic solicitations.

(c) Through the execution of the fraudulent scheme, at the direction of CC1, the defendant MARIA THANOS and her co-conspirators caused millions of these fraudulent solicitations to be sent by United States mail, private commercial carrier, and foreign mail to the Victims – many of whom were elderly – throughout the United States, including in the Eastern District of New York, as well as in Canada.

(d) As part of the scheme, at the direction of CC1, the defendant MARIA THANOS and her co-conspirators directed the Victims to send a payment – usually \$5 to \$50 – to purchase various purportedly unique and/or supernatural objects, purportedly personalized astrological books and studies, or additional purportedly personalized astrological services. In truth and in fact, the purportedly unique and/or supernatural objects were mass produced trinkets and the psychics did not provide personalized astrological services.

(e) When a Victim responded to a solicitation, at the direction of CC1, the defendant MARIA THANOS and her co-conspirators sent numerous additional follow-up or “back end” letters to that Victim also purportedly sent from the psychics. These letters purported to describe additional visions, offered additional services and unique and/or supernatural objects, and sought additional payments – usually \$20 to \$50 – from the

Victim. Victims received as many as 30 to 40 of these back end letters in a single six-month mailing cycle.

(f) At the direction of CC1, the defendant MARIA THANOS and her co-conspirators provided pre-addressed return envelopes with the solicitation letters and instructed the Victims to return payments to one of the shell companies at an address in Sparks, Nevada or Chicago, Illinois. Those addresses were not real business addresses, but simply mailboxes controlled by CC1 and the defendant's co-conspirators. At the direction of CC1, the defendant's co-conspirators provided instructions that all mail arriving at the mailboxes should be forwarded to a "caging service" located in Suffolk County in the Eastern District of New York. A caging service is a company that receives and handles return mail, payments, and correspondence on behalf of a direct mailer.

(g) It was also part of the scheme that, at the direction of CC1, the defendant MARIA THANOS and her co-conspirators opened accounts with a payment processing company in Canada in the name of the shell companies. The caging service forwarded Victim payments to the payment processing company. The payment processing company deposited checks, money orders, and credit card payments from the Victims into bank accounts controlled by the payment processing company. At the direction of CC1, the defendant and her co-conspirators then instructed the payment processing company to send money, by check and/or wire, to pay vendors that provided various services to the direct mail company, to bank accounts controlled by CC1 and other co-conspirators, as well as to pay a

portion of the expenses of the companies controlled by CC1 that paid the salaries of the defendant and other employees.

(h) It was further part of the scheme that, in coordination with CC1 and CC2, another co-conspirator, an individual located in Indiana whose identity is known to the United States (“CC3”), sent collection letters to any Victim whose check was returned for insufficient funds. CC3 sent the collection letters using the names of purported collections and legal services employees, and threatened the Victims with escalating consequences, including the initiation of legal proceedings. In truth and in fact, the collections and legal services employees were fictitious, the consequences of nonpayment did not escalate, and the threat of legal proceedings was false.

CONSPIRACY TO COMMIT MAIL FRAUD

5. The allegations contained in paragraphs one through four are re-alleged and incorporated as if fully set forth in this paragraph.

6. In or about and between January 1994 and November 2014, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MARIA THANOS, together with others, did knowingly and intentionally conspire to devise a scheme and artifice to defraud the Victims, and to obtain money and property from the Victims by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, did place and cause to be placed matters and things in a post office and authorized depository for mail matter, to be sent and delivered by the United States Postal Service, and did deposit and cause to be

deposited matters and things to be sent and delivered by private and commercial interstate carriers, and did take and receive therefrom, any such matter or thing, contrary to Title 18, United States Code, Section 1341.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

7. The United States hereby gives notice to the defendant that, upon her conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

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

- (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 Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

BY: 
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