

FILED

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

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CLERK US DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 8:20-cr-140T35CPT  
18 U.S.C. § 1956(h)

RACHAEL MAIA WINSLOW,  
a/k/a Pamela Henderson,  
RONALD JOSEPH DEMBOWSKI, and  
FRANK SEBASTIAN VISICARO

**INFORMATION**

The United States Attorney charges:

**COUNT ONE**  
**(Conspiracy to Commit Money Laundering)**

**A. Introduction**

At times material to this Information:

1. RACHAEL MAIA WINSLOW ("WINSLOW"), a/k/a Pamela Henderson, was a resident of Florida, Georgia, and Barcelona, Spain, who worked with MARY KATHERYN MARR and others, and opened accounts at financial institutions in the Middle District of Florida and elsewhere.

2. RONALD JOSEPH DEMBOWSKI ("DEMBOWSKI") was a resident of Hillsborough County, Florida, who opened accounts at financial institutions in the Middle District of Florida.

3. FRANK SEBASTIAN VISICARO (“VISICARO”) was a resident of Hillsborough County and Pasco County, Florida, who opened accounts at financial institutions in the Middle District of Florida.

4. MICHEL MARC CHATEAU (“CHATEAU”) was a resident of Pinellas County and Pasco County, Florida, who opened accounts at financial institutions in the Middle District of Florida and elsewhere, and recruited others to do so.

5. MARY KATHRYN MARR (“MARR”) was a resident of Florida and Barcelona, Spain, who worked with CHATEAU, WINSLOW, DEMBOWSKI, VISICARO and others to open accounts at financial institutions in the Middle District of Florida and elsewhere, and recruited others to do so.

6. The term “shell company” referred to a fictitious corporate entity that existed only on paper and had no legitimate employees, physical presence, or business functions. A “shell company” was used as a vehicle to carry out illicit activity, including financial transactions, while disguising the true nature and origin of the activity.

7. “First Assured Contact LLC” was a shell company registered to WINSLOW in New York. WINSLOW opened bank accounts in the name of that shell company, or in the names of entities associated with that company under “doing business as” or “fictitious name” registrations.

8. “Guardian Holdings Group LLC” was the name of multiple shell companies registered to WINSLOW in Florida, New York, and Nevada, respectively. WINSLOW opened bank accounts in the name of those shell companies, or in the names of entities associated with such companies under “doing business as” or “fictitious name” registrations.

9. “Connect Progress LLC” was a shell company registered to WINSLOW in Florida. WINSLOW opened a bank account in the name of this shell company, or in the names of entities associated with such company under “doing business as” or “fictitious name” registrations.

10. “Guardian Partners LLC” was a company name used by WINSLOW to open a bank account in Nevada.

11. “B Gold International LLC” was a shell company registered to DEMBOWSKI in Florida. DEMBOWSKI opened bank accounts in the name of this shell company, or in the names of entities associated with such company under “doing business as” or “fictitious name” registrations.

12. “Buy and Sell Real Estate Inc.” was a company name used by VISICARO to open bank accounts in Florida.

13. “Buy and Sell Realty and Investment LLC” was a company registered to VISICARO in Florida. VISICARO opened bank accounts in the

name of this company, or in the names of entities associated with such company under “doing business as” or “fictitious name” registrations.

14. “Clear View Group LLC” was a shell company originally registered to DEMBOWSKI, and later to VISICARO, in Florida. VISICARO opened bank accounts in the name of this shell company, or in the names of entities associated with such company under “doing business as” or “fictitious name” registrations.

15. A “boiler room” was a type of illegitimate sales operation that used high-pressure sales techniques, sophisticated mass-marketing, and misrepresentations to defraud individuals into believing they were investing money in regulated securities, financial products, stocks, and other investments.

16. The term “loading” referred to a tactic used by boiler room sales agents to convince victims to send additional funds for a purported investment opportunity, or related fees and expenses, in order to obtain the return or profit that was initially promised.

17. The term “buffer” referred to a secondary bank account in the United States that was used to transfer and conceal foreign victims’ money, so that banks could not easily detect that the victims’ incoming wire transfers were quickly rewired out to other accounts, including accounts overseas. Instead, the transfers to the secondary buffer accounts would merely appear to be ordinary transfers between domestic accounts, and so likely less suspicious to the banks.

**B. The Conspiracy**

18. Beginning on an unknown date, but at least as early as in or about March 2009, and continuing through and including in or about December 2013, in the Middle District of Florida and elsewhere, the defendants,

RACHAEL MAIA WINSLOW,  
a/k/a Pamela Henderson,  
RONALD JOSEPH DEMBOWSKI, and  
FRANK SEBASTIAN VISICARO,

did knowingly and willfully combine, conspire, and agree with each other, MARR, CHATEAU, and other persons, both known and unknown to the United States Attorney, to commit offenses against the United States, in violation of 18 U.S.C. § 1956, that is:

a. to conduct a financial transaction affecting interstate and foreign commerce, namely, to transport, transmit, and transfer monetary instruments and funds which involved the proceeds of a specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, with the intent to promote the carrying on of said specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A)(i); and

b. to conduct a financial transaction affecting interstate and foreign commerce, namely, to transport, transmit, and transfer monetary instruments and funds which involved the proceeds of a specified unlawful

activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of said specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

**C. Manner and Means**

19. The manner and means by which the conspirators sought to accomplish the objects of the conspiracy included, among others, the following:

20. It was a part of the conspiracy that conspirators would and did use interstate and foreign wire communications to defraud individuals throughout the world, and obtain funds from them by means of materially false and fraudulent pretenses and representations.

21. It was further part of the conspiracy that conspirators would and did incorporate shell companies with fictitious names and then open, and cause to be opened, bank accounts in the names of those shell companies at various federally insured financial institutions in the Middle District of Florida and elsewhere. These accounts were opened exclusively for the purpose of receiving, transmitting, or otherwise obtaining the proceeds of specified unlawful activity.

22. It was further part of the conspiracy that conspirators, when opening the bank accounts, would and did make materially false and fraudulent representations to the banks regarding the nature of the businesses in which the shell companies were engaged.

23. It was further part of the conspiracy that, in some instances, conspirators would and did use preexisting companies, and associated bank accounts in the names of those companies at various federally insured financial institutions in the Middle District of Florida and elsewhere, for the purpose of receiving, transmitting, or otherwise obtaining the proceeds of specified unlawful activity.

24. It was further part of the conspiracy that conspirators working for boiler rooms would and did contact foreign victims, via interstate and foreign emails and telephone calls, for the purpose of offering bogus investment and other financial opportunities. In truth and in fact, however, the purpose of those contacts was to gain their victims' trust and solicit money from them by means of materially false and fraudulent pretenses and representations.

25. It was further part of the conspiracy that conspirators working for boiler rooms would and did contact foreign victims, via interstate and foreign emails and telephone calls, for the purpose of "loading" them and soliciting even more money once the victims had been deprived of their initial investments.

26. It was further part of the conspiracy that conspirators working for boiler rooms would and did instruct victims to wire funds for the purported investment opportunities, and related fees and expenses, into the bank accounts of shell companies and other entities created and controlled by conspirators in the United States and elsewhere.

27. It was further part of the conspiracy that conspirators would and did wire and send, and cause to be wired and sent, the proceeds that they had fraudulently obtained from victims to multiple financial institutions, including financial institutions located outside of the United States, in order to promote the carrying on of the aforementioned fraud scheme.

28. It was further part of the conspiracy that conspirators would and did wire and send, and cause to be wired and sent, the proceeds that they had fraudulently obtained from victims to multiple financial institutions, including financial institutions located outside of the United States, in order to conceal and disguise the source of, and to hinder any efforts to locate, those proceeds.

29. It was further part of the conspiracy that conspirators would and did withdraw, and cause to be withdrawn, in cash the proceeds that they had fraudulently obtained from victims, in order to conceal and disguise the source of, and to hinder any efforts to locate, those proceeds.

30. It was further part of the conspiracy that conspirators would and did share in the proceeds of the fraud scheme, usually receiving a set percentage of the proceeds that they received, withdrew, handled and transferred.

31. It was further part of the conspiracy that conspirators would and did perform acts and make statements to misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, the objects of the conspiracy and the acts committed in furtherance of the conspiracy.

All in violation of 18 U.S.C. § 1956(h).

### **FORFEITURE**

1. The allegations contained in Counts One of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of 18 U.S.C. § 982(a)(1).

2. Upon a conviction of a violation of 18 U.S.C. § 1956 as alleged in Count One, the defendants,

RACHAEL MAIA WINSLOW,  
a/k/a Pamela Henderson,  
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FRANK SEBASTIAN VISICARO,

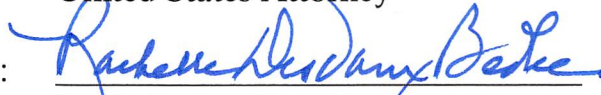
shall forfeit to the United States of America, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense and any property traceable to such property.

3. The assets to be forfeited include, but are not limited to, the following property which was involved in the offenses:
  - a. an order of forfeiture in an amount which represents the value of the property involved in the offenses;
  - b. approximately \$525,595.62 seized from account number 968712307 in the name of Guardian Holding Group LLC at JP Morgan Chase Bank; and
  - c. approximately \$222,013.19 seized from account number 058817662 in the name of First Assured Contact LLC at HSBC Bank.
4. If any of the forfeitable assets described above, as a result of any act or omission of the defendants:
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third person;
  - 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 subdivided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1).

MARIA CHAPA LOPEZ  
United States Attorney

By:



Rachelle DesVaux Bedke  
Assistant United States Attorney

By:



Jay G. Trezevant  
Assistant United States Attorney  
Chief, Economic Crimes Section