

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

# "UNDER SEAL"

**UNITED STATES of AMERICA**

DOCKET NO. 3:16-cr-136-MOC

V.

## **BILL OF INDICTMENT**

1) RICHARD ANTONUCCI, ) Vio: 18 U.S.C. § 1349  
2) IZABETH M. BUSTAMANTE VEGA, ) 18 U.S.C. § 1343  
3) STEPHANIE V. QUINTERO SANCHEZ, ) 18 U.S.C. § 2326  
and ) 18 U.S.C. § 1956(h)  
4) DAVID FRANKLIN VON RIESEN, ) 18 U.S.C. § 1956(a)(2)(A)  
Defendants. ) 18 U.S.C. § 982  
 ) 28 U.S.C. § 2461(c)  
 ) 18 U.S.C. § 2  
 )

## THE GRAND JURY CHARGES:

At all times relevant to this Indictment:

**COUNT ONE**

## The Defendants

1. Defendant **RICHARD ANTONUCCI**, a United States citizen, worked in at least one illegal telemarketing call center in Costa Rica as an “opener,” “loader,” “runner,” and “bridge.” As an opener, **ANTONUCCI** falsely informed victims that they had won a prize in a sweepstakes and had to send money to Costa Rica to pay various fees, taxes, and insurance premiums necessary to retrieve their prize. As a loader, **ANTONUCCI** falsely induced victims who had already made an initial payment based on an opener’s misrepresentations to make additional payments based on new misrepresentations (including that the victims’ prize amount had increased as a result of a clerical error or because of the disqualification of another winner).

As a runner, **ANTONUCCI** obtained victims' funds sent directly to his attention in Costa Rica via Western Union wire services. As a bridge, **ANTONUCCI** received in the United States funds from victims who were reluctant or unable to send money directly to Costa Rica and then, after retaining a percentage, forwarded the remaining funds to the illegal call center or telemarketers in Costa Rica.

2. Defendant **IZABETH M. BUSTAMANTE VEGA**, a Nicaraguan citizen, worked as an "opener" and "loader" in at least one illegal call center in Costa Rica.
3. Defendant **STEPHANIE V. QUINTERO SANCHEZ**, a United States citizen, worked as an "opener" and "loader" in at least one illegal call center in Costa Rica.
4. Defendant **DAVID FRANKLIN VON RIESEN**, a United States citizen, worked as an "opener" and "loader" in at least one illegal call center in Costa Rica.

The Conspiracy

5. Beginning in or about January 2012, the exact date being unknown to the Grand Jury, and continuing until at least April 30, 2016, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendants,

**RICHARD ANTONUCCI,  
IZABETH M. BUSTAMANTE VEGA,  
STEPHANIE V. QUINTERO SANCHEZ,  
and  
DAVID FRANKLIN VON RIESEN,**

together with other co-conspirators, both known and unknown to the Grand Jury, did knowingly combine, conspire, confederate, and agree with each other to knowingly and willfully 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 for the purpose of executing and

attempting to execute the scheme to defraud did knowingly and willfully transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce writings, signs, signals, pictures, and sounds, specifically, Western Union wire transfers that were electronically routed to and processed in Western Union facilities in Charlotte, Mecklenburg County, North Carolina, contrary to Title 18, United States Code, Section 1343.

Purpose of the Conspiracy

6. It was a purpose of the conspiracy that the defendants and their co-conspirators would enrich themselves by fraudulently inducing victims to send them money in exchange for falsely promised sweepstakes prizes.

Manner and Means of the Conspiracy and the Scheme to Defraud

7. It was part of the conspiracy and scheme to defraud, and among the manner and means by which the defendants and their co-conspirators carried out the conspiracy, that:

a. Beginning in or about 2012, the defendants and their co-conspirators operated at least one “call center” engaged in illegal telemarketing activities in San Jose, Costa Rica.

b. Through operation of the call center, the defendants and their co-conspirators would target victims who were residents of the United States—at least ten of whom were over the age of 55—and, using aliases, would inform those victims by telephone that they had won second prize in a sweepstakes contest. The defendants and their co-conspirators would then tell their victims that, in order to receive their prize, the victims had to send from one thousand to several thousand dollars via Western Union money wire transfers and other methods to “representatives” of an alleged “insurance entity” for a purported “refundable insurance fee.”

c. In order to induce their victims to send money, the defendants and their co-conspirators also would often falsely represent themselves as being agents of the "Federal Trade Commission," the "Federal Bureau of Investigation," or another U.S. government agency charged with ensuring that sweepstakes winners received their purported prize money.

d. The defendants and their co-conspirators 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 the defendants and their co-conspirators to use recognizable United States area codes, such as the Washington, D.C. area code, to make it falsely appear on victims' caller identification devices that their calls were made from somewhere in the United States when, in fact, the defendants and their co-conspirators were calling from Costa Rica.

e. When victims would ask to validate the legality of the sweepstakes company that purportedly had awarded them a prize, the defendants and their co-conspirators would direct those victims to call certain telephone numbers with United States area codes that the defendants and their co-conspirators falsely claimed were associated with the sweepstakes company. Through the use of VoIP technology, the defendants and their co-conspirators would answer those telephone numbers in Costa Rica. Posing as representatives of the non-existent sweepstakes company, the defendants and their co-conspirators would falsely reassure victims calling the telephone numbers that they had won a sweepstakes prize.

f. If a victim agreed to wire money directly to Costa Rica, the defendants and their co-conspirators would instruct the victim to send a wire transfer to a designated "runner," who would obtain the money and deliver it to the call center.

g. If a victim was hesitant or unable to send money directly to Costa Rica, the defendants and their co-conspirators would arrange for a “bridge” in the United States to receive the victim’s money and then forward it to the illegal call center.

h. After the defendants and their co-conspirators successfully had induced a victim to send money, the defendants and their co-conspirators would call that victim repeatedly to “reload” him or her, that is, to make further false and fraudulent misrepresentations in an effort to induce the victim to send yet more money. Such false and fraudulent misrepresentations included, but were not limited to, statements that: 1) a mistake had been made; 2) the victim had actually won first prize in the sweepstakes contest; and 3) the victim had to send thousands of additional dollars in further fees and taxes to ensure the safe delivery of the increased prize. This practice would continue as long as the victim continued to send money.

8. No victim of the conspiracy ever received a promised prize; the defendants and their co-conspirators kept all victim funds for their own personal benefit.

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

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

9. The allegations in paragraphs 1 through 4 and 6 through 8 are incorporated here, with the allegations in paragraph 7 setting forth the defendants’ scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises (“the scheme to defraud”).

10. On or about the dates set forth below, each such date constituting a separate count of the Indictment, in the Western District of North Carolina and elsewhere, defendants,

**RICHARD ANTONUCCI,  
IZABETH M. BUSTAMANTE VEGA,  
STEPHANIE V. QUINTERO SANCHEZ,  
and  
DAVID FRANKLIN VON RIESEN,**

together with others known and unknown to the Grand Jury, and for the purpose of executing the scheme to defraud, and attempting to do so, did knowingly and willfully transmit and cause to be transmitted, by means of wire communication in interstate and foreign commerce the following writings, signals, and sounds, specifically Western Union wire transfers that were electronically routed to and processed in Charlotte, Mecklenburg County, North Carolina, prior to being sent to their ultimate destination:

<b>Count</b>	<b>Sender Initials</b>	<b>Wire Transfer Sent From</b>	<b>Received</b>	<b>Date Received</b>	<b>Amount</b>
2	AC	North Augusta, SC	Costa Rica	6/24/2013	\$1,750
3	RE	Garfield Heights, OH	Costa Rica	12/03/2013	\$1,400
4	EA	Tiffin, OH	Costa Rica	1/27/2014	\$1,750
5	RR	St. Charles, MO	Cleveland, OH	1/30/2014	\$1,150
6	JR	Pensacola, FL	Costa Rica	2/03/2014	\$1,750
7	ER	Rio Grande, NJ	Costa Rica	2/06/2014	\$1,750

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

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

11. The allegations in paragraphs 1 through 4 and 6 through 8 are incorporated here.
12. In or about 2012 and continuing until on or about April 30, 2016, within the Western District of North Carolina and elsewhere, defendants,

**RICHARD ANTONUCCI,  
IZABETH M. BUSTAMANTE VEGA,  
STEPHANIE V. QUINTERO SANCHEZ,  
and  
DAVID FRANKLIN VON RIESEN,**

did knowingly and willfully combine, conspire, confederate, and agree together and with each other, and with others known and unknown to the Grand Jury, to transport, transmit, and transfer 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, namely, wire fraud.

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

**COUNTS NINE THROUGH FOURTEEN  
(MONEY LAUNDERING – INTERNATIONAL - 18 U.S.C. Section 1956(a)(2)(A))**

13. The allegations in paragraphs 1 through 4 and 6 through 8 are incorporated here.
14. On or about the respective dates set forth below, each such date constituting a separate count of this Indictment, within the Western District of North Carolina and elsewhere, defendants,

**RICHARD ANTONUCCI,  
IZABETH M. BUSTAMANTE VEGA,  
STEPHANIE V. QUINTERO SANCHEZ,  
and  
DAVID FRANKLIN VON RIESEN,**

together with others known and unknown to the Grand Jury, did knowingly transport, transmit, and transfer, and cause 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, namely, wire fraud:

Count	Sender Initials	Wire Transfer Sent From	Received	Date Received	Amount
9	WC	Thornton, CO	Costa Rica	8/14/2013	\$1,000
10	AG	Onalaska, WI	Costa Rica	11/26/2013	\$1,750
11	RA	Cleveland, OH	Costa Rica	1/31/2014	\$930
12	CB	Columbus, MS	Costa Rica	2/04/2014	\$1,750
13	PC	Somers Point, NJ	Costa Rica	2/06/2014	\$1,750
14	NC	Lynchburg, VA	Costa Rica	2/06/2014	\$1,750

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

**NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE**

Notice is hereby given of 18 U.S.C. § 982 and 28 U.S.C. § 2461(c). Under Section 2461(c), criminal forfeiture is applicable to any offenses for which forfeiture is authorized by any other statute, including but not limited to 18 U.S.C. § 981 and all specified unlawful activities listed or referenced in 18 U.S.C. § 1956(c)(7), which are incorporated as to proceeds by Section 981(a)(1)(C). The following property is subject to forfeiture in accordance with Section 982 and/or 2461(c):

- a. All property which constitutes or is derived from proceeds of the violations set forth in this bill of Indictment;
- b. All property involved in such violations or traceable to property involved in such violations; and
- c. If, as set forth in 21 U.S.C. § 853(p), any property described in (a) or (b) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other

property which cannot be divided without difficulty, all other property of the defendants to the extent of the value of the property described in (a) and (b).

The Grand Jury finds probable cause to believe that the following property is subject to forfeiture on one or more of the grounds stated above: A forfeiture money judgment in the amount of at least \$7,000,000, such amount constituting the proceeds of the violations set forth in this bill of Indictment.

A TRUE BILL



JILL WESTMORELAND ROSE  
UNITED STATES ATTORNEY

ANDREW WEISSMANN  
CHIEF, FRAUD SECTION,  
CRIMINAL DIVISION



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**"UNDER SEAL"****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:**

3:16-cr-136-MOC

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

: US vs RICHARD ANTONUCCI, ET AL

**COUNTY OF OFFENSE**

: MECKLENBERG

**RELATED CASE INFORMATION**

: United States v. Ian T. McCulloch, 3:15-cr-18-FDW-DSC

*Magistrate Judge Case Number*

:

*Search Warrant Case Number*

:

*Miscellaneous Case Number*

:

*Rule 20b*

:

**SERVICE OF PROCESS**

: ARREST WARRANT

**U.S.C. CITATIONS** *(Mark offense carrying greatest weight):* Petty Misdemeanor Felony

18 U.S.C. SECTION 1349

**JUVENILE:**  Yes  No**ASSISTANT U. S. ATTORNEY** : Gustav Eyler, Trial Attorney, DOJ/CRM/Fraud Section**VICTIM/WITNESS COORDINATORS:** Pamela Washington, DOJ/CRM/Fraud Section**INTERPRETER NEEDED** :**LIST LANGUAGE AND/OR DIALECT:****REMARKS AND SPECIAL INSTRUCTIONS:**