



and willfully combine, conspire, confederate, and agree with another person to commit certain offenses against the United States, that is:

a. To knowingly and with 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 they were false and fraudulent when made, and transmit and cause to be transmitted certain wire communications in interstate and foreign commerce, for the purpose of executing the scheme and artifice to defraud, in violation of Title 18, United States Code, Section 1343; and

b. To knowingly and with intent to defraud and deceive falsely assume and pretend to be an officer and employee acting under the authority of the United States and an agency thereof, and to act as such, in violation of Title 18, United States Code, Section 912.

**OBJECT OF THE CONSPIRACY**

6. It was the purpose and object of the conspiracy for defendant **VANIA LEE ALLEN** and her co-conspirator to unlawfully enrich themselves by falsely informing C.L. that he had won a large amount of money in a lottery, inducing C.L. to pay money in advance of receiving the purported lottery winnings, and keeping C.L.'s money for the defendant's and co-conspirator's own benefit without paying any purported lottery winnings.

**MANNER AND MEANS**

The manner and means by which defendant **VANIA LEE ALLEN** and her co-conspirator sought to accomplish the object of the conspiracy and the scheme and artifice to defraud included the following:

7. It was part of the conspiracy that Individual A contacted C.L. by telephone.

8. Individual A falsely informed C.L. that he had won money in a lottery, when in truth and in fact C.L. had not won any such money in a lottery.

9. Individual A falsely informed C.L. that he must make payments to various people in order to collect the purported lottery winnings.

10. Individual A instructed C.L. to send payments to various people.

11. In order to induce C.L. to continue to make payments as directed by Individual A, defendant **VANIA LEE ALLEN** traveled from Jamaica to the United States to meet with C.L. personally.

12. For the purpose of gaining the trust of C.L., and inducing C.L. to continue making payments at the direction of Individual A, defendant **VANIA LEE ALLEN** falsely portrayed herself to C.L. as a Special Agent with the Federal Bureau of Investigation.

#### OVERT ACTS

In furtherance of the conspiracy and to effect the object thereof, the following overt acts, among others, were committed in the Southern District of Georgia and elsewhere by at least one co-conspirator:

13. On or about May 1, 2015, defendant **VANIA LEE ALLEN** traveled by plane from Kingston, Jamaica to Atlanta, Georgia.

14. On or about May 3, 2015, defendant **VANIA LEE ALLEN** sent a text message to Individual A stating: "Preparation is key. So far I'm killing time looking for pawn shops that are open today. I haven't found one open. I see TONS of badges online for reasonable price, if prepared you could have had it sent to the hotel I would stay in and I could picked it up once I checked in."

15. On or about May 3, 2015, defendant **VANIA LEE ALLEN** sent a text message to Individual A stating: “No pawn shop open, I will ask driver, but if not, Whats the next move? Do you still want me to do your thing with out badge and if so, what am I saying?”

16. On or about May 3, 2015, Individual A sent a text message to defendant **VANIA LEE ALLEN** stating: “Just knock on the door and ask for [C.L.] ... And miss [P.G.] ... tell them our undercover FBI.. and you would like for them to speak with your supervisor... then just text me and I’ll call back and u give them the phone.”

17. On or about May 3, 2015, Individual A sent a text message to defendant **VANIA LEE ALLEN** stating: “If u don’t get the badge.. and them ask to see one tell them your undercover all orders go tru your supervisor... your supervisor name is Mr bill Swartz.”

18. On or about May 3, 2015, defendant **VANIA LEE ALLEN** traveled by car from Atlanta, Georgia to the home of C.L. and P.G. in Evans, Georgia.

19. On or about May 3, 2015, defendant **VANIA LEE ALLEN** was unable to make contact with C.L., and returned to Atlanta, Georgia.

20. On or about May 6, 2015, defendant **VANIA LEE ALLEN** sent a text message to Individual A attaching an image of a law enforcement style badge with an “FBI” logo and the words “Federal Bureau of Investigation” on the face of the badge.

21. On or about May 6, 2015, defendant **VANIA LEE ALLEN** sent a text message to Individual A stating: “Babes, I had to get the pin badge instead because the ones they had that looked like an id looked fake.”

22. On or about May 6, 2015, defendant **VANIA LEE ALLEN** sent a text message to Individual A stating: “I hope the one I got is ok.”

23. On or about May 6, 2015, Individual A sent a text message to defendant **VANIA LEE ALLEN** stating: "Just wear a blouse over it and when u get to the door just show it then make your blouse cover it back."

24. On or about May 6, 2015, defendant **VANIA LEE ALLEN** sent a text message to Individual A stating: "So I have a jacket and I will wear over it, a nice business jacket."

25. On or about May 6, 2015, Individual A sent a text message to defendant **VANIA LEE ALLEN** stating: "OK just make sure you dress nice with a blouse over your top to cover it [ ] so u can just show it one time then make it cover back ok."

26. On or about May 7, 2015, defendant **VANIA LEE ALLEN** sent a text message to Individual A stating: "Baby I wanted to tell you that I'm not at all telling you how to run your business, but when I put you on the phone today, please make sure your voice sounds as real and professional as possible. I don't know if you know, but the people I'm going to see in Evans are both medical doctors, did you know that?"

27. On or about May 7, 2015, defendant **VANIA LEE ALLEN** sent a text message to Individual A stating: "Please don't get mad at me for telling you this, I'm just trying to make sure that this thing will be successful."

28. On or about May 7, 2015, defendant **VANIA LEE ALLEN** traveled by car from Atlanta, Georgia to the home of C.L. and P.G. in Evans, Georgia.

29. On or about May 7, 2015, defendant **VANIA LEE ALLEN** falsely portrayed herself to C.L. as a Special Agent with the Federal Bureau of Investigation.

30. On or about May 7, 2015, defendant **VANIA LEE ALLEN** provided C.L. with a cellphone and directed C.L. to speak with the person on the line, who was in fact Individual A. At the direction of defendant **VANIA LEE ALLEN**, C.L. spoke with Individual A.

All in violation of Title 18, United States Code, Section 371.

**COUNT 2**  
**Wire Fraud**  
**18 U.S.C. § 1343**

**THE GRAND JURY FURTHER CHARGES THAT:**

31. The allegations in paragraphs 1 through 30 of this Indictment are hereby realleged and incorporated as if fully set forth herein.

32. On or about May 7, 2015, in the Southern District of Georgia and elsewhere, defendant **VANIA LEE ALLEN**, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire communications in interstate and foreign commerce, writings, signs, pictures, and sounds for the purpose of executing such scheme and artifice to defraud, to wit, defendant **VANIA LEE ALLEN**, while located in Evans, Georgia, transmitted and caused to be transmitted a telephone call between defendant **VANIA LEE ALLEN** and Individual A, located outside the state of Georgia, for the purpose of executing the above described scheme.

In violation of Title 18, United States Code, Section 1343.

**COUNT 3**  
**False Personation of an Employee of the United States**  
**18 U.S.C. § 912**

**THE GRAND JURY FURTHER CHARGES THAT:**

33. The allegations in paragraphs 1 through 30 of this Indictment are hereby realleged and incorporated as if fully set forth herein.

34. On or about May 7, 2015, defendant **VANIA LEE ALLEN** did knowingly and with intent to defraud and deceive falsely assume and pretend to be an officer and employee of

the United States acting under the authority thereof, that is a Special Agent with the United States Federal Bureau of Investigation (FBI), and acted as such in that she held herself out to be an FBI Special Agent to C.L.

In violation of Title 18, United States Code, Section 912.

A TRUE BILL.

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*(Signatures for Attorneys for the Government appear on the following page)*