

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

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CLERK, US DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DISTRICT

UNITED STATES OF AMERICA

v.

DOUGLAS THOMPSON

CASE NO. 3:16-cr- 83-J-39JRK
Ct. 1: 18 U.S.C. § 641
Ct. 2: 18 U.S.C. § 1001
Ct. 3-5: 18 U.S.C. § 1343
Forfeiture: 18 U.S.C. § 981(a)(1)(C) &
28 U.S.C. § 2461(c)

INDICTMENT

The Grand Jury charges:

COUNT ONE

Beginning in or about September 2010, and continuing through in or about November 2015, at Jacksonville and elsewhere, in the Middle District of Florida,

DOUGLAS THOMPSON

the defendant herein, did knowingly and willfully steal, embezzle, purloin and convert to his own use, more than \$1,000.00 in property of the United States, that is, unlawfully obtained Supplemental Security Income payments, comprising property of the Social Security Administration, an agency of the United States, and unlawfully obtained benefits from the Federal Medicaid Health Care Benefit Program, comprising of the property of a federal health care benefit program provided by the United States, and administered by the State of Florida Agency for Health Care Administration, with the intent to deprive the Social Security Administration and the Federal Medicaid Health Care Benefit Program of the use

and benefit of said property.

In violation of Title 18, United States Code, Section 641.

COUNT TWO

On or about January 27, 2015, at Jacksonville and elsewhere, in the Middle District of Florida,

DOUGLAS THOMPSON

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the government of the United States, by submitting to the Social Security Administration a written statement providing that he did "not work" and was not familiar with "DTI Inc.", which statement and representation were false because, as THOMPSON then and there knew, THOMPSON did work, operating his own business, which was known to him and others as DTI Inc.

In violation of Title 18, United States Code, Section 1001.

COUNTS THREE THROUGH FIVE

A. Introduction

At all times relevant to this Indictment:

1. DOUGLAS THOMPSON, the defendant herein, was a resident of Jacksonville, Florida, and owned and operated a business known as Douglas Thompson Industries, Inc. or DTI Inc., through which THOMPSON brokered the

purchase and sale of, among other things, trucking equipment, but also through which he executed a scheme and artifice to defraud potential customers.

2. Company A was a business operated in the Dallas, Texas metropolitan area, and in or about August 2014, was in the market to purchase truck container chassis. Person A acted on behalf on of Company A.

3. Company B was a business operated in the Winnipeg, Canada metropolitan area, and in and about November 2014, was in the market to purchase truck container chassis. Person B acted on behalf of Company B.

4. Company C was a business operated in the Miami, Florida metropolitan area, and in and about January 2015, was in the market to purchase truck container chassis. Person C acted on behalf of Company C.

B. Scheme and Artifice

In or about the years 2014 and 2015, in the Middle District of Florida, and elsewhere,

DOUGLAS THOMPSON

the defendant herein, did knowingly and willfully devise and intend to devise, and participate in, a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, both oral and written, that is, a scheme and artifice to induce would-be DTI Inc. customers to electronically transfer money to bank accounts controlled by THOMPSON by means of false and fraudulent representations about the availability, characteristics, sale, and delivery of trucking equipment and

associated title documents.

C. Manner and Means

1. It was part of the scheme that THOMPSON caused to be created websites, publically-available for viewing on the internet, that marketed the services of THOMPSON and DTI Inc., that depicted THOMPSON wearing a suit while standing in front of a limousine, and that contained materially false information concerning THOMPSON's business credentials, all to induce the public to do business with THOMPSON and DTI Inc. Such false representations included statements that THOMPSON was a graduate of the Massachusetts Institute of Technology and that DTI Inc. operated on a "worldwide" basis, was organized into multiple divisions, and had over "6000 buyers / sellers." While touting 30 years of making customers "happy" and THOMPSON's skill in "contract negotiation," such websites did not disclose THOMPSON's prior arrests and convictions for criminal offenses.

2. It was further part of the scheme that while in the State of Florida, THOMPSON communicated with victims of the scheme by telephone, text messages, and email. In particular, THOMPSON used an email account hosted by an internet service provider that did not maintain any email servers in the State of Florida, and accordingly, THOMPSON's email communications necessarily transited by means of interstate, and in some cases, international, wire communication.

3. It was further part of the scheme that THOMPSON would falsely

represent that he would make available for purchase by a victim of the scheme truck equipment with particular characteristics for a particular price, insist that purchase money be wired electronically to bank accounts that THOMPSON controlled, and after such amounts were wired to such accounts, caused to be delivered to the victim trucking equipment that did not meet the agreed upon characteristics.

4. It was further part of the scheme that THOMPSON would falsely represent that he would make available for purchase by a victim of the scheme truck equipment with particular characteristics for a particular price, insist that purchase money be wired electronically to bank accounts that THOMPSON controlled, and after such amounts were wired to such accounts, make none of truck equipment available to the victim and stop all communication with the victim.

5. It was further part of the scheme that after learning that a victim of the scheme needed particular truck equipment by a date certain to meet business obligations with third parties, THOMPSON would refuse to deliver that equipment unless paid in advance.

6. It was further part of the scheme that to create a sense of urgency on the part of a victim of the scheme, THOMPSON would falsely represent that he had already purchased promised equipment with THOMPSON's own funds, when in fact, he had not done so. Further, he would threaten to sell such equipment to third parties if not paid by the victim in advance of delivery of the equipment.

7. It was further part of the scheme that THOMPSON would send to a

victim of the scheme an invoice that listed as DTI Inc.'s business address a fictional location.

D. Execution of the Scheme

On or about the dates listed below, in the Middle District of Florida, and elsewhere,

DOUGLAS THOMPSON

the defendant herein, for the purpose of attempting to execute and executing the aforesaid scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did cause to be transmitted in interstate and international commerce, by means of a wire communication, certain signs, signals, and sounds, that is, the below-listed email communications:

<u>COUNT</u>	<u>DATE</u>	<u>WIRE COMMUNICATION</u>
Three	August 21, 2014	Email from THOMPSON to Person A, offering to provide ten used chassis with new tires and new tire rims to Company A
Four	November 21, 2014	Email from THOMPSON to Person B, offering to provide four chassis to Company B and sending wiring instructions to transfer the purchase money
Five	January 27, 2015	Email from THOMPSON to Person C sending an invoice from DTI Inc. to Company C for purported purchase of four chassis

All in violation of Title 18, United States Code, Section 1343.

FORFEITURE

1. The allegations contained in Counts One and Counts Three through Five of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of a violation of Title 18, United States Code, Sections 641 and/or 1343, the defendant, DOUGLAS THOMPSON, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense or offenses.

3. If any of the property described above, 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,

the United States of America shall be entitled to forfeiture of substitute property

under the provisions of Title 21, United States Code, Section 853(p), as
incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL.

[REDACTED]

Foreperson /

A. LEE BENTLEY, III
United States Attorney

By:



MICHAEL J. COOLICAN
Assistant United States Attorney

By:



MAC D. HEAVENER, III
Assistant United States Attorney
Deputy Chief, Jacksonville Division