

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN (DUBUQUE) DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TOBEY HINES, TIFFANY REYNOLDS,
JOSHUA WILLIS, PAYTON
McCARVILLE, MORGAN CORNELL,
and PAUL CHASE

Defendants.

No. 17-CR-1038

INDICTMENT

Counts 1 - 103

18 U.S.C. § 1343:

Wire Fraud

(Hines)

Counts 104 - 127

18 U.S.C. § 1343:

Wire Fraud

(Reynolds)

Counts 128 - 159

18 U.S.C. § 1343:

Wire Fraud

(Willis)

Counts 160 - 175

18 U.S.C. § 1343:

Wire Fraud

(McCarville)

Counts 176 - 189

18 U.S.C. § 1343:

Wire Fraud

(Cornell)

Counts 190 - 211

18 U.S.C. § 1343:

Wire Fraud

(Chase)

PRESENTED IN OPEN COURT
BY THE
FOREMAN OF THE GRAND JURY
And filed 8/24/2017
ROBERT L. PHELPS, CLERK

The Grand Jury charges:

Counts 1 – 211

Wire Fraud

Introduction

1. At all times relevant to this Indictment defendants TOBEY HINES, TIFFANY REYNOLDS, JOSHUA WILLIS, PAYTON McCARVILLE, MORGAN CORNELL, and PAUL CHASE resided in the Iowa-Wisconsin-Illinois tri-state region including Dubuque, Iowa.

The Scheme to Defraud

2. Beginning no later than December 2015 and continuing through at least September 2016, defendants TOBEY HINES, TIFFANY REYNOLDS, JOSHUA WILLIS, PAYTON McCARVILLE, MORGAN CORNELL, and PAUL CHASE, and others known and unknown to the Grand Jury, in the Northern District of Iowa and elsewhere, did knowingly devise and intend to devise and willfully participate in with knowledge of its fraudulent nature, a scheme to defraud individuals throughout the United States and to obtain money from these individuals by means of materially false and fraudulent pretenses, representations, and promises.

The Manner and Means of the Scheme to Defraud

3. Beginning no later than December 2015 and continuing through at least September 2016, individuals involved in a criminal organization (hereafter “the organization”) made deceptive phone calls to victims, generally elderly people, in order to lure the victims into wiring money to the organization. During these

phone calls, members of the organization told victims that a relative of the victim had been arrested and that the victim needed to wire money in order to post bond or bail and secure the release of the victim's relative. Another member of the organization would often participate in the phone call, claiming to be the victim's relative, and falsely and fraudulently purport to confirm that he or she was in jail and needed the victim to wire funds to secure his or her release. These claims were false and fraudulent, as the members of the organization knew, in that the victim's relative had not been arrested and there was no need for the victim to wire money to secure the release of his or her relative. If the victim believed the false and fraudulent phone call, members of the organization instructed the victim to wire money, generally via Western Union or Money Gram, to a certain person and location.

4. Once a victim had wired money as directed during the false and fraudulent phone call, leaders within the organization would either receive the wired money or drive other members of the organization (hereafter "runners") to Western Union and Money Gram locations including those within the Iowa-Wisconsin-Illinois tri-state region to receive the money wired by the victims to these various locations. After receiving the wired money, runners would usually give the cash to another member of the organization. Members of the organization, including defendants TOBEY HINES and TIFFANY REYNOLDS, and others, also sent wire transfers, often to an overseas location in the Dominican Republic, using money obtained from victims of the scheme to defraud. Other fraudulently obtained

money that was not sent via wire transfer was deposited into various bank accounts that were generally under the control of a leader within the organization. Runners received a fee, generally between \$20 and \$75, for each wire transfer the runner either received or sent.

Execution of the Scheme to Defraud

5. On or about the dates listed below, in the Northern District of Iowa and elsewhere, for the purposes of executing, and attempting to execute, the scheme described above, defendants TOBEY HINES, TIFFANY REYNOLDS, JOSHUA WILLIS, PAYTON McCARVILLE, MORGAN CORNELL, and PAUL CHASE caused to be transmitted by means of wire communication in interstate commerce signals and sounds as described below for each count, each transmission constituting a separate count:

TOBEY HINES

Wire Transfers Received

<u>Count</u>	<u>Reference Number</u>	<u>Wire Transfer Company</u>	<u>Date of Wire Transfer</u>	<u>Amount of Wire Transfer</u>
1	38841499	Money Gram	1/9/2016	\$1,925.00
2	26664105	Money Gram	1/11/2016	\$1,925.00
3	69802767	Money Gram	1/13/2016	\$1,950.00
4	47500587	Money Gram	1/15/2016	\$1,990.00
5	64115947	Money Gram	1/15/2016	\$1,000.00
6	45429039	Money Gram	1/28/2016	\$1,790.00
7	83487211	Money Gram	1/28/2016	\$1,790.00
8	17950475	Money Gram	1/29/2016	\$1,400.00
9	47370890	Money Gram	2/5/2016	\$1,932.00
10	60345689	Money Gram	2/5/2016	\$1,932.00
11	34976789	Money Gram	3/3/2016	\$1,925.00
12	30690735	Money Gram	3/5/2016	\$1,925.00

13	42469169	Money Gram	3/9/2016	\$1,985.00
14	57674101	Money Gram	3/11/2016	\$1,875.00
15	82721136	Money Gram	3/11/2016	\$1,750.00
16	70176210	Money Gram	3/12/2016	\$1,650.00
17	86242231	Money Gram	3/14/2016	\$1,450.00
18	96792884	Money Gram	3/14/2016	\$1,925.00
19	21226275	Money Gram	3/16/2016	\$1,950.00
20	60945404	Money Gram	3/16/2016	\$1,875.00
21	32210923	Money Gram	3/21/2016	\$1,950.00
22	24480506	Money Gram	3/22/2016	\$1,968.00
23	61412130	Money Gram	3/22/2016	\$1,925.00
24	0886032694	Western Union	3/14/2016	\$950.00
25	2365246607	Western Union	3/17/2016	\$1,355.00
26	0961745545	Western Union	4/1/2016	\$1,965.00

Wire Transfers Sent

<u>Count</u>	<u>Reference Number</u>	<u>Wire Transfer Company</u>	<u>Date of Wire Transfer</u>	<u>Amount of Wire Transfer</u>
27	9844382813	Western Union	1/9/2016	\$1,500.00
28	2864026110	Western Union	1/10/2016	\$1,500.00
29	4117751270	Western Union	1/12/2016	\$1,100.00
30	2819131660	Western Union	1/12/2016	\$1,100.00
31	1553317198	Western Union	1/13/2016	\$1,500.00
32	1895238559	Western Union	1/13/2016	\$1,500.00
33	7974054088	Western Union	1/15/2016	\$1,840.00
34	9384123360	Western Union	1/16/2016	\$1,715.00
35	7152914479	Western Union	1/20/2016	\$1,675.00
36	1903998428	Western Union	1/20/2016	\$1,775.00
37	8426455489	Western Union	1/21/2016	\$1,250.00
38	8563750350	Western Union	1/22/2016	\$1,675.00
39	1043679455	Western Union	1/22/2016	\$1,775.00
40	3923062070	Western Union	1/26/2016	\$1,490.00
41	9244782920	Western Union	1/26/2016	\$1,586.00
42	9903616187	Western Union	1/26/2016	\$1,586.00
43	3823776457	Western Union	1/26/2016	\$1,586.00
44	2084029659	Western Union	1/27/2016	\$1,295.00
45	2403246953	Western Union	1/28/2016	\$1,440.00
46	6204567732	Western Union	1/28/2016	\$1,525.00

47	5123204576	Western Union	1/28/2016	\$1,440.00
48	2527753837	Western Union	1/29/2016	\$1,150.00
49	4063074217	Western Union	2/5/2016	\$1,582.00
50	1493857242	Western Union	2/5/2016	\$1,582.00
51	3403018492	Western Union	2/6/2016	\$1,600.00
52	7778295715	Western Union	3/2/2016	\$1,600.00
53	6617929433	Western Union	3/2/2016	\$1,575.00
54	1888534112	Western Union	3/2/2016	\$1,625.00
55	9678297879	Western Union	3/3/2016	\$1,625.00
56	0778617319	Western Union	3/5/2016	\$1,625.00
57	3008366912	Western Union	3/7/2016	\$1,685.00
58	7388165457	Western Union	3/7/2016	\$1,665.00
59	0575261924	Western Union	3/9/2016	\$1,650.00
60	6314424613	Western Union	3/9/2016	\$1,555.00
61	0695183512	Western Union	3/9/2016	\$1,685.00
62	1919220402	Western Union	3/10/2016	\$1,625.00
63	0839128030	Western Union	3/11/2016	\$1,420.00
64	8428696820	Western Union	3/12/2016	\$1,350.00
65	4239065908	Western Union	3/12/2016	\$1,495.00
66	3779848814	Western Union	3/14/2016	\$1,525.00
67	8089615816	Western Union	3/14/2016	\$1,825.00
68	7338098916	Western Union	3/14/2016	\$1,150.00
69	2298419382	Western Union	3/14/2016	\$1,600.00
70	2708652692	Western Union	3/14/2016	\$1,625.00
71	4469768770	Western Union	3/15/2016	\$1,600.00
72	5217979328	Western Union	3/15/2016	\$1,600.00
73	7799810617	Western Union	3/15/2016	\$1,625.00
74	4854066471	Western Union	3/16/2016	\$1,550.00
75	0339481313	Western Union	3/17/2016	\$1,600.00
76	9208946686	Western Union	3/17/2016	\$1,650.00
77	8173736664	Western Union	3/18/2016	\$1,525.00
78	9894764147	Western Union	3/21/2016	\$1,650.00
79	0455320408	Western Union	3/22/2016	\$1,525.00
80	8274103386	Western Union	3/22/2016	\$1,635.00
81	5644051668	Western Union	3/23/2016	\$1,575.00
82	8844288790	Western Union	3/23/2016	\$1,625.00
83	0285056453	Western Union	3/28/2016	\$1,655.00
84	2363194465	Western Union	3/29/2016	\$1,500.00
85	1855184686	Western Union	3/29/2016	\$1,660.00
86	6333741623	Western Union	3/29/2016	\$1,475.00
87	8758801320	Western Union	3/30/2016	\$1,600.00

88	7444455230	Western Union	3/31/2016	\$1,590.00
89	0973746142	Western Union	3/31/2016	\$1,590.00
90	2703820145	Western Union	4/1/2016	\$1,500.00
91	4883008419	Western Union	4/1/2016	\$1,550.00
92	1934802371	Western Union	4/5/2016	\$1,560.00
93	2363721228	Western Union	4/7/2016	\$1,550.00
94	6954019190	Western Union	4/7/2016	\$1,345.00
95	0822804780	Western Union	4/8/2016	\$1,625.00
96	1518971692	Western Union	4/9/2016	\$1,450.00
97	4919616833	Western Union	4/9/2016	\$1,625.00
98	9019171737	Western Union	4/11/2016	\$1,655.00
99	1898121109	Western Union	4/11/2016	\$1,550.00
100	3769506669	Western Union	4/11/2016	\$1,675.00
101	2383701693	Western Union	4/12/2016	\$1,665.00
102	2763972248	Western Union	4/12/2016	\$1,668.00
103	6876562930	Western Union	4/15/2016	\$1,665.00

TIFFANY REYNOLDS

Wire Transfers Received

<u>Count</u>	<u>Reference Number</u>	<u>Wire Transfer Company</u>	<u>Date of Wire Transfer</u>	<u>Amount of Wire Transfer</u>
104	15699515	Money Gram	1/15/2016	\$1,875.00
105	45673324	Money Gram	1/19/2016	\$1,775.00
106	47742054	Money Gram	1/20/2016	\$1,925.00
107	67233834	Money Gram	1/20/2016	\$1,925.00
108	84615513	Money Gram	1/26/2016	\$1,750.00
109	96972210	Money Gram	1/26/2016	\$1,750.00
110	89598491	Money Gram	1/28/2016	\$1,950.00
111	97861660	Money Gram	2/16/2016	\$1,850.00
112	8267254345	Western Union	1/27/2016	\$1,995.00

Wire Transfers Sent

<u>Count</u>	<u>Reference Number</u>	<u>Wire Transfer Company</u>	<u>Date of Wire Transfer</u>	<u>Amount of Wire Transfer</u>
113	1032059723	Western Union	1/12/2016	\$200.00
114	6494881746	Western Union	1/12/2016	\$1,645.00
115	2925162787	Western Union	1/13/2016	\$200.00
116	9844515253	Western Union	1/14/2016	\$1,645.00

117	7772656491	Western Union	1/15/2016	\$1,725.00
118	9174224148	Western Union	1/19/2016	\$1,625.00
119	0072404959	Western Union	1/21/2016	\$1,775.00
120	4792191200	Western Union	1/26/2016	\$1,600.00
121	7774361592	Western Union	1/28/2016	\$1,645.00
122	9969521811	Western Union	1/30/2016	\$1,400.00
123	2277659273	Western Union	1/30/2016	\$100.00
124	7238729371	Western Union	2/4/2016	\$1,475.00
125	4173949918	Western Union	2/5/2016	\$1,550.00
126	9007253997	Western Union	2/5/2016	\$950.00
127	2793961210	Western Union	2/6/2016	\$1,575.00

JOSHUA WILLIS

Wire Transfers Received

<u>Count</u>	<u>Reference Number</u>	<u>Wire Transfer Company</u>	<u>Date of Wire Transfer</u>	<u>Amount of Wire Transfer</u>
128	92159648	Money Gram	6/16/2016	\$2,700.00
129	37302653	Money Gram	6/17/2016	\$1,825.00
130	15222343	Money Gram	6/17/2016	\$1,920.00
131	68110395	Money Gram	6/23/2016	\$1,675.00
132	47304254	Money Gram	6/23/2016	\$1,850.00
133	49711496	Money Gram	6/24/2016	\$1,875.00
134	37119276	Money Gram	6/24/2016	\$1,900.00
135	70377213	Money Gram	6/25/2016	\$2,300.00
136	21837395	Money Gram	6/27/2016	\$1,910.00
137	85048555	Money Gram	6/28/2016	\$1,850.00
138	69797101	Money Gram	6/29/2016	\$2,000.00
139	85374888	Money Gram	6/29/2016	\$2,000.00
140	96645861	Money Gram	6/30/2016	\$1,650.00
141	43901022	Money Gram	6/30/2016	\$1,650.00
142	35188882	Money Gram	6/30/2016	\$1,890.00
143	41897400	Money Gram	7/19/2016	\$1,750.00
144	69326677	Money Gram	7/19/2016	\$1,825.00
145	77627976	Money Gram	7/19/2016	\$1,940.00
146	71997546	Money Gram	7/28/2016	\$1,995.00
147	50293513	Money Gram	8/02/2016	\$1,925.00

148	35061043	Money Gram	8/03/2016	\$1,900.00
149	93284587	Money Gram	8/03/2016	\$1,980.00
150	23233490	Money Gram	8/04/2016	\$1,900.00
151	69809789	Money Gram	8/04/2016	\$1,715.00
152	89273547	Money Gram	8/16/2016	\$2,500.00
153	79368379	Money Gram	8/25/2016	\$1,895.00
154	89420065	Money Gram	8/25/2016	\$1,850.00
155	52890746	Money Gram	8/30/2016	\$1,820.00
156	4061354733	Western Union	6/25/2016	\$1,300.00
157	9764143141	Western Union	6/30/2016	\$1,500.00
158	4831117674	Western Union	7/1/2016	\$1,150.00
159	8810838036	Western Union	7/1/2016	\$1,200.00

PAYTON McCARVILLE

Wire Transfers Received

<u>Count</u>	<u>Reference Number</u>	<u>Wire Transfer Company</u>	<u>Date of Wire Transfer</u>	<u>Amount of Wire Transfer</u>
160	38585538	Money Gram	7/12/2016	\$1,985.00
161	39524586	Money Gram	7/23/2016	\$2,000.00
162	40415490	Money Gram	7/23/2016	\$2,233.00
163	51617238	Money Gram	7/26/2016	\$1,925.00
164	70893720	Money Gram	7/26/2016	\$2,500.00
165	31954903	Money Gram	8/2/2016	\$1,985.00
166	58243257	Money Gram	8/3/2016	\$2,225.00
167	73108620	Money Gram	8/4/2016	\$1,980.00
168	58891100	Money Gram	8/5/2016	\$1,995.00
169	77305293	Money Gram	8/5/2016	\$2,350.00
170	83167272	Money Gram	8/8/2016	\$2,500.00
171	96222565	Money Gram	8/9/2016	\$1,525.00
172	76738786	Money Gram	8/9/2016	\$1,825.00
173	97898858	Money Gram	8/9/2016	\$1,945.00
174	6457441895	Western Union	7/9/2016	\$1,700.00
175	9177173843	Western Union	7/9/2016	\$1,845.00

MORGAN CORNELL

Wire Transfers Received

<u>Count</u>	<u>Reference Number</u>	<u>Wire Transfer Company</u>	<u>Date of Wire Transfer</u>	<u>Amount of Wire Transfer</u>
176	24605362	Money Gram	8/17/2016	\$1,985.00
177	29756083	Money Gram	8/17/2016	\$2,600.00
178	87323381	Money Gram	8/24/2016	\$2,000.00
179	91041379	Money Gram	8/24/2016	\$2,350.00
180	55799141	Money Gram	8/29/2016	\$2,000.00
181	57031702	Money Gram	8/30/2016	\$1,875.00
182	95688156	Money Gram	8/31/2016	\$1,950.00
183	36423941	Money Gram	9/6/2016	\$1,890.00
184	57197845	Money Gram	9/7/2016	\$1,895.00
185	35502626	Money Gram	9/8/2016	\$1,900.00
186	2659622993	Western Union	8/17/2016	\$1,955.00
187	3344194264	Western Union	8/18/2016	\$2,200.00
188	9819825916	Western Union	8/31/2016	\$1,925.00
189	1390567582	Western Union	9/3/2016	\$1,710.00

PAUL CHASE

Wire Transfers Received

<u>Count</u>	<u>Reference Number</u>	<u>Wire Transfer Company</u>	<u>Date of Wire Transfer</u>	<u>Amount of Wire Transfer</u>
190	36142889	Money Gram	12/29/2015	\$1,550.00
191	47161032	Money Gram	2/11/2016	\$1,675.00
192	43943324	Money Gram	2/11/2016	\$1,675.00
193	31606987	Money Gram	5/27/2016	\$1,890.00
194	21162257	Money Gram	5/27/2016	\$1,000.00
195	90222971	Money Gram	5/27/2016	\$1,485.00
196	77281366	Money Gram	6/1/2016	\$1,970.00
197	88887461	Money Gram	6/2/2016	\$1,850.00
198	63934489	Money Gram	6/16/2016	\$1,995.00
199	78311404	Money Gram	6/16/2016	\$1,875.00
200	48210983	Money Gram	6/17/2016	\$1,887.00
201	71203696	Money Gram	6/17/2016	\$1,925.00
202	47204856	Money Gram	6/21/2016	\$2,300.00

203	72100676	Money Gram	6/21/2016	\$1,945.00
204	33629287	Money Gram	6/24/2016	\$1,988.00
205	52133416	Money Gram	6/25/2016	\$1,945.00
206	56245678	Money Gram	6/25/2016	\$1,825.00
207	91950141	Money Gram	6/27/2016	\$1,920.00
208	62149456	Money Gram	6/27/2016	\$1,975.00
209	20482856	Money Gram	6/28/2016	\$2,350.00
210	79217829	Money Gram	6/29/2016	\$1,985.00
211	90410355	Money Gram	7/15/2016	\$2,350.00

6. This was in violation of Title 18, United States Code, Section 1343.

A TRUE BILL

s/

Grand Jury Foreperson

24 Aug 17
Date

SEAN R. BERRY
Acting United States Attorney

By:

ANTHONY MORFITT
Assistant United States Attorney