

FILED

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

2018 JAN 16 P 3:41

Alexandria Division

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

UNITED STATES OF AMERICA)	
)	No. 1:18-CR-9
v.)	
)	<u>Count 1</u> : Conspiracy to Commit
RAHEEM OLIVER,)	Mail Fraud and/or Wire Fraud
)	(18 U.S.C. § 1349)
Defendant.)	

CRIMINAL INFORMATION

THE UNITED STATES CHARGES THAT:

Count 1
(Conspiracy to Commit Mail Fraud and/or Wire Fraud)

1. From at least in or about 2013, and continuing through at least in or about October 2016, the defendant, RAHEEM OLIVER (“OLIVER”) and his co-conspirators knowingly and intentionally combined, conspired, and agreed with each other and with other persons to commit offenses against the United States in violation of Title 18, United States Code, Section 1349, to wit:

- (a) Mail fraud — that is, having knowingly devised and intending to devise a scheme and artifice to defraud, and to obtain money or property by means of material false and fraudulent pretenses, representations, and promises, to deposit and cause to be deposited any matter or thing whatever to be sent and delivered by the U.S. Postal Service and by any private or commercial interstate carrier, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1341; and

- (b) Wire fraud — that is, having knowingly devised and intending to devise a scheme and artifice to defraud, and to obtain money and property by means of material false and fraudulent pretenses, representations, and promises, to transmit and cause to be transmitted by means of wire communication in interstate commerce writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

The Scheme and Artifice to Defraud

2. More specifically, from at least in or about 2013, and continuing through at least in or about October 2016, OLIVER and his co-conspirators, together with others, knowingly executed a scheme and artifice to defraud individuals in the Eastern District of Virginia and elsewhere by falsely representing to these individuals, who were often elderly, via telephone calls and other communications that the victims needed to pay thousands of dollars at a time for purported magazine subscription renewal fees, past-due magazine subscription balances, attorneys' fees, fines, other legal fees, and court costs. OLIVER falsely threatened these victims with legal action, often including arrest, if they did not make the payments as requested, and thereby induced the victims to make wire transfers to him and others, and to send payments via the U.S. Postal Service and by private or commercial interstate carrier. OLIVER and his co-conspirators also used victims' bank and credit card information to make unauthorized charges on their accounts.

Manner and Means

3. The manner and means that OLIVER and others used to accomplish the objectives of the conspiracy included at least 100 telephone calls from in or about May 2014 through in or about October 2015, made in furtherance of the conspiracy from a telephone number used by OLIVER in Arizona to a telephone number used by victim R.B. in the Eastern

District of Virginia, during which Oliver demanded payments from R.B. using false statements and false threats of legal action.

4. The manner and means that OLIVER and others used to accomplish the objectives of the conspiracy also included the following mailings: to wit, packages containing checks from victim R.B., all sent by victim R.B. on or about the dates below via the U.S. Postal Service, from U.S. Post Offices in the Eastern District of Virginia to addresses in Arizona, according to instructions given to R.B. by OLIVER and others:

Date	Mailed From	Delivered To
4/15/2015	Melfa Main Post Office, Melfa, VA 23410	Reader Selection PO Box 90384 Phoenix, AZ 85066
5/1/2015	Exmore Post Office, Exmore, VA 23350	Reader Selection PO Box 90384 Phoenix, AZ 85066
8/5/2015	Belle Haven Post Office, Belle Haven, VA 23306	1635 W. University Drive, Suite 125 Tempe, AZ 85281

(All in violation of Title 18, United States Code, Section 1349)

Forfeiture Notice

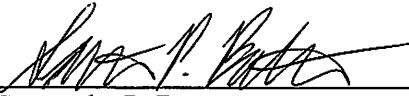
Pursuant to Federal Rule of Criminal Procedure 32.2(a), the defendant, OLIVER, is hereby notified that pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(8), and Title 28, United States Code, Section 2461(c), the defendant shall forfeit to the United States the following property:

- (a) Any real or personal property used or intended to be used to commit, to facilitate, or to promote the commission of the above-described offense in violation of Title 18, United States Code, Section 1349; and any real or personal property constituting, derived from, or traceable to the gross proceeds obtained directly or indirectly as a result of such violations, including but not limited to a money judgment in the amount of at least \$548,209.05;
- (b) Substitute property, up to the value of the amount described in subparagraph (a), if, by any act or omission of the defendant, the property described in subparagraph (a), or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, 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.

(In accordance with Title 18, United States Code, Section 981(a)(1)(C); Title 18, United States Code, Section 982(a)(8); Title 28, United States Code, Section 2461(c); and Rule 32.2(a), Federal Rules of Criminal Procedure)

DANA J. BOENTE
UNITED STATES ATTORNEY

By:


Samantha P. Bateman
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