

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

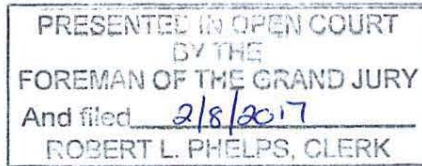
UNITED STATES OF AMERICA,

Plaintiff,

vs.

CARLOS KALIER RODRIGUEZ, CODY  
ALLEN RICHEY, MICHAEL LEE  
MARCOV, and STEPHANIE ANN  
MARCOV,

Defendants.



No. 17-CR-1004

**INDICTMENT**

Counts 1 - 24  
18 U.S.C. § 1343:  
Wire Fraud  
(Rodriguez)

Counts 25 - 36  
18 U.S.C. § 1343:  
Wire Fraud  
(Richey)

Counts 37 - 76  
18 U.S.C. § 1343:  
Wire Fraud  
(M. Marcov)

Counts 77 - 117  
18 U.S.C. § 1343:  
Wire Fraud  
(S. Marcov)

The Grand Jury charges:

**Counts 1 – 117**

**Wire Fraud**

**Introduction**

1. At all times relevant to this Indictment defendants CARLOS KALIER RODRIGUEZ, CODY ALLEN RICHEY, MICHAEL LEE MARCOV, and STEPHANIE ANN MARCOV 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 CARLOS KALIER RODRIGUEZ, CODY ALLEN RICHEY, MICHAEL LEE MARCOV, and STEPHANIE ANN MARCOV, 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, including defendants CARLOS KALIER RODRIGUEZ and MICHAEL LEE MARCOV and others, 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 CARLOS KALIER RODRIGUEZ, CODY ALLEN RICHEY, MICHAEL LEE MARCOV, and STEPHANIE ANN MARCOV 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 defendant CARLOS KALIER RODRIGUEZ. 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 CARLOS KALIER RODRIGUEZ, CODY ALLEN



RICHEY, MICHAEL LEE MARCOV, and STEPHANIE ANN MARCOV 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:

CARLOS KALIER RODRIGUEZ

*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>
1	3181343367	Western Union	12/3/2015	\$1,400
2	7857562491	Western Union	12/4/2015	\$1,450
3	9156890896	Western Union	12/4/2015	\$1,550
4	3968124647	Western Union	12/5/2015	\$1,450
5	6453253782	Western Union	12/8/2015	\$1,400
6	7543862990	Western Union	12/9/2015	\$1,000
7	6144150282	Western Union	12/16/2015	\$1,500
8	5592555970	Western Union	12/16/2015	\$1,550
9	0134501247	Western Union	12/17/2015	\$1,850
10	0232664999	Western Union	12/18/2015	\$4,440
11	73765925	Money Gram	12/18/2015	\$1,800
12	7003684589	Western Union	12/22/2015	\$1,450
13	5475569035	Western Union	12/23/2015	\$1,200
14	9214350950	Western Union	12/23/2015	\$1,200
15	7023672094	Western Union	12/24/2015	\$1,575
16	7237317687	Western Union	12/28/2015	\$1,475
17	6404581500	Western Union	12/29/2015	\$1,600
18	87046594	Money Gram	05/26/2016	\$725
19	57464149	Money Gram	05/26/2016	\$725
20	93975434	Money Gram	06/22/2016	\$790
21	89919119	Money Gram	06/22/2016	\$790
22	42149778	Money Gram	07/25/2016	\$800
23	91071290	Money Gram	06/21/2016	\$900
24	47236134	Money Gram	06/21/2016	\$900

CODY ALLEN RICHEY

*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>
25	7255633201	Western Union	12/16/2015	\$1,870
26	31993922	Money Gram	12/22/2015	\$1,900
27	73590273	Money Gram	12/23/2015	\$1,550
28	88553576	Money Gram	12/23/2015	\$1,550
29	82761245	Money Gram	12/24/2015	\$1,925
30	53922043	Money Gram	1/20/2016	\$1,725
31	58812508	Money Gram	5/25/2016	\$1,875
32	70959036	Money Gram	5/25/2016	\$1,750
33	39893978	Money Gram	5/26/2016	\$1,945
34	94970391	Money Gram	5/27/2016	\$1,875
35	28937042	Money Gram	7/20/2016	\$2,500

*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>
36	7766462859	Western Union	1/20/2016	\$1,575

MICHAEL LEE MARCOV

*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>
37	68428324	Money Gram	12/4/2015	\$1,900
38	46235151	Money Gram	12/15/2015	\$1,900
39	71116436	Money Gram	1/6/2016	\$1,726
40	8656296126	Western Union	1/6/2016	\$1,850
41	33023030	Money Gram	1/9/2016	\$1,886
42	38422985	Money Gram	1/9/2016	\$1,886
43	82009127	Money Gram	1/11/2016	\$1,768
44	76288315	Money Gram	1/13/2016	\$1,780
45	63568005	Money Gram	1/20/2016	\$1,825



46	82040622	Money Gram	1/26/2016	\$1,840
47	96698759	Money Gram	2/20/2016	\$1,850
48	53127156	Money Gram	2/22/2016	\$1,925
49	30393948	Money Gram	2/26/2016	\$1,675
50	91168375	Money Gram	2/26/2016	\$1,875
51	57888411	Money Gram	2/27/2016	\$1,700
52	72528502	Money Gram	2/27/2016	\$1,785
53	26557087	Money Gram	2/29/2016	\$1,450
54	71741750	Money Gram	3/2/2016	\$1,875
55	26005846	Money Gram	3/3/2016	\$1,900
56	62640407	Money Gram	3/3/2016	\$1,875
57	90566445	Money Gram	3/5/2016	\$1,950
58	46135834	Money Gram	3/7/2016	\$1,965
59	36645160	Money Gram	3/8/2016	\$1,985
60	82245107	Money Gram	3/8/2016	\$1,875
61	57402549	Money Gram	3/9/2016	\$1,950
62	77506857	Money Gram	3/9/2016	\$1,925
63	73116660	Money Gram	3/10/2016	\$1,925
64	61493328	Money Gram	3/12/2016	\$1,775
65	23140686	Money Gram	3/14/2016	\$1,900.35
66	27820282	Money Gram	3/14/2016	\$1,925
67	64414649	Money Gram	3/15/2016	\$1,925
68	56804997	Money Gram	3/22/2016	\$1,980
69	89164288	Money Gram	3/22/2016	\$1,935
70	36767251	Money Gram	3/23/2016	\$1,875
71	53376568	Money Gram	3/23/2016	\$1,935
72	31130974	Money Gram	3/29/2016	\$1,000
73	88896420	Money Gram	3/29/2016	\$975
74	53813503	Money Gram	4/1/2016	\$1,800
75	94000897	Money Gram	4/1/2016	\$1,850

*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>
76	84384503	Money Gram	1/11/2016	\$1,500

STEPHANIE ANN MARCOV

*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>
77	90563143	Money Gram	2/27/2016	\$1,875
78	18971878	Money Gram	3/12/2016	\$1,625
79	38252162	Money Gram	3/14/2016	\$1,775
80	70518982	Money Gram	3/14/2016	\$1,925
81	85046106	Money Gram	3/15/2016	\$1,900
82	33151908	Money Gram	3/17/2016	\$1,925
83	63989915	Money Gram	3/17/2016	\$1,975
84	40925088	Money Gram	3/18/2016	\$1,825
85	18966673	Money Gram	3/22/2016	\$1,825
86	67647097	Money Gram	3/22/2016	\$1,800
87	31534563	Money Gram	3/23/2016	\$1,850
88	86487471	Money Gram	3/23/2016	\$1,925
89	1552529827	Western Union	4/1/2016	\$1,350

*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>
90	9388286282	Western Union	2/20/2016	\$1,578
91	0959627128	Western Union	2/20/2016	\$1,700
92	3458428970	Western Union	2/26/2016	\$775
93	4269891934	Western Union	2/26/2016	\$800
94	5558125426	Western Union	2/27/2016	\$1,575
95	7939833230	Western Union	2/27/2016	\$1,400
96	1078082012	Western Union	2/27/2016	\$1,375
97	1909068080	Western Union	2/29/2016	\$1,650
98	5268851087	Western Union	2/29/2016	\$1,150
99	6488271515	Western Union	2/29/2016	\$1,485
100	6409094948	Western Union	3/3/2016	\$1,600
101	1927756248	Western Union	3/3/2016	\$1,575
102	8448892043	Western Union	3/3/2016	\$1,500
103	9778552327	Western Union	3/5/2016	\$1,650
104	6294183603	Western Union	3/8/2016	\$1,685
105	6374895862	Western Union	3/8/2016	\$1,450



106	0504448456	Western Union	3/8/2016	\$1,575
107	8598680376	Western Union	3/14/2016	\$1,625
108	6798147114	Western Union	3/17/2016	\$1,625
109	8463599449	Western Union	3/22/2016	\$1,500
110	4174229859	Western Union	3/22/2016	\$1,668
111	6924730395	Western Union	3/22/2016	\$1,550
112	6104063730	Western Union	3/23/2016	\$1,635
113	8635265334	Western Union	3/31/2016	\$1,655
114	0012773210	Western Union	4/1/2016	\$1,665
115	4653321928	Western Union	4/2/2016	\$1,050
116	2354761956	Western Union	4/4/2016	\$1,625
117	6704218089	Western Union	4/5/2016	\$1,575

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

A TRUE BILL

s/

Grand Jury Foreperson

2-7-2017

Date

KEVIN W. TECHAU  
United States Attorney

By:

  
ANTHONY MORFITT  
Assistant United States Attorney