

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on August 11, 2021

UNITED STATES OF AMERICA

v.

SEREIKA SAVARIAU,

Defendant.

CRIMINAL NO.

GRAND JURY ORIGINAL

VIOLATIONS:

18 U.S.C. §§ 1343, 1349, 3293(2)
(Conspiracy to Commit Wire Fraud
Affecting a Financial Institution)

18 U.S.C. § 1343, 3293(2) (Wire Fraud
Affecting a Financial Institution)

18 U.S.C. § 1028A (Aggravated Identity
Theft)

FORFEITURE ALLEGATION:

18 U.S.C. § 981(a)(2)(A);
21 U.S.C. § 853(p)

INDICTMENT

The Grand Jury charges that:

At times material to this Indictment:

Introduction

1. Defendant **Sereika Savariau**, a.k.a. Sereika Savariau-Goodison, a.k.a., Sereika Goodison (hereinafter “**Savariau**”), was a Jamaican citizen and resident.

2. The American Recovery and Reinvestment Act of 2009 (“ARRA”) was a statute enacted by the United States Congress in 2009 for purposes including the promotion of economic recovery and assisting those impacted by recession. The ARRA formed the Recovery

Accountability and Transparency Board (the “Recovery Board”) to coordinate and conduct oversight of covered funds to prevent fraud, waste, and abuse.

3. The Treasury Department Federal Credit Union (“TDFCU”) was a federally insured United States financial institution as defined by Title 18, United States Code, Section 20, and based in the District of Columbia.

COUNT ONE
(Conspiracy to Commit Wire Fraud Affecting a Financial Institution)

4. Paragraphs 1 through 3 are incorporated here by reference.

5. Beginning by at least on or about June 17, 2016 and continuing until at least on or about September 5, 2018, in the District of Columbia and elsewhere, defendant **Sereika Savariau** knowingly and intentionally agreed with other persons, known and unknown to the grand jury, 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, such scheme and artifice affecting a financial institution, and 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 the scheme and artifice, all in violation of Title 18, United States Code, Sections 1343, 1349, and 3293(2).

The Purpose of the Conspiracy

6. The purpose of the conspiracy was for **Savariau** and her co-conspirators to profit from fees paid by victims of the fraudulent debt relief companies described further below, and to induce victims to disclose personal identifying information, sensitive financial information, and identity documents to these companies, which Savariau and her co-conspirators used in this scheme and in further frauds.

The Manner and Means of the Conspiracy

7. The manner and means by which **Savariau** and others carried out the conspiracy included, but were not limited to, the following.

8. As part of the conspiracy, **Savariau**, with others known and unknown to the grand jury, created and operated a series of fraudulent businesses and websites that marketed and sold fraudulent debt relief services to members of the public. These businesses (“the Companies”) and websites included at least SERVgov LLC (at website servgov.org), National Credit Relief LLC (at website nationalcreditrelief.us), and American Bill Aid (at website americanbillaid.com).

9. It was further part of the conspiracy that **Savariau** and her co-conspirators used these websites, as well as telephone calls, emails, and other forms of communication, to fraudulently misrepresent that members of the public could apply for and obtain thousands of dollars’ worth of debt relief on their outstanding, unpaid bills in the form of grants, all in exchange for payment of a service or processing fee, and that this debt relief was funded and administered by the United States government. One such fraudulent website (servgov.org) made the following fraudulent claims:

a. “SERVgov® provides the Bill Payment Government Aid (available under the American Recovery & Reinvestment Act of 2009) nationwide to verifiable and eligible recipients. With your application and our experienced team, your bills are paid via ACH Direct Deposit within 7 business days of receiving and processing your application. . . . Register and apply for the Bill Payment Government Aid today and receive up to \$60,000 within 7 business days!”

b. “SERVgov® requires that all recipients are verifiable under the laws of the Patriot Act. We require the following from ALL applicants: Signed and Notarized Payout Agreement ... 2 Copies of valid government issued identification”;

c. “Types of bills we pay: Credit Card, Insurance (auto, home, life), Lease (home, auto), Loan, Medical, Mortgage, Utility (telephone, internet, cable, gas, water, power).”

d. “The processing rate associated with your government aid covers the overhead costs of processing and paying out of funds, all under which you have applied for (a recipient of the American Recovery & Reinvestment Act of 2009 Bill Payment Government Aid). The processing rate for the Bill Payment Government Aid is 14.1217% of the total amount of the government aid processed and paid to the creditor/biller on your submitted application.”

10. It was further part of the conspiracy that **Savariau** and her co-conspirators initiated payments, or caused payments to be initiated, to the victims’ creditors, knowing that these payments would be reversed or would otherwise fail prior to clearing. They did so to convince the victims that the fraudulent debt relief programs were legitimate and that their bills were being paid off, and to induce the victims to pay the service and processing fees.

11. It was further part of the conspiracy that, between in or about November 2016 and in or about December 2016, **Savariau** and her co-conspirators initiated and caused to be initiated over 100,000 dollars’ worth of fraudulent payments to the victims’ creditors using TDFCU’s routing number but fictitious account numbers and knowing and intending that the payments would be subsequently rejected by TDFCU.

12. It was further part of the conspiracy that, between at least June 17, 2016, and September 5, 2018, **Savariau** and her co-conspirators induced and attempted to induce victims throughout the United States to pay over a million dollars' worth of service or processing fees to **Savariau** and her co-conspirators via Western Union, Money Gram, PayPal, and other interstate payment mechanisms. The conspiracy's victims made such payments because they believed the conspirators' false and fraudulent representations that they were participating in a government funded debt relief program, and that payment of the so-called service or processing fees would result in their debts being paid off. In fact, **Savariau** and her co-conspirators did not act on behalf of a U.S. government funded debt relief program, and they did not pay off their victims' debts as claimed.

13. It was further part of the conspiracy that **Savariau** and her co-conspirators stole and used the personal identifying information, which had been submitted by victims to the fraudulent websites, to advance the conspiracy, to perpetrate the scheme, and for further frauds.

(Conspiracy to Commit Wire Fraud Affecting a Financial Institution, in violation of Title 18, United States Code, Sections 1343, 1349, and 3293(2))

**COUNTS TWO THROUGH FIVE
(Wire Fraud Affecting a Financial Institution)**

14. Paragraphs 1 through 3 and 6 through 13 are incorporated here by reference.

15. On or about the dates below, in the District of Columbia and elsewhere, defendant **Savariau**, having knowingly devised, intending to devise, and participating in a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, such scheme and artifice affecting a financial institution, that is, TDFCU, transmitted and caused to be transmitted by means of wire communication in

interstate commerce writings, signs, and signals for the purpose of executing the scheme and artifice, as set forth below, each such wire transmission being a separate count:

Count	Date	Wire Communication
2	December 5, 2016	Interstate wire communication from outside the District of Columbia to a location within the District of Columbia, which attempted to initiate a payment of \$2377.14 on behalf of E.M. to Capital One.
3	December 5, 2016	Interstate wire communication from outside the District of Columbia to a location within the District of Columbia, which attempted to initiate a payment of \$1078.96 on behalf of E.M. to Capital One.
4	December 5, 2016	Interstate wire communication from outside the District of Columbia to a location within the District of Columbia, which attempted to initiate a payment of \$1623.31 on behalf of E.M. to Dell Financial.
5	December 6 to 7, 2016	Interstate wire communication from outside the District of Columbia to a location within the District of Columbia, which attempted to initiate a payment of \$1242.96 on behalf of E.M. to U.S. Bank N.A.

**(Wire Fraud Affecting a Financial Institution, in violation of
Title 18, United States Code, Sections 1343 and 3293(2))**

**COUNT SIX
(Aggravated Identity Theft)**

16. Paragraphs 1 through 3 and 6 through 13 are incorporated here by reference.

17. Between on or about June 7, 2017, and on or about August 22, 2018, in the District of Columbia and elsewhere, defendant **Savariau** knowingly possessed, transferred, and used, without lawful authority, a means of identification of another person, that is, the name of victim M.S. in connection with creating and using an email account the conspirators controlled, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, conspiracy to commit wire fraud affecting a financial institution, in violation of 18 U.S.C. §§ 1343, 1349 and 3293(2), as charged in Count One of this Indictment, and wire fraud affecting a financial

institution, in violation of 18 U.S.C. §§ 1343 and 3293(2), as charged in Counts Two through Five of this Indictment, knowing that the means of identification belonged to another actual person.

**(Aggravated Identity Theft, in violation of
Title 18, United States Code, Sections 1028A(a)(1) and (c)(5))**

**COUNT SEVEN
(Aggravated Identity Theft)**

18. Paragraphs 1 through 3 and 6 through 13 are incorporated here by reference.

19. Between on or about May 4, 2017, and on or about May 30, 2017, in the District of Columbia and elsewhere, defendant **Savariau** knowingly possessed, transferred, and used, without lawful authority, a means of identification of another person, that is, the name of victim M.S. in registering the National Credit Relief Limited Liability Company in the State of California, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, conspiracy to commit wire fraud affecting a financial institution, in violation of 18 U.S.C. §§ 1343, 1349 and 3293(2), as charged in Count One of this Indictment, and wire fraud affecting a financial institution, in violation of 18 U.S.C. §§ 1343 and 3293(2), as charged in Counts Two through Five of this Indictment, knowing that the means of identification belonged to another actual person.

**(Aggravated Identity Theft, in violation of
Title 18, United States Code, Sections 1028A(a)(1) and (c)(5))**

**COUNT EIGHT
(Aggravated Identity Theft)**

20. Paragraphs 1 through 3 and 6 through 13 are incorporated here by reference.

21. On or about July 5, 2018, in the District of Columbia and elsewhere, defendant **Savariau** knowingly possessed, transferred, and used, without lawful authority, a means of identification of another person, that is, the name and home address of victim E.M. to register the

website americanbillaid.com, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, conspiracy to commit wire fraud affecting a financial institution, in violation of 18 U.S.C. §§ 1343, 1349 and 3293(2), as charged in Count One of this Indictment, and wire fraud affecting a financial institution, in violation of 18 U.S.C. §§ 1343 and 3293(2), as charged in Counts Two through Five of this Indictment, knowing that the means of identification belonged to another actual person.

**(Aggravated Identity Theft, in violation of
Title 18, United States Code, Sections 1028A(a)(1) and (c)(5))**

Forfeiture Allegation

1. Upon conviction of any of the offenses alleged in Counts One through Five, Defendant **Savariau** shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation(s). The United States will also seek a forfeiture money judgment against the defendant in an amount equal to the value of any property constituting, or derived from, proceeds, the defendant obtained, directly or indirectly, as a result of the offense.

2. If any of the property described above as being subject to forfeiture, 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 that cannot be divided without difficulty;

the defendant shall forfeit to the United States any other property of the defendant, up to the value of the property described above, pursuant to 21 U.S.C. § 853(p).

**(Criminal Forfeiture, pursuant to Title 18, United States Code, Section 981(a)(2)(A),
and Title 21, United States Code, Section 853(p))**

A TRUE BILL

FOREPERSON

A handwritten signature in black ink, reading "Matthew M. Groves/jpk". The signature is written in a cursive, flowing style.

ATTORNEY FOR THE UNITED STATES IN
AND FOR THE DISTRICT OF COLUMBIA