

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

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CAROL L. MICHEL
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**INDICTMENT FOR CONSPIRACY TO
COMMIT MAIL AND WIRE FRAUD, AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

v.

ACDANE CAMPBELL

CRIMINAL NO.

SECTION:

VIOLATION: 18 U.S.C. § 371

**20-00123
SECT. E MAG. 1**

* * *

The Grand Jury charges that:

COUNT 1

(Conspiracy to Commit Mail and Wire Fraud)

A. AT ALL TIMES MATERIAL HEREIN:

1. The defendant, **ACDANE CAMPBELL** ("CAMPBELL"), was a citizen of Jamaica and resided in New Orleans, in the Eastern District of Louisiana.
2. Walmart2Walmart, Western Union, and MoneyGram were money service businesses commonly used to send money electronically between persons.
3. B.L. was approximately 81 years old and resided in Watkinsville, Georgia.
4. F.H. was approximately 71 years old and resided in Piedmont, South Carolina.

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5. C.S. was approximately 85 years old and resided in Reno, Nevada.
6. J.Q. was approximately 70 years old and resided in Santa Rosa, California.
7. S.O. was approximately 74 years old and resided in Coshocton, Ohio.
8. V.P. was approximately 84 years old and resided in Bellville, Pennsylvania.
9. P.H. was approximately 68 years old and resided in Spring, Texas.
10. M.W. was approximately 72 years old and resided in Mammoth, Arizona.

B. CONSPIRACY TO COMMIT MAIL AND WIRE FRAUD:

Beginning at a time unknown, and continuing until the date of this Indictment, in the Eastern District of Louisiana and elsewhere, **ACDANE CAMPBELL**, and others known and unknown to the Grand Jury, willfully and knowingly did combine, conspire, confederate, and agree:

- a. to devise a scheme and artifice to defraud and to obtain money and property from elderly and vulnerable individuals by means of materially false and fraudulent pretenses, representations, and promises, by use of interstate wire transmissions, for the purpose of executing or attempting to execute the Scheme and Artifice to Defraud set forth in Section C, in violation of Title 18, United States Code, Section 1343; and,
- b. to devise a scheme and artifice to defraud and to obtain money and property from elderly and vulnerable individuals by means of materially false and fraudulent pretenses, representations, and promises, and willfully cause mail matter to be delivered by the United States Postal Service for the purpose of executing or attempting to execute the Scheme and Artifice to Defraud set forth in Section C, in violation of Title 18, United States Code, Section 1341.

C. THE SCHEME AND ARTIFICE TO DEFRAUD:

It was part of the scheme and artifice to defraud that unknown individuals employed false and fraudulent representations in order to convince unwitting victims to send money to **CAMPBELL** via the United States Postal Service or FedEx, thereby causing mail matter to be sent or delivered by United States Postal Service or private or commercial interstate carrier.

It was also part of the scheme and artifice to defraud that unknown individuals employed false and fraudulent representations in order to convince unwitting victims to electronically send money to **CAMPBELL** via Walmart2Walmart, MoneyGram, and Western Union, thereby causing to be transmitted by means of wire in interstate commerce any writings, signs, signals, or pictures.

It was also part of the scheme and artifice to defraud that **CAMPBELL** would send the ill-gotten proceeds that he received from the unwitting victims to unknown persons in Jamaica by money service business or mail, deposit the funds into his bank account, or otherwise use the money for his personal benefit.

D. OVERT ACTS:

Victim B.L.

1. At a time unknown, but prior to May 2016, an unknown individual contacted victim B.L. and falsely told her she had won the lottery. In order to claim her winnings, she would need to send a series of payments, some to **CAMPBELL**.

2. Based upon these false statements, on or about May 11, 2016, victim B.L. sent approximately \$1,200 via MoneyGram to **CAMPBELL** in New Orleans, Louisiana, causing a signal to travel through interstate commerce from Watkinsville, Georgia to New Orleans, Louisiana.

Victim F.H.

3. At a time unknown, but prior to July 2016, an unknown individual contacted victim F.H. and falsely told her she had won a car. In order to claim her car, she would need to send a series of payments for fees associated with the car, some to **CAMPBELL**.

4. Based upon these false statements, on or about July 28, 2016, victim F.H. sent approximately \$250 via MoneyGram to **CAMPBELL** in New Orleans, Louisiana, causing a signal to travel through interstate commerce from Piedmont, South Carolina to New Orleans, Louisiana.

Victim C.S.

5. At a time unknown, but prior to August 2016, an unknown individual contacted victim C.S. and falsely told him that he had won the lottery. In order to claim the winnings, he would need to send a series of payments, some to **CAMPBELL**.

6. Based upon these misrepresentations, on or about August 3, 2016, victim C.S. sent approximately \$108 via MoneyGram to **CAMPBELL** in New Orleans, Louisiana, causing a signal to travel through interstate commerce from Reno, Nevada to New Orleans, Louisiana.

Victim J.Q.

7. At a time unknown but prior to October 2016, J.Q. received calls from an unknown individual or individuals falsely telling him that he had won a lottery. In order to claim the winnings, he would need to send a series of payments, some to **CAMPBELL**.

8. Based upon these misrepresentations, on or about October 12, 2016, victim J.Q. sent \$1,500 via MoneyGram to **CAMPBELL** in New Orleans, Louisiana, causing a signal to travel through interstate commerce from Santa Rosa, California to New Orleans, Louisiana.

Victim S.O.

9. At a time unknown but prior to November 2016, an unknown female contacted victim S.O. The unknown woman falsely stated that S.O. had won a car and needed to pay taxes and fees on the prize. The female instructed S.O. to wire money to certain individuals, including **CAMPBELL**.

10. Based upon these misrepresentations, on or about November 5, 2016, victim S.O. sent \$380 via MoneyGram to **CAMPBELL** in New Orleans, Louisiana, causing a signal to travel in interstate commerce from Coshocton, Ohio to New Orleans, Louisiana.

Victim V.P.

11. At a time unknown but prior to November 2016, an unknown person called victim V.P. and falsely told her that she had won 3.5 million dollars in the Publisher's Clearing House sweepstakes. The unknown individual told her that in order to claim her winnings, she would need to make a series of payments, some to **CAMPBELL** for taxes and fees.

12. Based upon these misrepresentations, on or about November 12, 2016, victim V.P. sent approximately \$7,000 through the United States Postal service to **CAMPBELL** at an address on Press Drive in New Orleans, Louisiana.

Victim P.H.

13. At a time unknown but prior to November 2018, an unknown male contacted victim P.H. and falsely informed her that she had won the Publisher's Clearing House sweepstakes. The individual told her that before she could claim her winnings, she needed to make a series of payments, including some to **CAMPBELL**.

14. Based upon these false representations, on or about November 27, 2018, victim P.H sent approximately \$10,000 through the Federal Express to **CAMPBELL** at an address on Press Drive in New Orleans, Louisiana.

Victim M.W.

15. At a time unknown but prior to May 2019, unknown persons contacted victim M.W. and falsely informed her that she had won the Publisher's Clearing House sweepstakes. The individual told her that before she could claim her winnings, she needed to make a series of payments, including some to **CAMPBELL**.

16. On or about May 21, 2019, victim M.W. mailed approximately \$5,999 via Federal Express to **CAMPBELL** at an address on Press Drive in New Orleans, Louisiana:

All in violation of Title 18, United States Code, Section 371.

NOTICE OF FORFEITURE

1. The allegations of Count 1 of this Indictment are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

2. As a result of the offenses alleged in Count 1, the defendant, **ACDANE CAMPBELL**, shall forfeit to the United States 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 said offense.

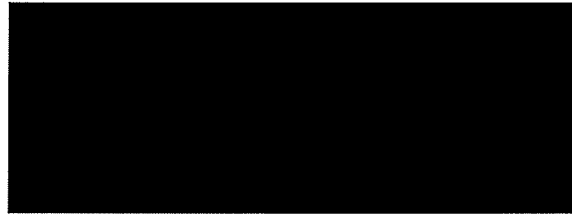
3. If any of the above-described property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- 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 subdivided without difficulty;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

A TRUE BILL:



PETER G. STRASSER
UNITED STATES ATTORNEY

A handwritten signature in cursive script, appearing to read "Shara", written over a horizontal line.

SHARAN E. LIEBERMAN
Assistant United States Attorney

New Orleans, Louisiana
November 6, 2020