

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO. 20-123
v.	*	SECTION: "E"
ACDANE CAMPBELL	*	
	*	
	*	

**FACTUAL BASIS**

The defendant, **ACDANE CAMPBELL**, (hereinafter, the "defendant" or "**CAMPBELL**"), has agreed to plead guilty as charged to the Indictment now pending against him, charging him with conspiracy to commit mail and wire fraud, in violation of Title 18, United States Code, Section 371. Both the Government and the defendant, **CAMPBELL**, do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crimes to which the defendant is pleading guilty. The Government and the defendant further stipulate that the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant:

From 2016 through 2019, **CAMPBELL** was a citizen of Jamaica and resided on Press Drive in New Orleans within the Eastern District of Louisiana. Beginning in 2016, a number of 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. These same 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.

After receiving victim funds, **CAMPBELL** would send the ill-gotten proceeds that he received from the unwitting victims to persons in Jamaica by money service businesses or mail, deposit the funds into his bank account, or otherwise use the money for his personal benefit. The details of at least eight (8) financial fraud victims and the use of the mails and wires in order to perpetuate the scheme and artifice to defraud are described below:

***Victim B.L.***

In May of 2016, B.L. was approximately 81 years old and resided in Watkinsville, Georgia. At a time unknown, but prior to May 2016, an unknown individual contacted victim B.L. and falsely told her she had won a lottery. In order to claim her winnings, she would need to send a series of payments, some to **CAMPBELL**. 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.***

In July of 2016, F.H. was approximately 71 years old and resided in Piedmont, South Carolina. 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**. 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.*

In August of 2016, C.S. was approximately 85 years old and resided in Reno, Nevada. At a time unknown, but prior to August 2016, an unknown individual contacted victim C.S. and falsely told 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**. Based upon these misrepresentations, 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.*

In October of 2016, J.Q. was approximately 70 years old and resided in Santa Rosa, California. 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**. 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.*

In November of 2016, S.O. was approximately 74 years old and resided in Coshocton, Ohio. 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**. 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.***

In November of 2016, V.P. was approximately 84 years old and resided in Bellville, Pennsylvania. 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. Based upon these misrepresentations, on or about November 12, 2016, victim V.P. sent approximately \$15,000 through the United States Postal service to **CAMPBELL** at an address on Press Drive in New Orleans, Louisiana.

***Victim P.H.***

In November of 2018, P.H. was approximately 68 years old and resided in Spring, Texas. 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**. 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.***

In May of 2019, M.W. was approximately 72 years old and resided in Mammoth, Arizona. 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**. 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.

***Campbell Admissions***

On December 2, 2016, an inspector with United States Postal Inspection Service and an agent with the Department of Homeland Security consensually interviewed **CAMPBELL** at his residence on Press Drive, New Orleans, Louisiana. At that time, **CAMPBELL** stated that he was a citizen of Jamaica who had been living in the United States since January of 2016. He moved to the United States to attend college. **CAMPBELL** stated that after helping a friend with using MoneyGram wire services in the United States, **CAMPBELL** began to receive calls from various people in Jamaican asking for his assistance in transferring money. Afterward, **CAMPBELL** knowingly and voluntarily began to accept money into his bank account from persons he did not know and then transfer a majority of the funds to persons in Jamaica. **CAMPBELL** admitted that, after a while, he realized that the proceeds he was receiving were the products of “scamming.” He also admitted keeping a portion of the funds that he received as compensation for transportation.

On November 6, 2017, an inspector with United States Postal Inspection Service and an agent with the Department of Homeland Security consensually interviewed **CAMPBELL** a second time at his residence on Press Drive, New Orleans, Louisiana, about an intercepted package that was connected to fraudulent activity. At that time, **CAMPBELL** stated that he was only forwarding a ring with a gemstone to a friend. Afterward, the agent with Department of Homeland Security was able to verify that the shipper

of the ring to **CAMPBELL** was the victim of a romance scam.<sup>1</sup> On November 8, 2017, the inspector with United States Postal Inspections retrieved the ring from **CAMPBELL** and mailed it back to the victim.

On September 16, 2020, **CAMPBELL**, who now lived in Hattiesburg, Mississippi, was interviewed by an agent with the Federal Bureau of Investigation and a Lamar County Deputy about a New York scam victim. Again, **CAMPBELL** admitted in a consensual interview to receiving cash, gift cards, money orders, credit and debit cards of persons, sometimes by deposits and other times in packages, and then forwarding the majority of the finds to persons in Jamaica.

**CAMPBELL** voluntarily went to the local Federal Bureau of Investigation offices two days later in Hattiesburg, Mississippi, on September 18, 2020, for another interview. **CAMPBELL** further explained that “scammers” in Jamaica would buy lists of people, which included phone numbers. The individual “scammer” would call the people on the list and try to convince them that they had won something. The “scammer” would then ask the contacted person to pay some sort of entry fee or authorization fee. If agreed, the contacted person was given a mailing address where the money could be sent. **CAMPBELL** agreed to participate in this scheme while living in the United States. He would receive calls and texts with information on victim funds and where to send the victim funds in Jamaica.

In total, **CAMPBELL** received the sum of at least \$107,747.97 from the victims detailed above. Both the government and the defendant further agree that **CAMPBELL** did not know the ages or vulnerabilities of the victims involved in this scheme.

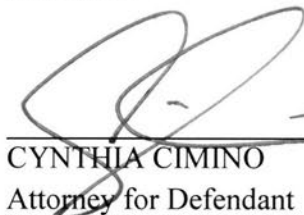
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<sup>1</sup> A “romance scam” is typically one wherein a victim is induced by an online persona to send funds, presents or gift cards for a variety of reasons (emergency, medical issue, travel, etc.) after a relationship of trust has been established. In reality, the online persona is using an assumed/false identity and need for the funds is a ruse in order to victimize the sender.

The above facts come from an investigation conducted by and would be proven at trial by credible testimony from the victims, Special Agents from the Department of Homeland Security, Inspectors from the United States Postal Service, business records from FedEx, MoneyGram, Walmart-2-Walmart, or Western Union, documents and tangible exhibits in the custody of the Department of Homeland Security, and the admissions of the defendant, **CAMPBELL**.

  
ACDANE CAMPBELL      11/05/21  
Defendant      Date

  
EDWARD J. RIVERA      11/5/21  
Assistant United States Attorney      Date

  
CYNTHIA CIMINO      11/5/21  
Attorney for Defendant      Date