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FILED

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

2015 MAY 27 PM 2: 51

CLERK, U.S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE, FLORIDA

UNITED STATES OF AMERICA

v.

JOHN PATRICK AMELL  
ILIA MATO

CASE NO. 3:15-cr-11-39mc  
Ct. 1: 18 U.S.C. §§ 371, 1084(a),  
and 2  
Forfeiture: 18 U.S.C. § 981(a)(1)(C)  
and 28 U.S.C. § 2461(c)

INDICTMENT

The Grand Jury charges:

COUNT ONE

A. The Conspiracy

1. Between in or about September 2011, and continuing through in or about January 2013, in Duval County, in the Middle District of Florida and elsewhere,

JOHN PATRICK AMELL,  
ILIA MATO,

the defendants herein, did knowingly and willfully combine, conspire, confederate, and agree with each other and with others, known and unknown to the Grand Jury, to commit offenses against the United States, specifically to, while being engaged in the business of betting and wagering, knowingly use and cause to be used a

wire communication facility, for the transmission in interstate or foreign commerce, bets and wagers on sporting events, in violation of Title 18, United States Code, Sections 1084(a) and 2.

**B. Manner and Means**

2. It was part of the conspiracy that John Patrick Amell and Ilia Mato would supervise managers, who ran individual groups of bettors.

3. It was a further part of the conspiracy that John Patrick Amell and Ilia Mato would instruct bettors to use www.visionwager.com as a website to place bets and wagers.

4. It was a further part of the conspiracy that John Patrick Amell and Ilia Mato would collect debts representing losses from bets and wagers that were placed on www.visionwager.com.

5. It was a further part of the conspiracy that John Patrick Amell and Ilia Mato would pay earnings representing winnings from bets and wagers that were placed on www.visionwager.com.

6. It was a further part of the conspiracy that conspirators would and did perform acts and make statements to hide and conceal the purposes of the conspiracy and the acts committed in furtherance thereof.

### **C. Overt Acts**

7. In furtherance of the conspiracy and to effectuate its objectives, the following overt acts, among others, were committed within the Middle District of Florida:

a. On or about October 6, 2011, John Patrick Amell provided a named source with a username and password to access www.visionwager.com for the purpose of placing bets and wagers.

b. On or about January 18, 2012, John Patrick Amell accepted a \$940 payment from a named source, representing losses from bets and wagers that were placed on www.visionwager.com.

c. On or about February 8, 2012, Ilia Mato instructed a named subject to pay \$150 to a named source, representing winnings from bets and wagers that were placed on www.visionwager.com.

d. On or about November 28, 2012, Ilia Mato instructed a named subject to pay \$1,165 to a named source, representing winning from bets and wagers that were placed on www.visionwager.com.

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

### **FORFEITURE**

1. The allegations contained in Count One of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of a violation of Title 18, United States Code, Section 1084, the defendants, JOHN PATRICK AMELL and ALIA MATO, shall forfeit to the United States of America, 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 the offense.

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

- 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 which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property

pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL,

Susanna Vance

Foreperson

A. LEE BENTLEY, III  
Acting United States Attorney

By: D. Robinson  
DIIDRI W. ROBINSON  
Assistant United States Attorney

By: Julie Hackenberry  
JULIE HACKENBERRY  
Assistant United States Attorney  
Chief, Jacksonville Division

No.

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**UNITED STATES DISTRICT COURT**  
Middle District of Florida  
Jacksonville Division

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THE UNITED STATES OF AMERICA

vs.

JOHN PATRICK AMELL  
ILIA MATO

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**INDICTMENT**

Violations:

18 U.S.C. §§ 371, 1084(a), and 2

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A true bill,

Susanna Vance

Foreperson

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Filed in open court this 27 day

of May, 2015.

Angel Tucker, Deputy Clerk

Clerk

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Bail \$ \_\_\_\_\_

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