

---

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

---

UNITED STATES OF AMERICA

v.

RAINA MASSEY

:  
: Hon. Joseph A. Dickson  
:  
: Mag. No. 16-6542  
:  
: CRIMINAL COMPLAINT  
:  
: **FILED UNDER SEAL**  
:

I, Ariel Kaufman, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the United States Department of State, and that this complaint is based on the following facts:

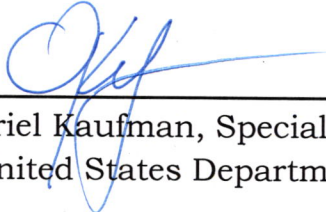
**SEE ATTACHMENT B**

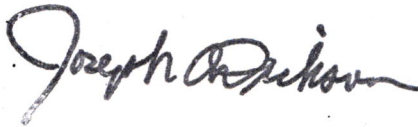
continued on the attached pages and made a part hereof.

Sworn to before me, and  
subscribed in my presence

March 10, 2016 at  
Essex County, New Jersey

HONORABLE JOSEPH A. DICKSON  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Ariel Kaufman, Special Agent  
United States Department of State

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**Counts One and Two**  
**(Wire Fraud)**

From in or about February 2012 through in or about March 2015, in Essex County, in the District of New Jersey and elsewhere, defendant

**RAINA MASSEY**

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud and to obtain money and property from victims by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute this scheme and artifice, did knowingly and intentionally transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce the following writings, signs, signals, pictures and sounds, including the transactions listed below, each constituting a separate count of this Complaint:

<b>Count</b>	<b>Approximate Date</b>	<b>Description</b>
1	December 4, 2012	Text message from defendant MASSEY to Victim 1
2	November 14, 2012	Text message from defendant MASSEY to Victim 2

In violation of Title 18, United States Code, Sections 1343 and Section 2.

**Count Three**  
**(Visa Fraud)**

From in or around August 2011 through in or around May 2012, in the District of New Jersey, and elsewhere, defendant

**RAINA MASSEY**

did knowingly utter, use, possess, obtain, accept, and receive non-immigrant visas, for entry into and as evidence of authorized stay in the United States, knowing that the visas had been procured by means of false claims and statements and otherwise procured by fraud and unlawfully obtained.

In violation of Title 18, United States Code, Section 1546(a).

**Count Four**  
**(Aggravated Identity Theft)**

On or about October 15, 2012, in the District of New Jersey and elsewhere, defendant

**RAINA MASSEY**

during and in relation to the wire fraud scheme as set forth in Counts One and Two of this Complaint did knowingly transfer, possess and use, without lawful authority, a means of identification of Victim 3.

In violation of Title 18, United States Code, Sections 1028A and 2.

## **ATTACHMENT B**

I, Ariel Kaufman, a Special Agent with the United States Department of State, having conducted an investigation and discussed this matter with other law enforcement officers who have participated in this investigation, have knowledge of the following facts. Because this Complaint is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts which I believe are necessary to establish probable cause. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part.

### **Relevant Entities and Individuals**

1. At all times relevant to this Complaint, unless otherwise indicated:
  - a. Defendant RAINA MASSEY was a resident of Elmont, New York.
  - b. Defendant MASSEY owned or controlled an entity known as Care Worldwide ("CWW"), which purported to be a clinical research company. CWW was based on Commerce Street in downtown Newark, New Jersey.
  - c. Non-United States citizens had to have some kind of authorization to work legally in the United States. The "H1B" visa was one such type of work authorization. H1B visas were non-immigrant visas designed to allow United States-based employers to recruit and employ non-U.S. citizen professionals. Not all professions were permitted under the H1B program: it was limited to certain "specialty occupations" within the United States. H1B visas were also issued only for a specified, limited duration.
  - d. H1B visas were a type of "sponsored" visa; that is, they were employer, not employee, driven. Indeed, the foreign workers admitted under the H1B program were known as "Beneficiaries" of the visas.
  - e. To obtain an H1B visa, an employer had to apply on behalf of the Beneficiary and complete various forms required for the visa to be approved. The Beneficiary did not have to pay any fees in connection with the visa application, nor was the Beneficiary responsible for finding their own employment.
  - f. The United States Department of Homeland Security, U.S. Citizenship and Immigration Services Form I-797C was referred to as a "Notice of Action," and was used by the United States government to memorialize, among other things, that an application for an H1B visa had been successfully filed on behalf of an H1B Beneficiary and that the application had been vetted by the United States government. The Form I-797C could be used by an H1B

applicant to obtain a range of benefits, including, for example, obtaining a driver's license.

g. The Form I-797C displayed a unique identifying number for the H1B application, which was referred to as a "Receipt Number." The Form I-797C was a United States government document and was the property of the United States.

h. Victim 1 was a native and citizen of the Philippines and resided in New Jersey.

i. Victim 2 was a native and citizen of the Philippines and resided in Texas.

j. Victim 3 was a native and citizen of Bangladesh.

k. Victim 4 was a native and citizen of Bangladesh and resided in Bangladesh.

### **Overview of the Scheme to Defraud**

2. From in or about February 2012 through in or about March 2015, defendant RAINA MASSEY orchestrated a multi-pronged immigration fraud scheme. MASSEY and others executed the fraud scheme through her company, CWW, which purported to be a clinical research company, but which in truth and in fact was a shell company that did little to no legitimate work of any kind.

3. Defendant MASSEY and others sought out and advertised for qualified foreign professionals, purportedly to work for CWW in clinical research positions as Beneficiaries of H1B visas. These Beneficiaries became the victims of the scheme to defraud because the positions advertised by defendant MASSEY and others, however, did not actually exist.

4. The scheme to defraud encompassed several different types of fraudulent misrepresentations:

a. For one set of victims, defendant MASSEY engaged in "benching," a form of fraud in which defendant MASSEY and others falsely represented that the victim Beneficiaries would have specialty technical jobs waiting for them upon their arrival at CWW. After taking illegal payments from these Beneficiaries, defendant MASSEY and others then completed applications for H1B visas to be filed for these Beneficiaries, and therefore caused Form I-797Cs to be filed for these Beneficiaries. The applications that defendant MASSEY and others completed contained false and fraudulent information. Among other things, the applications falsely claimed that qualifying specialized or technical jobs awaited the victim Beneficiaries. When the victim

Beneficiaries arrived in the United States pursuant to the fraudulently-procured H1B visas, however, defendant MASSEY and others employed these non-U.S. citizen professionals in menial tasks, such as handing out flyers on street corners.

b. For a second set of victims, defendant MASSEY and others, after illegally taking payments from the victims, never actually applied for H1B visas for these victims. Nonetheless, defendant MASSEY and others provided these victims with false and fraudulent Form I-797Cs, which contained the Receipt Numbers from other, previously-filed, H1B visa applications.

c. For a third set of victims, defendant MASSEY and others, after illegally taking payments from the victims based on fraudulent representations regarding H1B visas, never provided any documentation whatsoever to the victims.

5. In all cases, however, defendant MASSEY and others demanded and took illegal payments from victims in exchange for purportedly filing H1B visa applications on behalf of the victims.

### **Examples of the Fraudulent Scheme**

6. Victim 1 met with defendant MASSEY in or around January 2012. Defendant MASSEY represented to Victim 1 that defendant MASSEY could hire Victim 1 as a "clinical researcher," and that Victim 1 would have to pay approximately \$4,000 in "training costs" and approximately \$3,500 in "filing fees" for Victim 1's H1B application.

7. Based on defendant MASSEY's representations, Victim 1 made cash payments to defendant MASSEY in or around mid-2012. Subsequent to these payments, defendant MASSEY falsely represented to Victim 1 that Victim 1's H1B application would be filed, when in fact, no application was ever filed for Victim 1.

8. Part of these misrepresentations included that defendant MASSEY provided photocopies of Form I-797Cs to her victims, including to Victim 1. These photocopies included the unique Receipt Number from the Form I-797Cs of other H1B visa applications.

9. For example, on or about October 15, 2012, defendant MASSEY provided a photocopy of a Form I-797C to Victim 1. This Form I-797C, which defendant MASSEY transferred, possessed, and used in furtherance of her scheme to defraud, contained the Receipt Number from a different H1B application, which had been filled out in the name of a previous victim of the scheme to defraud, Victim 3.

10. When Victim 1 did not receive Victim 1's paperwork in the time described by defendant MASSEY, Victim 1 began to contact defendant MASSEY through means of wire communications in interstate and foreign commerce, including via text messages sent between New Jersey and other states. Defendant MASSEY responded to Victim 1 by making fraudulent misrepresentations to Victim 1 about the status of Victim 1's purported H1B application, which had never, in truth and in fact, been filed.

11. As just one example, on or about December 4, 2012, Victim 1 texted defendant MASSEY and stated, in sum and substance, "Doc good morning.. DMV wants the original notice of action receipt.. Can we get the original tomorrow?? Thanks.." In response, defendant MASSEY replied, falsely, "We have notvreceived [sic] original yet." The "notice of action receipt" to which Victim 1 referred was a Form I-797C, which Victim 1 was trying to use to renew a driver's license. Defendant MASSEY had only supplied Victim 1 with a photocopy of a fraudulent Form I-797C because defendant MASSEY had never, in fact, filed an H1B application on behalf of Victim 1.

12. Victim 2 met with defendant MASSEY in or around May 2012. During one meeting, defendant MASSEY told Victim 2 that Victim 2 would have to pay approximately \$7,500 for an H1B visa or approximately \$15,000 for a "green card," indicating legal permanent residency in the United States.

13. Victim 2 paid defendant MASSEY thousands of dollars in cash towards an H1B visa, but never received an H1B visa. In fact, defendant MASSEY never applied for an H1B visa for Victim 2.

14. When Victim 2 did not receive his paperwork in the time described by defendant MASSEY, Victim 2 began to contact defendant MASSEY through means of wire communications in interstate and foreign commerce, including via text messages. Defendant MASSEY responded to Victim 2 by making fraudulent misrepresentations to Victim 2 about the status of Victim 2's purported H1B application, which had never, in truth and in fact, been filed.

15. For example, on or about November 14, 2012, Victim 2 sent a text message to defendant MASSEY in which Victim 2 asked, "hi! Dra. Reina how are you? Did you submit my h1 application." MASSEY responded, in substance and in part, "yes [Victim 2.]"

16. As noted above, as part of her scheme to defraud, defendant MASSEY did complete H1B visa applications for several victims. For each of these victims, however, the H1B visa application paperwork contained false and fraudulent information. As just one example, each H1B visa application that defendant MASSEY submitted or caused to be submitted to the United States government claimed that CWW had qualifying employment for the Beneficiary. In truth and in fact, however, neither CWW nor defendant

MASSEY ever filled a qualifying employment slot with any victim of the scheme to defraud. Rather, the Beneficiaries who did arrive in the United States pursuant to H1B visa applications completed or caused to be completed by defendant MASSEY found work only in menial positions.

17. For example, Victim 4 was a native and citizen of Bangladesh. In or around August 2011, Victim 4 went to a CWW office in Bangladesh, where Victim 4 was provided information about obtaining an H1B visa. As part of the information provided by CWW, Victim 4 communicated with defendant MASSEY via Skype. Victim 4 was told, by defendant MASSEY and others, that it would cost approximately \$15,000. Defendant MASSEY and others rehearsed with Victim 4 some of the lies they should tell immigration authorities if questioned.

18. Upon Victim 4's arrival, there was no qualifying employment for Victim 4, and Victim 4 ended up performing a number of menial tasks, including handing out flyers, clerical and cleaning duties, watering plants, and secretarial work. For these chores, Victim 4 was not paid in the amount that was originally represented to Victim 4 by defendant MASSEY.