



SEALED

**Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard South,
Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336**

1 NICHOLAS A. TRUTANICH
 United States Attorney
 2 NICHOLAS D. DICKINSON
 Assistant United States Attorney
 United States Attorney's Office
 3 501 Las Vegas Blvd. South, Suite 1100
 Las Vegas, Nevada 89101
 4 Tel: (702) 388-6175; Fax: (702) 388-6787
 5 Nicholas.Dickinson@usdoj.gov
 6

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
NOV 12 2019	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY:	DEPUTY

7 TIMOTHY FINLEY
 DANIEL ZYTNICK
 Trial Attorneys
 U.S. Department of Justice
 Consumer Protection Branch
 8 PO Box 386
 Washington, DC 20044
 9 Tel: (202) 307-0050; Fax: (202) 514-8742
 Timothy.T.Finley@usdoj.gov
 10 Daniel.E.Zytnick@usdoj.gov
 11

12 Attorneys for Plaintiff
 United States of America
 13
 14

15 UNITED STATES DISTRICT COURT
 16 DISTRICT OF NEVADA
 17
 18

19 UNITED STATES OF AMERICA,
 20 Plaintiff

21 v.

22 MARIO CASTRO,
 23 JOSE SALUD CASTRO,
 24 SALVADOR CASTRO,
 MIGUEL CASTRO,
 25 JOSE LUIS MENDEZ, and
 ANDREA BURROW,
 26 Defendants.
 27
 28

SEALED
 CRIMINAL INDICTMENT

2:19-cr-295

VIOLATIONS:

Conspiracy (18 U.S.C. § 1349)

Mail Fraud (18 U.S.C. § 1341)

False Statement (18 U.S.C. § 1001)

1 **THE GRAND JURY CHARGES THAT:**

2
3 At all times relevant to this indictment:

4 **INTRODUCTORY ALLEGATIONS**

5 1. Defendants **MARIO CASTRO, JOSE SALUD CASTRO, SALVADOR**
6 **CASTRO, MIGUEL CASTRO, JOSE LUIS MENDEZ, and ANDREA BURROW,**
7 together with others, engaged in a direct-mail scheme that sent fraudulent prize-notification
8 mailings to millions of consumers across the United States. The mailings contained false
9 statements that led victims to believe they would receive a large cash prize if they paid a fee
10 of between \$20 and \$30. None of the victims who mailed a fee in response to the mailings
11 ever received a large cash prize. The scheme caused over \$10 million in losses to victims,
12 many of whom were elderly and vulnerable.

13 2. Defendant **MARIO CASTRO**, who resided in Clark County, Nevada,
14 operated a number of printing and mailing businesses that produced fraudulent prize-
15 notification mailings for the scheme. He was one of the partners behind the scheme and
16 received a share of the profits. To conceal his involvement as a partner, he used straw
17 owners to form corporations and open corporate bank accounts that were used to carry out
18 the scheme. The straw owners were people whose identities were used to hide who was
19 really behind the scheme – the straw owners had no meaningful involvement in the
20 businesses they supposedly owned. **MARIO CASTRO** was the brother of **JOSE SALUD**
21 **CASTRO, SALVADOR CASTRO, and MIGUEL CASTRO.**

22 3. Defendant **JOSE SALUD CASTRO**, who resided in Clark County, Nevada,
23 worked at his brothers' businesses and helped with the printing and mailing of fraudulent
24 prize-notification mailings for the scheme. He was one of the partners behind the scheme
25 and received a share of the profits. To conceal his involvement, he first used a false identity
26 and then recruited straw owners to form corporations and open corporate bank accounts
27 that were used to carry out the scheme.
28

1 4. Defendant **SALVADOR CASTRO**, who resided in Clark County, Nevada,
2 worked at his brothers' businesses and helped with the printing and mailing of fraudulent
3 prize-notification mailings for the scheme. He was one of the partners behind the scheme
4 and received a share of the profits. Using his own name, he formed corporations and
5 opened corporate bank accounts that were used to carry out the scheme.

6 5. Defendant **MIGUEL CASTRO**, who resided in Clark County, Nevada,
7 operated a printing and mailing business that produced fraudulent prize-notification
8 mailings for the scheme. He also performed bookkeeping services for the companies that
9 were used to carry out the scheme. He was one of the partners behind the scheme and
10 received a share of the profits. In order to conceal his involvement as a partner, he used the
11 name of a straw owner on the corporate filing for a company that was used to carry out the
12 scheme.

13 6. Defendant **JOSE LUIS MENDEZ**, who resided in Clark County, Nevada,
14 was married to a relative of **JOSE SALUD CASTRO**. He worked at the Castros'
15 businesses and helped with the printing and mailing of fraudulent prize-notification mailings
16 for the scheme. He was one of the partners behind the scheme and received a share of the
17 profits. Using his own name, he formed corporations and opened corporate bank accounts
18 that were used to carry out the scheme.

19 7. Defendant **ANDREA BURROW**, who resided in Clark County, opened
20 victim return mail, sorted cash and other payments sent by victims, and deposited victim
21 payments at a bank. Each time a victim sent money, **BURROW** entered that victim's
22 personal information into a database that the scheme used to target the same victims again
23 with repeated fraudulent prize-notification mailings. **BURROW** was paid by her co-
24 conspirators for these services.

COUNT 1

**Conspiracy to Commit Mail Fraud
18 U.S.C. § 1349**

8. Paragraphs 1-7 of this Indictment are hereby realleged and incorporated herein by reference.

9. Beginning in or around March 2010 and continuing through on or about February 2018, in the District of Nevada and elsewhere, defendants

**MARIO CASTRO,
JOSE SALUD CASTRO,
SALVADOR CASTRO,
MIGUEL CASTRO,
JOSE LUIS MENDEZ, and
ANDREA BURROW**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice to defraud, to cause to be delivered by commercial interstate carrier a matter or thing, in violation of 18 U.S.C. § 1341.

The Object of the Conspiracy

10. The object of the conspiracy was for defendants **MARIO CASTRO, JOSE SALUD CASTRO, SALVADOR CASTRO, MIGUEL CASTRO, JOSE LUIS MENDEZ, and ANDREA BURROW**, and other co-conspirators to enrich themselves by causing victims to send payments in response to materially misleading prize notifications and distributing those payments to themselves and others.

The Manner and Means of the Conspiracy

The Fraudulent Prize-Notification Mailings

11. Defendants **MARIO CASTRO, JOSE SALUD CASTRO, SALVADOR CASTRO, MIGUEL CASTRO, JOSE LUIS MENDEZ, and ANDREA BURROW**, together with others, sent and caused to be sent a variety of fraudulent prize-notification

1 mailings. Most looked like official notices and had titles such as "IMMEDIATE
2 RESPONSE – LAST CHANCE VOUCHER," "CASH CLAIM," "YOU ARE
3 OFFICIALLY SWORN TO SECRECY ABSOLUTELY CONFIDENTIAL," and
4 "OFFICIAL AWARDS NOTIFICATION." The mailings appeared to be sent by
5 corporate organizations with names like Imperial Award Services, Assets Unlimited, Pacific
6 Disbursement Reporting, Special Money Managers, Price Awards, and Money Securities.
7 The mailings purported to be signed by individuals with official titles such as "Director of
8 Disbursements," "President," or "Comptroller." These individuals did not exist.

9 12. The mailings led victims to believe that they were receiving an urgent notice
10 that they had won a large cash prize. For example, a mailing from Imperial Award Services
11 falsely stated that the recipient's name had been drawn for "confirmed prizes" of "over
12 \$3,341,006.00." A mailer from Montgomery Marketing, Inc. LLC falsely claimed that
13 \$1,239,745.00 in "PENDING MONIES" had been "SLATED AND EARMARKED
14 FOR" the named recipient. The mailer further stated, "THIS IS THE REAL THING . . . I
15 FIRMLY URGE YOU to read this because this is the REAL ONE. We hope that we will
16 help you to have your life **SHOWERED** with funds if the contest winner requirements are
17 **REALIZED** and for which you are **EMINENTLY QUALIFIED!**" The mailings often
18 stated that recipients were "confirmed," "verified," "guaranteed," or "approved." In some
19 mailings, the fictional sender would claim to be excited to inform the recipients about their
20 good fortune.

21 13. The mailings appeared personalized, when in fact they were form letters.
22 They frequently included unique identification numbers or claim numbers. Others
23 contained what appeared to be handwritten notes from the sender congratulating the
24 recipient. Others falsely stated that the sender had tried to call the recipients or that the
25 fictional sender was personally awaiting the recipients' responses: "I will **PERSONALLY**
26 be on the lookout for the letter from you, and I will **RUSH IT THROUGH ALL THE RED**
27 **TAPE.**"

1 Jury. P.K. distributed the cash to herself, defendants **MARIO CASTRO, JOSE SALUD**
2 **CASTRO, SALVADOR CASTRO, MIGUEL CASTRO, JOSE LUIS MENDEZ,** and
3 other co-conspirators whose identities are known to the Grand Jury.

4 19. Victim response mail also contained checks written by victims to the various
5 company names that were printed on the prize-notification mailings. **BURROW**
6 deposited these checks into more than ten separate bank accounts opened in the names of
7 these companies and controlled by P.K. for the benefit of the scheme. P.K. distributed the
8 money from these bank accounts to herself, the defendants, and others.

9 20. Next, **BURROW** scanned the bar code at the bottom of each paying victim's
10 response slip, causing information about that victim to be uploaded into a database
11 maintained by the scheme. Defendants **MARIO CASTRO, JOSE SALUD CASTRO,**
12 **SALVADOR CASTRO, MIGUEL CASTRO, JOSE LUIS MENDEZ,** and **BURROW,**
13 together with others, used the database to target the same victims repeatedly with more
14 prize-notification mailings.

15 *Concealment Efforts*

16 21. Defendants **MARIO CASTRO, JOSE SALUD CASTRO, SALVADOR**
17 **CASTRO, MIGUEL CASTRO, JOSE LUIS MENDEZ,** and **ANDREA BURROW**
18 sought to conceal their illegal activity from law enforcement. Two members of the
19 conspiracy, P.K. and E.D., whose identities are known to the Grand Jury, were ordered by
20 the United States Postal Service to stop sending fraudulent mail. On at least seven
21 occasions, the United States Postal Service ordered one or more of the scheme's mailing
22 companies to stop sending fraudulent mail. Defendants responded to these law enforcement
23 actions by using new mailings with different names and resuming their fraud.

24 22. In order to conceal their involvement, defendants **MARIO CASTRO, JOSE**
25 **SALUD CASTRO,** and **MIGUEL CASTRO,** together with others, created more than
26 twelve shell companies with names that matched the fictitious organizations that
27 supposedly sent the mailings. To hide their control of the shell companies, defendants
28

1 **MARIO CASTRO, JOSE SALUD CASTRO, and MIGUEL CASTRO**, together with
 2 others, recruited straw owners to act as the owners of the shell companies. Defendants
 3 **MARIO CASTRO, JOSE SALUD CASTRO, and MIGUEL CASTRO**, together with
 4 others, used the straw owners to open bank accounts in the names of the shell companies.
 5 To further conceal their involvement, defendants **MARIO CASTRO, JOSE SALUD**
 6 **CASTRO, and MIGUEL CASTRO**, used the identities of the straw owners to rent the
 7 mailboxes that received victim mail.

8 All in violation of Title 18, United States Code, Section 1349.

9 **COUNT 2-13**
 10 **Mail Fraud**
 11 **18 U.S.C. § 1341**

12 23. Paragraphs 1-22 of this Indictment are hereby realleged and incorporated
 13 herein by reference.

14 24. Beginning in or around March 2010 and continuing through on or about
 15 February 2018, in the District of Nevada and elsewhere, defendants

16 **MARIO CASTRO,**
 17 **JOSE SALUD CASTRO,**
 18 **SALVADOR CASTRO,**
 19 **MIGUEL CASTRO,**
 20 **JOSE LUIS MENDEZ, and**
 21 **ANDREA BURROW,**

22 together with others known and unknown to the Grand Jury, did devise and intend to
 23 devise and participate in a scheme and artifice to defraud for obtaining money and property
 24 by means of materially false and fraudulent pretenses, representations, and promises, as set
 25 forth above, and, for the purpose of executing such scheme and artifice, and attempting to
 26 do so, did knowingly cause to be delivered by commercial interstate carrier any matter and
 27 thing according to the direction thereon, as follows:
 28

COUNT	APPROXIMATE DATE	DESCRIPTION
2	June 2016	Check from victim J.M. shipped by commercial interstate carrier to Nevada
3	June 2016	Check from victim J.M. shipped by commercial interstate carrier to Nevada
4	July 2016	Check from victim J.P. shipped by commercial interstate carrier to Nevada
5	January 2017	Check from victim L.R. shipped by commercial interstate carrier to Nevada
6	March 2017	Check from victim C.S. shipped by commercial interstate carrier to Nevada
7	June 2017	Check from victim B.L.S. shipped by commercial interstate carrier to Nevada
8	June 2017	Check from victim L.R. shipped by commercial interstate carrier to Nevada
9	July 2017	Check from victim B.L.S. shipped by commercial interstate carrier to Nevada
10	August 2017	Check from victim J.G. shipped by commercial interstate carrier to Nevada
11	September 2017	Check from victim J.P. shipped by commercial interstate carrier to Nevada
12	October 2017	Check from victim C.S. shipped by commercial interstate carrier to Nevada
13	November 2017	Check from victim J.G. shipped by commercial interstate carrier to Nevada

All in violation of Title 18, United States Code, Section 1341.

COUNT 14
False Statement
18 U.S.C. § 1001

25. Paragraphs 1-22 of this Indictment are hereby realleged and incorporated herein by reference.

26. On or about February 21, 2018,

SALVADOR CASTRO

defendant herein, did knowingly and willfully make a false, fictitious, and fraudulent material statement to United States Postal Inspectors conducting an investigation into fraudulent prize-notification mailings, in a matter within the jurisdiction of the United States Postal Service, an agency of the United States, when he stated that he did not know

1 P.K., whose identity is known to the Grand Jury, when in truth and in fact he knew that
2 P.K. was his business partner who repeatedly gave him cash and other payments.

3 All in violation of Title 18, United States Code, Section 1001.

4 **FORFEITURE ALLEGATION**

5 **Mail Fraud and Conspiracy to Commit Mail Fraud**

6 1. The allegations contained in Counts 1-13 of this Criminal Indictment are
7 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture
8 pursuant to 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c).

9 2. Upon conviction of any of the felony offenses charged in Counts 1-13 of this
10 Criminal Indictment,

11 **MARIO CASTRO,**
12 **JOSE SALUD CASTRO,**
13 **SALVADOR CASTRO,**
14 **MIGUEL CASTRO,**
JOSE LUIS MENDEZ, and
ANDREA BURROW

15 defendants herein, shall forfeit to the United States of America any property, real or
16 personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C.
17 § 1341, a specified unlawful activity as defined in 18 U.S.C. §§ 1956(c)(7)(A) and
18 1961(1)(B), or 18 U.S.C. § 1349, conspiracy to commit such offense:

- 19 1. \$106,150;
- 20 2. \$20,400.32;
- 21 3. \$34,364;
- 22 4. \$40,010;
- 23 5. \$50,126.59;
- 24 6. \$4,998;
- 25 7. \$10,908;
- 26 8. \$15,278;
- 27
- 28

1 9. \$6,975;

2 10. \$4,644;

3 11. \$3,101;

4 12. \$1,824;

5 13. \$13,146;

6 14. \$1,785;

7 15. \$14,439;

8 16. \$9,887;

9 17. \$8,253;

10 18. \$138;

11 19. \$12,464.03;

12 20. \$18,950; and

13 21. an in personam criminal forfeiture money judgment including, but not

14 limited to, at least an amount to be calculated pursuant to the forfeiture

15 statute in this forfeiture allegation and Fed. R. Crim. P. 32.2(b)(2)(C)

16 (all of which constitutes property).

17 3. If any of the property being subject to forfeiture pursuant to 18 U.S.C. §
18 981(a)(1)(C) with 28 U.S.C. § 2461(c); as a result of any act or omission of the defendants:

19 a. cannot be located upon the exercise of due diligence;

20 b. has been transferred or sold to, or deposited with, a third party;

21 c. has been placed beyond the jurisdiction of the court;

22 d. has been substantially diminished in value; or

23 e. has been commingled with other property which cannot be divided without
24 difficulty;

25 it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), to seek
26 forfeiture of any other property of the defendants for the property listed above.

1 All pursuant to 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c); 18 U.S.C. §§ 1341
2 and 1349; and 21 U.S.C. § 853(p).

3 DATED: this 12th day of November, 2019

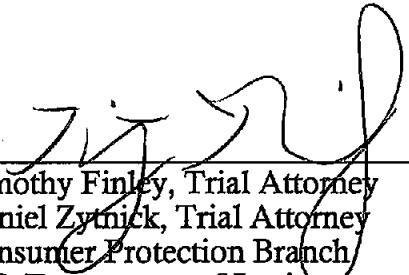
4 A TRUE BILL:

5
6 /S/
7 FOREPERSON OF THE GRAND JURY

8 GUSTAV W. EYLER
9 Director
10 Consumer Protection Branch
11 U.S. Department of Justice

NICHOLAS A. TRUTANICH
United States Attorney

Nicholas D. Dickinson
Assistant United States Attorney

12
13 
14 Timothy Finley, Trial Attorney
15 Daniel Zytnick, Trial Attorney
16 Consumer Protection Branch
17 U.S. Department of Justice
18
19
20
21
22
23
24
25
26
27
28