

**FILED**

**OCT 10 2018**

CLERK U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
vs. )  
)  
MICHAEL CARY LAWING, )  
)  
Defendant. )  
)

Criminal No. 18-CR-30160-NJR

Title 18, United States Code, Section 1349  
Conspiracy to Commit Wire Fraud

**INFORMATION**

**THE UNITED STATES ATTORNEY CHARGES:**

**COUNT 1**

Beginning on or about February 15, 2015, and continuing until on or about June 29, 2016, in the Southern District of Illinois and elsewhere, the defendant,  
  
MICHAEL CARY LAWING,  
  
through his employment with ABC Repair Tech Ltd., a fraudulent company based in Costa Rica which later changed its name to Software Solution Pros, knowingly and willfully conspired with others known and unknown to commit an offense against the United States, namely to devise and participate in a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing the scheme, and attempting to do so, knowingly to cause telephone calls, internet communications, credit card transactions, electronic fund transfers, and other signals to be transmitted in foreign commerce by means of wire and radio communication, in violation of Title 18, United States Code, Section 1343.

In furtherance of and as a foreseeable consequence of the conspiracy, telephone calls, internet communications, electronic fund transfers, and other signals were sent by wire and radio transmission between co-conspirators in Costa Rica and co-conspirators in Florida, as well as between co-conspirators in Costa Rica and consumers located in Canada, Belgium, the United Kingdom, and the United States, including the Southern District of Illinois. At least 45 victims of the offense were located in the Southern District of Illinois, in the counties of St. Clair, Madison, Clark, Crawford, Effingham, Fayette, Franklin, Gallatin, Jackson, Jefferson, Johnson, Marion, Massac, Monroe, Perry, Richland, Saline, Wabash, Wayne, and Williamson..

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

The offense occurred in connection with the conduct of telemarketing and victimized 10 or more persons over the age of 55, in violation of the SCAMS Act, punishable under Title 18, United States Code, Section 2326.



STEVEN D. WEINHOEFT  
UNITED STATES ATTORNEY



NATHAN D. STUMP  
Assistant United States Attorney