

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
CHRISTOPHER WILSON, :
a/k/a "Eric Fields," :
JACK KAVNER, :
a/k/a "Bob Wiley," :
a/k/a "Phil Powers," :
DANIEL QUIRK, :
a/k/a "Lou Epstein," :
a/k/a "Bill Huckabee," :
a/k/a "Josh Newman," :
:
Defendants, :
:
- - - - - X

**SEALED SUPERSEDING
INDICTMENT**

S4 17 Cr. 243 (SHS)

COUNT ONE

(Conspiracy to Commit Wire Fraud)

The Grand Jury charges:

1. From at least in or about October 2013 up to and including at least in or about March 2017, in the Southern District of New York and elsewhere, CHRISTOPHER WILSON, a/k/a "Eric Fields," JACK KAVNER, a/k/a "Bob Wiley," a/k/a "Phil Powers," and DANIEL QUIRK, a/k/a "Lou Epstein," a/k/a "Bill Huckabee," a/k/a "Josh Newman," the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

2. It was a part and object of the conspiracy that CHRISTOPHER WILSON, a/k/a "Eric Fields," JACK KAVNER, a/k/a "Bob Wiley," a/k/a "Phil Powers," and DANIEL QUIRK, a/k/a "Lou Epstein," a/k/a "Bill Huckabee," a/k/a "Josh Newman," the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

COUNT TWO

(Conspiracy to Commit Money Laundering)

The Grand Jury further charges:

3. From at least in or about October 2013 up to and including at least in or about December 2016, in the Southern District of New York and elsewhere, CHRISTOPHER WILSON, a/k/a "Eric Fields," JACK KAVNER, a/k/a "Bob Wiley," a/k/a "Phil Powers," and DANIEL QUIRK, a/k/a "Lou Epstein," a/k/a "Bill Huckabee," a/k/a "Josh Newman," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate,

and agree together and with each other to violate Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1957(a).

4. It was a part and an object of the conspiracy that CHRISTOPHER WILSON, a/k/a "Eric Fields," JACK KAVNER, a/k/a "Bob Wiley," a/k/a "Phil Powers," and DANIEL QUIRK, a/k/a "Lou Epstein," a/k/a "Bill Huckabee," a/k/a "Josh Newman," the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, cash transactions and wire transfers, represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, wire fraud, with the intent to promote the carrying on of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

5. It was a further part and an object of the conspiracy that CHRISTOPHER WILSON, a/k/a "Eric Fields," JACK KAVNER, a/k/a "Bob Wiley," a/k/a "Phil Powers," and DANIEL QUIRK, a/k/a "Lou Epstein," a/k/a "Bill Huckabee," a/k/a "Josh Newman," the defendants, and others known and unknown, within the United States, in an offense involving and affecting interstate and foreign commerce, knowingly would and did engage and attempt to engage in monetary transactions in criminally derived property of a value

greater than \$10,000 that was derived from specified unlawful activity, to wit, wire fraud, in violation of Title 18, United States Code, Section 1957(a).

(Title 18, United States Code, Section 1956(h).)

COUNT THREE

(Destruction, Alteration, or Falsification of Records in a Federal Investigation)

The Grand Jury further charges:

6. In or about March 2017, in the Southern District of New York and elsewhere, CHRISTOPHER WILSON, a/k/a "Eric Fields," the defendant, did knowingly alter, destroy, mutilate, conceal, cover up, falsify and make a false entry in a record, document, and tangible object with the intent to impede, obstruct, and influence the investigation and proper administration of a pending investigation by the Department of Homeland Security, a department and agency of the United States, to wit, WILSON destroyed and concealed records of a telemarketing company WILSON owned and operated after becoming aware that certain of WILSON's co-conspirators were arrested by the Department of Homeland Security.

(Title 18, United States Code, Section 1519.)

FORFEITURE ALLEGATIONS

7. As the result of committing the offense alleged in Count One of this Superseding Indictment, CHRISTOPHER WILSON, a/k/a "Eric Fields," JACK KAVNER, a/k/a "Bob Wiley," a/k/a "Phil Powers," and DANIEL QUIRK, a/k/a "Lou Epstein," a/k/a "Bill

Huckabee," a/k/a "Josh Newman," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

8. As a result of committing the offense alleged in Count Two of this Superseding Indictment, CHRISTOPHER WILSON, a/k/a "Eric Fields," JACK KAVNER, a/k/a "Bob Wiley," a/k/a "Phil Powers," and DANIEL QUIRK, a/k/a "Lou Epstein," a/k/a "Bill Huckabee," a/k/a "Josh Newman," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

SUBSTITUTE ASSET PROVISION

9. If any of the above-described forfeitable property, 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 person;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

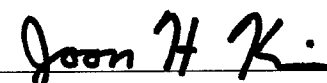
(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28 United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 492;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



FOREPERSON



JOON H. KIM
Acting United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

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Defendants.

SUPERSEDING INDICTMENT

S4 17 Cr. 243 (SHS)

(18 U.S.C. § 1349, 1519, 1956(h), and 2.)

JOON H. KIM

Acting United States Attorney


Foreperson
