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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

FILED

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2018 Grand Jury

ED CR No. 18-**EDCR-18-200-SVW**

UNITED STATES OF AMERICA,

Plaintiff,

v.

LISA KAY CAMP,
aka "Mindy Price,"
aka "Roxy,"
BARRY LEE BIDDLE,
aka "Andrew,"
aka "John,"
ANDREA MAUREEN AVILES,
aka "Abby,"
aka "Michelle Banks,"
GERALD JAMES CAMP,
aka "Gerry,"
aka "Roger,"
aka "Andrew," and
ALLISA LYNN VASQUEZ,
aka "Gracie,"

Defendants.

I N D I C T M E N T

[18 U.S.C. § 1343: Wire Fraud; 18
U.S.C. § 1349: Conspiracy to
Commit Wire Fraud; 18 U.S.C.
§ 2(a): Aiding and Abetting]

The Grand Jury charges:

COUNTS ONE THROUGH FOUR

[18 U.S.C. §§ 1343, 2(a)]

A. INTRODUCTORY ALLEGATIONS

1. At all times relevant to this Indictment:

1 a. Defendants LISA KAY CAMP, also known as ("aka") "Mindy
2 Price," aka "Roxy" ("L. CAMP"), BARRY LEE BIDDLE, aka "Andrew," aka
3 "John" ("BIDDLE"), ANDREA MAUREEN AVILES, aka "Abby," aka "Michelle
4 Banks" ("AVILES"), GERALD JAMES CAMP, aka "Gerry," aka "Roger," aka
5 "Andrew" ("G. CAMP"), and ALLISA LYNN VASQUEZ, aka "Gracie"
6 ("VASQUEZ"), were supervisors or employees of a telemarketing
7 business (the "telemarketing business") which operated a call center
8 located in Riverside County, California.

9 b. The name of the telemarketing business changed several
10 times and included "Contractor Management, "Contracting Crews,"
11 "Construction Crews," "Trade Crews," "Contractor 411," "Fed Check,"
12 "Commercial Crews," "US Tradepros," "US Workmen," "IPower Marketing,"
13 and "IPower Marketing and Productions."

14 c. "Fed Check" maintained a separate website which
15 purported to be that of security company which conducted background
16 checks.

17 B. THE SCHEME TO DEFRAUD

18 2. Beginning on a date unknown to the Grand Jury, but at least
19 as early as in or about May 2009, and continuing through on or about
20 July 30, 2013, in Riverside County, within the Central District of
21 California, and elsewhere, defendants L. CAMP, BIDDLE, AVILES,
22 G. CAMP, and VASQUEZ, together with others known and unknown to the
23 Grand Jury, knowingly and with intent to defraud, devised,
24 participated in, and executed a scheme to defraud victim job seekers
25 as to material matters, and to obtain money and property from the
26 victim job seekers by means of false and fraudulent pretenses,
27 representations, and promises, and the concealment of material facts.

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1 3. The fraudulent scheme operated, in substance, in the
2 following ways, among others:

3 **Summary**

4 a. Between approximately May 2009 and July 30, 2013,
5 defendants, collectively acting through the telemarketing business,
6 defrauded victim job seekers by making false statements and
7 guarantees, and omitting material information, regarding the
8 telemarketing business's ability and intention to find job leads and
9 work orders for the victim job seekers and the nature of a background
10 check which the victim job seekers were told was necessary to undergo
11 before being sent job leads and work orders.

12 **Operation of the Telemarketing Business**

13 b. The telemarketing business contacted prospective job
14 seekers using an auto-dialer service.

15 c. The telemarketing business employed salespersons to
16 speak by telephone with members of the public who were interested in
17 obtaining a job or paying work. Using scripts provided to the
18 salespersons by the telemarketing business's supervisors, the
19 salespersons would tell the victim job seeker that the telemarketing
20 business had contracts with banks which needed workers to repair
21 properties in the victim job seeker's geographic area. The
22 salespersons would guarantee that work was available in the victim
23 job seeker's geographic area. The salespersons would tell the victim
24 job seeker that the telemarketing business had contracts with banks
25 which owned these properties and that the telemarketing business
26 could provide leads to the victim job seekers for paid positions
27 refurbishing and repairing the properties.

1 d. The victim job seekers were told that, to become
2 eligible for these job leads and work orders, the victim job seeker
3 must first pass a background check that was required by the bank and
4 that the victim job seeker had to pay a fee of \$39, \$60, or \$99 for
5 the background check, which could be paid over the telephone or on
6 the Internet via the Fed Check website. The victim job seekers were
7 told that if they did not pass the background check, the background
8 check fee would be refunded.

9 e. After paying for the background check, the victim job
10 seekers were told that they would receive job leads and work orders
11 via e-mail or would receive job leads and work orders directly from
12 the banks.

13 f. The telemarketing business kept the background check
14 fee, which was deposited into a bank account controlled by the
15 telemarketing business and then typically transferred to one or more
16 additional bank accounts controlled by the telemarketing business.
17 Bank accounts of the telemarketing business received total deposits
18 in excess of approximately \$3 million in background check fees.

19 g. Supervisors of the telemarketing business would lie to
20 new employees about the nature of the telemarketing business,
21 including the existence of contracts with banks, the necessity of
22 background checks, and how the telemarketing business was
23 compensated.

24 h. Salespersons generally were paid between \$5 and \$25
25 per sale.

26 i. Most employees of the telemarketing business were paid
27 in cash without any income being withheld by the telemarketing
28 business.

1 **The Defendants' Roles**

2 j. Defendant L. CAMP owned and operated the telemarketing
3 business and its call center. Defendant L. CAMP supervised all
4 supervisors and employees of the telemarketing business.

5 k. Defendant BIDDLE set up, maintained, and operated the
6 websites used by the telemarketing business, including the Fed Check
7 website, which was used to accept payments for the background check
8 fees collected by the telemarketing business. These websites were
9 used to convince victim job seekers that the telemarketing business,
10 including Fed Check, was legitimate. Defendant BIDDLE also set up
11 and maintained an auto-dialer service used by the telemarketing
12 business to contact potential job seekers.

13 l. Defendants AVILES, G. CAMP, and VASQUEZ were employees
14 of the telemarketing business who served as supervisors at the
15 telemarketing business's call center.

16 i. Defendant AVILES's role included recruiting new
17 salespersons for the call center, managing salespersons at the call
18 center, and communicating with victim job seekers who called to
19 complain about the telemarketing business.

20 ii. Defendant G. CAMP's role included hiring,
21 training, and managing call center salespersons.

22 iii. Defendant VASQUEZ's role included handling
23 payments from victim job seekers, including credit card payments and
24 "checks by phone," and payroll for the telemarketing business's
25 employees.

26 **False Statements to Victim Job Seekers**

27 m. The telemarketing business, through its websites and
28 its salespersons, acting at the direction of defendants L. CAMP,

1 AVILES, G. CAMP, and VASQUEZ, would make the following false
2 statements, among others, when speaking to or otherwise communicating
3 with victim job seekers:

4 i. Statements that the telemarketing business had
5 contracts with banks involving bank-owned properties;

6 ii. Statements and guarantees that the telemarketing
7 business or the banks with which it purportedly contracted would
8 provide job leads and work orders to the victim job seekers;

9 iii. Statements and guarantees that work repairing
10 bank-owned properties was available in the victim job seeker's
11 geographic area;

12 iv. Statements and guarantees about the intention of
13 the telemarketing business to provide job leads and work orders to
14 the victim job seekers;

15 v. Statements regarding the name or geographic
16 location of the salesperson;

17 vi. Statements that the banks required the victim job
18 seekers to pass a background check before any job leads and work
19 orders could be provided;

20 vii. Statements that the telemarketing business would
21 use the money collected from victim job seekers for purposes of
22 conducting a background check on the victim job seeker; and

23 viii. Statements that the business would refund
24 the background check fee if the victim job seeker did not pass the
25 background check.

26 n. In truth, as defendants then well knew:

27 i. The telemarketing business had no contracts with
28 any banks involving bank-owned properties;

1 ii. The telemarketing business had no intention of
2 providing job leads and work orders for bank-owned properties to the
3 victim job seekers;

4 iii. The telemarketing business's call center was
5 located in Riverside County, California, and not in the various
6 locations claimed by salespersons during telephone calls with victim
7 job seekers;

8 iv. The background check described by the
9 salespersons was a fraudulent process used by the telemarketing
10 business as a pretext for collecting money from the victim job
11 seekers;

12 v. No refunds were provided for the background
13 check; and

14 vi. The money provided for the background check was
15 not used to pay for any background check.

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1 C. THE USE OF THE WIRES

2 4. On or about the dates set forth below, in Riverside County,
 3 within the Central District of California, and elsewhere, defendants
 4 L. CAMP, BIDDLE, AVILES, G. CAMP, and VASQUEZ, and other co-schemers
 5 known and unknown to the Grand Jury, aiding and abetting one another,
 6 for the purpose of executing and attempting to execute the above-
 7 described scheme to defraud, transmitted and caused the transmission
 8 of the following items of wire communication in interstate and
 9 foreign commerce:

COUNT	DATE	ITEM WIRED
ONE	July 10, 2013	Wire communication from California to New York caused by the deposit of \$1,089.00 which included background check fees
TWO	July 12, 2013	Wire communication from California to New York caused by the deposit of \$1,089.00 which included background check fees
THREE	July 17, 2013	Wire communication from California to New York caused by the deposit of \$1,089.00 which included background check fees
FOUR	July 26, 2013	Wire communication from California to New York caused by the deposit of \$495.00 which included background check fees

COUNT FIVE

[18 U.S.C. § 1349]

A. INTRODUCTORY ALLEGATIONS

5. The Grand Jury hereby re-alleges and incorporates by reference paragraph 1 of this Indictment as though set forth fully herein.

B. OBJECT OF THE CONSPIRACY

6. Beginning on a date unknown to the Grand Jury, but at least as early as in or about May 2009, and continuing through on or about July 30, 2013, in Riverside County, within the Central District of California, and elsewhere, defendants LISA KAY CAMP, also known as ("aka") "Mindy Price," aka "Roxy" ("L. CAMP"), BARRY LEE BIDDLE, aka "Andrew," aka "John" ("BIDDLE"), ANDREA MAUREEN AVILES, aka "Abby," aka "Michelle Banks" ("AVILES"), GERALD JAMES CAMP, aka "Gerry," aka "Roger," aka "Andrew" ("G. CAMP"), and ALLISA LYNN VASQUEZ, aka "Gracie" ("VASQUEZ"), together with others known and unknown to the Grand Jury, knowingly combined, conspired, and agreed with each other to commit an offense against the United States, namely, Wire Fraud, in violation of Title 18, United States Code, Section 1343.

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1 C. THE MANNER AND MEANS OF THE CONSPIRACY

2 7. The Grand Jury hereby re-alleges and incorporates by
3 reference paragraph 3 of this Indictment as though set forth fully
4 herein.

5 D. OVERT ACTS

6 8. On or about the following dates, in furtherance of the
7 conspiracy and to accomplish its object, defendants L. CAMP, BIDDLE,
8 AVILES, G. CAMP, and VASQUEZ, and others known and unknown to the
9 Grand Jury, committed and caused others to commit various acts within
10 the Central District of California, and elsewhere, including, but not
11 limited to, the following:

12 Overt Act No. 1: On or about July 10, 2013, defendant L. CAMP
13 caused the deposit of \$1,089.00 which included background check fees.

14 Overt Act No. 2: On or about July 12, 2013, defendant L. CAMP
15 caused the deposit of \$1,089.00 which included background check fees.

16 Overt Act No. 3: On or about July 17, 2013, defendant L. CAMP
17 caused the deposit of \$1,089.00 which included background check fees.

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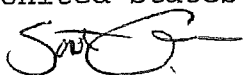
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1 Overt Act No. 4: On or about July 26, 2013, defendant L. CAMP
2 caused the deposit of \$495.00 which included background check fees.

3 A TRUE BILL

4
5 15/
6 Foreperson

7 NICOLA T. HANNA
8 United States Attorney

9 
10 Scott Garinger
11 Deputy Chief, Criminal Division Fort

12 LAWRENCE S. MIDDLETON
13 Assistant United States Attorney
14 Chief, Criminal Division

15 JOSEPH B. WIDMAN
16 Assistant United States Attorney
17 Chief, Riverside Branch Office
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