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9 ZE'SHAWN CAMPBELL

10
11 UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,)

14 Plaintiff,)

15 v.)

16 ZE'SHAWN CAMPBELL.)

17 Defendant)

Case No. 2:21-00099-MCS

**SENTENCING POSITION PAPER
ZE'SHAWN CAMPBELL**

THE HONORABLE MARK SCARSI

18 TO THE U.S. DISTRICT COURT FOR THE CENTRAL DISTRICT OF
19 CALIFORNIA, TO AUSA RANEE KATZENSTEIN, AND TO THE UNITED
20 STATES PROBATION OFFICE COMES Ze'Shawn Campbell, defendant in the
21 above-entitled matter, by and through his attorney, hereby submits his Sentencing
22 Memorandum and Exhibits.

23
24 **I. INTRODUCTION**

25 Before the Court is Ze'Shawn Campbell who has pled guilty to one count of
26 Wire Fraud, a violation of Title 18 of the U.S. Code Section 1343 and one count of
27 Engaging in Monetary Transactions in Property Derived from Specified Unlawful
28 Activities, a violation of Title 18 U.S. Code Section 1957. Campbell is a 35-year-old

1 male who was arrested on April 6, 2021 and was released on bond on August 11,
2 2021. He is currently working two jobs and lives in Fontana.

3 Upon his arrest, the FBI issued a press release labeling the defendant as “The
4 Romance Scammer” and alleging he took money from over ten women. The details
5 of the press release and the subsequent media coverage read like the script to a
6 Hallmark TV movie, complete with salacious details and a psychopathic boyfriend.
7 The press release and subsequent media coverage may make for compelling and
8 entertaining reading but as they say in Hollywood movies, the press release is
9 loosely based on true events, with the emphasis on loosely.

10 To be clear, Campbell does not deny that he was loaned money from several
11 women and in some cases spent it on business expenses and personal items rather
12 than what he told the women the money was being used for. He is guilty of this,
13 acknowledges misappropriation is a crime and has accepted responsibility by
14 pleading in this courtroom.

15 However, the full story is not what was presented in the press release, in the
16 indictment and in several of the FBI’s 302’s. As described in further detail below,
17 Campbell actually gave several of the women more money than they ever gave to
18 him. When he was doing well in business and successful at the gambling table, he
19 would buy them cars, expensive jewelry, pay their rent and phone bills and even
20 invested money in a business that one of the women asked him to invest in. Unlike
21 how he has been portrayed, he was not a serial scam artist who never worked and
22 just lived off women he dated. Unlike how it has been portrayed, these were not
23 one-sided relationships with Campbell being the only one getting money and gifts.
24 Also, unlike how it has been portrayed, he has worked very hard his whole life,
25 sometimes working two jobs at 80 hours a week (as he is doing currently) and
26 making sure that his two young girls were always taken care of and being a good
27 father to them.
28

1 Mr. Campbell knows that by criticizing the narrative in this case, he is
2 running a risk. He will no doubt be accused of attacking the victims and of trying to
3 scam the Court. However, he is willing to accept whatever punishment the Court
4 decides without complaint, but he wants the full story to be presented and the Court
5 to look at the evidence that disputes much of what has been presented. He does not
6 try and present himself as an angel, far from it. He knows that he took money from
7 some women and used it for purposes other than what he was telling them.
8 Specifically, Campbell enormously regrets his relationship with M.G., and how he
9 treated her and took money from her. She did not deserve how he treated her. He
10 also regrets bringing K.H. into the investments that her daughter and he were putting
11 together. She was an extremely nice woman who always treated him very well and
12 he diverted some of the money from the investment to his own personal use.

13 But the story of the romance scammer is simply not true and he wants to set
14 the record straight. As the Court will see in the letters of recommendations, he is a
15 kind, extremely generous individual who has never intentionally hurt anyone. He
16 made some poor decisions when he was trying to keep up his lifestyle and he knows
17 he has to pay for that. But this sentencing memorandum is an attempt to show the
18 Court that the full story is very different from the history of the sequence of events
19 presented by the government in what was a one-sided investigation.

20 At the end of the sentencing memorandum, the defendant will be asking the
21 Court for a sentence of 12 months. That request is based upon the following
22 mitigating factors discussed in detail below:

- 23 (1) Defendant admits that he was loaned money by girlfriends and friends and
24 in some cases spent it on his business and personal expenses. However,
25 what is disputed is the extent and the amount of money used illegally by
26 the defendant. Many of the claims made in the interviews and in the
27 indictment are simply not true.
28

1 (2) As discussed below, defendant did in fact pay back money to several of the
2 victims in this case and was continuing to make payments when he was
3 arrested. He also gave several of the women money when they were
4 dating to purchase cars, pay their cellphone bills, to take vacations and to
5 pay their rent. In some instances, he gave the victims listed more money
6 than they ever provided him. Defendant understands that this does not
7 excuse his behavior, but it does demonstrate that the romance scammer
8 narrative is false.

9 (3) Defendant has always had a strong work ethic as is demonstrated by his
10 current work situation. Since his release from MDC, he is now working
11 two separate jobs. During the day, he is a driver for UPS for forty hours a
12 week. At night, he works as the manager at a mini-grocery store for
13 another forty hours a week. His 80 hour a week work schedule shows he
14 is not a con artist looking to live off scamming others.

15 (4) Defendant has two young girls from his former marriage that he adores
16 and supports. They live in Texas and he flies to see them every month and
17 talks to them on the phone several times a week. He has paid child support
18 for years and has fought to have as much contact as possible with them.

19 **II. ARGUMENT**

20 **(A) Campbell's background is important in understanding this case**

21 The government in this case indicted Ze'Shawn Campbell for having
22 defrauded ten women and several businesses by convincing them to loan him money
23 for various projects or personal expenses and spending the money on a lavish
24 lifestyle. The women involved, identified by their initials are: M.G., M.B., J.Q.,
25 K.H., M.H., R.Z., N.M., N.H., D.W., and J.L.

26 The narrative is that these were women Campbell dated and romanced into
27 providing him with money to buy expensive cars and support a high lifestyle. To
28 begin with, three of these women were not women he dated or had a romantic

1 relationship with. In fact, one is his sister-in-law whose letter is attached as Exhibit
2 #1A.

3 Secondly, the government alleged, and the PSR mimicked, that Campbell
4 committed identity theft by stealing some of the women's social security numbers,
5 driver's licenses and other personal information. From the beginning, Campbell has
6 denied committing identity theft and refused to plead to the identity theft count that
7 was initially included in his plea agreement. That plea agreement was changed to
8 reflect a different count that was not identity theft. In fact, after some language in
9 the plea agreement was inadvertently left in at the change of plea hearing, Campbell
10 refused to follow through with the plea until it was removed. The Court may recall
11 that the language was then removed.

12 Third, in the case of several of the women, Campbell provided them with
13 more money and paid for more of their expenses than they ever loaned him.
14 Campbell understands that this does not negate the fact that he had several of the
15 women loan him money under false pretenses, the crime that he has pled to before
16 this Court. But it is offered to the Court to negate this narrative of the Romance
17 Scammer. For example, it is undisputed that he paid J.Q. at least \$50,000 total in car
18 down payments, Rolexes, and money he deposited in her account. If Campbell was a
19 scam artist, he was a very bad one. Would a scam artist spend \$50,000 to scam a
20 woman out of \$63,000? (As argued below, he actually paid her back more than the
21 \$63,000).

22 In order to help the Court understand the larger picture in this case, it is
23 important to understand Campbell's work history, relationships and his lifestyle.
24 Campbell has always had a very strong work ethic. From the time he was a teen, he
25 was working at McDonalds, Ralph's, a pizza restaurant and a security company.
26 As he got older, he often held two jobs at a time, working as a forklift driver at
27 Costco and as a manager at a Texas gym, for example.

28 Campbell was not driven as much about making money as he was about

1 presenting the image of success. He had not grown up in poverty, but his family was
2 far from wealthy. He was always extremely ambitious and from a very young age he
3 was contemplating opening various businesses and being an entrepreneur.

4 By 2010, he was working as a commissioned salesperson at Texas
5 Family Fitness and worked his way up to general manager. He was making close to
6 six figures when he decided to move to southern California and work at Equinox
7 where he could make even more money. He continued that for several years before
8 he became exhausted working 80-hour weeks.

9 When Campbell started making money at Equinox, he also started a
10 gambling habit that included frequent trips to Las Vegas and large bets at the
11 blackjack table. He was a very good blackjack player and would often leave Las
12 Vegas having made \$25,000, \$50,000 and even \$100,000 during a trip.

13 As the Court can see from the numerous letters of recommendation
14 (Exhibit #1) Campbell is very kind-hearted and generous. When Campbell won,
15 everyone won. He would buy elaborate gifts for the women he was dating, including
16 jewelry, paying off their bills and even down-payments for cars. Many of the
17 victims listed in this case were the recipients of these gifts as well as lavish weekend
18 vacations, premium tickets to Laker games and nights out at some of the best
19 restaurants in town. It is fair to say that he was very generous with these women. It
20 is also fair to say that he was foolish with his money.

21 Although Campbell was a good blackjack player, as every gambler
22 knows, the house eventually wins. And there were times when Campbell came back
23 from gambling with losses that matched his highest winnings. In a somewhat
24 twisted sense of morality, he would not borrow money from people to gamble. But
25 his losses put him in positions where he could not pay bills and could not keep the
26 companies he had created afloat. It was in those instances where he would get
27 money under false pretenses and paid some of his personal and business expenses. In
28 that sense, it had the same effect as if he was using the money for gambling.

1 Rather than embarrassingly admit that he could not make his business
2 work or that he could not pay the bills, he would tell people that he needed the
3 money for business trips or investing in new ventures or for medical expenses. Once
4 he got the money, in several instances, he used it for purposes other than what the
5 people were told. Campbell took the money and misappropriated it believing that he
6 would pay it back in the future and in some cases, he did. However, in others he did
7 not, which is why he understands that his conduct was criminal and that he has to
8 accept punishment.

9 **(B) The Government Failed to investigate the Other Side of the Story**

10 In charging Campbell in this case, the FBI agents were driven by one of
11 the women, J.Q., whose story was featured prominently on You Tube. She made it
12 her mission to destroy Campbell, which is ironic since she is the woman who most
13 benefited from his generosity when he was on a winning streak. She provided the
14 FBI with the names of other women who told similar stories and soon the narrative
15 was born of the Romance Scammer, a phrase she created and the FBI appropriated.
16 However, the FBI agents took the stories of each of these women as gospel truth and
17 failed to look at any evidence that might contradict that story line. Listed below are
18 several examples where the evidence shows that the stories were not always as
19 presented.

20 (1) R.Z. - The poster child for the one-sided nature of this investigation is
21 R.Z. She is listed in the indictment as a victim and in the discovery and PSR by her
22 initials. In the PSR calculation of losses, under her initials it shows a loss of
23 \$89,000.

24 There is absolutely nothing in the discovery that indicates the defendant took
25 any money from R.Z. The reason is simple. R.Z. is defendant's sister-in-law.
26 Apparently, the entirety of the investigation into R.Z. was seeing that she deposited
27 \$89,000 into his bank account and then jumping to the conclusion that she was a
28 romance scammer victim. There is no interview with her as she told them she had

1 nothing negative to say. Nevertheless, they included her in the victim list and added
2 her amount to the total.

3 As the Court will see in Exhibit #1A, a letter from R.Z., not only did Campbell
4 not defraud her, the \$89,000 in question was from her husband and her to repay
5 Campbell for loaning them the money for house repairs. (The defense would note
6 that this is evidence of what was mentioned earlier i.e. when Campbell had money he
7 was extremely generous).

8 In addition, and discussed in more detail below, her letter discusses in depth
9 the pain and suffering the family went through when Campbell was diagnosed and
10 treated for cancer. The investigation and numerous of the interviews have painted a
11 picture of Campbell fabricating the cancer story. The medical records provided
12 (Exhibit #2) and this letter should show this is not true.

13 (2) J.Q. – The investigation and the subsequent indictment of Campbell was
14 largely due to the efforts of one of Campbell’s former girlfriends, J.Q. After their
15 breakup, she began a campaign to destroy Campbell because she stated that he had
16 scammed her out of money and lied to her about several things. Most importantly,
17 she produced a You Tube video excoriating Campbell that was spread across the
18 Internet and resulted in not only his losing his businesses, but eventually ended in his
19 arrest. She also contacted ex-girlfriends and advertised for women to come forward
20 to tell their stories about Campbell, several of whom falsely mimicked what she had
21 been put in the video.

22 Much of what is stated in the video is simply not true, including stories about
23 what he told her, but they were repeated by a few other women and accepted as fact.
24 For example, she stated that Campbell told her he was adopted and that his adoptive
25 parents owned a number of McDonalds. In fact, Campbell introduced J.Q. to his
26 mother and his family at a Thanksgiving dinner at his house. She was aware that his
27 father had died before he was born and she met his mother. Why would the scammer
28 that she claims Campbell to be, tell her this story of rich adoptive parents and then

1 take her to meet his mother and the rest of his family, any one of which could have
2 quickly dispelled a lie about adoptive parents or about owning McDonalds?

3 What is true is that she gave Campbell \$63,000 in 2018. He told her he was
4 going to invest the money in bitcoin, an investment he had started dabbling in that
5 year. He did not invest the money in Bitcoin but instead used it to pay personal and
6 business expenses. In fact, the two counts that Campbell pled to are related to J.Q.

7 What the investigators did not tell the Court is that Campbell not only paid
8 back the money he got from her, but he also had given her \$25,000 for a down
9 payment on a car (a fact that is not in dispute), paid off several of her bills, bought
10 her two expensive watches, the receipt for one of which is Exhibit #4A and ended up
11 giving her more than the \$63,000 he got from her. He also bought her numerous
12 gifts, paid for vacations, took her to Laker games and wined and dined her at some of
13 the best restaurants in Los Angeles.

14 J.Q. has told the government contradictory stories about how much was paid
15 back, but it appears the government has chosen to credit him with a little over
16 \$8,000. In fact, as Exhibit #5 demonstrates, she was paid back in full. After
17 Campbell had only paid back \$13,000 (the number she now says he paid back) of the
18 \$63,000 owed, he was contacted by J.Q on a three-way call telling him to pay the
19 money back to a man named Chris who, along with a man named Frank Block, she
20 had essentially hired to be collectors. Chris in particular made it clear he was an
21 enforcer and sent Campbell pictures of his house and his children as indirect
22 warnings. Campbell then gave Chris everything in his storage unit to sell which
23 amounted to approximately \$70,000 and was told the money went to J.Q.

24 Exhibit #5 is a transcript of a portion of a recorded conversation between
25 Campbell and Block. (Exhibit 5, Page 7, lines 16-28; p.10, lines 1-8). During the
26 conversation, Block states that he does not understand why J.Q. is still after
27 Campbell since she has now gotten paid back. He states that he knows that
28 Campbell made good on the payment and he thinks she is just a mad ex-girlfriend.

1 Exhibit #6 is text messages from Campbell's ex-girlfriend Jasmine to J.Q.
2 asking why J.Q. is saying these things and asking if she should be worried. These
3 are provided because the text messages reference J.Q. admitting that she has brought
4 in Chris to collect.

5 (3) J.L. - In one of the more puzzling aspects of the case, J.L. gives a lengthy
6 interview detailing her relationship with Campbell including that they were engaged
7 (without a ring) and that they had a lengthy relationship that ended in her being
8 convinced to take out a loan from Navy Credit Federal Union to give to Campbell.
9 She also claims he ruined her credit.

10 Campbell is genuinely confused regarding the interview with J.L. When
11 confronted with the list of names, he immediately recognized all but one, J.L. He
12 had no recollection of J.L. and only after thinking about it and reading her interview,
13 did he realize who she was. Campbell denies that they ever had a relationship and
14 that, to the best of his recollection, they went to lunch and dinner a couple of times,
15 mostly to discuss if he would help her get credit. He believes they texted and talked
16 a few times on the phone about the credit issues but there was no relationship and
17 certainly no talk of an engagement. In fact, without going into specific detail,
18 Campbell learned something personal about J.L. that ended any thought of a
19 relationship.

20 The discovery provided to the defense regarding J.L. contains only two things:
21 an interview with her and her credit report. What makes it bizarre is that the credit
22 report seems to contradict her interview. She does take out a loan from Navy Credit
23 Union but she has been making payments on the loan and it has not affected her
24 credit. She could have easily had the loan forgiven by showing that Campbell has
25 been accused of defrauding her. Instead, she is making the payments.

26 She claims that he forced her to buy a bunch of stereo equipment at Best Buy
27 and furniture at a store and then did not pay for it. Yet there is nothing in her credit
28

1 report regarding Best Buy or a furniture store and certainly nothing derogatory.

2 Apparently, the government tried to find these accounts and were unable.

3 On a side note, she states in her interview that she was impressed with
4 Campbell at the time because he was driving a Lamborghini. Campbell did not own
5 a Lamborghini at the time she claims they were dating. But coincidentally, in J.Q.'s
6 You Tube videos and Instagram posts, J.Q. shows Campbell with a Lamborghini.
7 The defense would again suggest to the Court that this shows a number of the
8 accusations were taken directly from J.Q.'s videos.

9 (4) MH and KH – M.H. and K.H are mother and daughter. Campbell dated
10 M.H. for two months and then remained friends. Campbell became acquainted with
11 her mother, K.H. through his relationship with M.H. The victim's statements to the
12 police were true to an extent. They gave Campbell money for an investment and
13 they have not been repaid. However, as with the rest of this case, that is not the full
14 story.

15 The investment referred to was not a house to be sold (Campbell did do some
16 house flipping). In actuality, the investment was a container company that M.H.
17 introduced Campbell to through her friend Darrell Hollinquest. It was not Campbell's
18 idea to invest in the container company – it was actually the opposite. In fact, much
19 of the money that her mother and she invested was put into the container business,
20 including money that was never given to Campbell. The defense has attached
21 Exhibit #7 to show the exchange between M.H., Darrell Hollinquest and Campbell.

22 Campbell admits that he took some of the money given to him by M.H. and
23 K.H and put them in other businesses and used them to pay personal items. Again, it
24 is why he has pled guilty in this case. But this is another example of how the
25 "Romance scammer" scenario put forth by the government is simply not true.
26 Campbell did not date her and convince her to invest her money in a company. She
27 was the one who asked him to invest and, in fact, Campbell did invest in the
28 company and lost \$30,000.

1 Campbell does not disagree that K.H. gave him the \$60,000 for the
2 investment. He does not agree that she gave him an additional \$25,000 for cancer
3 treatment. Counsel has been unable to find the \$25,000 wire sent to Campbell either.
4 However, even if there was an additional \$25,000 provided to Campbell, that still
5 equals a total of \$85,000, not the \$126,975 listed in the PSR loss column.

6 One final note. M.H. states that Campbell gave her \$1000 when she was in
7 financial trouble. Campbell believes that the amount is closer to \$10,000 to \$15,000,
8 plus paying for a number of expenses. The Court can see from text messages that he
9 is paying a lot of her bills. (Exhibit #8).

10 (5) Credit Reports – The problem that the defense has with the
11 allegations that Campbell “convinced” several of the women to get credit cards and
12 cars is that once again the entire story is not being told. Campbell did not convince
13 anyone to get a credit card or a car. Many of the women he was with saw that he had
14 a luxury car and several credit cards. They wanted a nice car, a nicer apartment and
15 high limit credit cards.

16 Campbell helped them to get these things, mostly by helping them fill out the
17 applications. He would advise them to put in higher incomes than they made and put
18 themselves down as an employee of a company he owned and with a high salary.
19 He would verify if anyone checked. At times, either one of his companies or
20 Campbell personally would be put on the application because the applicant did not
21 have good credit or sufficient income.

22 Campbell understands that telling the Court this does not put him in a good
23 light. However, it is important to him that the Court understand that many of these
24 were not helpless women being taken advantage of, but rather women who saw an
25 opportunity to get nicer things and got Campbell’s help to get them. The defense
26 would simply tell the Court that on these applications that contained the inflated
27 income, the alleged victims filled out the application and signed it. The women
28 knowingly put down the false information in order to get the luxuries.

1 Furthermore, when they could not make the payments (or Campbell stopped
2 helping them make the payments), they did not do anything until J.Q's You Tube
3 video and her contact with them. After that, and after talking with the police, they
4 went to the credit reporting agencies and reported the charges as fraud, using
5 Campbell as the scapegoat, to get the bad credit removed.

6 (6) Cancer – There are numerous references to Campbell telling various
7 people that he had cancer, specifically Hodgkins Lymphoma. The clear insinuation
8 from the government is that this was a lie and part of the scam that Campbell was
9 pulling on these women.

10 In particular, an investigator from the FBI contacted Cedars-Sinai Hospital to
11 find out if they had records regarding Campbell. According to a couple of the
12 victims, Campbell had specifically referenced being treated at Cedars-Sinai.
13 According to the FBI, the hospital reported that no records were found.

14 Exhibit # 2 is a collection of Campbell's medical documents from Hoag
15 Hospital and Cedars-Sinai Hospital. There are also documents from Kaiser
16 Permanente that were ordered but have not yet been provided.

17 The records show that Campbell did have a history of Hodgkins lymphoma
18 and that he was treated at several hospitals over the years. Campbell was diagnosed
19 with Hodgkins when a larger tumor was taken off his back. Fortunately, he caught it
20 early and it had not spread. As with many Hodgkins patients, he has occasional
21 flare-ups that are signaled by discoloration of the skin and small bumps. He gets
22 regular check-ups and so far there has been nothing serious.

23 Of particular note are the records provided from Cedars-Sinai which show
24 Campbell getting lab tests for cysts on his body. (Exhibit #2). Although the results
25 are mostly positive, they do indicate that he has to continue to monitor his health.

26 Two additional notes on the supposed cancer scam. At least two of the
27 women in their interviews mention seeing the discoloration and bumps on
28 Campbell's neck and forehead and asking him about the marks. Secondly, R.Z., one

1 of the supposed victims and Campbell's sister-in-law, states in her letter (Exhibit
2 #1A) how offensive the talk of Campbell faking the cancer is because she was with
3 him during the time, including during surgery, and knows how difficult it was.
4

5 **III. PERSONAL BACKGROUND**

6 Mr. Campbell's story begins on the outskirts of tragedy. When Mr.
7 Campbell's mother was four months pregnant with him, his father was murdered.
8 Stanley Campbell was shot in the back of the head during a robbery of his vehicle
9 when he was attempting to go pick up Mr. Campbell's mother, Ms. Chonta Hurd
10 from the hospital.

11 Mr. Campbell has three maternal half-siblings and two paternal half-brothers.
12 All of Mr. Campbell's maternal siblings have different fathers, and Mr. Campbell
13 always watched his siblings with their fathers and their interactions. Although, none
14 of them had a consistent father figure, Mr. Campbell was always envious as a child
15 because he always thought to himself 'at least they have a dad.'

16 His father was a figment of his imagination, and because he was not there to
17 prove him otherwise, in his mind, his father was a folktale hero. His visions of his
18 father were nothing short of fairytale, especially in light of the fact that he had
19 always heard from his family that his father was an exceptional man. Although, he
20 had never met him, Mr. Campbell formed a strong bond with the idea of his kind and
21 loving father. He always kept a photograph of his father taped to the back of his
22 bedroom door. This seemed to provide Campbell some comfort and a sense of
23 belonging.

24 Until he was about 8 years old, Mr. Campbell resided with his mother,
25 maternal grandmother, and siblings in Los Angeles. Mr. Campbell had a close
26 relationship with his grandmother, especially because his mother was so young.
27
28

1 When Mr. Campbell was in the third grade, his mother married Alonzo Herd and he,
2 his mother and his younger half-sister moved to Pomona to live in his stepfather's
3 home.

4 It was then that Campbell's life changed forever. Campbell's stepfather
5 physically abused him--he was choked, whipped with a belt, slapped, etc. Aside
6 from the physical abuse, his stepfather also abused him mentally and emotionally.
7 The worst of it for him was when his stepfather tore and ripped into pieces his
8 biological father's photograph off his bedroom door, shouting, "I don't want this
9 dead n**** on my door." His stepfather knew how much Campbell's father meant to
10 him. This might have been more painful than the physical abuse Campbell endured
11 as that photograph was one of the few memorabilia he had of his father.

12 Campbell's mother worked two jobs to make ends meet. She would
13 complete her first job, come home to cook dinner for the family, and then go to her
14 second job. Thus sadly, Campbell spent more time with his stepfather than his
15 mother, as he had to be home alone with his stepfather while his mother was away
16 working. As such, his mother did not personally witness all the abuse Campbell
17 endured when he was alone with his stepfather. He would try to tell his mother what
18 happened, but his stepfather would always convince his mother that he was lying.
19 Campbell began to resent his mother for believing his stepfather, even after the fact
20 that his stepfather was also abusive towards his mother. He also resented the fact that
21 she would always forgive him and go back to him regardless of his abuse. Campbell
22 recalls that his mother would sometimes wear her hair over her eye to cover a black
23 eye.

24 The last straw was when his stepfather took Mr. Campbell to the train
25 station and told him to leave, never to return and left him there at the train station.
26 After that incident, Mr. Campbell went to live with his aunt, his biological father's
27 sister. He was 16 years old at the time. Campbell's mother got a divorce from his
28 stepfather in 2004.

1 Despite the pain his stepfather caused him through his childhood and his
2 teenage years, Mr. Campbell still says that he is thankful to his stepfather for one
3 thing—he taught him that he can only earn with hard work. Mr. Campbell would not
4 receive an allowance unless he worked for it. Even when he was a child, his
5 stepfather made him cut the neighbors’ grass, clean their pigeon cages, clean after
6 the dogs etc. in order to receive an allowance. This is the only positive memory he
7 has of his stepfather. After Mr. Campbell moved out, he had no interactions with his
8 stepfather.

9 Mr. Campbell never received therapy as a child or a young adult because as
10 an African American male he was always taught that he is a man and he just had to
11 deal with it, and that therapy was not an acceptable alternative. However, as he grew
12 older, he realized how desperately he needed someone to talk to about what
13 happened in his life, especially because he feels he cannot share his intimate
14 thoughts, emotions, or even the events of his life with anyone openly. The only
15 sense of normalcy he has ever felt was with his biological father’s side of the family.
16 Not even his mother. Thus, Mr. Campbell is currently in therapy, and finds that it is
17 helping him cope.

18 Health Issues

19 Mr. Campbell has struggled with his health since he was a child. Mr.
20 Campbell has had an irregular heartbeat from a young age. He also has a history of
21 seizures that began while he was in high school, specifically after he suffered a
22 concussion playing football. His seizures were exacerbated by a very traumatic
23 event in his life. When he was 19, there was a racial war in Pomona between
24 Hispanics and African Americans. During the time, gang initiation for Hispanics
25 was to kill an African American. When Campbell was 19 years old, Hispanic males
26 put a gun to his head and told him to drive to a secluded area. During the drive, they
27 repeated that they were going to kill him, specifically that they were going to set him
28 on fire. They stopped at a remote area, put Mr. Campbell in the trunk of his vehicle

1 and poured gasoline all over him. By pure luck, they had forgotten to bring a match
2 or a lighter, and so they decided to leave Mr. Campbell in the trunk of the vehicle.

3 Mr. Campbell tried to escape, but was unable to. All he can recall is waking
4 up in a hospital bed with a ventilator, and two police officers outside his hospital
5 room. He later learned that a tow truck driver found him passed out in the trunk of
6 his vehicle. After this incident, Mr. Campbell began to suffer from extreme anxiety,
7 panic attacks, and began to experience troubling seizures. To present day, he cannot
8 tolerate the scent of gasoline.

9 Furthermore, Mr. Campbell as discussed above, was diagnosed with
10 Hodgkin's lymphoma. The lymphoma has caused a tumor to be removed. He has had
11 two removed from his neck and his forehead and his buttocks. The tumor were
12 caught early and at a young age so it has been very treatable. The last occurrence
13 was in 2015 but he has had positive sampling as recently as this year. These are
14 small discolorations and are not necessary to have treatment but do require checking
15 on periodically. Having the disease at an early age, convinced Campbell that he was
16 not going to live long, a feeling that he admits is more psychological than scientific.

17 **Marriage and Family Life**

18 Mr. Campbell married Joanna Sou in 2012 year in Dallas, Texas.
19 Unfortunately, the couple separated repeatedly over the course of their marriage and
20 then finally divorced in 2021 as they realized they were an incompatible pair. They
21 have two children, Makayla and Kaliana, ages 10 and 8 respectively. Mr.
22 Campbell's children mean everything to him, and he is extremely close with both of
23 them.

24 Before his arrest, he would have the children from Thursday until Tuesday
25 every other week. After this case, his ex-wife has moved and taken the children to
26 Austin, Texas. His wife made the decision to move in Texas as she felt the children
27 were being harassed and teased at school regarding the instant case. Some of the
28

1 parents learned of Jessica Quezada's YouTube video relating to Mr. Campbell, and
2 the children began taunting Campbell's daughters.

3 Mr. Campbell is now only able to see his children when probation allows him
4 to travel once or twice a month to Texas. However, he FaceTime's with his girls
5 every day, and speaks to them multiple times over the phone. He also pays child
6 support. The children are struggling as they miss their father and cannot
7 comprehend why they are unable to see him more often.

8 Because the thoughts that he failed as a father were haunting him, he began
9 drinking alcohol and using cocaine after they separated for good. This was the first
10 time he had ever tried drugs. Previously, he stayed away from any and all drugs as
11 he had family members pass due to a drug overdose.

12 Mr. Campbell struggled mightily after his separation. However, he pulled
13 himself together after a year for the sake of his children. His goal was to focus on
14 his work and providing for his children.

15 Mr. Campbell has been working his whole life since he was 16 years old.
16 And not just working one job – most of the time it was two or even three. He has
17 never been able to rely on anyone financially. He had to depend on himself since he
18 was a teenager. His first job was at a McDonald's. He also worked at Round Table
19 Pizza, Ralphs, a Costco distribution center as a forklift driver, Walmart, and Home
20 Depot.

21 His first major job was at Texas Fitness Facility in Copell, Texas. He started
22 as a salesman and worked his way up to general manager at a new fitness center in
23 Dallas. The general managers had a structured pay package that included
24 commissions based on profits and by the end of his first year as manager he was
25 pulling in close to six figures.

26 He eventually left Texas to move to California and got a job at Equinox
27 Fitness, a high-end gym where customers paid three to four times what they were
28

1 paying in Texas. He continued to earn a high income for several years, but the job
2 was stressful and he wanted to be an entrepreneur.

3 In 2014, he started ITUS Security Company, a company that employed seven
4 unarmed security guards. (Exhibit #9A). He was able to secure small contracts with
5 apartment complexes and malls. Campbell had a guard card and would often work
6 night shifts after working all day at Equinox.

7 After he quit Equinox, Campbell started Arion Transportation with his
8 brother-in-law out of Texas. (Exhibit #9B). Arion's function was to transport cars
9 and other items across the country. For example, if a person moved to California
10 from Florida, Arion would move their cars for them. They owned a Gooseneck truck
11 and later got another truck that could pull six cars at a time. The company was
12 successful to a point, they would often pull in \$10,000 to \$12,000 a month, but
13 Campbell was doing much of the driving himself, especially early on, and the toll it
14 took on his personal life was harsh. In 2017, after one of the trucks needed massive
15 repairs, they closed the business.

16 Although the security company was still providing an income, Campbell
17 decided he wanted to get a real estate license. He went to real estate school but
18 found out that he was not likely to get a license because of the felony on his record.
19 He began partnering on projects with Crystal Carter who would invest in properties,
20 stage them with nice furniture and then flip them a few months later. She let
21 Campbell invest in some of the homes and he would make some money when she
22 flipped the houses. (Exhibit 1D, Carter letter).

23 Campbell also started dabbling in a credit repair business. He would help
24 some of his friends get cars and mortgages by cleaning up their credit and showing
25 them what they needed to get a mortgage. The letter from Michael and Stephanie
26 Parker attached as Exhibit #1E is an example of a couple he helped get a house.

27 During his friendship with M.H., she mentioned a friend, Darrell Hollinquest,
28 who was putting together a container business. Essentially, it was buying large

1 shipping containers for anywhere from \$3500 to \$5000, and remaking them into
2 small homes for the homeless. The idea was to partner with the government to
3 provide fast and functional housing during the homeless crisis. The containers are
4 not re-cyclable, so this also provided a service in disposing of them in a profitable
5 way. Furthermore, California had just passed a law that allowed for the use of items
6 like the containers to house the homeless.

7 Campbell liked the idea and, along with M.H., invested \$30,000 of his own
8 money. Darrell turned out to be a flake who refused to back up his promises or come
9 up with any money and eventually was dropped from the business. Campbell took
10 over the operations purchased thirteen containers to fix up and renamed the business
11 IPH-LA. (See Exhibit #9C). Some of the money given to Campbell by the women in
12 this case went to building up the business, specifically leasing a space for the
13 containers and a place to rework them. He met with local housing officials and was
14 making progress when he was arrested in this case.

15 The FBI also refers to a company name INDVLS where money was wired into
16 the business account. INDVLS was the parent company to the other companies he
17 had created. It can be confusing because there was also INDVLS Fitness and
18 Wellness which was a company Campbell formed with two friends to start an
19 upscale gym in Los Angeles. Campbell had to drop out after his arrest, but he
20 believes the partners did open the gym.

21 The point of this lengthy breakdown of his work history is simple – scam
22 artists do not usually work two jobs a week at jobs that are often manual labor. One
23 of the reasons that several of the women dated Campbell was that he was clearly
24 ambitious and appeared to be headed for enormous success. As with a lot of
25 entrepreneurs, Campbell was always sure that the next business was going to be the
26 next big thing and he would be able to pay back everything.

27 But perhaps most importantly, after Campbell's arrest and release, he did not
28 sit in a house all day bemoaning his problems and refusing to go forward. He did

1 what he had done since he was 16 – he went to work. Campbell got a job as a UPS
2 driver during the day and the manager of a mini-grocery store at night. He currently
3 works eighty hours per week at a minimal salary. But he is determined to keep
4 working and taking care of his children.

5 Mr. Campbell has always been insecure in himself. He always struggled with
6 an identity crisis, and always felt that the only time people noticed him was when he
7 did something for them or for their benefit. Thus, anytime that he won any money
8 while gambling, he would share the wealth, to say the least. He would purchase
9 luxury gifts for his friends, family members, girlfriends, including some of the
10 women mentioned in the indictment herein.

11 A close friend, Jasmine Sanchez (Exhibit 1C) states in her letter addressed to
12 the Court,

13
14 “Zeshawn is always ready to hand the shirt off his back when needed. He has
15 one of the biggest hearts I know. From helping people on the side of the road
16 from an accident to educating and lending out a hand when needed. When I
17 first met him 4 years ago, he lent me his vehicle when mine had broken down
18 and I had no other transportation. He lent me that car with no hesitations with
19 not knowing me for long and helped me get my car out. He is truly amazing
20 and has big plans to help the homeless out in the city of Los Angeles. He has
21 worked really hard on his project he created, IPHLA (Indvls Project
22 Homeless) His desire and thrive to do better in the world and giving back is
impeccable. I have watched him work on this dream of his for 4 years now
and the motivation and strive gets stronger each time. Ze is a well-rounded,
good-hearted person that wants nothing more than to be happy and be closer to
his daughters.”

23 His current girlfriend Samantha (Exhibit 1B) writes to the Court:

24
25 “When Ze and I met in august 2021 my oldest son at the time 11 years old was
26 starting to have extreme depression and anxiety attacks making it impossible
27 to even get him in the car for school or out of the house. My son was
becoming violent in fear...Ze was an incredible help from the start. Within
the first 2 weeks of knowing him he had sent my son and I journals and wrote
my son a brief message telling him when he was young writing things down
helped him process spaces better. He would sit on the phone with me for

1 hours listening to me cry and helping me understand patience's...He has made
2 the children feel safe and like they had a father figure around finally. He has
3 made time to spend days with each of them separately to get to know them and
4 do things they enjoyed doing...

5 Before you can call Ze'Shawn anything, he is a father first. To the ends of the
6 universe, he would go x10 for Makayla and Kaliana Campbell. If it's needing
7 to hope on a plane, drive 18 hours, be up at 4am to say good morning,
8 YouTube how to do hair, play dress up, be a stunt man for their gymnastics,
9 motivate, discipline, teach or congratulate them he's there...Nothing on this
10 earth holds a candle to them."

11 **IV. Conclusion**

12 Campbell hopes that the Court will show leniency in the sentencing and
13 understand that he is not the monster portrayed by the government. His actions hurt
14 several women but that was never his intention. In particular, he feels that one
15 person he treated poorly was M.G. who was different that the other women in that
16 she was not looking for material items. He also has enormous regret that he pushed
17 M.H.'s mother to get involved in the company and that he used some of the funds
18 she provided for his own personal use and businesses.

19 He does regret how he used to live and his desire to focus on material wealth
20 versus what is important. He recognizes he got caught up in that lifestyle and that
21 his actions hurt people and they lost money. He has always been a big believer in
22 hard work and as he moves forward in the future, he will focus on simply working
23 harder.

24 However, Campbell is not going to downplay the truth in order to get a lighter
25 sentence. He is struggling with how he has been portrayed. He feels that a part of
26 this prosecution has been unfair as several of the women accusing him were not only
27 willing partners to providing false documentation, they were often the instigators as
28 they wanted material things as well. Again, and this cannot be repeated enough, he
is not saying this excuses his behavior. But he wants the record set straight. He
never intended to hurt any of those women and, in fact, he thought he was helping

1 them. It pains him to see several of the women who actively pushed for the cars,
2 jewelry and credit cards to now portray themselves as innocent victims of the
3 Romance scammer.

4 The defense would simply refer the Court to Exhibit #10, the loan application
5 for J.Q. to get a Range Rover. She filled out the application falsely and signed under
6 penalty of perjury and got a Range Rover, thanks to his \$25,000 down-payment.
7 When they broke up and he refused to make the monthly payments, she started a
8 crusade to destroy him which she was successful in doing. Notably absent from her
9 videos and postings was the mention that she had knowingly perjured herself to get a
10 Range Rover. Also absent was any mention of the Rolex and the Vegas trips and the
11 many other things he did for her as well as the money he did pay back. Instead, she
12 had portrayed herself as the naïve victim of the romance scammer who did nothing
13 but steal from her and then left. It does not excuse his behavior, but hopefully it
14 gives the Court the bigger picture.

15 Based upon all of the above, the defense is asking for a sentence of 12-14
16 months which is adequate to punish the defendant for what happened in this case.
17 He did not intend to hurt people, but he realizes that he was selfish and panicked
18 when he started having financial issues. Regardless of the sentence and the
19 restitution, he will work hard the rest of his life to make it right.

20 Respectfully submitted:

21 Dated: March 17, 2023

22 *s/ Pat Harris*
23 PAT HARRIS
24 ATTORNEY FOR
25 ZE'SHAWN CAMPBELL
26
27
28