

a. to knowingly devise and intend to devise a scheme and artifice to defraud to obtain money and property belonging to others by means of materially false and fraudulent pretenses, representations, and promises, by use of interstate wire communications and transmissions, in violation of Title 18, United States Code, Section 1343, and

b. to knowingly devise and intend to devise a scheme and artifice to defraud to obtain money and property belonging to others by means of materially false and fraudulent pretenses, representations, and promises, and by use of mail and/or interstate carrier, in violation of Title 18, United States Code, Section 1341.

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that EDMONSON and others unknown to the Grand Jury would fraudulently induce their victims, often vulnerable elderly individuals, to send money and/or valuable property via mail or interstate carrier, promising the victims they had won the lottery and need only pay their taxes or fees to receive their winnings.

3. It was further part of the conspiracy that EDMONSON would and did maintain and control addresses, including street addresses and Post Office boxes, to which these fraudulent funds, including cash, checks, cashier's checks, and money orders, would be mailed.

4. It was further part of the conspiracy that the fraudulent funds, arriving to EDMONSON's control would then be deposited into a financial account controlled by EDMONSON, or otherwise converted into another transferable form.

5. It was further part of the conspiracy that the funds were then sent by EDMONSON to her known and unknown co-conspirators. This usually occurred by EDMONSON transferring fraudulent funds from an initial deposit account to another financial account to which the co-conspirators had access via an ATM and debit card to conduct cash withdrawal and transactions in Jamaica.

OVERT ACTS

6. In furtherance of the conspiracy and to achieve the objects thereof Defendant EDMONSON committed and caused to be committed the following overt acts, among others, within the Northern District of Alabama and elsewhere:

7. On December 24, 2019, victim "P.P.," a resident of Section, AL, in the Northern District of Alabama, sent a package to EDMONSON via United States Postal Service (USPS) from the Northern District of Alabama to EDMONSON's address in Houston, Texas. This package contained valuable jewelry (three rings and three bracelets) fraudulently induced by an unknown co-conspirator as payment to claim fake lottery winnings.

8. On or about February 19, 2019, EDMONSON deposited a Regions money order for \$600.00 sent by victim “S.C.,” an elderly individual in Birmingham, AL, into her Bank of America account (ending -7086).

9. On or about April 8, 2019, EDMONSON deposited a USPS money order for \$450.00 sent by victim “S.C.,” an elderly individual in Birmingham, AL, into her Woodforest National Bank Account (ending -7943).

10. On or about March 8, 2019, EDMONSON received an Okaloosa County Teachers FCU Official Check for \$22,000.00 from victim “V.W.,” an elderly individual in Holt, FL. EDMONSON deposited this check into her Woodforest National Bank account (ending – 7943). EDMONSON later made these funds available to her co-conspirators by transferring the funds to another bank account.

11. On or about March 14, 2019, EDMONSON received and deposited a \$7,000.000 Fulton Bank Cashier’s check from victim “H.S.” in Jenkintown, PA. The initial deposit went into EDMONSON’s Bank of America account (ending -7086). EDMONSON subsequently transferred the funds from the Bank of America account to another bank account accessible to her co-conspirators.

12. On or about March 18, 2019, EDMONSON received an Associated Credit Union official check for \$10,000.00 in fraudulent funds from victim K.P.M. in Brookhaven, GA. This was initially deposited into EDMONSON’s Bank of

America account (ending -7086). EDMONSON subsequently moved funds from the Bank of America account to another bank account accessible to co-conspirators.

13. On or about March 29, 2019, EDMONSON deposited a \$10,000.00 Chase Bank cashier's check from victim "A.K.," an elderly individual living in Normandy Park, WA, into EDMONSON's Woodforest Bank account (ending -7493). The victim used an LLC belonging to her to send this check and other funds totaling close to \$50,000.00. EDMONSON subsequently transferred these fraudulent funds into other accounts to facilitate cash withdrawals in Jamaica.

14. On or about April 5, 2019, EDMONSON received and deposited an official check from Coosa Valley Credit Union from victim "S.I.," an elderly individual from Cedartown, GA, for \$7,500.00. This was deposited in Primeway Federal Credit Union. After sending this check and suspecting a scam, "S.I." cut off communication with the fraudsters. The fraudsters continued to attempt contact, including sending taxis to take her to the bank and unsolicited food deliveries in attempt to regain contact.

15. On or about February 24, 2020, EDMONSON was interviewed at her residence in Houston, TX, by FBI Special Agents regarding lottery scam activity. EDMONSON falsely represented herself as a victim in the scheme and denied collecting money from other individuals. EDMONSON knew these statements were willfully false as she was actively receiving funds from victims and engaged in

facilitating the transfer of fraudulent funds to other members of the conspiracy at the time of the interview.

16. On or about March 24, 2020, EDMONSON received a UPS package containing \$7,000.00 in cash from victim “J.P.,” an elderly individual living in Las Vegas, NV. This package was sent from the victim to one of EDMONSON’s known addresses in Houston, TX. EDMONSON had communicated via telephone with victim “J.P.” and fraudulently induced her to send this package. Victim “J.P.” noted EDMONSON’s phone number as a number ending in -1731.

17. On or about August 10, 2020, EDMONSON deposited a Bank of the West check from victim “G.W.,” an elderly individual in Claypool, AZ, in the amount of \$8,000.00. This was deposited into EDMONSON’s Primeway Federal Credit Union account (ending -0007) and later made available via ATM card to co-conspirators for cash withdrawal in Jamaica.

18. On or about September 22, 2020, victim “D.M.,” an elderly individual in Bunkie, LA, sent a USPS package containing \$300.00 cash to EDMONSON at one of her known mailing addresses in Houston, TX.

19. On or about September 23, 2020, victim “J.L.,” an elderly individual from Greensprings, OH, mailed a \$500.00 Croghan Colonial Bank check to EDMONSON as directed by a co-conspirator to receive promised lottery winnings. This package was intercepted by United States Postal Inspection Service and

returned to “J.L.” On September 24, 2020, EDMONSON called the USPIIS case agent to inquire about the seizure of the package. Subsequently, the fraudsters called the Sandusky County Sheriff’s Department posing as the son of “J.L.” and requested a welfare check. The fraudsters also sent a plumbing service to the victim’s home in attempt to regain contact.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO AND THREE

**Wire Fraud
18 U.S.C. § 1343**

20. The factual allegations in paragraphs 1 through 19 of this Indictment are realleged as though fully set forth herein.

21. Between on or about January 2019 and continuing through on or about December 2020, the exact dates being unknown to the Grand Jury, within Jefferson County in the Northern District of Alabama, and elsewhere, the defendant,

GLORIA KIRK EDMONSON,

Did knowingly and with intent to defraud, devise and intend to devise, and attempt to devise, a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises.

22. The scheme to defraud was carried out in the following manner:

- a. Defendant EDMONSON’s co-conspirators would communicate, often by telephone, with elderly victims to induce them

to send money to EDMONSON, usually through mail.

b. EDMONSON would receive these funds and deposit them into one of her bank accounts.

c. EDMONSON and her unknown co-conspirators would then transfer these fraudulent funds to other members of the scheme using various methods.

TRANSACTIONS TO EXECUTE THE FRAUD

23. On or about the dates listed below, each such date constituting a separate count of the Indictment, for the purpose of executing the above-described scheme and artifice, Defendant EDMONSON transmitted and caused to be transmitted and attempted to transmit in interstate commerce, by means of a wire communication, certain signs, signals, and communications, that is, Defendant EDMONSON caused an interstate wire communication be made as described below, for each Count:

Count	Amount	Date of Deposit	Victim	Victim Location	Account	Deposit Source
2	\$600.00	2/19/19	S.C.	Birmingham, AL	Bank of America	Regions Bank Personal Money Order
3	\$450.00	4/8/19	S.C.	Birmingham, AL	Woodforest National Bank	USPS Money Order

All in violation of Title 18, United States Code, Section 1343.

COUNT FOUR
Mail Fraud
18 U.S.C. 1341

24. The factual allegations in paragraphs 1 through 23 of this Indictment are realleged as though fully set forth herein.

25. Between on or about January 2019 and continuing through on or about December 2020, the exact dates being unknown to the Grand Jury, within Jefferson County in the Northern District of Alabama, and elsewhere, the defendant,

GLORIA KIRK EDMONSON,

With the intent to defraud, willfully participated in, with knowledge of its fraudulent nature, the above-described scheme and artifice to defraud and obtain money and/or property by materially false and fraudulent pretenses, representations, and promises.

26. For the purpose of executing or attempting to execute the above-described scheme and artifice to defraud and deprive, Defendant knowingly caused to be delivered by mail according to the direction thereon, the following matters:

Count	Date Mailed	Victim	Origin	Destination Address	Description
4	12/24/2019	P.P.	Section, AL	GLORIA EDMONSON ***8 Rand St APT **, Houston, TX	USPS package containing valuable jewelry, specifically three

					rings and three bracelets
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All in violation of Section 1341 of Title 18 of the United States Code.

COUNT FIVE
Money Laundering Conspiracy
18 U.S.C. § 1956(h)

27. The factual allegations in paragraphs 1 through 26 of this Indictment are realleged as though fully set forth herein.

28. Beginning on or about January 2019 and continuing through approximately December 2020, in the Northern District of Alabama and elsewhere, the Defendant,

GLORIA KIRK EDMONSON

Knowingly and willfully combined, conspired, confederated and agreed with others unknown to the Grand Jury to:

- a. Commit an offense and offenses in violation of Title 18, United States Code, § 18 U.S.C. § 1956(a)(2)(B)(i), to wit: to transport, transmit, transfer, and attempt to transport, transmit, and transfer funds from a place in the United States to a place outside the United States, knowing that the funds involved in the transportation represented the proceeds of some form of unlawful

activity and knowing that such transportation was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, to wit: violations of 18 U.S.C. 1341 and 1343.

- b. Commit and offense against the United States in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), to wit: to knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, which involved the proceeds of a specified unlawful activity, that is, a violation of 18 U.S.C. 1343, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

MANNER AND MEANS

29. In addition to those acts set forth in paragraphs 1 through 28 of this Indictment, it was part of the conspiracy for EDMONSON to receive funds, usually through mail service, at a street address or Post Office box under her control.

30. It was further part of the conspiracy for EDMONSON to deposit these fraudulent funds in a bank account under her direct control.

31. It was further part of the conspiracy that EDMONSON would then move funds, often through cash withdrawal and subsequent cash deposit, into a secondary account accessible by her unknown co-conspirators located in Jamaica.

32. It was further part of the conspiracy that the unknown co-conspirators in Jamaica would then access the secondary account via ATM and withdraw the funds in cash. EDMONSON provided the ATM card willingly and knowingly.

OVERT ACTS

33. On or about February 19, 2019, EDMONSON deposited \$600.00 from a Regions Money Order from victim "S.C." into her account at Bank of America. On February 27, 2019, EDMONSON withdrew \$2,500.00 from her Bank of America account (ending -7086) and deposited the same in her Primeway FCU account (ending -0007). The Primeway account was accessed on February 28, 2019 for two ATM withdrawals from Jamaica for a total of \$1,010.00.

34. On or about March 8, 2019, EDMONSON deposited an Okaloosa County Teachers Federal Credit Union official check for \$22,000.00 into her Woodforest National Bank account (ending – 7943). This check was sent by victim "V.W." from Holt, FL. On March 18, 2019, EDMONSON withdrew \$15,000.00 from the Woodforest account. On the same day, EDMONSON made three cash

deposits of \$5,000.00, \$8,700.00, and \$1,000.00 into her Primeway, Harris County FCU, and Energy Capital accounts respectively. Between March 18 and 21, 2019, EDMONSON's Energy Capital account was debited five times for a total of \$981.37 from a Bank of Nova Scotia ATM located in Jamaica. On these same dates, EDMONSON's Primeway account was accessed for a total of \$2,020. Simultaneously, EDMONSON's Harris County FCU account was accessed multiple times for a total of \$7,459.06 from Bank of Nova Scotia ATMs located in and around Montego Bay, Jamaica.

35. On or about March 14, 2019, EDMONSON deposited a \$7,000.00 Fulton Bank Cashier's check from victim "H.S.," an elderly individual in Jenkintown, PA. The initial deposit went into EDMONSON's Bank of America account (ending -7086). On March 15, 2019, EDMONSON withdrew \$5,200.00 cash from Bank of America, then depositing \$3,000.00 cash into Harris County Federal Credit Union and \$2,000.00 cash into Primeway Federal Credit Union (ending -0007). On the same day, EDMONSON's Primeway account was debited for a total of \$1,010.00 from an ATM in Jamaica. An additional \$1,010.00 was withdrawn via ATM in Jamaica on the following day, March 16, 2019. EDMONSON's Harris County FCU account was accessed for \$1,499.36 on March 15, 2019, from a Bank of Nova Scotia ATM in Montego Bay, Jamaica.

36. On or about March 18, 2019, EDMONSON deposited an Associated Credit Union official check for \$10,000.00 in fraudulent funds from victim K.P.M. in Brookhaven, GA. This was initially deposited into EDMONSON's Bank of America account (ending -7086). On March 25, 2019, EDMONSON withdrew \$4,843.00 from the Bank of America account. On the same day, EDMONSON deposited \$4,000.00 cash into her Harris County Federal Credit Union account (ending -050) and \$500.00 cash into Energy Capital Credit Union (ending -S700). Between March 25 and 27, 2019, EDMONSON's Harris County FCU account was debited multiple times via Bank of Nova Scotia ATMs located in Montego Bay, Jamaica for a total of \$5,409.55. On March 25, 2019, EDMONSON's Energy Capital account was also debited \$505.00 from an ATM in Jamaica.

37. On or about April 8, 2019, EDMONSON was contacted by bank officials from Primeway Federal Credit Union regarding transactions occurring in Jamaica. EDMONSON stated she was aware of the withdrawals and had provided her ATM card to someone else who had permission to make these withdrawals.

38. On or about April 8, 2019, EDMONSON deposited a USPS money order for \$450.00 sent by victim "S.C.," an elderly individual in Birmingham, AL, into her Woodforest National Bank Account (ending – 7943). This same account was accessed multiple times from a Bank of Nova Scotia ATM located at the City Centre

branch in Montego Bay, Jamaica, on April 13-15, 2019, to make several cash withdrawals.

39. On or about August 4, 2020, EDMONSON deposited a Bank of the West check from victim "G.W.," an elderly individual in Claypool, AZ, for the amount of \$8,000.00. This was deposited into her Primeway Federal Credit Union account (ending -0007). On the same day, EDMONSON withdrew \$3,300.00 in cash from the Primeway account and deposited \$3,063.00 in cash into her Harris County Federal Credit Union account (ending -050). The Harris County FCU account was accessed on August 10, 2020, seven (7) separate times for ATM withdrawals and debits totaling \$1,717.80.

40. On September 3, 2020, EDMONSON deposited a \$5,000.00 check from Citizens First Bank from victim "T.M.," an elderly individual in Juneau, WI, into her Primeway FCU account (ending -007). On the same day, EDMONSON withdrew \$800.00 in cash and deposited \$580.00 cash into her Harris FCU account (ending -050). On September 8, 2020, EDMONSON again withdrew \$4,200.00 cash from Primeway FCU and deposited \$4,140.00 cash into Harris FCU. On September 8, 2020, EDMONSON's Harris FCU account was accessed from a Bank of Nova Scotia ATM in Montego Bay, Jamaica, withdrawing \$1,465.83 over five consecutive transactions.

All of the above being in violation of Title 18, United States Code, Section 1956 (h).

NOTICE OF FORFEITURE:

18 U.S.C. §§ 981(a)(1)(C), 982(a)(2)(A) and 28 U.S.C. § 2461(c)

1. The factual allegations of Counts One through Four of this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2)(A), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses set forth in Counts One through Four of this Indictment, the defendant,

GLORIA KIRK EDMONSON,

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from, directly or indirectly, proceeds traceable to the commission of the said violations, including but not limited to the following:

JUDGMENT FOR PROCEEDS:

A sum of money equal to the amount of proceeds obtained as a result of said offenses.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- 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
divided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

NOTICE OF FORFEITURE:
18 U.S.C. § 982(a)(1)

1. The allegations contained in Count Five of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(1).

2. Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense in violation of Title 18, United States Code, Section 1956, the defendant,

GLORIA KIRK EDMONSON,

shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property, including but not limited to the following:

JUDGMENT FOR PROCEEDS:

A sum of money equal to the value of any property, real or personal, involved in such offense, and any property traceable to such property.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- 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 divided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

/s/ Electronic Signature

FOREPERSON OF THE GRAND JURY

PRIM F. ESCALONA
United States Attorney

/s/ Electronic Signature

KRISTEN S. OSBORNE
Assistant United States Attorney