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CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
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**REDACTED FOR
PUBLIC DISCLOSURE**

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

CR-14-00858-DGC (BSB)

vs.

INDICTMENT

1. Steven Audette,
2. Mary Roach,

VIO: 18 U.S.C. § 1343
(Wire Fraud)
Counts 1-90

18 U.S.C. § 1349
(Conspiracy)
Count 91

Defendants.

THE GRAND JURY CHARGES:

At all times material to this indictment, within the District of Arizona and elsewhere:

INTRODUCTION

Defendants

1. Steven Audette ("AUDETTE"), age 53, is a resident of Laredo, TX, and has no known legitimate means of support.
2. Mary Roach ("ROACH"), age 53, uses various aliases including Gennifer Parrill and Nicole Ross. ROACH is the wife of AUDETTE and also resides in Laredo, TX. ROACH has no known legitimate means of support.

Overview of Scheme

3. Between approximately 2002 and 2013, AUDETTE and ROACH obtained more than \$2 million from victims by making false and fraudulent representations and

1 threats of harm. Among other things, AUDETTE and ROACH would falsely tell
2 victims that funds were needed to further secret government investigations; would
3 falsely warn victims that any disclosure of these secret government investigations
4 (even to law enforcement) would compromise the investigations and expose the
5 victims and their family members to a risk of retribution and physical harm; and
6 would induce victims to send money by falsely claiming the money was needed to
7 assist AUDETTE in fleeing from the mafia.

8 **The False Claims To Victims S.W. and L.W.**

- 9 4. In 1992, AUDETTE contacted victim S.W. indicating that he needed to borrow
10 money. S.W. initially sent AUDETTE approximately \$200-\$400 via Western
11 Union.
- 12 5. About one month later, AUDETTE called requesting more money. For the next
13 ten years, AUDETTE starting calling S.W. more frequently, wanting to borrow
14 increased amounts of money.
- 15 6. AUDETTE told S.W. that AUDETTE was running from the mafia because he
16 was the son of reputed crime figure Lucky Luciano and stood to inherit a lot of
17 money.
- 18 7. AUDETTE represented to S.W. that he was also a member of a secret government
19 investigation being conducted by the Central Intelligence Agency ("CIA").
20 AUDETTE began indirectly threatening S.W.'s family by stating the family would
21 be in danger if S.W. quit paying AUDETTE the money.
- 22 8. In 2002, in response to continued requests from AUDETTE for more money,
23 S.W. L.M. if she would provide AUDETTE money.
- 24 9. L.M. responded to S.W.'s request by agreeing to loan money to AUDETTE. L.M.
25 initially gave the money to S.W. so he could pass the money onto AUDETTE.
26 Eventually, AUDETTE contacted L.M. directly to request more money.
- 27
28

- 1 10. Similar to what he told S.W., AUDETTE informed L.M. that he needed money
2 because he was on the run from the mafia and because he was working on a secret
3 government investigation. AUDETTE explained to L.M. that she would be paid
4 back all of her money as soon the investigation was over.
- 5 11. Over time, AUDETTE became more threatening in his demands for the money by
6 telling L.M. that, if he were ever captured by the mafia, he would tell the mafia
7 where L.M. lived. AUDETTE warned L.M. that if the mafia showed up at her
8 house, her grandchildren would be harmed or murdered.
- 9 12. AUDETTE told L.M. that since this was part of a secret government investigation,
10 L.M. could not tell anyone, including law enforcement, about what was going on
11 or L.M. would ruin the entire investigation and people would end up dead.
12 Because L.M. feared for the safety of her family and herself, she agreed to
13 continue sending money whenever AUDETTE would call to demand it.
14 AUDETTE would call and send text messages demanding money and indicating
15 that the secret government investigation was almost over.
- 16 13. AUDETTE would provide L.M. with the names of people to whom to send the
17 money and indicated that the recipients were government agents or that the money
18 was going into a secure government account.
- 19 14. Between 2002 and 2013, L.M. sent over \$1 million to the bank accounts
20 designated by AUDETTE. The transfers continued until L.M. exhausted all of her
21 funds.

22 **ROACH's Role In Receiving And Distributing Funds**

- 23
- 24 15. Victims of the scheme were typically instructed to send money to friends and
25 family members of AUDETTE and ROACH. After the money was initially
26 transmitted in this fashion, ROACH, using various aliases, would then assist in
27 further transferring and distributing the proceeds of the scheme. For example, on
28

1 August 5, 2008, H.R., ROACH's daughter, sent \$900 to "Nicole Ross," a known
2 alias used by ROACH.

3 16. On August 7, 2008, H.R. sent another \$900 to "Nicole Ross."

4 17. On August 7, 2008, L.C., ROACH's ex-son-in-law, sent \$900 to "Gennifer
5 Parrill," another known alias used by ROACH.

6 18. On March 28, 2012, ROACH, using the alias "Gennifer Parrill," sent \$900 to K.P.

7 19. On March 28, 2012, ROACH, using the alias "Gennifer Parrill," sent another \$850
8 to K.P.

9 20. On March 29, 2012, ROACH, using the alias "Gennifer Parrill," sent \$500 to K.P.

10 21. On June 14, 2012, ROACH, using the alias "Gennifer Parrill," wired \$700 from
11 Texas to K.P. in Ohio.

12 22. On June 15, 2012, ROACH, using the alias "Gennifer Parrill," wired \$750 from
13 Texas to K.P. in Ohio.

14 23. On June 16, 2012, ROACH, using the alias "Gennifer Parrill," wired \$700 from
15 Texas to K.P. in Ohio.

16 24. On March 8, 2013, ROACH, using the alias "Gennifer Parrill," sent \$850 to K.P.

17 25. On March 9, 2013, ROACH, using the alias "Gennifer Parrill," sent \$750 to K.P.

18 26. On March 14, 2013, ROACH, using the alias "Gennifer Parrill," sent \$750 to K.P.

19 27. On March 16, 2013, ROACH, using the alias "Gennifer Parrill," sent \$700 to K.P.

20 **COUNTS 1-90**

21 **Wire Fraud**

22 **[18 U.S.C. § 1343]**

23
24 28. The factual allegations in paragraphs 1-27 of the Indictment are incorporated by
25 reference and re-alleged as though fully set forth herein.

26 29. Beginning in or around 2002 and continuing through in or around January 2014, in
27 the District of Arizona and elsewhere, AUDETTE, ROACH, and other individuals
28 known and unknown to the Grand Jury, devised and intended to devise a scheme

1 and artifice to defraud and to obtain money by means of materially false and
2 fraudulent pretenses, representations, promises, and omissions.

3 30. On or about the dates listed below, in the District of Arizona and elsewhere, for
4 the purpose of executing said scheme and artifice, AUDETTE, ROACH, and other
5 individuals known and unknown to the Grand Jury knowingly transmitted and
6 caused to be transmitted, by means of wire and radio communications in interstate
7 commerce, certain writings, pictures, signals and sounds, to and from the District
8 of Arizona and elsewhere, as set forth in the chart below, each such instance being
9 a separate Count of this Indictment:

10 a. Financial Transactions by Wire:

Count	Date	Sent From	Sent To	Amount
11 1	5/7/2009	L.M.	B.R.	\$5,000.00
12 2	6/5/2009	L.M.	B.R.	\$3,000.00
13 3	6/12/2009	L.M.	B.R.	\$8,000.00
14 4	6/12/2009	L.M.	B.R.	\$4,000.00
15 5	8/17/2009	L.M.	B.R.	\$15,000.00
16 6	9/18/2009	L.M.	B.R.	\$15,000.00
17 7	9/18/2009	L.M.	B.R.	\$9,000.00
18 8	11/2/2009	L.M.	B.R.	\$15,000.00
19 9	12/21/2009	L.M.	B.R.	\$8,000.00
20 10	1/15/2010	L.M.	B.R.	\$15,000.00
21 11	2/4/2010	L.M.	B.R.	\$3,000.00
22 12	2/4/2010	L.M.	B.R.	\$11,000.00
23 13	2/5/2010	L.M.	B.R.	\$1,000.00
24 14	3/23/2010	L.M.	B.R.	\$10,000.00
25 15	4/22/2010	L.M.	B.R.	\$4,000.00
26 16	4/22/2010	L.M.	B.R.	\$6,000.00

1	17	4/23/2010	L.M.	B.R.	\$6,000.00
2	18	6/15/2010	L.M.	B.R.	\$13,000.00
3	19	6/16/2010	L.M.	B.R.	\$7,000.00
4	20	7/29/2010	L.M.	B.R.	\$5,000.00
5	21	7/30/2010	L.M.	B.R.	\$5,000.00
6	22	8/19/2010	L.M.	B.R.	\$6,500.00
7	23	9/29/2010	L.M.	B.R.	\$2,300.00
8	24	10/4/2010	L.M.	B.R.	\$2,000.00
9	25	10/25/2010	L.M.	B.R.	\$1,400.00
10	26	11/23/2010	L.M.	B.R.	\$200.00
11	27	12/1/2010	L.M.	B.R.	\$1,000.00
12	28	12/3/2010	L.M.	B.R.	\$6,800.00
13	29	12/29/2010	L.M.	R.R.	\$2,000.00
14	30	1/5/2011	L.M.	R.R.	\$1,000.00
15	31	1/14/2011	L.M.	R.R.	\$850.00
16	32	1/27/2011	L.M.	R.R.	\$300.00
17	33	1/28/2011	L.M.	R.R.	\$300.00
18	34	2/1/2011	L.M.	R.R.	\$800.00
19	35	2/8/2011	L.M.	R.R.	\$220.00
20	36	2/14/2011	L.M.	R.R.	\$220.00
21	37	2/17/2011	L.M.	R.R.	\$2,000.00
22	38	2/25/2011	L.M.	R.R.	\$2,000.00
23	39	3/1/2011	L.M.	R.R.	\$500.00
24	40	3/3/2011	L.M.	R.R.	\$2,000.00
25	41	3/7/2011	L.M.	R.R.	\$1,000.00
26	42	3/8/2011	L.M.	R.R.	\$2,000.00
27	43	3/11/2011	L.M.	R.R.	\$60,000.00
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1	44	3/31/2011	L.M.	R.R.	\$20,000.00
2	45	9/30/2011	L.M.	B.R.	\$25,000.00
3	46	10/18/2011	L.M.	H.R.	\$25,000.00
4	47	10/19/2011	L.M.	H.R.	\$25,000.00
5	48	11/23/2011	L.M.	H.R.	\$15,000.00
6	49	12/8/2011	L.M.	H.R.	\$15,000.00
7	50	12/14/2011	L.M.	H.R.	\$15,000.00
8	51	12/27/2011	L.M.	H.R.	\$15,000.00
9	52	1/10/2012	L.M.	H.R.	\$60,000.00
10	53	2/6/2012	L.M.	H.R.	\$40,000.00
11	54	3/28/2012	L.M.	H.R.	\$40,000.00
12	55	5/2/2012	L.M.	H.R.	\$50,000.00
13	56	6/13/2012	L.M.	H.R.	\$40,000.00
14	57	7/9/2012	L.M.	H.R.	\$42,000.00
15	58	8/14/2012	L.M.	H.R.	\$7,500.00
16	59	8/15/2012	L.M.	H.R.	\$32,500.00
17	60	9/28/2012	L.M.	H.R.	\$45,000.00
18	61	11/1/2012	L.M.	H.R.	\$10,000.00
19	62	11/6/2012	L.M.	H.R.	\$5,000.00
20	63	11/13/2012	L.M.	H.R.	\$3,500.00
21	64	11/14/2012	L.M.	H.R.	\$28,000.00
22	65	12/21/2012	L.M.	H.R.	\$1,800.00
23	66	12/28/2012	L.M.	H.R.	\$1,980.00
24	67	12/31/2012	L.M.	H.R.	\$11,700.00
25	68	1/3/2013	L.M.	H.R.	\$800.00
26	69	1/4/2013	L.M.	H.R.	\$5,000.00
27	70	1/10/2013	L.M.	H.R.	\$5,600.00
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1	71	1/11/2013	L.M.	H.R.	\$4,800.00
2	72	1/14/2013	L.M.	H.R.	\$3,133.00
3	73	1/15/2013	L.M.	H.R.	\$5,767.00
4	74	1/31/2013	L.M.	H.R.	\$10,000.00
5	75	2/8/2013	L.M.	H.R.	\$15,000.00
6	76	2/22/2013	L.M.	H.R.	\$15,000.00
7	77	3/8/2013	L.M.	H.R.	\$25,000.00
8	78	4/4/2013	L.M.	H.R.	\$6,000.00
9	79	4/9/2013	L.M.	H.R.	\$1,500.00
10	80	4/10/2013	L.M.	H.R.	\$24,000.00

11 b. Text Messages by Wire:

12	Count	Date	Sender (Texas)	Recipient (Arizona)	Text Message
13	81	11/15/2010	AUDETTE	L.M.	[L.M.], I am very worried about [S.W.] He does not realize who we are dealing with, and as you mentioned, he has a difficult time wrapping his arms around this whole mess. It is very important that he realizes that this is no joke. He is who I said he is, and they will hurt him if they find him. He has got to be careful.
14	82	11/27/2010	AUDETTE	L.M.	Agent called they think that they found [S.W.]. Call me

1	83	11/28/2010	AUDETTE	L.M.	you have got to come thru
2					for us asap. Found out that
3					jim got shot one week ago,
4					thought he was me. [S.W.]
5					will be next...go to your
6					family, do whatever it
7					takes. [S.W.] and I are
8					running out of
9					time...Please...we don't
10					have weeks to wait.
11	84	10/25/2012	AUDETTE	L.M.	They said pick up and pick
12					up NOW this not a request
13					IT IS AN ORDER
14					ANSWER NOW
15	85	10/27/2012	AUDETTE	L.M.	We need to talk it is in your
16					best interest to talk to me
17					PICK UP TODAY
18	86	8/9/2013	AUDETTE	L.M.	[L.M.] we have worked our
19					tails off getting this cleared
20					up for you and your family.
21					There are important people
22					here waiting to sign off on
23					this and they are al waiting
24					on you.! Answer your
25					phone now.....!!!!!!
26	87	8/9/2013	AUDETTE	L.M.	Do you want your money or
27					not.? The. Only way is to
28					answer so we can get the

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				info we need. They're getting angry. Answer your phone.
88	8/10/2013	AUDETTE	L.M.	We have spent all this time and resources taking care of you and your family, and now you won't even answer your phone for us.? We are all the only ones that sacrificed for you, for you, for you. You were given a direct order ... answer your phone when I call. ... answer your phone!!!!!!!!!!!!!!!
89	9/5/2013	AUDETTE	L.M.	I am in a room with stacks of bank statements and documents waiting for me to sign and they will not allow me to sign off on anything without the last check that they need to do. They have to make sure that everything is secured before large sums of money start hitting your account. Send as much as you can today

1				and do the rest asap. We
2				told you we would take care
3				of this problem and we did.
4				When you get your money
5				is entirely up to you now.
6				Will call you back.

7 c. Phone Call by Wire:

8	90	1/14/14	AUDETTE	S.W.	Advises S.W. that the
9					secret government
10					operation is blown.
11					Requests L.M.'s current
12					phone number. Asks S.W.
13					for money.

14 All in violation of 18 U.S.C. § 1343.

15 **COUNT 91**

16 **Conspiracy**

17 **[18 U.S.C. § 1349]**

18 31. The factual allegations in paragraphs 1-30 of this Indictment are incorporated by
19 reference and re-alleged as though fully set forth herein.

20 32. Beginning in or around 2002 and continuing through in or around January 2014,
21 in the District of Arizona and elsewhere, defendants AUDETTE and ROACH
22 knowingly and willfully agreed and conspired with each other and others, known
23 and unknown to the Grand Jury, to commit Wire Fraud, in violation of Title 18,
24 United States Code, Section 1343.

25 **OBJECTS OF THE CONSPIRACY**

26 33. The object of the conspiracy was to obtain money from victims and to avoid
27 detection.

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MANNER AND MEANS OF THE CONSPIRACY

34. The manner and means of the conspiracy are described in paragraphs 3-27 and 30 above, incorporated by reference and re-alleged as though fully set forth herein. All in violation of 18 U.S.C. § 1349.

A TRUE BILL

S/
FOREPERSON OF THE GRAND JURY
Date: June 17, 2014

JOHN S. LEONARDO
United States Attorney
District of Arizona

S/
KEVIN M. RAPP
Assistant U.S. Attorney