

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

UNITED STATES OF AMERICA)	<u>UNDER SEAL</u>
)	
v.)	CRIMINAL NO. 2:24cr 137
)	
SHERISE WILLIAMS,)	18 U.S.C. § 1349
(Counts 1, 2-3, 12))	Conspiracy
)	(Count 1)
AMBER TEAGUE,)	
a/k/a "Amber Johnson")	18 U.S.C. § 1341
(Counts 1, 4-5, 12))	Mail Fraud
)	(Counts 2-11)
JENNIFER SNYDER,)	
(Counts 1, 6-7, 12))	18 U.S.C. § 1343
)	Wire Fraud
MELISSA APODACA,)	(Count 12)
(Counts 1, 8-9, 12))	
)	18 U.S.C. § 982(a)(7)
CINDI SWINDLE,)	Criminal Forfeiture
(Counts 1, 10-11, 12))	
)	
<i>Defendants.</i>)	

INDICTMENT

December 2024 TERM - At Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

Beginning in or about April 2017 and continuing through in or about May 2020, the exact dates being unknown, in the Eastern District of Virginia and elsewhere, the defendants SHERISE WILLIAMS, AMBER TEAGUE, JENIFER SNYDER, MELISSA APODACA, and CINDI SWINDLE, along with Lori Ann Talens and Pacifico Talens, and other co-conspirators both known and unknown to the Grand Jury, knowingly and unlawfully combined, conspired,

confederated and agreed together and with each other to commit one or more of the following offenses against the United States, that is:

A) to knowingly devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and in execution of such scheme and artifice, to place and cause to be placed in any Post Office and authorized depository for mail matter, any matter and thing whatever, to be sent and delivered by the Postal Service and private and commercial interstate carrier, in violation of Title 18, United States Code, Section 1341 and;

B) to knowingly devise and intend to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, and did transmit and cause to be transmitted by means of wire, radio, and television communication, in interstate and foreign commerce, any writings, signs, signals, pictures, and sounds for the execution of such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

WAYS, MANNER, AND MEANS

The ways, manner, and means by which the conspiracy was carried out included, but were not limited to, the following:

1. The purpose of the conspiracy was for defendants SHERISE WILLIAMS, AMBER TEAGUE, JENIFER SNYDER, MELISSA APODACA, and CINDI SWINDLE, along with Lori Ann Talens and Pacifico Talens, and other co-conspirators both known and unknown to the Grand Jury, to fraudulently create counterfeit coupons and sell them over the internet to individual customers and coupon enthusiasts who would then fraudulently redeem the coupons

for financial benefit at a variety of retailers across the United States. Lori Ann and Pacifico Talens created and distributed the fraudulent coupons. Defendants SHERISE WILLIAMS, AMBER TEAGUE, JENIFER SNYDER, MELISSA APODACA, and CINDI SWINDLE were all top purchasers of fraudulent coupons from Lori Ann and Pacifico Talens causing estimated losses valued in the millions of dollars.

2. It was a part of the conspiracy that Lori Ann Talens used her computer to design, create, and produce a wide variety of counterfeit coupons in her home located in the Eastern District of Virginia. These counterfeit coupons were virtually indistinguishable from authentic coupons and were often created with inflated values, far in excess of what an authentic coupon would offer, in order to receive items from retail for free or for a greatly reduced price.

3. It was further a part of the conspiracy that Lori Ann Talens communicated with coupon enthusiasts using various social media tools such as Facebook and Telegram. Lori Ann Talens would locate individual coupon enthusiasts on Facebook and invite them to chat privately on Telegram, an encrypted and private instant messaging app. Using the monikers "MasterChef," "John Miller," "J.J. Miller," "CeeCee Aquino," and "CeeCee Reyes," Lori Ann Talens would offer to sell counterfeit coupons to other coupon enthusiasts over the Telegram app. Defendants SHERISE WILLIAMS, AMBER TEAGUE, JENIFER SNYDER, MELISSA APODACA, and CINDI SWINDLE, and other co-conspirators both known and unknown to the Grand Jury. communicated with Lori Ann Talens over Telegram and through instant messaging and other communications applications over the internet and as a result, knowingly purchased thousands of dollars of these counterfeit coupons from Lori Ann Talens and used them to defraud businesses and enrich themselves.

4. It was further a part of the conspiracy that once an agreement was struck to purchase counterfeit coupons, Lori Ann Talens would use her computer to create and print out the counterfeit coupons and then ship them across the United States using the United States Postal Service and other commercial parcel delivery services. Lori Ann Talens accepted payment for her counterfeit coupons through a variety of online payment methods, including Bitcoin and Paypal. Defendants SHERISE WILLIAMS, AMBER TEAGUE, JENIFER SNYDER, MELISSA APODACA, and CINDI SWINDLE, and other co-conspirators both known and unknown to the Grand Jury, knowingly purchased their fraudulent coupons from Lori Ann Talens in this manner.

5. It was further a part of the conspiracy that Pacifico Talens aided and abetted his wife Lori Ann Talens with the execution of the conspiracy. Pacifico Talens was aware of the counterfeit coupon scheme, profited off of it, and assisted in the operation of it by shipping packages of counterfeit coupons on behalf of his wife Lori Ann Talens. Pacifico Talens took part in other administrative tasks at the direction of his wife in order to ensure the continued operation and success of the conspiracy.

ACTS IN FURTHERANCE OF AND TO ACCOMPLISH THE CONSPIRACY

In furtherance of the conspiracy and to accomplish its objects, the defendants SHERISE WILLIAMS, AMBER TEAGUE, JENIFER SNYDER, MELISSA APODACA, and CINDI SWINDLE, along with Lori Ann Talens and Pacifico Talens, and other co-conspirators both known and unknown to the Grand Jury, committed and caused to be committed the following acts, among others, in the Eastern District of Virginia and elsewhere:

6. On various dates and times throughout the life of the conspiracy, Lori Ann Talens

and Pacifico Talens created, used, and possessed over 13,000 separate and distinct counterfeit coupons designs. Based upon the designs created, used, and possessed by Lori Ann Talens, approximately \$31,817,997.05 of counterfeit coupons were redeemed at a variety of retailers all across the United States. In addition, approximately \$1 million in counterfeit coupons were seized from the defendants' residence during the execution of a federal search warrant.

7. Defendant SHERISE WILLIAMS knowingly purchased thousands of dollars' worth of counterfeit coupons from Lori Talens from April 2017 through March 2020. WILLIAMS paid Lori Ann Talens approximately \$19,821.34 for these counterfeit coupons, spread out over approximately 274 separate transactions, causing an estimated loss of \$1,387,493.80 to manufacturers and retailers. Talens printed the coupons and shipped them through interstate commerce to WILLIAMS located in Palmetto, Florida.

8. Defendant AMBER TEAGUE knowingly purchased thousands of dollars' worth of counterfeit coupons from Lori Talens from August 2017 through April 2020. TEAGUE paid Lori Ann Talens approximately \$12,332.72 for these counterfeit coupons, spread out over approximately 155 separate transactions, causing an estimated loss of \$863,290.40 to manufacturers and retailers. Talens printed the coupons and shipped them through interstate commerce to TEAGUE located in Louisville, Kentucky.

9. Defendant JENNIFER SNYDER knowingly purchased thousands of dollars' worth of counterfeit coupons from Lori Talens from March 2017 through May 2020. SNYDER paid Lori Ann Talens approximately \$4,870.35 for these counterfeit coupons, spread out over 120 separate transactions, causing an estimated loss of \$340,924.50 to manufacturers and retailers. Talens printed the coupons and shipped them through interstate commerce to

SNYDER located in Lavon, Texas.

10. Defendant MELISSA APODACA knowingly purchased thousands of dollars' worth of counterfeit coupons from Lori Talens from May 2017 through March 2020. APODACA paid Lori Ann Talens approximately \$9,311.42 for these counterfeit coupons, spread out over 94 separate transactions, causing an estimated loss of \$651,799.40 to manufacturers and retailers. Talens printed the coupons and shipped them through interstate commerce to APODACA located in Thornton, Colorado.

11. Defendant CINDI SWINDLE knowingly purchased thousands of dollars' worth of counterfeit coupons from Lori Talens from April 2017 through February 2020. SWINDLE paid Lori Ann Talens approximately \$4,776.98 for these counterfeit coupons, spread out over 42 separate transactions, causing an estimated loss of \$334,388.60 to manufacturers and retailers. Talens printed the coupons and shipped them through interstate commerce to SWINDLE located in Jacksonville, Florida.

12. On various dates throughout the life of the conspiracy, defendants SHERISE WILLIAMS, AMBER TEAGUE, JENIFER SNYDER, MELISSA APODACA, and CINDI SWINDLE, used interstate wires, including but not limited to, Facebook Messaging, Telegram messages, text messages, and other forms of online internet communications to further the purposes of the scheme and accomplish its objectives.

(In violation of Title 18, United States Code, Section 1349.)

COUNTS TWO THROUGH ELEVEN

Beginning in or about April 2017 and continuing through in or about May 2020, the exact dates being unknown, in the Eastern District of Virginia and elsewhere, the defendants SHERISE WILLIAMS, AMBER TEAGUE, JENIFER SNYDER, MELISSA APODACA, and CINDI SWINDLE, along with Lori Ann Talens and Pacifico Talens, and other co-conspirators both known and unknown to the Grand Jury, did knowingly and unlawfully devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and in execution of such scheme and artifice, to place and cause to be placed in any Post Office and authorized depository for mail matter, any matter and thing whatever, to be sent and delivered by the Postal Service and private and commercial interstate carrier, which scheme and artifice, and the execution thereof, operated in substance as follows:

THE SCHEME AND ARTIFICE TO DEFRAUD

The ways, manner, and means by which the scheme and artifice to defraud was carried out included, but were not limited to, the following:

13. Paragraphs 1-12 of Count 1 are reincorporated and realleged as if fully set forth herein.

MAILINGS IN EXECUTION OF THE SCHEME AND ARTIFICE

14. From in or about 2017 through in or about 2019, the exact dates being unknown, for the purpose of executing the aforementioned scheme and artifice and attempting to do so, the defendants SHERISE WILLIAMS, AMBER TEAGUE, JENIFER SNYDER, MELISSA APODACA, and CINDI SWINDLE, along with Lori Ann Talens and Pacifico Talens, and other

co-conspirators both known and unknown to the Grand Jury, did place and cause to be placed in any Post Office and authorized depository for mail matter, any matter and thing whatever, to be sent and delivered by the Postal Service and private and commercial interstate carrier according to the direction thereon, that is, defendants mailed and caused to be mailed the below listed mailings each containing a number of counterfeit coupons, each mailing being a separate count of this indictment as indicated, and aided and abetted the same:

COUNT	APPROXIMATE DATE OF MAILING	DEFENDANT
2	March 2020	SHERISE WILLIAMS
3	January 2020	SHERISE WILLIAMS
4	May 2020	AMBER TEAGUE
5	January 2020	AMBER TEAGUE
6	May 2020	JENNIFER SNYDER
7	January 2020	JENNIFER SNYDER
8	May 2020	MELISSA APODACA
9	March 2020	MELISSA APODACA
10	January 2020	CINDI SWINDLE
11	March 2019	CINDI SWINDLE

(In violation of Title 18, United States Code, Sections 1341 and 2.)

COUNT TWELVE

15. Beginning in or about April 2017 and continuing through in or about May 2020, the exact dates being unknown, in the Eastern District of Virginia and elsewhere, the defendants SHERISE WILLIAMS, AMBER TEAGUE, JENIFER SNYDER, MELISSA APODACA, and CINDI SWINDLE, along with Lori Ann Talens and Pacifico Talens, and other co-conspirators both known and unknown to the Grand Jury did knowingly and unlawfully devise and intend to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, and did transmit and cause to be transmitted by means of wire, radio, and television communication, in interstate and foreign commerce, any writings, signs, signals, pictures, and sounds for the execution of such scheme and artifice, which scheme and artifice, and the execution thereof, operated in substance as follows:

THE SCHEME AND ARTIFICE TO DEFRAUD

16. Paragraphs 1-12 of Count One are realleged and incorporated herein by reference, as if fully stated herein.

ELECTRONIC TRANSMISSIONS IN FURTHERANCE OF THE SCHEME AND ARTIFICE

17. From in or about April 2017 through in or about May 2020, the exact dates being unknown, for the purpose of executing the aforementioned scheme and artifice and attempting to do so, the defendants SHERISE WILLIAMS, AMBER TEAGUE, JENIFER SNYDER, MELISSA APODACA, and CINDI SWINDLE, along with Lori Ann Talens and Pacifico Talens, and other co-conspirators both known and unknown to the Grand Jury, did knowingly transmit and cause to be transmitted by means of wire and radio communication in interstate and

foreign commerce certain writings, signs, signals, pictures, and sounds, that is, various online messages through Telegram, Facebook, and other online social media, from the Eastern District of Virginia to locations all across the United States, and outside of the Eastern District of Virginia, and aided and abetted the same:

(In violation of Title 18, United States Code, Sections 1343 and 2.)

FORFEITURE

THE GRAND JURY FURTHER ALLEGES AND FINDS PROBABLE CAUSE THAT:

1. The defendants, SHERISE WILLIAMS, AMBER TEAGUE, JENIFER SNYDER, MELISSA APODACA, and CINDI SWINDLE, if convicted of any of the Counts alleged in Counts 1-12 of this indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense.

2. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

(In accordance with Title 18, United States Code, Section 982(a)(7).)

United States v. Sherise Williams, et al.,
Criminal No. 2:24cr 137

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the original of this page has been filed
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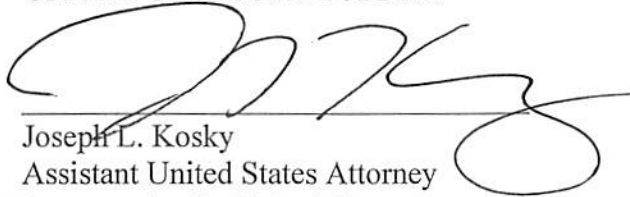
A TRUE BILL:

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FOREPERSON

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