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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	No.
)	
Plaintiff,)	<u>COUNTS 1-11:</u>
)	<u>WIRE FRAUD</u>
vs.)	Vio. of 18 U.S.C. § 1343
)	
FLOYD JAY MANN, JR.,)	<u>COUNTS 12-19:</u>
)	<u>MONEY LAUNDERING</u>
Defendant.)	Vio. of 18 U.S.C. § 1956
)	

I N D I C T M E N T

The Grand Jury charges that:

THE SCHEME

1. At a date unknown, but at least by November 2011, and continuing to April 2016, in the District of Alaska and elsewhere, the defendant Floyd Jay Mann, Jr. of Puyallup, Washington, devised and

intended to devise a material scheme and artifice to defraud and obtain money from victims in Alaska and elsewhere by means of materially false and fraudulent pretenses, representations, and promises.

PURPOSE OF THE SCHEME

2. The purpose of the scheme was for Floyd Jay Mann, Jr. to obtain money from victim “investors” located primarily in Alaska through material false and fraudulent pretenses and representations by claiming, among other false representations: that he was the successful plaintiff in a class-action, pharmaceutical lawsuit and he was to receive a multi-million, dollar settlement; that if the victims paid for his medical bills and related lawsuit expenses they would receive a portion of the settlement and get a substantial return on their “investment;” that the lawsuit was covered by a “gag order” such that any attempt to make inquiries about the case would result in additional penalties imposed by the court. Mann made these false representations when in fact, as Mann well knew, there was no lawsuit settlement; the money from victims was not used to pay medical bills or other case-related expenses; and there was no potential return on the “investment” for Mann’s victims, instead Mann used the majority of the money he obtained from the victims to gamble at a casino in his home state of Washington.

MANNER AND MEANS

3. The defendant Floyd Jay Mann, Jr. devised a scheme to obtain cash from victims through a series of false representations and promises including but not limited to the following:

A. The victims were falsely told that Mann had obtained a multi-million, dollar settlement in a class action lawsuit against the pharmaceutical company Pfizer in relation to a prescription drug Levaquin that had purportedly caused him to have cancer;

B. The victims were falsely told that the court would not release the settlement funds until Mann had a clean bill of health and his ongoing medical bills and other case-related fees were paid. The victims were also falsely told that Mann would die without further medical treatment;

C. Victims were falsely told that ‘investors’ who contributed to pay Mann’s medical and other bills would receive their money back when the settlement came in plus a significant return on their money;

D. Victims were falsely told not to discuss the settlement with anyone because there was a gag order from the court and they would be subject to penalties if they discussed the case; and

E. The victims were falsely told that the FBI and a private security firm were providing security for Mann because of the large amount of money involved and because Pfizer wanted Mann killed.

4. It was further part of the scheme that the defendant Floyd Jay Mann, Jr. supported his false claims by providing false and forged documents to corroborate his false representations and promises including, but not limited to the following:

A. A false and forged court order purporting to be from the United States District Court of Texas indicating that there was “preliminary approval” for “\$38 million in relief” to be granted in a “massive class action case” to which Floyd Jay Mann of Puyallup, Washington was a party; and

B. A false and forged letter purporting to be from the Supreme Court of Texas indicating that “Pfizer Drug Corporation was the initial cause of [Mann’s] severe health complications.” And that he was awarded \$189 million in a settlement with Pfizer.

5. It was further part of the scheme that the defendant Floyd Jay Mann, Jr. regularly sent text messages and made phone calls to Alaska from Washington falsely claiming, among other things, the following:

A. The type and amount of the medical bills that needed to be paid and that the settlement would be released when the bills were paid by the victims.

B. The type and amount of legal fees and security fees associated with the class action lawsuit that had to be paid and that the settlement would be released once these fees were paid by the victims.

C. The type and amount of penalties that had to be paid when the fees were not paid promptly or if anyone made inquiries into the lawsuit that violated the gag order.

D. That the defendant Floyd Jay Mann’s daughter, A.M., was helping to monitor Mann’s medical conditions, procedures, and treatments, and that she was sending text messages from Mann’s phone indicating that Mann would die without further medical treatments that had to be paid for before the settlement money would be released.

6. It was further part of the scheme that Floyd Jay Mann, Jr. regularly had co-conspirators, unknown to the grand jury, call victims to

falsely corroborate Mann's false and fraudulent pretenses, representations, and promises, falsely claiming, among other things, the following:

- A. That an individual was Mann's attorney in the class action lawsuit and that Mann's settlement was legitimate.
- B. That the individual was an FBI agent providing security for Mann and that Mann's settlement was legitimate.
- C. That the individual was a judge overseeing the case and that Mann's settlement was legitimate.
- D. That the individual was the lieutenant governor of Texas and that Mann's settlement was legitimate.

7. Contrary to Mann's representations---Mann did not have cancer, Mann had not been awarded a lawsuit settlement, and the money Mann obtained from victims did not go toward paying bills associated with a lawsuit settlement. Instead, Mann used approximately \$2.7 million that he obtained from victims to gamble at a casino and win approximately \$1 million in casino jackpots.

8. It was further part of the scheme that Mann and his wife and son were receiving need-based Social Security benefits during the time frame of the fraud that they would not have qualified for if he had reported either his proceeds from his fraud or his casino winnings as required by law.

9. As a result of the scheme, Floyd Jay Mann, Jr., obtained by false and fraudulent pretenses approximately \$2.7 million from approximately 15 victims.

COUNTS 1-11: WIRE FRAUD

10. Paragraphs 1-9 are re-alleged and incorporated here.

11. On or about each of the dates set forth below, in the District of Alaska and elsewhere, the defendant Floyd Jay Mann, Jr., for the purpose of executing and attempting to execute the material scheme and artifice to defraud described previously, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did knowingly transmit, and cause to be transmitted the following wire communications in interstate commerce:

Count	Date on or about	Between	Description
1	November 27, 2012, approximately 11:07 am AST	Washington/Alaska	Mann called from Washington to P.D. in Alaska to obtain cash for fraudulent expenses related to the fraudulent lawsuit settlement.
2	August 8, 2013, approximately 10:26 am ADT	Washington/Alaska	Mann sent a text from Washington to P.D. in Alaska claiming the need for cash for fraudulent expenses related to the fraudulent scheme.

3	August 20, 2013, approximately 7:39 am ADT	Washington/Alaska	Mann caused a text to be sent from his phone in Washington to P.D. in Alaska claiming the need for cash for fraudulent expenses related to the fraudulent scheme.
4	August 21, 2013, approximately 4:25 am ADT	Washington/Alaska	Mann caused a text to be sent from his phone in Washington to P.D. in Alaska claiming the need for cash for fraudulent expenses related to the fraudulent scheme needs to be in by 2:30 that day.
5	August 22, 2013, approximately 7:48 am ADT	Washington/Alaska	Mann caused a text to be sent from his phone in Washington to P.D. in Alaska claiming the need for cash for fraudulent expenses related to the fraudulent scheme.
6	August 25, 2013, approximately 12:30 pm ADT	Washington/Alaska	Mann caused a text to be sent from his phone in Washington to P.D. in Alaska claiming the need for cash for fraudulent expenses related to the fraudulent scheme.
7	August 28, 2013, approximately 11:14 am ADT	Washington/Alaska	Mann caused a text to be sent from his phone in Washington to P.D. in Alaska claiming the need for cash for fraudulent expenses related to the fraudulent scheme.
8	September 3, 2013, approximately, 3:18 am ADT	Washington/Alaska	Mann sent a text from Washington to P.D. in Alaska claiming the need for cash for fraudulent expenses related to the fraudulent scheme.
9	February 3, 2014, approximately 2:12 pm AST	Washington/Alaska	Mann sends a text from Washington to P.D. in Alaska directing the delivery of cash for fraudulent expenses related to the fraudulent scheme.

10	July 17, 2015, approximately 9:57 am ADT	Alaska/Washington	Mann caused a text to be sent from Alaska to P.D. in Washington to update the status of the transaction to fulfill Mann's request for cash for fraudulent expenses related to the fraudulent settlement.
11	April 8, 2016, approximately 4:38 pm ADT	Washington/Alaska	Mann caused P.D. in Washington send a text to Alaska claiming the need for cash for fraudulent expenses related to the fraudulent scheme.

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

COUNTS 12-19: MONEY LAUNDERING

12. Paragraphs 1-9 and 11, are re-alleged and incorporated here.
13. On or about the dates set forth below, in the District of Alaska and elsewhere, the defendant Floyd Jay Mann, Jr., knowing that the property involved in the financial transactions set out below represented the proceeds of some form of unlawful activity, did conduct and attempt to conduct financial transactions set out below affecting interstate commerce, which in fact involved the proceeds of specified unlawful activity---specifically, Wire Fraud---and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source ownership and control of the proceeds of the specified unlawful activity.

14. The defendant, Floyd Jay Mann, Jr., participated in the transfer of the proceeds of the specified unlawful activity from the District of Alaska to Washington where the financial transactions were conducted. Each financial transaction set out by date and amount below is a separate count:

Count	Date	Financial Transaction	Amount
12	November 28, 2012	Cash withdrawal from JP Morgan Chase account ending 8047	\$9,250
13	August 20, 2013	Cash withdrawal from Bank of America account ending 3098	\$7,500
14	August 21, 2013	Cash withdrawal from Bank of America account ending 3098	\$5,000
15	August 22, 2013	Cash withdrawal from Bank of America account ending 3098	\$2,500
16	August 26, 2013	Cash withdrawal from Bank of America account ending 3098	\$9,000
17	August 29, 2013	Cash withdrawal from Bank of America account ending 3098	\$7,500
18	September 3, 2013	Cash withdrawal from Bank of America account ending 3098	\$8,500
19	September 3, 2013	Cash withdrawal from Bank of America account ending 3098	\$6,000

All of which is in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and (i).

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MONEY JUDGMENT

The United States alleges that it is entitled to a money judgment equal to the total amount of proceeds obtained as a result of the wire fraud and the total amount of money involved in the money laundering offense for which defendant is convicted.

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Andrea T. Steward
ANDREA T. STEWARD
United States of America
Assistant U.S. Attorney

s/ Karen L. Loeffler
KAREN L. LOEFFLER
United States of America
United States Attorney

DATE: 8-16-16