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DISTRICT OF CINCINNATI
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1) On or about November 16, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendant, JOYELL RILEY, knowingly devised and intended to devise a scheme and artifice to defraud members and veterans of the United States military and others across the country, and to obtain money and property from them by means of false and fraudulent pretenses, representations, and promises, by falsely representing through an internet GoFundMe account that she suffered from breast cancer and needed financial contributions for experimental surgery to save her life (Riley Cancer GoFundMe Account).

2) As part of the scheme and artifice to defraud, JOYELL RILEY, falsified U.S. military form DD214 and represented to members and veterans of the United States military and others across the country through the internet that she was a highly decorated combat veteran and served as a Captain in the United States Marine Corps.

3) As part of the scheme and artifice to defraud, JOYELL RILEY caused financial contributions made to the Riley Cancer GoFundMe Account to be transferred by wire, in interstate commerce from accounts outside Ohio, to a financial account in California and then to another financial account owned by RILEY at Directions Credit Union in Ohio.

4) For the purpose of executing the foregoing scheme and artifice, the defendant, JOYELL RILEY, did transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds as follows:

a. On or about November 16, 2014, JOYELL RILEY caused P.G., a person known to the grand jury to reside in Adrian, Michigan, to send \$1,000.00 by wire transfer to the Riley Cancer GoFundMe Account in California; RILEY then caused these funds to be sent by wire transfer to her Directions Credit Union account in Ohio.

b. On or about November 16, 2014, JOYELL RILEY caused S.M., a person known to the grand jury to reside in Phoenix, Arizona, to send \$100.00 by wire transfer to the Riley Cancer GoFundMe Account in California; RILEY then caused these funds to be sent by wire transfer to her Directions Credit Union account in Ohio.

c. On or about November 16, 2014, JOYELL RILEY caused M.B., a person known to the grand jury to reside in Leander, Texas, to send \$75.00 by wire transfer to the Riley Cancer GoFundMe Account in California; RILEY then caused these funds to be sent by wire transfer to her Directions Credit Union account in Ohio.

d. On or about November 17, 2014, JOYELL RILEY caused D.A., a person known to the grand jury to reside in Snohomish, Washington, to send \$100.00 by wire transfer to the Riley Cancer GoFundMe Account in California; RILEY then caused these funds to be sent by wire transfer to her Directions Credit Union account in Ohio.

5. As a result of this and other fraudulent conduct by the defendant, JOYELL RILEY, approximately thirty-two (32) individuals sustained total losses of approximately \$3,515.00.

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

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.