

JJD: RAT
F.# 2014R00348

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

- against -

JERRY CAMPORA, JR.,

Defendant.

-----X

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

I. The Defendant

1. The defendant JERRY CAMPORA, JR. resided at One Market Path, Setauket, New York (hereinafter, the "Market Path Residence").

II. The Victims

2. John Doe #1, whose identity is known to the Grand Jury, was a Judge of the New York State Court of Claims, and an Acting Justice of the New York State Supreme Court, with chambers in Riverhead, New York.

3. John Doe #2, whose identity is known to the Grand Jury, was a private attorney licensed in the State of New York, a principal of a law firm with an office in Centereach, New York, and served as a court-appointed referee in mortgage foreclosure actions.

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★ MAR 18 2015 ★

LONG ISLAND OFFICE

INDICTMENT

CR 15 123
Cr. No. (T. 18, U.S.C., §§ 981(a)(1)(C),
1341, 2 and 3551 et seq.; T. 21,
U.S.C., § 853(p); T. 28, U.S.C.,
§ 2461(c))

SEYBERT, J

TOMLINSON, M

4. John Doe #3, whose identity is known to the Grand Jury, served as a Judge of the New York State Supreme Court with chambers in Riverhead, New York, until his retirement in December 2011.

5. John Doe #4, whose identity is known to the Grand Jury, was a Judge of the New York Supreme Court with chambers in Riverhead, New York.

III. The Market Path Residence Foreclosure Litigation

6. The defendant JERRY CAMPORA, JR. purchased the Market Path Residence on April 13, 2004 for the amount of \$570,000. In order to finance the purchase of the Market Path Residence, the defendant obtained a \$513,000 mortgage loan from HSBC Bank USA (the "Mortgage Loan"). On or about April 27, 2009, the defendant ceased paying loan payments and did not make any further payments on the Mortgage Loan.

7. On or about March 3, 2010, a mortgage foreclosure action was brought against the defendant JERRY CAMPORA, JR. for his failure to pay the Mortgage Loan on the Market Path Residence, which was thereafter adjudicated in Supreme Court, Suffolk County. On July 27, 2010, John Doe #1 entered an order granting summary judgment on the foreclosure action and appointing John Doe #2 as referee for the purpose of making various computations related to the foreclosure of the Market Path Residence ("Order #1").

8. Subsequently, the defendant JERRY CAMPORA, JR. moved to vacate Order #1, which motion was denied by John Doe #3 in an order dated October 26, 2011 ("Order #2").

9. Thereafter, the defendant JERRY CAMPORA, JR. brought a third-party complaint seeking equitable and monetary relief from additional parties, including the

Supreme Court of the State of New York, Suffolk County, John Doe #1 and John Doe #3, based on alleged “fraud” and other factors.

10. In an order dated September, 21, 2012 (“Order #3”), John Doe #4 dismissed the defendant JERRY CAMPORA, JR.’s third party claims, finding that: “Campora has evidently conjured up an alternative legal universe in which he is the sovereign and the courts merely exist as ministerial bodies to do his bidding. This Court will not countenance any such conduct by Campora in the future.”

11. Following the foregoing rulings, the defendant JERRY CAMPORA, JR. persisted in making additional applications in aid of his third-party claims. By an order dated February 15, 2013 (“Order #4”), John Doe #4 ruled that defendant’s additional submissions comprised a “nullity” and enjoined the defendant from filing further papers. Order #4 found that “[t]he submission is nothing more than a diatribe wherein Campora, yet again, seeks a platform for his philosophical beliefs.”

12. On August 1, 2013, the defendant JERRY CAMPORA, JR. filed a motion seeking to disqualify John Doe #4, which was denied by an order filed on October 1, 2013 (“Order #5”).

13. On October 1, 2013, in Supreme Court, Suffolk County, John Doe #4 entered a judgment of foreclosure and sale for the Market Place Residence.

14. On October 25, 2013, the defendant JERRY CAMPORA, JR. filed a notice of appeal from the judgment of foreclosure and sale for the Market Place Residence.

15. On January 23, 2014, the New York State Appellate Division for the Second Department rejected the defendant JERRY CAMPORA, JR.’s appeal, upheld the

previous rulings and refused to stay the order of foreclosure and sale for the Market Place Residence.

IV. The Lien and Judgment Scheme

16. From on or about October 11, 2013, and continuing through the date of this Indictment, within the Eastern District of New York and elsewhere, the defendant JERRY CAMPORA, JR. with the intent to defraud, devised and executed a scheme and artifice to defraud John Does #1 through #4, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, to wit: the defendant caused false and fraudulent documents to be filed to create a false appearance of indebtedness of John Does #1 through #4, when in fact John Does #1 through #4 did not owe the defendant any money or property.

17. On October 11, 2013, in retaliation against John Does #1 through #4, the defendant JERRY CAMPORA, JR. caused to be filed various papers and records (hereinafter, the "October Court Filings") with the Clerk's Office at the Lamar County, Georgia Superior Court, (hereinafter, the "Lamar County Clerk's Office"). The October Court Filings were sent through the United States Postal Service, (hereinafter, "USPS") and had a return address of "Jerry Campora Junior; 1 Market Path; Setauket, New York 11733." The money order used to pay the filing fees at the Lamar County Clerk's Office was marked as being sent from "Jerry Campora Junior" and listed the address of the Market Path Residence. The money order pertaining to the October Court Filings was purchased with a bank debit card, which was issued in the defendant's name. The October Court Filings consisted of four affidavits pertaining to John Does #1 through #4 and were signed by

defendant JERRY CAMPORA, JR. Each of these affidavits claimed filing status for the defendant as "Sovereign In Capita Sui Juris," and stated that each of the four individuals had tacitly admitted to infringing the defendant's legal rights in various respects.

18. On November 13, 2013, the defendant JERRY CAMPORA, JR. caused further materials (hereinafter, the "November Court Filings") to be recorded by the Lamar County Clerk's Office. The November Court Filings were sent via USPS and had a return address of "Jerry Campora Junior; 1 Market Path; Setauket, New York 11733." The money order used to pay the filing fees at the Lamar County Clerk's Office for the November Court Filings was marked as being sent from "Jerry Campora Junior" and listed the address of the Market Path Residence. The money order pertaining to the November Court Filings was purchased with the same bank debit card that was used to purchase the money order used for the October Court Filings. The November Court Filings recorded in the Lamar County Clerk's Office consisted of four documents, each entitled "Affidavit of Jerry Campora, Junior for Claim of Lien by Operation of Law." The four documents comprising the November Court Filings pertained to John Does #1 through #4. The November Court Filings cited the previous October Court Filings as a predicate for liens against John Does #1 through #4 each in the amount of \$1,539,000.00.

19. The November Court Filings were recorded in the Lamar County Clerk's Office. In the manner described above, the defendant JERRY CAMPORA, JR.

submitted false and fraudulent documents indicating indebtedness to the defendant in the amount of \$1,539,000.00 against:

- a. John Doe #1, "Magistrate, Attorney";
- b. John Doe #2, "Referee, Attorney";
- c. John Doe #3, "Magistrate, Attorney"; and
- d. John Doe #4, "Magistrate, Attorney."

COUNTS ONE THROUGH EIGHT
(Mail Fraud)

20. The allegations of paragraphs 1 through 19 are realleged and incorporated as if fully set forth in this paragraph.

21. On or about the dates listed below, within the Eastern District of New York and elsewhere, the defendant JERRY CAMPORA, JR. together with others, did knowingly and intentionally devise a scheme and artifice to defraud the victims identified below, and to obtain money and property from them, by means of materially false and fraudulent pretenses, representations and promises, and for the purposes of executing such scheme and artifice, did place and cause to be placed in a post office and authorized depository for mail matter, one or more matters and things to be sent and delivered by the

United States Postal Service and any private and commercial interstate carrier, according to the directions thereon, as set forth below.

COUNT	APPROXIMATE DATE OF FILING	VICTIM	DESCRIPTION OF MAILING
ONE	10/11/2013	John Doe #1	Affidavit of Acceptance, Agreement and Accord and Special Entry Upon Discovery by Tacit Procuration
TWO	10/11/2013	John Doe #2	Affidavit of Acceptance, Agreement and Accord and Special Entry Upon Discovery by Tacit Procuration
THREE	10/11/2013	John Doe #3	Affidavit of Acceptance, Agreement and Accord and Special Entry Upon Discovery by Tacit Procuration
FOUR	10/11/2013	John Doe #4	Affidavit of Acceptance, Agreement and Accord and Special Entry Upon Discovery by Tacit Procuration
FIVE	11/13/2013	John Doe #1	Affidavit of Jerry Campora, Junior and Claim of Lien by Operation of Law
SIX	11/13/2013	John Doe #2	Affidavit of Jerry Campora, Junior and Claim of Lien by Operation of Law
SEVEN	11/13/2013	John Doe #3	Affidavit of Jerry Campora, Junior and Claim of Lien by Operation of Law
EIGHT	11/13/2013	John Doe #4	Affidavit of Jerry Campora, Junior and Claim of Lien by Operation of Law

(Title 18, United States Code, Sections 1341, 2 and 3551 et seq.).

CRIMINAL FORFEITURE ALLEGATION AS TO COUNTS ONE THROUGH EIGHT

22. The United States hereby gives notice to the defendant that, upon his conviction of any offense charged in Counts One through Eight, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28,

United States Code, Section 2461(c), of any property constituting or derived from proceeds obtained directly or indirectly as a result of such offenses.

23. 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any


other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL


FOREPERSON

LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. § 0.136

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

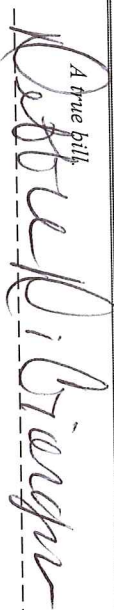
vs.

JERRY CAMPORA, JR.,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 981(a)(1)(C), 1341, 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill


Foreperson

Filed in open court this _____ day,
of _____ A.D. 20 _____

Clerk

Bail, \$ _____

[AUSA Name], Assistant U.S. Attorney 718/631... _____