

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

UNITED STATES OF AMERICA)
)
 v.) CASE NO. 2:26-CR-69
)
MICHAEL CAMPBELL)

GOVERNMENT’S MOTION FOR DETENTION

COMES NOW the United States, by the United States Attorney for the Northern District of Indiana, Adam L. Mildred, through Philip C. Benson, Assistant United States Attorney, and files its request for detention as follows:

I. Procedural History

On April 16, 2026, James Gerodemos and twenty-one other individuals were indicted by a federal grand jury for this district in a twenty-eight count indictment on various federal charges, including Conducting an Illegal Gambling Business (18 U.S.C. 1955), Hobbs Act Extortion/Conspiracy (18 U.S.C. 1951), Collection of Extensions of Credit by Extortionate Means/Conspiracy (18 U.S.C. 894), Conspiracy to Commit Money Laundering (18 U.S.C. 1956(h)), and Interstate Transmission of Wagering Information (18 U.S.C. 1084(a)). See *United States v. James Gerodemos et al*, 2:26 CR 69.

Also part of this indictment, are three forfeiture allegations related to the various violations of federal law contained in the indictment.

Defendant Campbell is charged in the Indictment as follows:

Count 1: Illegal Gambling Business 18/1955

Count 6: Conspiracy - Hobbs Act Extortion 18/1951

Count 7: Conspiracy - Collection of Extensions of Credit by Extortionate Means 18/894

Count 8: Hobbs Act Extortion 18/1951

Count 9: Collection of Extensions of Credit by Extortionate Means 18/894

Based upon all of the evidence gathered thus far in this case, the government seeks detention on the following grounds: danger to the community.

II. Applicable Law

The Bail Reform Act of 1984, 18 U.S.C. § 3141, *et seq.*, governs all questions of pretrial detention or release. *United States v. Salerno*, 481 U.S. 739, 741-742 (1987). Pending trial, a defendant must be released on personal recognizance, released on conditions, or detained. 18 U.S.C. § 3142(a). The government (or in some cases the court) may request a “hearing to determine whether any condition or combination of conditions ... will reasonably assure the appearance of the person as required.” 18 U.S.C. § 3142(f). The magistrate or district court “is not given unbridled discretion in making the

detention determination.” *Salerno*, 481 U.S. at 782 . Instead, the court must consider and weigh the specific factors set forth in Section 3142(g), namely

- (1) The nature and circumstances of the offense charged, including whether the offense is a crime of violence, a violation of section 1591, a Federal crime of terrorism, or involves a minor victim or a controlled substance, firearm, explosive, or destructive device;
- (2) The weight of the evidence against the person;
- (3) The history and characteristics of the person, including (A) the person’s character, physical and mental condition, family ties, employment, financial resources, length of residence in the community, community ties, past conduct, history relating to drug or alcohol abuse, criminal history, and record concerning appearance at court proceedings; and (B) whether, at the time of the current offense or arrest, the person was on probation, on parole, or on other release pending trial, sentencing, appeal, or completion of sentence for an offense under Federal, State, or local law; and
- (4) The nature and seriousness of the danger to any person or the community that would be posed by the person’s release.

Detention is appropriate if the district court finds by a preponderance of the evidence that the defendant poses a risk of flight such that no combination of conditions can reasonably assure his presence at trial. *United States v. Portes*, 786 F.2d 758, 765-766 (7th Cir. 1985). 18 U.S.C. § 3142(e)(1) also permits detention if the court finds it necessary to reasonably assure “the safety of any other person and the community.” This latter finding must be “supported by clear and convincing evidence.” 18 U.S.C. § 3142(f).

Likelihood of flight and danger to the community “are distinct statutory sources of authority to detain,” so either, standing alone, is enough to require detention. *United States v. Daniels*, 772 F.2d 382, 383 (7th Cir. 1985); *Portes*, 786 F.2d at 765.

If the defendant is charged with “crime of violence” he is subject to a rebuttable presumption that there are no conditions that will assure their appearance and the safety of the community.” *United States v. Wilks*, 15 F.4th 842, 846 (7th Cir. 2021). In response to the presumption, the defendant has a “light burden” to produce evidence that sufficient conditions exist. *Id.* The burden of persuasion to support detention “always rests with the government.” *Id.* at 846-47. The presumption of detention “is not, by itself, an adequate reason to order detention.” *Id.* at 847. Instead, the presumption should be considered alongside the other Section 3142(g) factors. *Id.*

While it is unclear if the Hobbs Act Extortion is a crime of violence in the Seventh Circuit, the Second Circuit holds that it is a crime of violence. See *US v. Nikolla*, 950 F.3d 51, 54 (2d Cir 2020):

In *Nikolla*, the indictment charged Nikolla with “threatening physical violence in furtherance of a plan to extort [the victim]” in violation of 18 U.S.C. § 1951(a). App’x at 38. Section 1951(a) defines several separate offenses, one of which applies to a defendant who “commits or threatens

physical violence to any person or property in furtherance of a plan or purpose to [commit Hobbs Act robbery or extortion].” 18 U.S.C. § 1951(a); *Scheidler v. Nat’l Org. for Women*, 547 U.S. 9, 22, 126 S.Ct. 1264, 164 L.Ed.2d 10 (2006) (recognizing that committing or threatening physical violence in furtherance of Hobbs Act robbery or extortion is a “separate Hobbs Act crime”). The elements of that offense mirror almost exactly the definition of a “crime of violence” in the Elements Clause of § 924(c). Compare 18 U.S.C. § 924(c)(3)(A) (defining “crime of violence” as a felony that “has as an element the ... threatened use of physical force against the person or property of another”) with id. § 1951(a) (imposing criminal liability on any person who “commits or threatens physical violence to any person or property in furtherance of a plan [of Hobbs Act extortion]”).

However, the Court need not decide this issue because under the Bail Reform Act’s residual clause, Hobbs Act extortion is a crime violence, therefore creating a rebuttable presumption in favor of detention.

18 U.S.C. 3142(f)(2) States:

“(2) upon motion of the attorney for the Government or upon the judicial officer’s own motion in a case, that involves—

(A) a serious risk that such person will flee; or

(B) a serious risk that such person will obstruct or attempt to obstruct justice, or threaten, injure, or intimidate, or attempt to

threaten, injure, or intimidate, a prospective witness or juror.
(emphasis added)

... The facts the judicial officer uses to support a finding pursuant to subsection (e) that no condition or combination of conditions will reasonably assure the safety of any other person and the community shall be supported by clear and convincing evidence.”

Subsection (e) states:

Detention.—

(1) If, after a hearing pursuant to the provisions of subsection (f) of this section, the judicial officer finds that no condition or combination of conditions will reasonably assure the appearance of the person as required and the safety of any other person and the community, such judicial officer shall order the detention of the person before trial.

Either with or without the rebuttable presumption for detention created by a “crime of violence,” the facts below clearly support by clear and convincing evidence that the defendant is a danger to the community, or is a serious risk that he will obstruct or attempt to obstruct justice, or threaten, injure, or intimidate, or attempt to threaten, injure, or intimidate, a prospective witness or juror. Therefore, detention of this defendant is warranted.

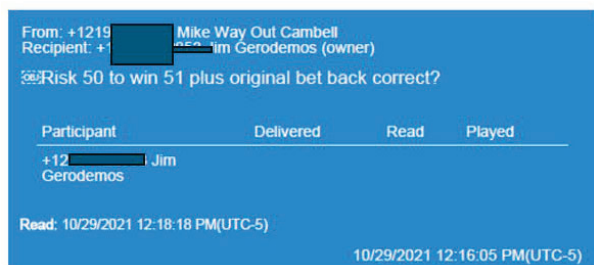
a. Nature and Circumstances of the Crime

Michael Campbell was a union organizer/Field Representative who is very close to JAMES GERODEMOS and involved in this gambling organization as a bettor, bookie, line pool seller, money runner/collector and

enforcer. Campbell, as charged in Counts 6-9, also provided information in attempts to locate extortion Victim #2. Additionally, Campbell engaged in dangerous and erratic counter-surveillance activities which endangered numerous individuals traveling on I-65, as well the undercover surveillance team involved in this investigation.

Campbell's text messaging also reveals a dangerous mindset that reflects admiration and aspiration to be part of the "mob culture" as well as great admiration for JAMES GERODEMOS and all that he has accomplished with his criminal activities.

The following are a mere sampling of 1000+ pages of text messages between JAMES GERODEMOS and MICHAEL CAMPBELL (read left to right) :



Recipient: +1219 [REDACTED] Jim Gerodemos (owner)
Switch the PARAGON car with my van because I need the van back there switch switch my car with the van are use other Ginos van

Participant	Delivered	Read	Played
+1219 [REDACTED] Jim Gerodemos			

Delivered: 12/23/2021 4:16:48 PM(UTC-6)
12/23/2021 4:16:47 PM(UTC-6)

Campbell's Knowledge of Sam Nuzzo's background:

From: +12 [REDACTED] Mike Way Out Cambell
Recipient: +121 [REDACTED] Jim Gerodemos (owner)

According to the FBI, the largest gambling operation in Lake County is run by Sam Nuzzo Jr., 45, of Merrillville, who is said to control more than 80 percent of the illegal gambling in the county, primarily in Merrillville and Gary.

A number of bookmakers in the county are independent, but "lay off" a portion of their bets to the Nuzzo syndicate, a confidential informant has told the FBI.

In other areas, the government has identified major gambling operators who are not connected with the Nuzzos but are linked with the Chicago Outfit, who run games like barbooth, a fast-paced, high-stakes dice game long associated with the Greek community; bolita, a Latino version of the lottery; and the policy, or numbers, rackets in predominantly black neighborhoods.

Participant	Delivered	Read	Played
+12 [REDACTED] Jim Gerodemos			

Read: 8/23/2023 2:11:20 PM(UTC-5)
8/23/2023 2:11:07 PM(UTC-5)

From: +1 [REDACTED] Mike Way Out Cambell
Recipient: + [REDACTED] 3 Jim Gerodemos (owner)

No, that's you and Senad

Participant	Delivered	Read	Played
+12197 [REDACTED] Jim Gerodemos			

Read: 9/3/2023 4:40:32 PM(UTC-5)
9/3/2023 4:40:07 PM(UTC-5)

Campbell Refers to BASAM IBRAHIM as "the Boss":

Recipient: +12 [redacted] Jim Gerodemos (owner)
 Where are u at and Basam?

Participant	Delivered	Read	Played
+12 [redacted] Jim Gerodemos			

Delivered: 9/11/2023 2:44:20 PM(UTC-5)
 9/11/2023 2:44:19 PM(UTC-5)

From: + [redacted] Mike Way Out Cambell
 Recipient: + [redacted] Jim Gerodemos (owner)
 The boss is at the Paragon, I'm on my way to my dentist appointment. I can't wait to sleep in the dentist chair plus the Dentist lady has big boobs that they just dangle over your face while they clean your teeth

Participant	Delivered	Read	Played
+ [redacted] Jim Gerodemos			

Read: 9/11/2023 3:22:45 PM(UTC-5)
 9/11/2023 2:46:23 PM(UTC-5)

Recipient: + [redacted] Jim Gerodemos (owner)
 I am
 Tell [redacted] he can buy his way back to heaven make check out to Abcwagering.com lol

Participant	Delivered	Read	Played
[redacted] Jim Gerodemos			

Delivered: 9/12/2023 11:53:29 PM(UTC-5)
 9/12/2023 11:53:29 PM(UTC-5)

From: + [redacted] Mike Way Out Cambell
 Recipient: + [redacted] Jim Gerodemos (owner)
 Unfortunately, he does not gamble. Should I look for a hotel room for Sunday then or sat/sun

Participant	Delivered	Read	Played
+ [redacted] Jim Gerodemos			

Read: 9/12/2023 11:54:32 PM(UTC-5)
 9/12/2023 11:54:19 PM(UTC-5)

CAMPBELL and ARMENTA Splitting Bettors:

From: [redacted] Mike Way Out Cambell
 Recipient: +12197122853 Jim Gerodemos (owner)
 Me & Steve Armenta gonna be partners. He approached me and we are in motion now

Participant	Delivered	Read	Played
+ [redacted] Jim Gerodemos			

Read: 11/6/2023 9:21:05 AM(UTC-6)
 11/6/2023 9:19:01 AM(UTC-6)

From: +1 [redacted] Mike Way Out Cambell
 Recipient: + [redacted] Jim Gerodemos (owner)
 This guys got some real cash

Participant	Delivered	Read	Played
[redacted] Jim Gerodemos			

Read: 11/6/2023 9:21:05 AM(UTC-6)
 11/6/2023 9:19:16 AM(UTC-6)

Recipient: +12 [redacted] Jim Gerodemos (owner)
 ancwagering.ag
 username
 qr3447
 mc

Participant	Delivered	Read	Played
[redacted] Jim Gerodemos			

Delivered: 11/12/2023 8:48:04 PM(UTC-6)
 11/12/2023 8:48:03 PM(UTC-6)

From: +121 [redacted] Mike Way Out Cambell
 Recipient: +12 [redacted] Jim Gerodemos (owner)
 \$200 is extra only 1 of the 3 parlays are vaid

Participant	Delivered	Read	Played
[redacted] Jim Gerodemos			

Read: 11/12/2023 9:30:17 PM(UTC-6)
 11/12/2023 9:09:23 PM(UTC-6)

CAMPBELL'S Bettors:

From: [redacted] Mike Way Out Cambell
 Recipient: [redacted] Jim Gerodemos (owner)

Jimmy, the kid dropped the \$1,000.00 off to my house. It's in my possession & in my safe. I am leaving for Florida in a couple hours. I'm going to give you his phone number and name if you can set him up with a username and password for the site in the morning. And when I get back from Florida, I'll give you his money. I have it in my possession.

Participant	Delivered	Read	Played
[redacted] Jim Gerodemos			

Read: 2/14/2024 12:45:58 AM(UTC-6) 2/14/2024 12:44:54 AM(UTC-6)

From: +1 [redacted] Mike Way Out Cambell
 Recipient: +1 [redacted] Jim Gerodemos (owner)

His name is B [redacted]

Participant	Delivered	Read	Played
+1 [redacted] Jim Gerodemos			

Read: 2/14/2024 12:45:58 AM(UTC-6) 2/14/2024 12:45:23 AM(UTC-6)

Recipient: + [redacted] Jim Gerodemos (owner)

Abcwagering.ag
 Username
 Qr8463
 Password
 B [redacted]

Participant	Delivered	Read	Played
[redacted] Jim Gerodemos			

Delivered: 2/14/2024 12:30:16 PM(UTC-6) 2/14/2024 12:30:15 PM(UTC-6)

Recipient: + [redacted] Jim Gerodemos (owner)

B [redacted] p 196

Participant	Delivered	Read	Played
+ [redacted] Jim Gerodemos			

Delivered: 3/4/2024 9:01:56 AM(UTC-6) 3/4/2024 9:01:54 AM(UTC-6)

From: [redacted] Mike Way Out Cambell
 Recipient: [redacted] Jim Gerodemos (owner)

He works tomorrow he wants to know if he can stop by this afternoon to pick it up

Participant	Delivered	Read	Played
+12 [redacted] Gerodemos			

Read: 3/4/2024 9:16:57 AM(UTC-6) 3/4/2024 9:16:50 AM(UTC-6)

Recipient: + [redacted] 3 Jim Gerodemos (owner)

Yes

Participant	Delivered	Read	Played
+1 [redacted] Jim Gerodemos			

Delivered: 3/4/2024 9:16:59 AM(UTC-6) 3/4/2024 9:16:59 AM(UTC-6)

From: +1 [redacted] Mike Way Out Cambell
 Recipient: + [redacted] 3 Jim Gerodemos (owner)

Ok thanks

Participant	Delivered	Read	Played
+12 [redacted] Jim Gerodemos			

Read: 3/4/2024 9:43:50 AM(UTC-6) 3/4/2024 9:17:05 AM(UTC-6)

Recipient: +121 [redacted] Jim Gerodemos (owner)
 [redacted] win 2870

Participant	Delivered	Read	Played
+121 [redacted] Jim Gerodemos			

Delivered: 4/18/2024 4:39:32 AM(UTC-5)
 4/18/2024 4:39:31 AM(UTC-5)

Recipient: +12 [redacted] Jim Gerodemos (owner)
 [redacted] m4000

Participant	Delivered	Read	Played
+12 [redacted] Jim Gerodemos			

Delivered: 4/18/2024 1:13:23 PM(UTC-5)
 4/18/2024 1:13:22 PM(UTC-5)

From: +1 [redacted] Mike Way Out Cambell
 Recipient: +1 [redacted] Jim Gerodemos (owner)
 Your boys senad & basam are blowing up my phone and bothering me. I haven't answered them.

Participant	Delivered	Read	Played
+ [redacted] Jim Gerodemos			

Read: 4/18/2024 11:00:43 PM(UTC-5)
 4/18/2024 10:25:35 PM(UTC-5)

From: + [redacted] Mike Way Out Cambell
 Recipient: + [redacted] Jim Gerodemos (owner)
 Keep it quiet and tell them to leave me the fuck alone.

Participant	Delivered	Read	Played
+ [redacted] Jim Gerodemos			

Read: 4/18/2024 11:00:43 PM(UTC-5)
 4/18/2024 10:25:49 PM(UTC-5)

Campbell's Sale of Line Pool Cards:

The government has recovered dozens of text messages involving Campbell's sale of Superbowl line pool cards to various individuals. The following are a small sample of those texts:

From: +1 [redacted] Michael Campbell (owner)
 To: +1574 [redacted]

Attachments:




Title: IMG_7163.HEIC
 Size: 1940055
 File name: ~\Library\SMS\Attachments\c9\09\85A915FA-17F0-4697-9F6B-AFD7FBAC7036\IMG_7163.HEIC
 ~\Library\SMS\Attachments\c9\09\85A915FA-17F0-4697-9F6B-AFD7FBAC7036\IMG_7163.HEIC

Participant	Delivered	Read	Opened
+1574 [redacted] Songer Snop			

Status: Sent
 1/30/2023 1:47:54 PM(UTC+0)

From: +1 [redacted] Michael Campbell (owner)
 To: +121 [redacted]

Attachments:



Title: IMG_3566.HEIC
 Size: 2309339
 File name: ~\Library\SMS\Attachments\66\06\BC94B937-D990-459C-8961-5738A6D383CA\IMG_3566.HEIC
 ~\Library\SMS\Attachments\66\06\BC94B937-D990-459C-8961-5738A6D383CA\IMG_3566.HEIC

To

Participant	Delivered	Read	Opened
+12 [redacted]			

Status: Sent

1/29/2022 1:33:44 AM(UTC+0)

Source Extraction:
 Legacy (2)

From: +12 [redacted] Michael Campbell (owner)
 To: +1219 [redacted]

So if the two numbers on the Right add up to 9 I win correct?


Participant	Delivered	Read	Opened
+12 [redacted] Michael Campbell		1/29/2022 1:36:59 AM(UTC+0)	

Status: Read

1/29/2022 1:35:22 AM(UTC+0)

From: +1 [redacted] Michael Campbell (owner)
 To: +121808 [redacted]

Attachments:



Title: IMG_7016.HEIC
 Size: 1794921
 File name: ~\Library\SMS\Attachments\65\05\C5AC1E66-E1A8-4B11-8CB0-59972137B8E7\IMG_7016.HEIC
 ~\Library\SMS\Attachments\65\05\C5AC1E66-E1A8-4B11-8CB0-59972137B8E7\IMG_7016.HEIC

To

Participant	Delivered	Read	Opened
+1219 [redacted]			

Status: Sent

1/12/2023 10:20:14 PM(UTC+0)

Source Extraction:
 Legacy (2)

From: +1219 [redacted]
 To: +12 [redacted] Michael Campbell (owner)

Give me 2 and 8

Participant	Delivered	Read	Opened
+12 [redacted] Michael Campbell		1/12/2023 10:22:46 PM(UTC+0)	

Status: Read

1/12/2023 10:22:45 PM(UTC+0)

Campbell / Sanad Ibrahim Texts:

From: +12 [redacted] Mike Way Out Cambell
 Recipient: +12 [redacted] Jim Gerodemos (owner)

\$125 to sanad for the week

Participant	Delivered	Read	Played
+12 [redacted] Jim Gerodemos			

Read: 12/30/2023 6:09:05 PM(UTC-6)
 12/30/2023 5:55:18 PM(UTC-6)

From: +12 [redacted] Mike Way Out Cambell
 Recipient: +12 [redacted] Jim Gerodemos (owner)

I just gave it to him

Participant	Delivered	Read	Played
+12 [redacted] Jim Gerodemos			

Read: 12/30/2023 6:09:05 PM(UTC-6)
 12/30/2023 6:08:49 PM(UTC-6)

Campbell's Admiration for JAMES GERODEMOS and the Mob

From: +1219 [redacted] Mike Way Out Cambell
 Recipient: +1 [redacted] Jim Gerodemos (owner)

Dear Jimmy G,

I wanted to take a moment to express my heartfelt appreciation for your friendship and the positive impact you've had on my life. Your influence goes beyond being just an older friend—it extends to being a mentor, a confidant, and a source of inspiration.

Throughout the time we have known each other, you have shared your wisdom generously, always offering guidance and support whenever I needed it. Your life experiences and vast knowledge have been invaluable in helping me navigate challenges and make important decisions. I am truly grateful for the way you have selflessly invested in my growth and wellbeing.

More than just advice, your presence in my life has brought warmth and comfort. Your genuine care and unwavering belief in my abilities have given me the confidence to pursue my dreams and set higher goals. You have shown me that age is no barrier to achieving greatness and that life is filled with endless possibilities.

Your own journey, rife with accomplishments and resilience, serves as a constant reminder that with determination and perseverance, anything can be overcome. You have taught me to embrace challenges as opportunities for growth and to never lose sight of my passion and purpose. Your steadfast determination and relentless pursuit of success continue to inspire me on my own path.

As I reflect on our friendship, I am reminded of the quote by Maya Angelou: "I've learned that people will forget what you said, people will forget what you did, but people will never forget how you made them feel." You have not only impacted my life with your words and actions but also with the way you've made me feel—valued, encouraged, and motivated.

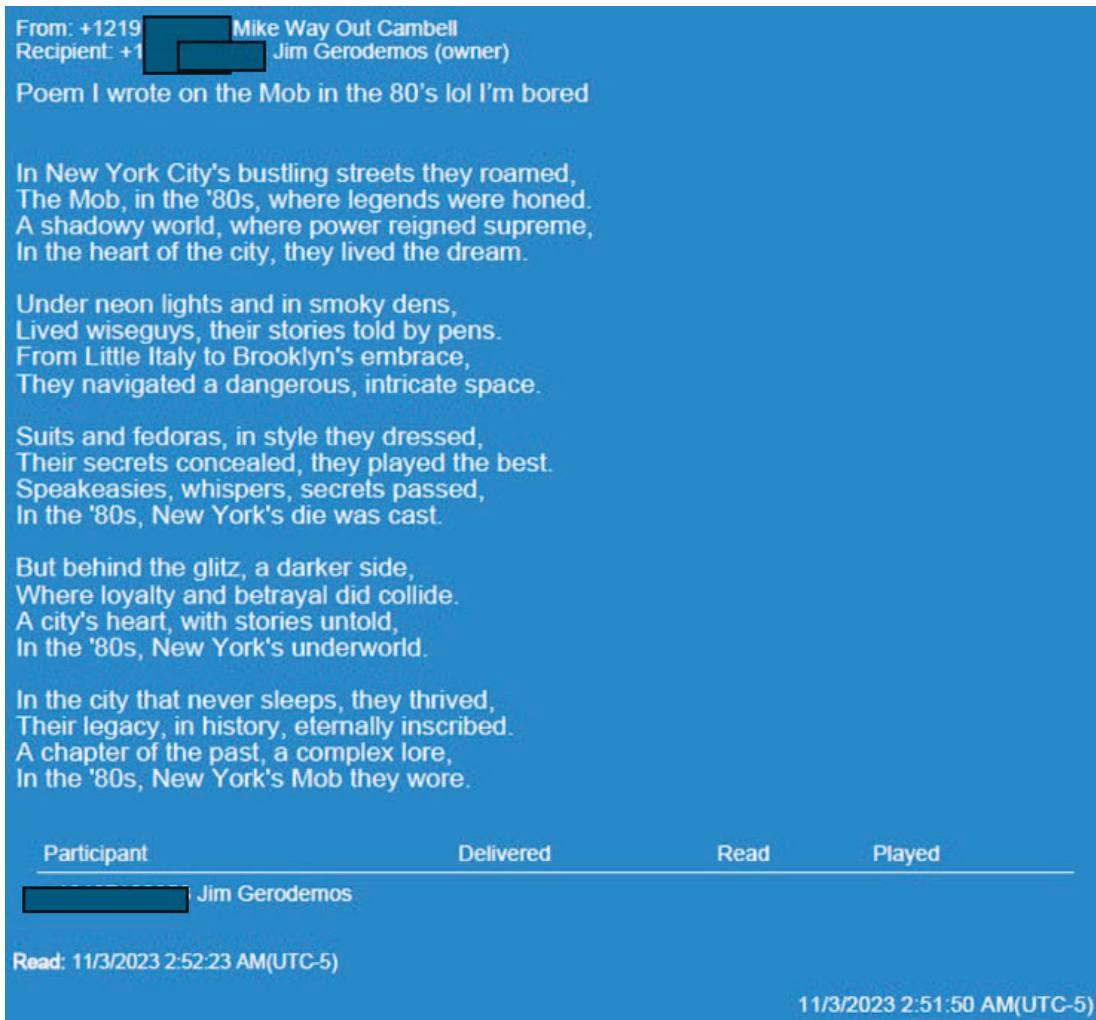
Thank you for being an incredible friend and mentor, and thank you for continuously inspiring me to be the best version of myself. Your presence in my life is a true blessing, and I am forever grateful.

With deep appreciation and admiration,

Michael Campbell

Participant	Delivered	Read	Played
+1219 [redacted] Jim Gerodemos			

Read: 11/3/2023 2:52:23 AM(UTC-5)
 11/3/2023 1:47:50 AM(UTC-5)



Extortion of Victim #2

In attempts to locate and extort Victim #2, Campbell sent JAMES GERODEMOS information about Victim #2, including his work address, biographical information, home address, and information about Victim #2's residence:

From: +1219 [redacted] Mike Way Out Cambell
 Recipient: +1219 [redacted] Jim Gerodemos (owner)
 Contact Information for:
 S [redacted] Inc.
 3 [redacted]
 Ha [redacted]
 Contact [redacted]
 Title: President
 Phone: [redacted] 11

Participant Delivered Read Played

+1219 [redacted] Jim Gerodemos

Read: 11/4/2024 1:51:06 PM(UTC-6) 11/4/2024 1:50:14 PM(UTC-6)

From: +12197 [redacted] Mike Way Out Cambell
 Recipient: +1219 [redacted] Jim Gerodemos (owner)
 A [redacted]
 Age 47, Born [redacted]
 Lives in [redacted] FL
 (646) 22 [redacted]

Participant Delivered Read Played

+12197 [redacted] Jim Gerodemos

Read: 11/4/2024 1:51:06 PM(UTC-6) 11/4/2024 1:51:00 PM(UTC-6)

From: +1219 [redacted] Mike Way Out Cambell
 Recipient: +12197 [redacted] Jim Gerodemos (owner)
 Current Address:
 [redacted]
 FL [redacted]

Home Value - \$364,000
 & Estimated Equity \$364,000

2 Bed | 1 Bath | 845 Sq Ft | Built: 1987
 [redacted] IV
 (Dec 2019 - Nov 2024)

Participant Delivered Read Played

+1219 [redacted] Jim Gerodemos

Read: 11/4/2024 1:55:13 PM(UTC-6) 11/4/2024 1:53:09 PM(UTC-6)

From: +1219 [redacted] Mike Way Out Cambell
 Recipient: +1219 [redacted] Jim Gerodemos (owner)
 \$85,000
 Last Sale Date
 12/03/ [redacted]
 Occupancy Type
 Non-Owner Occupied
 Ownership Type
 Individual
 Land Use
 Condominium Unit (Residential)
 Property Class
 Residential
 Subdivision
 [redacted] Condo

Lot Square Feet
 N/A
 APN
 3 [redacted] 10
 School District
 [redacted] County School District

Participant Delivered Read Played

+1219 [redacted] Jim Gerodemos

Read: 11/4/2024 1:55:13 PM(UTC-6) 11/4/2024 1:53:12 PM(UTC-6)

Recipient: [redacted] Jim Gerodemos (owner)
 More Plese

Participant Delivered Read Played

+ [redacted] Jim Gerodemos

Delivered: 11/4/2024 1:56:05 PM(UTC-6) 11/4/2024 1:56:05 PM(UTC-6)

Recipient: + [redacted] Jim Gerodemos (owner)
 Print out

Participant Delivered Read Played

+ [redacted] Jim Gerodemos

Delivered: 11/4/2024 1:56:10 PM(UTC-6) 11/4/2024 1:56:10 PM(UTC-6)

After this request from JAMES GERODEMOS, Campbell sent additional detailed evidence about Victim #2. Approximately three months later, Campbell inquired about how much money he could get if he collected from Victim #2:

From: [REDACTED] Mike Way Out Cambell
Recipient: +121 [REDACTED] Jim Gerodemos (owner)
Is the offer still on the table for half if I pick up the money from our friend in [REDACTED]?

Participant	Delivered	Read	Played
+12 [REDACTED] Jim Gerodemos			

Read: 2/11/2025 7:11:10 PM(UTC-6) 2/11/2025 7:10:57 PM(UTC-6)

Recipient: +121 [REDACTED] 3 Jim Gerodemos (owner)
Yes

Participant	Delivered	Read	Played
+1219 [REDACTED] Jim Gerodemos			

Delivered: 2/11/2025 7:11:23 PM(UTC-6) 2/11/2025 7:11:23 PM(UTC-6)

Recipient: + [REDACTED] Jim Gerodemos (owner)
Did basam get his commision fee???

Participant	Delivered	Read	Played
+121 [REDACTED] Jim Gerodemos			

12/29/2024 3:30:03 PM(UTC-6)

From: + [REDACTED] 5 Donny Brasco
Recipient: + [REDACTED] 3 Jim Gerodemos (owner)
You still owe me \$100

Participant	Delivered	Read	Played
+ [REDACTED] 3 Jim Gerodemos			

Read: 12/29/2024 3:38:00 PM(UTC-6) 12/29/2024 3:37:58 PM(UTC-6)

In addition to sending GERODEMOS the above information about Victim #2, MICHAEL CAMPBELL was in almost continuous contact with JAMES GERODEMOS and numerous other co-conspirators shortly before, during, and after the extortion of Victim #1 involving Victim #1's daughter, in February of 2025:

- On January 15, 2025, Victim #1 and PETER PAVLOPOULOS exchanged four text messages. At 12:18 pm, JAMES GERODEMOS called MICHAEL CAMPBELL for 817 seconds, joining RAMI MANSOUR for the last 117 seconds on a multiparty call at 12:30 pm.

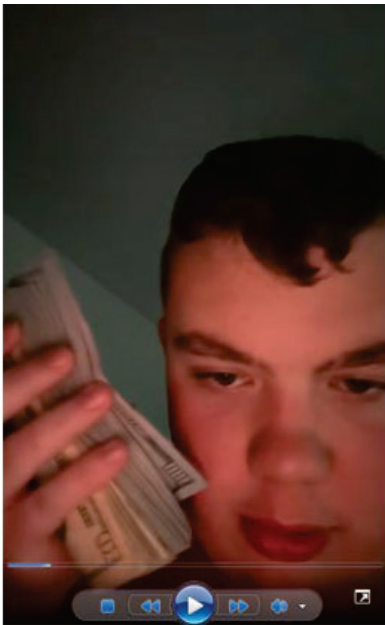
- On February 4, 2025, at 12:18 pm, JAMES GERODEMOS called BASAM IBRAHIM for 176 seconds, joining MICHAEL CAMPBELL on a multiparty call for 318 seconds. At 12:24 pm, SANAD IBRAHIM called JAMES GERODEMOS for 387 seconds.
- On February 5, 2025 at 1:53 pm, MICHAEL CAMPBELL called JAMES GERODEMOS for 227 seconds. At 1:57 pm, JAMES GERODEMOS attempted to call Victim #1. At 1:59 pm, JAMES GERODEMOS called RAMI MANSOUR for 229 seconds.
- On February 12, 2025 at 8:44 am, 10:03 am, 10:41 am, 3:32 pm, 5:17 pm, 6:15 pm, and 7:00 pm, JAMES GERODEMOS attempted to call Victim #1. At 7:01 pm, JAMES GERODEMOS called RAMI MANSOUR for 123 seconds. At 7:07 pm, BASAM IBRAHIM called JAMES GERODEMOS for 422 seconds. At 7:23 pm, JAMES GERODEMOS called MICHAEL CAMPBELL for 66 seconds.

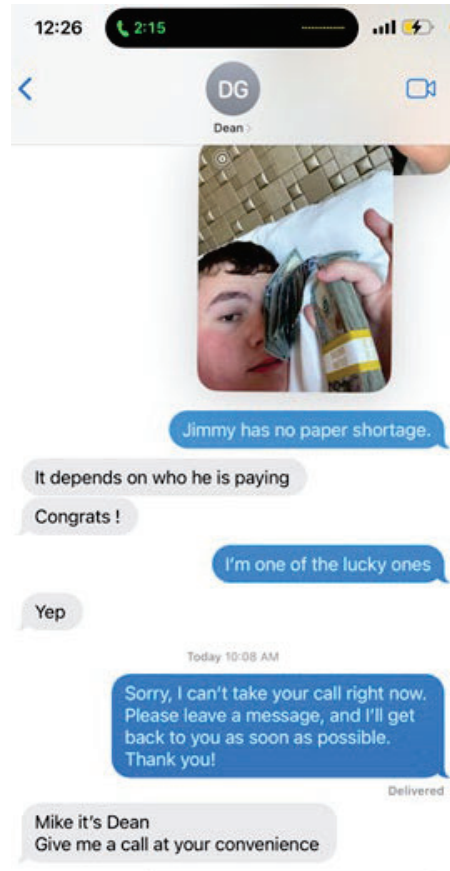
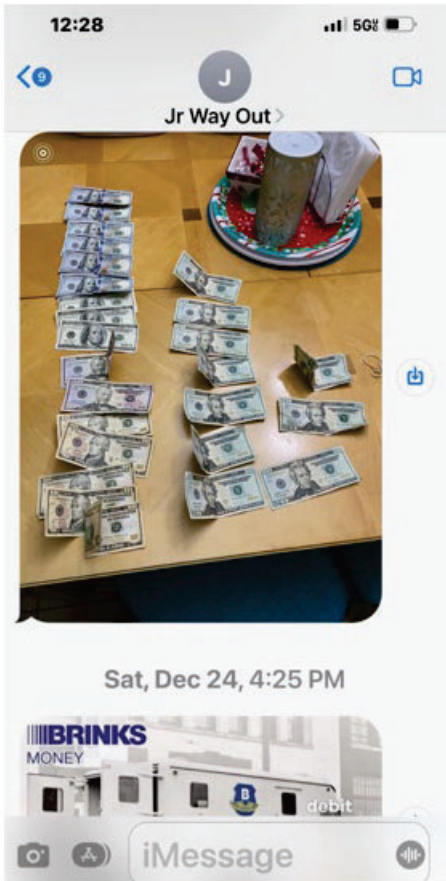
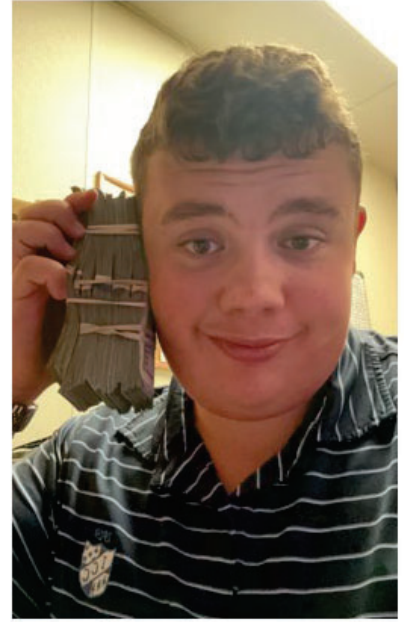
These contacts, and many more, continued through the rest of February.

Images Recovered from Campbell's iCloud Account

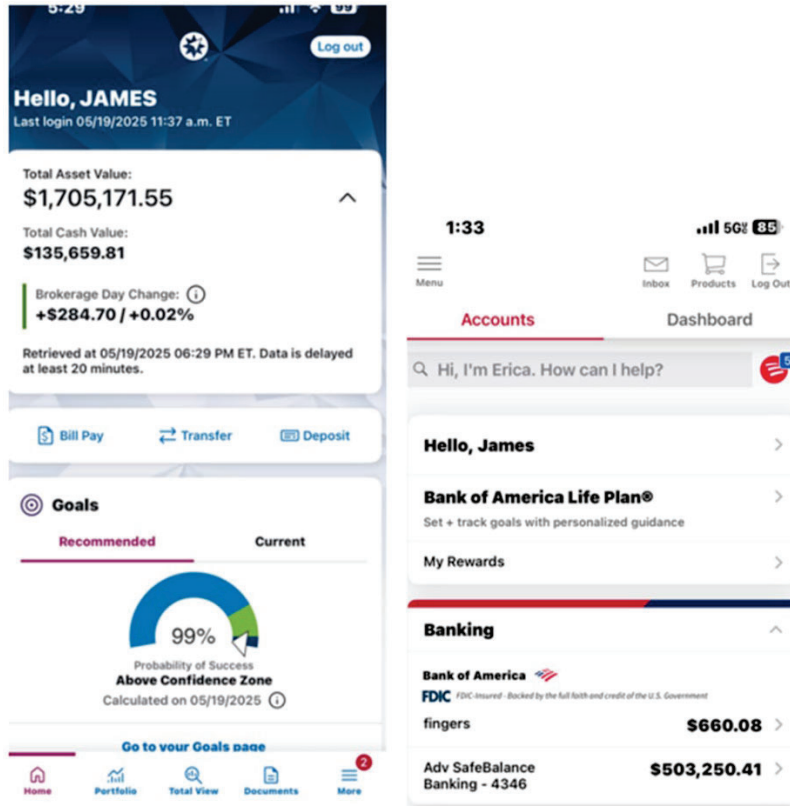
All of the following images were recovered from a search warrant for MICHAEL CAMPBELL's iCloud:

Sample of images of MICHAEL CAMPBELL's cash:





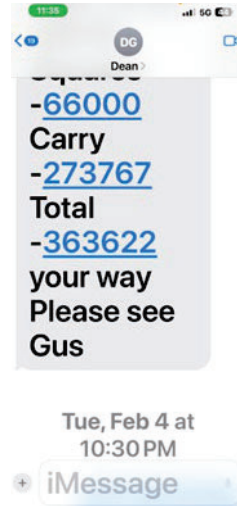
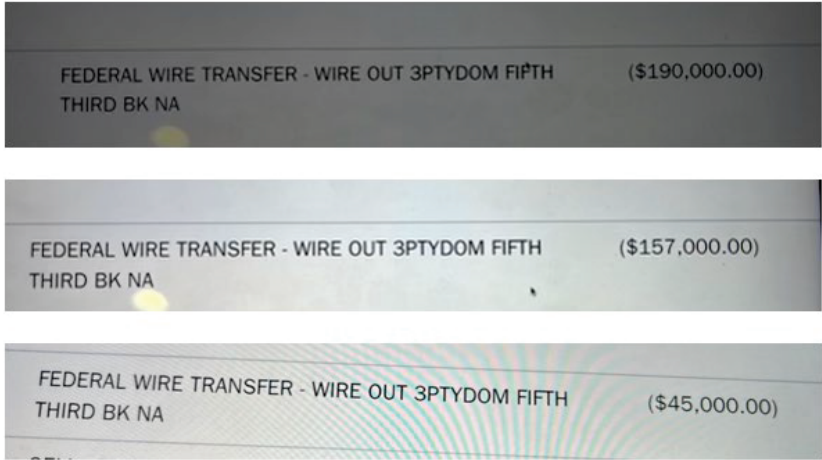
Images Related to JAMES GERODEMOS Recovered from CAMPBELL's iCloud:



Check from CHRIS GERODEMOS to James Gerodemos for \$639,887.00



WIRE TRANSFER RECEIPTS



The Payoff: Campbell and One of His Bettors in Campbell's Truck



Additional Miscellaneous Images:

James Gerodemos



Abcwagering screen captures:

STRAIGHT BET		
Date Placed		Result
03/06/2024 10:47 PM	[20105382] LW-MINNESOTA GOLDEN GOPHERS +14½-135	100.00
STRAIGHT BET		
Date Placed		Result
03/06/2024 11:58 PM	[20111061] LW-MILWAUKEE BUCKS +9½-114	-114.00
STRAIGHT BET		
Date Placed		Result
03/07/2024 12:46 AM	[20114496] LW-LOS ANGELES LAKERS +10½-109	100.00

Campbell's Attempts to Detect the Identity of the UCE and Counter Surveillance

On numerous occasions, the UCE (Undercover Employee) observed JAMES GERODEMOS possess a red spiral notebook that was secured by a rubber band. JAMES GERODEMOS carried it with him when they first went to FILIPPO ROVITO's restaurant/club. Capri's, but left it in the UCE's vehicle when they went inside the restaurant/club.

On February 27, 2025, while at Gino's Steakhouse, JAMES GERODEMOS told STEVEN ARMENTA to swear on the Bible, referring to

this red notebook. On March 14, 2025 the UCE, STEVEN ARMENTA, and MICHAEL CAMPBELL departed Gino's to travel to FILIPPO ROVITO's Capri Ristorante. JAMES GERODEMOS drove separately and met them there. On the ride to the restaurant, the UCE asked STEVEN ARMENTA and MICHAEL CAMPBELL about the red notebook. MICHAEL CAMPBELL said he didn't know what was in the notebook. MICHAEL CAMPBELL claimed JAMES GERODEMOS probably kept his "sketches, his artwork in there, his doodling's" inside the notebook.

The UCE believed the red notebook was JAMES GERODEMOS' sports book and that MICHAEL CAMPBELL knew what is inside the red notebook due to the odd answer he gave and the way he seemed to answer it in jest. The UCE saw JAMES GERODEMOS leave Gino's Steakhouse carrying this red notebook many times.

A review of the iCloud revealed that on the same day, March 14, 2025 at about 8:34 pm (believed to be after the conversation about the red notebook described above), MICHAEL CAMPBELL texted JAMES GERODEMOS, "Keep your mouth shut around this [UCE] guy I'm telling you man" and "Trust me on this man."

On March 15, 2025 after the UCE dropped off STEVEN ARMENTA and MICHAEL CAMPBELL, MICHAEL CAMPBELL texted JAMES

GERODEMOS a TikTok link that contained a video warning about hidden cameras and offered for sale a hidden camera detector, and then sent the following text to JAMES GERODEMOS “[UCE]?!”

A search warrant served on Apple asking for iCloud records for JAMES GERODEMOS was served on May 23, 2025 for the time period of “January 1, 2021 to the present.” However, text messages in the iCloud were only supplied up to March 15, 2025. which is the day MICHAEL CAMPBELL sent the message warning about the UCE. Apple subscriber records obtained in January 2025 for JAMES GERODEMOS showed he had the feature for “iCloud Backup (iOS Devices)” turned on. Apple subscriber records obtained in August 2025 showed he had the feature for “iCloud Backup (iOS Devices)” turned off. It appears that based upon MICHAEL CAMPBELL’s text messages, JAMES GERODEMOS stopped backing up his data to the iCloud on the March 15, 2025 to avoid law enforcement detection.

Tailing the UCE

On the evening of April 9, 2026, as undercover law enforcement agents were leaving JAMES GERODEMOS, one of the surveillance agents noticed a GMC truck, similar to one driven by MICHAEL CAMPBELL following the undercover agent in an attempt to determine where the undercover was going. (The driver of the GMC vehicle was later positively identified as

MICHAEL CAMPBELL) . The undercover agent saw the GMC vehicle also and notified surveillance units. CAMPBELL stayed behind the undercover agent for a few blocks as the undercover agent was heading eastbound on US 30. CAMPBELL then moved into the far-left lane. As the undercover agent merged onto the ramp to go southbound on I-65, CAMPBELL made a last second erratic move to cross all three lanes on US 30, to follow the undercover agent as the undercover agent exited U.S. 30 onto the Southbound I-65 entrance ramp. Surveillance units followed CAMPBELL as he traveled southbound I65. CAMPBELL was observed following the undercover agent and driving erratically at speeds in excess of 100 mph.

Throughout CAMPBELL's attempts at countersurveillance, Campbell continuously weaved in and out of traffic, approached the rear of one of the surveillance vehicle and began tailgating them and flashing his brights in attempts to catch up to the undercover agent. During this time frame, as MICHAEL CAMPBELL approached a construction zone, to avoid traffic that was backed up and waiting to enter the construction zone, CAMPBELL activated the emergency amber lights located on the rear tailgate area and in the front grill area to engage in an illegal U-turn on I-65. CAMPBELL'S countersurveillance pursuit lasted from US 30 and I-65 to shortly after the I-65 Lafayette exit and was in excess of one hour. Later. CAMPBELL was

observed exiting I-65 Northbound at exit 178 and stopping at a Speedway gas station in West Lafayette. At this time, CAMPBELL was sitting in the black GMC pickup truck and was positively identified as MICHAEL CAMPBELL. The black GMC pickup truck with Indiana license plates was registered to the same labor union that CAMPBELL is a member of. During the occurrence of this event, there were several calls between JAMES GERODEMOS and MICHAEL CAMPBELL.

b. Weight of the Evidence

As indicated above, the weight of the evidence is overwhelming. The above evidence comes directly from iCloud messages of Gerodemos, Campbell and other co-conspirators.

c. History and Characteristics of the Person

Campbell has no documented criminal history. However evidence recovered in this case definitively identifies Campbell as being involved in a swatting incident in the City of Hobart. Campbell assisted JAMES GERODEMOS in falsely reporting that a former tenant of JAMES GERODEMOS was pointing a gun at his girlfriend. GERODEMOS was charged in this swatting incident in Hobart, Indiana City Court under Cause No. 45H05-DM3246000 and entered into a Deferred Prosecution. Campbell's

involvement only came to light when the iCloud search warrants were issued in the instant investigation.

Swatting Offense

On May 5, 2024 at about 4:18 pm, Hobart Police Department responded to a report of a domestic disturbance related to an allegation that Gerodemos' former tenant pulled a gun on a female. This was determined to be a false report.

A voice recording of the reporting party was determined to be JAMES GERODEMOS according to the former tenant and the Special Agent who is familiar with JAMES GERODEMOS' voice. The former tenant alleged JAMES GERODEMOS and him were involved in ongoing court proceedings and prior reports were made to Chesterton, Indiana police about harassing texts and phone calls from JAMES GERODEMOS. These court proceedings are related to a disputed debt. The phone number that called in the false report to Hobart PD came from (219) 31x-xxxx. According to T-Mobile, the subscribed name to (219) 31x-xxxx is "jimmy stakehouse."

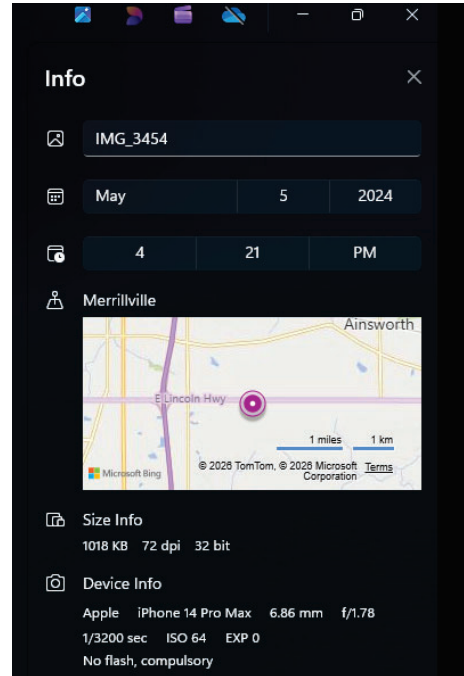
A review of the iCloud records revealed that JAMES GERODEMOS created the phone number contact in his normal phone for the Hobart Police Department on May 5, 2024 at 4:17 pm, one minute before the incident was dispatched by the Hobart PD. Leading up to the police being dispatched,

starting at 3:58 pm, MICHAEL CAMPBELL made seven incoming calls to JAMES GERODEMOS. At 4:15 pm and 4:16:27 pm., MICHAEL CAMPBELL tried to call JAMES GERODEMOS, but it appeared JAMES GERODEMOS' line was busy. At 4:16:44 pm, MICHAEL CAMPBELL called JAMES GERODEMOS and the call lasted 26 seconds. According to toll records, immediately after his conversation with MICHAEL CAMPBELL, at 4:17 pm JAMES GERODEMOS made an outgoing call to Hobart Police Department showing 12 seconds. At 4:21 pm, MICHAEL CAMPBELL called JAMES GERODEMOS, and they spoke for 73 seconds. At 4:35 pm, BASAM IBRAHIM called JAMES GERODEMOS and spoke for 251 seconds.

On May 16, 2025, a subpoena/summons was issues to JAMES GERODEMOS for False Informing and Unlawful Use of 911 Service related to this incident. A review of the iCloud for Michael Campbell revealed Athena Gerodemos text messaged the documents to MICHAEL CAMPBELL shortly after receiving these summons.

On the day of her arrest in the instant matter, April 29, 2025, Athena Gerodemos was interviewed after Miranda rights waiver. She stated that she believed that JAMES GERODEMOS and MICHAEL CAMPBELL were together when the Hobart PD were called on her father's former tenant.

iCloud documents recovered from Michael Campbell's iCloud contained photos of Hobart Police responding to the swatting incident at the AutoZone on May 5, 2024. GPS data from the images showed that Campbell was at that location when the photos were taken by him on his phone:



Campbell's acts in causing a situation where officers had guns drawn on an innocent individual reveals to this Court the true history and characteristics of this defendant.

d. Seriousness of Danger to any Person or Community

Given Campbell's conduct as alleged in the indictment and supported by the above evidence, if released, Campbell would represent a present danger to at least extortion Victim #2 and who knows who else, given his

“mob mentality” and erratic behavior in support of the Gerodemos Gambling Organization, and JAMES GERODEMOS himself..

Additionally, given his past conduct, Campbell also presents a substantial risk that if released, he would obstruct or attempt to obstruct justice, or threaten, injure, or intimidate, or attempt to threaten, injure, or intimidate, a prospective witness.

Flight Risk

Campbell has no passport and no international travel. It is not believed that he presents a risk of flight.

IV. Conclusion

Based on the foregoing, the government requests that this defendant be detained on the grounds of danger to the community.

Respectfully submitted,

Adam L. Mildred
United States Attorney

By: /s/ Philip C. Benson
Assistant United States Attorney
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Hammond, Indiana 46320