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CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF IOWAIN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,	)	Criminal No. 3:19-cr-110
	)	
v.	)	<u>INDICTMENT</u>
	)	
BRADLEY SHANE MCCORKLE,	)	T. 18 U.S.C. § 1343
ISAAC BELL,	)	T. 18 U.S.C. § 1349
KENDRIC VENDRELL MCCRAY,	)	T. 18 U.S.C. § 2
DEREK MARTINEZ, also known as Derek Cole,	)	T. 49 U.S.C. § 32709(b)
KEITHEN DEONE MCCORKLE,	)	T. 49 U.S.C. § 32703(2)
NICHOLAS T. MCFARLIN,	)	T. 18 U.S.C. § 513(a)
	)	T. 18 U.S.C. § 513(c)

Defendants.

THE GRAND JURY FINDS:**INTRODUCTION**

At all times material to this Indictment:

1. 4th Avenue Auto Sales was a used motor vehicle business located at 4130 4th Avenue in Moline, Illinois (4th Avenue).
2. 4th Avenue was owned and operated by defendants, BRADLEY MCCORKLE and ISAAC BELL.
3. Defendant, KENDRIC VENDRELL MCCRAY and others were “straw buyers” or “straw purchasers” of used motor vehicles purchased by and through 4th Avenue.
4. Defendants, KEITHEN DEONE MCCORKLE and NICHOLAS T. MCFARLIN, and others, recruited, persuaded and induced persons to be straw buyers to place vehicle titles in their names when purchasing and selling used motor vehicles through 4th Avenue and elsewhere.
5. Defendant, DEREK MARTINEZ, also known as Derek Cole, advertised through Craigslist.org and sold motor vehicles purchased by 4th Avenue through defendant, KENDRIC VENDRELL MCCRAY, and others.

6. Craigslist.org is a website headquartered in San Francisco, California, that individuals can use to post advertisements for, among other items, used motor vehicles, with those postings being transmissions in interstate commerce. Craigslist servers are located in San Francisco, California and Ashburn, Virginia.

THE GRAND JURY CHARGES:

COUNT 1
(Conspiracy to Commit Wire Fraud)

The grand jury hereby incorporates all the allegations contained in the paragraphs 1 through 6, inclusive, as if set forth in full in this charge.

Beginning on an unknown date, but as early as 2013, and continuing to during or about some time in 2018, in the Southern District of Iowa, and elsewhere, the defendants, BRADLEY SHANE MCCORKLE, ISAAC BELL, KENDRIC VENDRELL MCCRAY, DEREK MARTINEZ, also known as Derek Cole, KEITHEN DEONE MCCORKLE, and NICHOLAS T. MCFARLIN, knowingly and intentionally conspired with each other and with other persons known and unknown to the Grand Jury, to commit offenses against the United States, that is to devise a scheme to defraud as to material matters and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by intentional concealment of material facts and to knowingly transmit and cause to be transmitted in interstate commerce between the States of Iowa, Illinois, California and Virginia, by means of wire communication, certain signs, signals, pictures, and sounds, to wit: postings on Craigslist used to sell certain motor vehicles, in violation of Title 18, United States Code, Sections 1343.

THE SCHEME TO DEFRAUD

7. Beginning on an unknown date, but as early as 2013, and continuing to during or about some time in 2018, the defendants, BRADLEY SHANE MCCORKLE, ISAAC BELL, KENDRIC

VENDRELL MCCRAY, DEREK MARTINEZ, also known as Derek Cole, KEITHEN DEONE MCCORKLE, and NICHOLAS T. MCFARLIN, and others, devises and intended to devise a scheme to defraud the State of Iowa and purchasers of used motor vehicles by means of materially false and fraudulent pretenses, representations, and promises, and by intentional concealment of material facts, that is the concealment of the identity of the true seller of used motor vehicles and the actual mileage on the used motor vehicles as well as the vehicles' histories, and the vehicles operating conditions by knowingly and willfully using straw buyers in whose names the titles were placed and by resetting and altering, and causing to be reset and altered, the odometers of motor vehicles, intending to change the mileage registered by the odometers.

8. It was part of the scheme that BRADLEY SHANE MCCORKLE and ISAAC BELL purchased used motor vehicles on behalf of 4th Avenue.

9. It was further part of the scheme that defendants, BRADLEY SHANE MCCORKLE, ISAAC BELL, DEREK MARTINEZ, also known as Derek Cole, KEITHEN DEONE MCCORKLE, and NICHOLAS T. MCFARLIN, purchased vehicles from and through 4th Avenue, and did use as many as fourteen (14) "straw buyers" including, but not limited to, defendant KENDRIC VENDRELL MCCRAY, to purchase approximately 335 used motor vehicles. The straw buyers including, but not limited to, defendant, KENDRIC VENDRELL MCCRAY, made false representations that they were purchasing and had purchased certain used motor vehicles for their own use when in fact the motor vehicles were placed in the names of the straw buyers. Many of the used motor vehicles never changed hands between 4th Avenue and the straw buyers and were never in the possession of the straw buyers but were put in the names of the straw buyers to conceal the fraud committed by the defendants.

10. It was further part of the scheme and artifice to defraud that, during the scheme to defraud, advertisements were posted on Craigslist.org (Craigslist) that used motor vehicles were available

for sale, such vehicles having fraudulently altered odometers.

11. It was further part of the scheme that persons known and unknown to the grand jury, with the knowledge of defendants, KENDRIC VENDRELL MCCRAY, BRADLEY SHANE MCCORKLE, ISAAC BELL, KEITHEN DEONE MCCORKLE, and DEREK MARTINEZ, also known as Derek Cole, NICHOLAS T. MCFARLIN, and others, that persons altered, and reset or “rolled back”, the odometers on high-mileage used motor vehicles, and to conceal the fraud, altered or falsely completed, or caused to be altered and falsely completed, vehicle titles and bills of sale.

12. It was further part of the scheme that defendants, ISAAC BELL, DEREK MARTINEZ, also known as Derek Cole, KEITHEN DEONE MCCORKLE, KENDRIC VENDRELL MCCRAY, and NICHOLAS T. MCFARLIN, themselves or through straw buyers did sell the vehicles with the false odometer readings to individuals in Iowa, including Scott County, Johnson County, and elsewhere in the Southern District of Iowa, and elsewhere, in exchange for money including vehicles 1 through 10, inclusive, described in paragraph 13 below..

13. It was further part of the scheme to post information on Craigslist to sell Vehicles 1, 2, 3, 4, 5, 6, 9, and 10 described below:

Vehicle No.	Year/Make/Model	Vehicle Identification No.
1	2003 Honda Pilot	2HKYF18463H619675
2	2002 Chevrolet Trailblazer	1GNDT13S322484658
3	2008 Dodge Caliber	1B3HB48B88D786081
4	2005 Chevrolet Suburban	3GNFK16Z45G165012
5	2004 Buick LeSabre	1G4HR54K644107811
6	2004 Pontiac Grand Prix	2G2WP522041204880
7	2002 Buick Park Avenue	1G4CW54K624242903

8	2001 Chevy Monte Carlo	2G1WX15K819146099
9	2006 Honda Odyssey	5FNRL38786B000775
10	2003 Chevrolet Silverado	1GCHK29UX3Z105322

14. It was further part of the scheme that from 2013 and up to and including 2018, vehicles, including but not limited to, the above-described vehicles 1 through 10, were sold to uninformed and unsuspecting purchasers based on false and fraudulent representations and promises regarding the mileage on the vehicles, the vehicles' history, and the vehicles operating conditions.

All in violation of Title 18, United States Code, Section 1349.

THE GRAND JURY FURTHER CHARGES:

COUNTS 2-7
(Wire Fraud)

Paragraphs 1 through 14 of this Indictment are re-alleged and incorporated herein as if set forth in full.

From on or about the dates indicated, in the Southern District of Iowa, and elsewhere, the defendants, BRADLEY SHANE MCCORKLE, ISAAC BELL, DEREK MARTINEZ, KEITHEN DEONE MCCORKLE, NICHOLAS T. MCFARLIN, KENDRIC VENDRELL MCCRAY, and others, having devised and intended to devise a scheme to defraud, and for obtaining money by means of material false and fraudulent pretenses and representations, and for the purpose of executing such scheme to defraud and knowingly transmitted and cause to be transmitted in interstate commerce between the States of Iowa, Illinois, California and Virginia, by means of wire communication, certain signs, signals, pictures, and sounds, to wit: postings on Craigslist (communications) used to sell the vehicles listed below, each communication constituting a separate count of this indictment as described below:

Count	Vehicle Number	Approximate Date	Craigslist posting
2	1	March 11, 2016	2003 Honda Pilot with 117,000 miles
3	2	July 23, 2014	2002 Chevrolet Blazer with 109,000 miles
4	4	December 17, 2015	2005 Chevrolet Suburban with 123,000 miles
5	6	March 1, 2016	2004 Pontiac Grand Prix with 116,000 miles
6	9	April 23, 2016	2006 Honda Odyssey with 118,000 miles
7	10	September 16, 2016	2003 Chevrolet Silverado with 120,000 miles

All in violation of Title 18, United States Code, Sections 1343 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNTS 8-17
(Odometer Fraud)

On or about the dates indicated below, in and about Scott County in the Southern District of Iowa, and elsewhere, the defendants, BRADLEY SHANE MCCORKLE, and ISAAC BELL, knowingly and willfully reset and altered, and had reset and altered, the odometers of the below-identified motor vehicles, which reflected lower mileages than the actual mileages, each such instance constituting a separate Count of this Indictment:

Count	Approximate Date of Sale	Vehicle No.	High Mileage	False Mileage	VIN
8	March 11, 2016	1	197,239	117,000	2HKYF18463H619675
9	February 10, 2015	2	215,431	109,000	1GNDT13S322484658
10	December 23, 2014	3	177,700	45,584	1B3HB48B88D786081
11	January 22, 2016	4	211,517	122,640	3GNFK16Z45G165012
12	September 6, 2015	5	179,847	119,363	1G4HR54K644107811

13	March 10, 2016	6	212,623	116,000	2G2WP522041204880
14	June 22, 2017	7	215,431	142,000	1G4CW54K624242903
15	February 22, 2017	8	219,914	130,000	2G1WX15K819146099
16	May 2, 2016	9	196,956	118,000	5FNRL38786B000775
17	September 25, 2016	10	208,272	120,000	1GCHK29UX3Z105322

All in violation of Title 49, United States Code, Sections 32703(2) and 32709(b), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 18

(Securities Fraud involving a Motor Vehicle Title)

The grand jury hereby incorporates all the allegations contained in the previous Counts as if set forth in full in this charge.

On or about December 23, 2014, in the Southern District of Iowa and elsewhere, the defendants, BRADLEY SHANE MCCORKLE, ISAAC BELL, and KENDRIC VENDRELL MCCRAY, knowingly made, uttered, and possessed, and willfully caused the making, uttering, and possession of, forged securities of the State of Iowa, that is, an automobile title for Vehicle No. 3, with the intent to deceive other persons, organizations, and governments.

This is a violation of Title 18, United States Code, Section 513(a), (c), and Title 18, United States Code, Section 2.

A TRUE BILL.

Marc Krickbaum
United States Attorney

FOREPERSON

By:



Clifford R. Cronk III
Assistant United States Attorney

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SOUTHERN DISTRICT OF IOWAIN THE UNITED STATES DISTRICT COURT
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UNITED STATES OF AMERICA,

v.

BRADLEY SHANE MCCORKLE,

ISAAC BELL,

KENDRIC VANDRELL* MCCRAY,

DEREK MARTINEZ, also known as Derik* Cole,

KEITHEN DEONE MCCORKLE,

NICHOLAS T. MCFARLIN,

Defendants.

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2. 4th Avenue was owned and operated by defendants, BRADLEY MCCORKLE and ISAAC BELL.

3. Defendant, KENDRIC VANDRELL MCCRAY and others were "straw buyers" or "straw purchasers" of used motor vehicles purchased by and through 4th Avenue.

4. Defendants, KEITHEN DEONE MCCORKLE and NICHOLAS T. MCFARLIN, and others, recruited, persuaded and induced persons to be straw buyers to place vehicle titles in their names when purchasing and selling used motor vehicles through 4th Avenue and elsewhere.

5. Defendant, DEREK MARTINEZ, also known as Derik Cole, advertised through Craigslist.org and sold motor vehicles purchased by 4th Avenue through defendant, KENDRIC VANDRELL MCCRAY, and others.

) Criminal No. 3:19-cr-110

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) **INDICTMENT**

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) T. 18 U.S.C. § 1343

) T. 18 U.S.C. § 1349

) T. 18 U.S.C. § 2

) T. 49 U.S.C. § 32709(b)

) T. 49 U.S.C. § 32703(2)

) T. 18 U.S.C. § 513(a)

) T. 18 U.S.C. § 513(c)

On 11/18/2019, Government orally moves to amend indictment to correct spelling of Deft, McCray's Middle Name from VENDRELL to VANDRELL and Deft, Martinez, a/k/a from Derek to Derik. IT SO ORDERED. SBJ.

6. Craigslist.org is a website headquartered in San Francisco, California, that individuals can use to post advertisements for, among other items, used motor vehicles, with those postings being transmissions in interstate commerce. Craigslist servers are located in San Francisco, California and Ashburn, Virginia.

THE GRAND JURY CHARGES:

COUNT 1
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THE GRAND JURY FURTHER CHARGES:

COUNT 18
(Securities Fraud involving a Motor Vehicle Title)

The grand jury hereby incorporates all the allegations contained in the previous Counts as if set forth in full in this charge.

On or about December 23, 2014, in the Southern District of Iowa and elsewhere, the defendants, BRADLEY SHANE MCCORKLE, ISAAC BELL, and KENDRIC VANDRELL MCCRAY, knowingly made, uttered, and possessed, and willfully caused the making, uttering, and possession of, forged securities of the State of Iowa, that is, an automobile title for Vehicle No. 3, with the intent to deceive other persons, organizations, and governments.

This is a violation of Title 18, United States Code, Section 513(a), (c), and Title 18, United States Code, Section 2.

A TRUE BILL.

Marc Krickbaum
United States Attorney

FOREPERSON

By:



Clifford R. Cronk III
Assistant United States Attorney