

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : HON.  
 :  
 v. : Criminal No. 15-  
 :  
 KARL STEHLIN, :  
 a/k/a "Mark Sawyer" : 18 U.S.C. §§ 1343 & 2

**INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

**Background**

1. At times relevant to this Indictment:

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a. Defendant KARL STEHLIN, a/k/a "Mark Sawyer" ("defendant STEHLIN"), was a resident of Florida.

b. "Factoring Company A" was a New Jersey limited liability company with its principal place of business in Bergen County, New Jersey. Among other things, Factoring Company A purchased accounts receivable from transportation companies in the transportation industry.

c. Sawyer Express Transportation, Inc. ("Sawyer Express"), purported to be a transportation company doing business in Idaho, but in reality provided no services.

**The Scheme to Defraud**

2. From at least in or about June 2014 through in or about September 2014, in Bergen County, in the District of New Jersey, and elsewhere, defendant

KARL STEHLIN,  
a/k/a "Mark Sawyer,"

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud "Factoring Company A," and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises concerning the sale of purported accounts receivable from a fake transportation company, namely, Sawyer Express, which scheme and artifice was in substance as set forth below.

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**Object**

3. The object of the scheme and artifice to defraud was for defendant STEHLIN to enrich himself by submitting fake invoices to Factoring Company A for advance payment of services that were never rendered.

**Manner and Means**

4. It was part of the scheme and artifice to defraud that defendant STEHLIN created Sawyer Express, which purported to provide transportation services, but in fact provided no transportation services.

5. It was further part of the scheme and artifice to defraud that defendant STEHLIN e-mailed fake invoices to Factoring Company A for advance payment on those invoices.

6. It was further part of the scheme and artifice to defraud that defendant STEHLIN, using the methods described above, caused Factoring Company A to wire transfer approximately \$220,000 from New Jersey to Sawyer Express' bank account in Florida.

7. On or about the dates set forth below, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud, in Bergen County, in the District of New Jersey, and elsewhere, the defendant,

KARL STEHLIN,  
a/k/a "Mark Sawyer,"

knowingly transmitted and caused to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs,

signals, pictures, and sounds, namely, the invoices or wire transfers set forth below in the approximate amounts set forth below.

<u>Count</u>	<u>Date</u>	<u>Invoice or Wire Transfer</u>	<u>Amount</u>
1	7/08/14	E-Mailed Invoice	\$ 4,181
2	7/08/14	Wire Transfer	\$ 3,748
3	7/24/14	E-Mailed Invoices	\$ 12,108
4	7/24/14	Wire Transfer	\$ 10,882
5	7/29/14	Wire Transfer	\$ 10,214

In violation of Title 18, United States Code, Section 1343 and  
Section 2.

## **FORFEITURE ALLEGATION**

1. The allegations contained in this Indictment are incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses charged in Counts One through Five of this Indictment, the government will seek forfeiture from defendant STEHLIN, in accordance with Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Section 1343.

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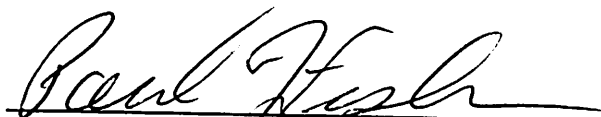
3. If by any act or omission of defendant STEHLIN any of the property subject to forfeiture herein:

- 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 subdivided 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 defendant STEHLIN up to the value of the property described in this forfeiture allegation.

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: \_\_\_\_\_

United States District Court  
District of New Jersey

UNITED STATES OF AMERICA

v.

KARL STEHLIN,  
a/k/a "Mark Sawyer"

INDICTMENT FOR

18 USC §§ 1343 and 2

PAUL J. FISHMAN

UNITED STATES ATTORNEY, NEWARK, NEW JERSEY

ANDREW KOGAN  
ASSISTANT U.S. ATTORNEY  
NEWARK, NEW JERSEY  
973.645.2754

*R. Benpace*

*J. J. Jurek*

6/5/15