



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

August 2024 Grand Jury

1 UNITED STATES OF AMERICA,
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8 Plaintiff,

9 v.

10 GEMMA TRAYA AUSTIN (1)
11 MICHAEL CRIS TRAYA SORDILLA (2),
12 BRYAN NAVALES TAROSA (3),
13
14 Defendants.

Case No. '24 CR2712 WQH

I N D I C T M E N T

Title 18, U.S.C., Sec. 1349 -
Conspiracy to Commit Mail
and Wire Fraud; Title 18, U.S.C.
Sec. 1956(h) - Conspiracy to
Commit Money Laundering; Title 18,
U.S.C., Secs. 981(a)(1)(C),
982(a)(1), and 982(b), and
Title 28, U.S.C., Sec. 2461(c) -
Criminal Forfeiture

15 The grand jury charges:

16 INTRODUCTORY ALLEGATIONS

17 At all times relevant to this indictment:

18 1. GEMMA TRAYA AUSTIN ("AUSTIN") was the organizer and registered
19 agent for PageTurner, Press and Media LLC ("PageTurner").

20 2. PageTurner was a limited liability company incorporated in the
21 State of California in September 2017. PageTurner's principal place of
22 business was in Chula Vista, California. PageTurner claimed to be a
23 book publishing business.

24 3. MICHAEL CRIS TRAYA SORDILLA ("SORDILLA") was the President and
25 CEO of Innocentrix Philippines, which purported to be a "business process
26 outsourcing" company in the Philippines.

27 4. BRYAN NAVALES TAROSA ("TAROSA") was the Vice President of
28 Operations at Innocentrix.

Count 1

18 U.S.C. § 1349

(Conspiracy to Commit Mail Fraud and Wire Fraud)

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3 5. The allegations contained in paragraphs 1 through 4 are re-
4 alleged and incorporated herein.

5 6. From at least September 2017, and continuing up to and
6 including December 9, 2024, within the Southern District of California,
7 and elsewhere, defendants GEMMA TRAYA AUSTIN, MICHAEL CRIS TRAYA
8 SORDILLA, and BRYAN NAVALES TAROSA, together with each other and with
9 others known and unknown, knowingly and intentionally conspired to
10 commit mail fraud, in violation of Title 18, United States Code,
11 Section 1341, and wire fraud, in violation of Title 18, United States
12 Code, Section 1343.

13 Manner and Means

14 7. As part of the conspiracy, defendants GEMMA TRAYA AUSTIN,
15 GEMMA TRAYA AUSTIN, MICHAEL CRIS TRAYA SORDILLA, and BRYAN NAVALES TAROSA
16 and their co-conspirators operated a book publishing scam targeting
17 elderly victims throughout the United States, including in the Southern
18 District of California.

19 8. As part of the conspiracy, conspirators working for
20 Innocentrix contacted individual authors through unsolicited interstate
21 and foreign wire communications, including phone calls and emails.

22 9. As part of the conspiracy, the conspirators falsely
23 represented that PageTurner was a book publishing business that acted
24 as a liaison between individuals who sought to publish their books or
25 have their books turned into motion pictures or television series.

1 10. As part of the conspiracy, the conspirators falsely
2 represented PageTurner worked with literary agents, major motion picture
3 studios, and popular video streaming services.

4 11. As part of the conspiracy, the conspirators impersonated
5 literary agents and executives from major publishers, motion picture
6 studios, and popular video streaming services.

7 12. As part of the conspiracy, the conspirators fraudulently
8 convinced victim-authors to send PageTurner payments to, for example,
9 pre-pay taxes, pay transaction fees, or pay for services before the
10 victim-author's work could be published or optioned to studios.

11 13. As part of the conspiracy, the conspirators falsely told
12 victim-authors their works had been selected for acquisition by
13 publishers or movie studios.

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

15 Count 2

16 Conspiracy to Launder Monetary Instruments
17 (18 U.S.C. § 1956(h))

18 14. Paragraphs 1 through 13 are re-alleged and incorporated
19 herein.

20 15. From at least January 2018, and continuing up to and including
21 December 9, 2024, within the Southern District of California and
22 elsewhere, defendants GEMMA TRAYA AUSTIN, MICHAEL CRIS TRAYA SORDILLA,
23 and BRYAN NAVALES TAROSA, together with others known and unknown, did
24 knowingly conspire, and agree:

- 25 a. to knowingly conduct financial transactions affecting
26 interstate and foreign commerce which involved the proceeds
27 of specified unlawful activity, that is, mail and wire fraud
28 in violation of Title 18, United States Code, Sections 1341

1 and 1343, with the intent to promote the carrying on of the
2 specified unlawful activity, knowing the property involved in
3 the financial transactions represented the proceeds of some
4 form of unlawful activity, in violation of Title 18, United
5 States Code, Section 1956(a)(1)(A)(i);

6 b. to knowingly conduct financial transactions affecting
7 interstate and foreign commerce, which transactions involved
8 the proceeds of specified unlawful activity, that is, mail and
9 wire fraud, knowing that the transactions were designed in
10 whole and in part to conceal and disguise the nature, location,
11 source, ownership, and control of the proceeds of specified
12 unlawful activity, and knowing that the property involved in
13 the financial transactions represented the proceeds of some
14 form of unlawful activity, in violation of Title 18, United
15 States Code, Section 1956(a)(1)(B)(i); and

16 c. to transport, transmit, and transfer a monetary instrument and
17 funds involving the proceeds of specified unlawful activity,
18 that is, mail and wire fraud, from a place in the United States
19 to a place outside the United States, knowing that the monetary
20 instrument and funds involved in the transportation,
21 transmission, and transfer represented the proceeds of some
22 form of unlawful activity and knowing that such
23 transportation, transmission, and transfer was designed in
24 whole and in part to conceal and disguise the nature, location,
25 source, ownership, and control of the proceeds of the
26 specified unlawful activity, in violation of Title 18, United
27 States Code, Section 1956(a)(2)(B)(i).

28 All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATIONS

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2 1. The allegations contained in Counts 1 and 2 above are realleged
3 herein and incorporated for purposes of seeking forfeiture to the United
4 States pursuant to Title 18, United States Code, Section 981(a)(1)(C),
5 and Title 28, United States Code, Section 2461(c) and Title 18, United
6 States Code, Sections 982(a)(1) and 982(b).

7 2. Upon conviction of the offense set forth in Count 1, and
8 pursuant to Title 18, United States Code, Section 981(a)(1)(C), and
9 Title 28, United States Code, Section 2461(c), defendants GEMMA TRAYA
10 AUSTIN, MICHAEL CRIS TRAYA SORDILLA, and BRYAN NAVALES TAROSA shall
11 forfeit to the United States of America all their rights, title, and
12 interest, in any property, real and personal, constituting and derived
13 from proceeds traceable to such offense. The properties to be forfeited
14 include, but are not limited to:

15 a. the real property located at 484 Jamul Ct, Chula Vista
16 California, 91911, more particularly described as: Lot 4 of
17 Country Club View No. 3, in the City of Chula Vista, County
18 of San Diego, State of California, According to Map Thereof
19 No. 4428, Filed in the Office of the County Recorder of San
20 Diego County, December 29, 1959;

21 b. \$3,504,126.37 seized from Bank A business checking account
22 number ending in -8816 in the name PageTurner Press and Media
23 LLC;

24 c. \$904,939.16 seized from Bank C account number ending in -7639
25 in the name GEMMA TRAYA AUSTIN;

26 d. \$31,419.13 seized from Bank C checking account number ending
27 in -9011 in the name PageTurner Press and Media LLC;

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1 e. \$1,442,345.69 seized from Bank D checking account number
2 ending in -2745 in the name PageTurner Press and Media LLC.

3 3. Upon conviction of the offense set forth in Count 2, and
4 pursuant to Title 18, United States Code, Section 982(a)(1), defendants
5 GEMMA TRAYA AUSTIN, MICHAEL CRIS TRAYA SORDILLA, and BRYAN NAVALES TAROSA
6 shall forfeit to the United States of America all their rights, title,
7 and interest, in any property, real and personal, involved in the offense
8 and any property traceable to such property. The properties to be
9 forfeited include, but are not limited to, the same specific properties
10 described in paragraph 2(a) though 2(e) above.

11 4. If any of the forfeitable property, as a result of any act or
12 omission of the defendants:

- 13 a. cannot be located upon the exercise of due diligence;
- 14 b. has been transferred or sold to, or deposited with, a third
15 party;
- 16 c. has been placed beyond the jurisdiction of the Court;
- 17 d. has been substantially diminished in value; or
- 18 e. has been commingled with other property which cannot be
19 subdivided without difficulty;

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1 it is the intent of the United States, pursuant to Title 18, United
2 States Code, Section 982(b), and Title 28, United States Code,
3 Section 2461(c), to seek forfeiture of any other property of the
4 defendants up to the value of the forfeitable property.

5 All pursuant to Title 18, United States Code, Sections 981(a)(1)(C),
6 982(a)(1), and 982(b), and Title 28, United States Code, Section 2461(c).

7 DATED: December 20, 2024.

8 A TRUE BILL:



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10
11 TARA K. McGRATH
12 United States Attorney

13 By:


14 OLEKSANDRA Y. JOHNSON
15 Assistant U.S. Attorney
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