

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREGORY CAMACHO,

Defendant.

CRIMINAL NO. 2021/ 06

INDICTMENT

**VIOLATIONS**

Conversion of Government Property

18 U.S.C. § 641

Acts Affecting a Personal Financial  
Interest

18 U.S.C. § 208

Wire Fraud

18 U.S.C. § 1343

False, Fictitious or Fraudulent Claims

18 U.S.C. § 287

Theft of Government Property

18 U.S.C. § 641

**THE GRAND JURY CHARGES:**

**INTRODUCTION**

At all times relevant to this Indictment:

1. The National Park Service ("NPS") is a bureau of the U.S. Department of the Interior.
2. The NPS, as outlined in the NPS Organic Act, 1916, is tasked with providing opportunities for public use and enjoyment of national parks and monuments, while simultaneously protecting its natural and historic resources.
3. The Virgin Islands is in Department of Interior Region 2, South Atlantic – Gulf, with the regional office located in Atlanta, Georgia.
4. The NPS properties on St. Croix, Virgin Islands, include the Christiansted National Historical Site, the Buck Island Reef National Monument, and the Salt River Bay National

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Historical Park and Ecological Preserve.

5. **Gregory Camacho (“Camacho”)** began his employment with the NPS in 2007 as a law enforcement ranger. **Camacho** held this position in both St. Croix, VI, and Atlanta, GA. **Camacho** was promoted to Supervisory Law Enforcement Ranger in 2015 and was stationed in multiple locations, including St. Croix, VI.

6. From September 2018 – March 2019, **Camacho** was granted a temporary detail as Acting Deputy Park Superintendent on St. Croix, VI.

7. In June 2019, **Camacho** was promoted to Deputy Park Superintendent on St. Croix, VI, where he is currently assigned and maintains his law enforcement commission. In addition, from June 2019 – August 2020, Camacho served as Acting Park Superintendent on St. Croix, VI.

#### **OVERVIEW OF THE HOUSING SCHEME**

8. The NPS at Sion Farm on St. Croix, VI, maintains government housing units that are available for rent by NPS employees.

9. House Three is a housing unit that can be classified as a single-family home or dormitory style residence. The required rent is determined by the use and classification.

10. From September 2018 – March 2019, **Camacho** stayed in House Three. However, he was not required to pay rent as he was in a temporary position and the Government paid for his lodging and per diem.

11. From June 2019 – August 2020, after his promotion to Deputy Park Superintendent, **Camacho** occupied House Three as a single-family home.

12. From June 2019 – January 2020, **Camacho** paid no rent. In June 2020, **Camacho** paid reduced rent for February 2020 – June 2020, after he directed a subordinate to change the

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housing classification to dormitory style. From July 2020 – August 2020, **Camacho** paid no rent.

**COUNTS ONE - FIFTEEN**  
**(Conversion of Government Property)**

13. The factual allegations contained in Paragraphs 1 through 12 of this Indictment are re-alleged and incorporated as if fully set forth herein.

14. From on or about June 2019 to on or about August 2020, on St. Croix, in the District of the Virgin Islands, the defendant,

**GREGORY CAMACHO,**

did willfully and knowingly convert to his personal use NPS Government housing by occupying the NPS Government housing without paying the required rent, the value of the required rent exceeding \$1,000, each month constituting a separate count as specified below:

| <u>Count</u> | <u>Date</u>    | <u>Required Rent Amount</u> |
|--------------|----------------|-----------------------------|
| 1            | June 2019      | \$1,955.57                  |
| 2            | July 2019      | \$1,955.57                  |
| 3            | August 2019    | \$1,955.57                  |
| 4            | September 2019 | \$1,955.57                  |
| 5            | October 2019   | \$1,955.57                  |
| 6            | November 2019  | \$1,955.57                  |
| 7            | December 2019  | \$1,955.57                  |
| 8            | January 2020   | \$1,955.57                  |
| 9            | February 2020  | \$1,955.57                  |
| 10           | March 2020     | \$2,008.27                  |
| 11           | April 2020     | \$2,008.27                  |
| 12           | May 2020       | \$2,008.27                  |
| 13           | June 2020      | \$2,008.27                  |

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|    |             |            |
|----|-------------|------------|
| 14 | July 2020   | \$2,008.27 |
| 15 | August 2020 | \$2,008.27 |

All in violation of Title 18, United States Code, § 641.

**COUNT SIXTEEN**  
**(Acts Affecting a Personal Financial Interest)**

15. The factual allegations contained in Paragraphs 1 through 12 of this Indictment are re-alleged and incorporated as if fully set forth herein.

16. On or about June 17, 2020, on St. Croix, in the District of the Virgin Islands, the defendant,

**GREGORY CAMACHO,**

being an officer and employee of the NPS of the U.S. Department of the Interior, knowingly and willfully participated personally and substantially as a Government officer and employee, through directing a subordinate to change the classification of his Government housing unit from a single-family home to dormitory style to lessen the rent that was required from him, and in which defendant had a financial interest, in violation of Title 18, United States Code, §§ 208(a) and 216(a)(2).

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**COUNT SEVENTEEN**  
**(Wire Fraud)**

17. The factual background contained in Paragraphs 1 through 7 of this Indictment is re-alleged and incorporated as if fully set forth herein.

18. On or about August 15, 2015, through August 12, 2019, the defendant,

**GREGORY CAMACHO,**

did knowingly devise and intend to devise a scheme and artifice to defraud the NPS and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

**OBJECT OF THE SCHEME AND ARTIFICE**

19. The object of the scheme and artifice to defraud was for **Camacho** to obtain money under false pretenses from the NPS that he was not entitled to.

**MANNERS AND MEANS OF THE SCHEME AND ARTIFICE**

20. It was part of the scheme and artifice to defraud the NPS that **Camacho** would submit false permanent change of duty station questionnaires and vouchers to the NPS reflecting that various members of his family would be relocating with him.

21. Based on the documentation submitted by **Camacho**, the Accounting Operations Center of the NPS would provide reimbursement for the relocation expenses allegedly incurred by **Camacho**. The Accounting Operations Center of the NPS is located in Herndon, VA.

22. In 2015, **Camacho** relocated from Atlanta, GA, to Marrero, LA, and falsely claimed that his two sons relocated with him. As a result, **Camacho** received an additional \$2,670 in NPS relocation expenses reimbursement that he was not entitled to.

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23. In 2017, **Camacho** relocated from St. Croix, VI, to Titusville, FL, and falsely claimed that his two sons relocated with him. As a result, **Camacho** received an additional \$2,775 in NPS relocations expenses reimbursement that he was not entitled to.

24. In July 2019, **Camacho** relocated from Titusville, FL, to St. Croix, VI, and falsely claimed that his wife, two sons, and two daughters relocated with him. As a result, **Camacho** received an additional \$13,387.50 in NPS relocation expenses reimbursement that he was not entitled to.

25. On or about August 12, 2019, in the District of the Virgin Islands and elsewhere, the defendant,

**GREGORY CAMACHO,**

for the purposes of executing the scheme described above, caused to be transmitted by means of wire communications in interstate commerce, emails to the NPS that contained change of duty station voucher documentation, knowing that the claim was false, fictitious, and fraudulent in that he falsely reflected he was relocating various members of his family with him to the new duty station, in violation of Title 18, United States Code, § 1343.

**COUNT EIGHTEEN**  
**(False, Fictitious or Fraudulent Claims)**

26. The factual background contained in Paragraphs 1 through 7 of this Indictment is re-alleged and incorporated as if fully set forth herein.

27. On or about August 12, 2019, on St. Croix, in the District of the Virgin Islands, the defendant,

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**GREGORY CAMACHO,**

made and presented to the NPS a claim upon and against the NPS, that is, permanent change of duty station voucher documentation, knowing that the claim was false, fictitious, and fraudulent in that he falsely reflected he was relocating various members of his family with him to the new duty station, in violation of Title 18, United States Code, § 287.

**COUNT NINETEEN**  
**(Theft of Government Money)**

28. The factual background contained in Paragraphs 1 through 7 of this Indictment is re-alleged and incorporated as if fully set forth herein.

29. On or about November 19, 2019, on St. Croix, in the District of the Virgin Islands, the defendant,

**GREGORY CAMACHO,**

did willfully and knowingly convert to his personal use NPS funds, the value exceeding \$1,000, in violation of Title 18, United States Code, § 641

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**COUNTS TWENTY – TWENTY-SIX**  
**(Wire Fraud)**

30. The factual background contained in Paragraphs 1 through 7 of this Indictment is re-alleged and incorporated as if fully set forth herein.

31. On or about October 24, 2018, through November 1, 2019, the defendant,

**GREGORY CAMACHO,**

did knowingly devise and intend to devise a scheme and artifice to defraud the NPS and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

**OBJECT OF THE SCHEME AND ARTIFICE**

32. The object of the scheme and artifice to defraud the NPS was for **Camacho** to obtain money under false pretenses from the NPS that he was not entitled to.

**MANNER AND MEANS OF THE SCHEME AND ARTIFICE**

33. As a part of his duties at the NPS, **Camacho** traveled from his primary duty station and was entitled to reimbursement for various travel-related expenses, including Meal and Incidental Expenditures (“M&IE”).

34. The NPS utilizes the Department of the Interior’s travel voucher and payment system known as Concur to process and provide travel expense reimbursement.

35. From September 23, 2018, to October 22, 2018, **Camacho** traveled to St. Croix, VI, on a temporary detail assignment. On October 24, 2018, **Camacho**, through Concur, signed, and submitted his travel voucher, claiming M&IE per diem.



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36. From October 16, 2018, to October 21, 2018, **Camacho** traveled from St. Croix, VI, to Titusville, FL (his duty station). On November 6, 2018, **Camacho**, through Concur, signed, and submitted his travel voucher, claiming M&IE per diem.

37. The travel vouchers referenced in paragraphs 35 and 36 overlapped and resulted in **Camacho** improperly claiming M&IE per diem for two locations simultaneously.

38. In addition, because the travel voucher referenced in paragraph 35 was for a period of 30 days or longer, Camacho was required to claim reduced M&IE. He failed to do so.

39. From October 23, 2018, to January 13, 2019, **Camacho** traveled to St. Croix, VI, on a second temporary detail assignment. On January 30, 2019, **Camacho**, through Concur, signed, and submitted his travel voucher, claiming M&IE per diem.

40. From November 14, 2018, to November 28, 2018, **Camacho** traveled from St. Croix, VI, to Titusville, FL (his duty station). On March 27, 2019, **Camacho**, through Concur, signed, and submitted his travel voucher, claiming M&IE per diem for the first and last day of the travel.

41. The travel vouchers referenced in paragraphs 39 and 40 overlapped and resulted in **Camacho** improperly claiming M&IE per diem for two locations simultaneously.

42. From December 12, 2018, to December 14, 2018, **Camacho** traveled from St. Croix, VI, to Atlanta, GA. On January 30, 2019, **Camacho**, through Concur, signed, and submitted his travel voucher, claiming M&IE per diem.

43. The travel vouchers referenced in paragraphs 39 and 42 overlapped and resulted in **Camacho** improperly claiming M&IE per diem for two locations simultaneously.

44. In addition, because the travel voucher referenced in paragraph 39 was for a period

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of 30 days or longer, **Camacho** was required to claim reduced M&IE. He failed to do so.

45. From September 8, 2019, to September 14, 2019, **Camacho** traveled from St. Croix, VI, to San Juan, PR. On October 16, 2019, **Camacho**, through Concur, signed, and submitted his travel voucher, claiming M&IE per diem.

46. From September 10, 2019, to September 11, 2019, **Camacho** traveled from San Juan, PR, to St. Croix, VI (his duty station). On November 1, 2019, **Camacho**, through Concur, signed, and submitted his travel voucher, claiming M&IE per diem.

47. The travel vouchers referenced in paragraphs 45 and 46 overlapped and resulted in **Camacho** improperly claiming M&IE per diem for two locations simultaneously.

48. On or about the dates set forth below, in the District of the Virgin Islands and elsewhere, the defendant,

**GREGORY CAMACHO,**

for the purposes of executing the scheme described above, caused to be transmitted by means of wire communications in interstate commerce, electronically submitted travel vouchers to the NPS through the Department of the Interior travel system known as Concur, knowing that the claim was false, fictitious, and fraudulent in that he submitted and sought per diem reimbursement on overlapping travel vouchers and failed to adjust per diem reimbursement submissions when reaching a 30-day period, each travel voucher submission constituting a separate count as specified below:

| Count | Date             |
|-------|------------------|
| 20    | October 24, 2018 |

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|    |                  |
|----|------------------|
| 21 | November 6, 2018 |
| 22 | January 30, 2019 |
| 23 | March 27, 2019   |
| 24 | January 30, 2019 |
| 25 | October 16, 2019 |
| 26 | November 1, 2019 |

All in violation of Title 18, United States Code, § 1343.

**COUNTS TWENTY-SEVEN – THIRTY-THREE**  
**(False, Fictitious or Fraudulent Claims)**

47. The factual background contained in Paragraphs 1 through 7 of this Indictment is re-alleged and incorporated as if fully set forth herein.

48. On or about the dates set forth below, in the District of the Virgin Islands and elsewhere, the defendant,

**GREGORY CAMACHO,**

made and submitted to the NPS, through the Department of the Interior travel system known as Concur, a claim upon and against the NPS, that is, travel vouchers, knowing that the claim was false, fictitious, and fraudulent in that he submitted and sought per diem reimbursement on overlapping travel vouchers and failed to adjust per diem reimbursement submissions when reaching a 30-day period, each travel voucher submission constituting a separate count as specified below:

| <b>Count</b> | <b>Date</b>      |
|--------------|------------------|
| 27           | October 24, 2018 |
| 28           | November 6, 2018 |

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|    |                  |
|----|------------------|
| 29 | January 30, 2019 |
| 30 | March 27, 2019   |
| 31 | January 30, 2019 |
| 32 | October 16, 2019 |
| 33 | November 1, 2019 |

All in violation of Title 18, United States Code, § 287.

**COUNT THIRTY-FOUR**  
**(Theft of Government Money)**

49. The factual background contained in Paragraphs 1 through 7 of this Indictment is re-alleged and incorporated as if fully set forth herein.

50. On or about October 29, 2018, through November 14, 2018, on St. Croix, in the District of the Virgin Islands, the defendant,

**GREGORY CAMACHO,**

did willfully and knowingly convert to his personal use NPS funds, the value exceeding \$1,000, in violation of Title 18, United States Code, § 641

**COUNT THIRTY-FIVE**  
**(Theft of Government Money)**

51. The factual background contained in Paragraphs 1 through 7 of this Indictment is re-alleged and incorporated as if fully set forth herein.

52. On or about February 8, 2019, through April 9, 2019, on St. Croix, in the District of the Virgin Islands, the defendant,

**GREGORY CAMACHO,**

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did willfully and knowingly convert to his personal use NPS funds, the value exceeding \$1,000,  
in violation of Title 18, United States Code, § 641

**COUNT THIRTY-SIX**  
**(Theft of Government Money)**

53. The factual background contained in Paragraphs 1 through 7 of this Indictment is re-alleged and incorporated as if fully set forth herein.

54. On or about October 21, 2019, through November 5, 2019, on St. Croix, in the District of the Virgin Islands, the defendant,

**GREGORY CAMACHO,**

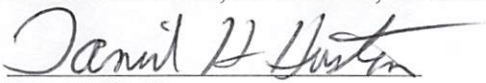
did willfully and knowingly convert to his personal use NPS funds, the value not exceeding \$1,000,  
in violation of Title 18, United States Code, § 641

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The Grand Jury returned a TRUE BILL

**GRETCHEN C.F. SHAPPERT**  
United States Attorney

By: ALESSANDRA SERANO Digitally signed by ALESSANDRA  
SERANO  
Date: 2021.04.20 08:33:45 -04'00'  
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By:   
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DISTRICT COURT OF THE VIRGIN ISLANDS: Returned into the District Court on  
this 20<sup>th</sup> day April 2021, by Grand Jurors and filed.

  
**GEORGE W. CANNON, JR.**  
U.S. Magistrate Judge  
District of the Virgin Islands