

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**CV 16 - 5266**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERCAN BARKA, a/k/a JOHN BARKA,  
d/b/a DGF MANAGEMENT, CLIFFMONT  
GROUP LIMITED, CORE DIRECT LTD.,  
BROWN STONE, PHOENIX MARKETING  
SOLUTIONS CORPORATION, AND RED  
CREEK LTD., and

TRUE VISION LLC,

Defendants.

COMPLAINT

Civil Action No. 16-

FILED  
CLERK  
2016 SEP 22 AM 9:30  
U.S. DISTRICT COURT  
EASTERN DISTRICT  
OF NEW YORK

**VITALIANO, J.**

**SCANLON, M.J.**

Plaintiff, the UNITED STATES OF AMERICA, by and through the undersigned attorneys, hereby alleges as follows:

INTRODUCTION

1. The United States brings this action for a temporary restraining order, preliminary and permanent injunctions, and other equitable relief pursuant to 18 U.S.C. § 1345, in order to enjoin the ongoing commission of criminal mail fraud in violation of 18 U.S.C. § 1341. The United States seeks to prevent continuing and substantial injury to the victims of fraud.

2. Since at least 2012, and continuing to the present, defendants Ercan Barka (“Barka”) and True Vision LLC (collectively “Defendants”), using the U.S. mail, have engaged in a predatory mail fraud scheme that targets victims throughout the United States and abroad.

3. Each year since at least 2012, Defendants send millions of written solicitations through the U.S. mail to recipients throughout the United States and abroad. These solicitations