

DAVID B. BARLOW, United States Attorney (#13117)  
MICHAEL J. ROMANO, Special Assistant United States Attorney  
STUART A. WEXLER, Special Assistant United States Attorney  
Attorneys for the United States of America  
185 South State Street, #300  
Salt Lake City, Utah 84111  
Telephone: (801) 524-5682

FILED  
U.S. DISTRICT COURT  
2013 JUN 26 12:00  
DISTRICT OF UTAH  
BY: \_\_\_\_\_  
DEPUTY CLERK

---

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

---

UNITED STATES OF AMERICA, :

Plaintiff, :

vs. :

PAUL BEN ZACCARDI, :

Defendant. :

INDICTMENT

VIOLATIONS OF:

18 U.S.C. § 287 – False,  
Fictitious, and Fraudulent  
Claims

18 U.S.C. § 514(a)(2) –  
Fictitious Obligations

Case: 2:13-cr-00463  
Assigned To : Campbell, Tena  
Assign. Date : 06/26/2013  
Description: USA v.

---

THE GRAND JURY CHARGES THAT:

**COUNTS ONE THROUGH FIVE**

(18 U.S.C. § 287 – False, Fictitious, and Fraudulent Claims)

On or about August 20, 2008, within the District of Utah and elsewhere,

Defendant

**PAUL BEN ZACCARDI,**

a resident of Sandy, Utah, made and presented to the Internal Revenue Service, an agency  
of the United States Department of the Treasury, claims against the United States in the

amounts listed below with knowledge that such claims were false, fictitious, and fraudulent. Defendant made and presented the false claims by submitting U.S. Individual Income Tax Returns, Forms 1040, for the years listed below, which requested federal income tax refunds to which Defendant knew he was not entitled.

<b>Count</b>	<b>Year</b>	<b>Amount of Claim</b>
1	1996	\$90,449.01
2	1997	\$313,221.79
3	1998	\$372,817.21
4	1999	\$389,215.20
5	2000	\$344,547.98

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

**COUNTS SIX THROUGH EIGHT**  
(18 U.S.C. § 514(a)(2) – Fictitious Obligations)

On or about the dates listed below, within the District of Utah and elsewhere,

Defendant

**PAUL BEN ZACCARDI,**

a resident of Sandy, Utah, with intent to defraud the United States, passed, uttered, presented, offered, brokered, issued, sold, and attempted and caused to do the same, false and fictitious instruments appearing, representing, purporting, and contriving through scheme and artifice to be actual securities and other financial instruments issued under the authority of the United States. Specifically, Defendant submitted to the Internal

Revenue Service false and fictitious instruments with the titles and amounts listed below for the purported payment of tax.

Count	Date	Title	Amount
6	June 27, 2008	Certified Payment Bond	\$5,000,000
7	November 9, 2009	Private-Discharging-And-Indemnity-Bond	\$300,000,000
8	November 9, 2009	Peace-Bond	\$300,000,000

All in violation of Title 18, United States Code, Section 514(a)(2).

A TRUE BILL:

151  
FOREPERSON OF THE GRAND JURY

DAVID B. BARLOW  
United States Attorney

Michael J. Romano  
MICHAEL J. ROMANO  
Special Assistant United States Attorney

Stuart A. Wexler  
STUART A. WEXLER  
Special Assistant United States Attorney