

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

FEB 24 2011

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MATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.)
)
 PAUL CONRAD WARD, JR.)
)
 Defendant.)

CRIMINAL NO. 1:10-cr02318 JB
Counts 1-5: 18 U.S.C. §§ 1343 and 2(a),
Wire Fraud and Aiding and Abetting;
Count 6: 18 U.S.C. §§ 981 and 982,
Forfeiture.

FIRST SUPERSEDING INDICTMENT

The Grand Jury charges:

Introduction

1. Beginning at least on or about December 11, 2006, and continuing through on or about August 20, 2008, in the District of New Mexico and elsewhere, the defendant, **PAUL CONRAD WARD, JR.**, devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, promises, and omissions, and for the purpose thereof, the defendant knowingly and wilfully engaged in the acts and omissions as further set forth herein.

2. The defendant is an attorney licensed by the State of California. He formed and caused to be formed business entities called Dynasty Interest Trust Private Fund and Dynasty International Group, Inc.

3. Acting on behalf of Dynasty, the defendant solicited and accepted \$500,000.00 from the victim, with whom the defendant had established an attorney-client relationship, and promised to invest the victim's money. However, the defendant did not invest the money as

promised but rather in less than three weeks time spent almost all of the victim's money for his own personal use and the use of others.

4. The defendant knowingly and willfully made the following material misrepresentations to the victim, including, but not limited to, the following:

- a. the victim's money would be invested in a trading program;
- b. the victim's money would be allowed to "piggyback" on a trading program initiated by a trader for the Vatican involving \$2 billion euros;
- c. the program would go into trade within 30 days;
- d. the defendant would go to Santander Bank in Madrid to sign all of the original documents, and then the trading would start;
- e. the entire program would run for 42 weeks and end in July 2008;
- f. the defendant would give the victim a guarantee on her payout and an advance of her payments after the trading started; and
- g. the defendant's proposed investments promised a high yield and specifically income of 15% per week.

5. The defendant also falsely represented to the victim that the defendant was associated with a member of the former Dutch royal family of Indonesia who was very wealthy and who managed the private assets of the Indonesian royal family.

6. Relying on the defendant's representations, the victim gave the defendant approximately \$500,000.00 to invest in the Spanish trading program. Instead of investing this money, as promised, the defendant transferred and caused to have transferred the victim's money into personal bank accounts controlled by the defendant and others and within less than three

weeks converted nearly all of the victim's money to the defendant's personal use and the use of others.

7. To lull the victim into a false sense of security, the defendant promised that the victim's money would be returned to her; the defendant gave the victim reports of imminent returns on her investment; and the defendant told the victim that the defendant was involved in ventures that would soon enable the defendant to return the victim's money to the victim.

Execution of the Scheme and Artifice to Defraud

8. Paragraphs 1-7 of this indictment are incorporated as part of this count of the information as if fully re-alleged herein.

9. In the District of New Mexico and elsewhere, for the purpose of executing the scheme and artifice to defraud described herein and to obtain the victim's money and property by means of materially false and fraudulent pretenses, representations, and promises, the defendant, **PAUL CONRAD WARD, JR.**, knowingly and wilfully transmitted and caused to be transmitted in interstate commerce, by means of wire communications, certain writings, signs, signals, and sounds, on as follows:

COUNT	DATE	DESCRIPTION OF WIRE TRANSACTION
1	August 21, 2007	Email from the defendant to the victim describing the investment program he invited her to invest in
2	September 10, 2007	\$500,000.00 wire transfer from the victim's Compass Bank account to Dynasty's Chase Bank account number XXXXXX6313
3	September 10, 2007	\$500,000 wire transfer from Dynasty Interest's Chase Bank account number XXXXXX6313 to Dynasty International's JP Morgan Chase Bank account number XXXXXX4374

4	September 10, 2007	\$297,000 wire transfer from Dynasty's JP Morgan Chase Bank account number XXXXXX4374 to the defendant's Bank of America account number XXXXX10806
5	September 10, 2007	\$50,000 wire transfer from Dynasty's JP Morgan Chase Bank account number XXXXXX4374 to Ward's Washington Mutual bank account number XXXXXX2752

In violation of 18 U.S.C. §§ 1343 and 2(a).

Count 6

10. Pursuant to 18 U.S.C. § 982(a)(1), the defendant, if convicted of one or more of the offenses set forth in Counts 1 through 5 shall forfeit to the United States the following property:

a. All right, title, and interest in any and all property involved in each offense in violation of 18 U.S.C. § 1343 for which the defendant is convicted, and all property traceable to such property, including the following: (1) all money or other property that was the subject of each transaction, transportation, transmission or transfer in violation of § 1343; (2) all commissions, fees and other property constituting proceeds obtained as a result of those violations; and (3) all property used in any manner or part to commit or to facilitate the commission of those violations.

b. A sum of money equal to the total amount of money involved in each offense for which the defendant is convicted.

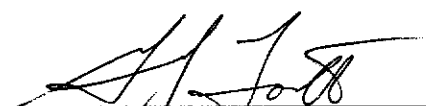
11. Pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), the defendant shall forfeit substitute property, up to the value of the amount described in paragraph 3, or any portion thereof, that cannot be located upon the exercise of due diligence; has been

transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All in accordance with 18 U.S.C. § 982(a)(1) and F.R.Crim.P. 32.2(a).

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY


Assistant United States Attorney

02/23/2011 (11:01am)