

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	<u>I N D I C T M E N T</u>
)	
Plaintiff,)	CR. NO. _____
)	Title 18, Sections 371,
v.)	1341, 1956(a)(1)(A), and
)	2, United States Code
DANIEL JOSIC,)	
JEREMY JOSIC, and)	
DONNA M. BOMBARD,)	
)	
Defendants.)	

COUNT 1

The Grand Jury charges:

1. At times relevant herein:

A. The defendant, DANIEL JOSIC, resided at 543 Somerset Road, Akron, Ohio, and 1565 Scenic Hollow Drive, Rochester Hills, Michigan, and controlled several Michigan and Ohio entities, including Omni Publishing, Horizon

Publishing, and Monitor Publishing, each purporting to be in the business of publishing and mailing materials to customers.

B. The defendant, JEREMY JOSIC, resided at 3199 Buena Hills Drive, Oceanside, California, and controlled at least two entities in California known as Ocean Publishing and Global Consumer Information, purporting to be in the business of publishing and mailing materials to customers.

C. The defendant, DONNA M. BOMBARD, resided at 12141 Monsbrook Drive, Sterling Heights, Michigan, and was employed by the defendant, DANIEL JOSIC, in his purported publishing businesses.

2. The defendants, DANIEL JOSIC and JEREMY JOSIC, at least as early as March 1999, who were later aided and abetted by the defendant, DONNA M. BOMBARD, undertook a scheme to defraud various persons across the United States by falsely offering a work-at-home business involving stuffing and mailing envelopes, or stapling booklets, for the purported businesses which the defendants claimed would pay individuals money, in varying amounts between \$5 and \$10, for each envelope stuffed and mailed, or booklet stapled.

3. As a part of the scheme to defraud, the defendants from time to time, would use various business names in order to avoid growing complaints against any one company. Some of the company names used by the defendants included

the following during the noted periods of time:

Company Name	Location	Approx. Time Period
Central Communications	Warren, MI 48090	June 2003
Avon Communications	Monroe, MI 48161	Nov 2002– June 2003
Rainbow Publications	Cleveland, OH 44106	April – July 2002
Lakeside Publications	Troy, MI 48083	May 2002 – June 2003
Ocean Publishing	Oceanside, California	2003
Avon Publishing	Cleveland, OH 44106	March - May 2002
Horizon Publishing	Fairview Park, OH 44126	Sept 2001 – May 2002
Monitor Publishing	Akron, OH 44320	Sept 2001 – Nov 2001
Omni Publishing	Akron, OH 44320	Feb 2001 - Jan 2002
Able Publishing	Detroit, MI 48207	May 2001 – Dec 2001
Acme Publishing	Royal Oak, MI 48067	Feb 2001
ABC Publishing	Detroit, MI 48207	Feb – May 2001
Griffin Enterprises	Highland Park, MI 48203	January 2000
Consumer Publishing	Centerline, MI 48015	July - August 1999
Apex Publishing	Akron, OH 44333	July - August 1999
KLM Publishing	Utica, MI 48318	July - August 1999
Global Consumer Information	Carlsbad, California	June 1999 - April 2002
Financial Publishing	Centerline, MI 48015	July - August 1999
D.J. Company	Sterling Heights, MI 48311	March 1999 – Dec 2001

4. As a further part of the scheme to defraud, persons interested in the work-at-home business were asked to pay, up front, a fee, in varying amounts, as an “application fee” before receiving materials for the stuffing of envelopes or stapling of booklets. The defendants did send some materials to persons who paid the application fee, but it was never the intention of the defendants to pay anyone for stuffing and mailing envelopes or stapling booklets. Rather, the sole purpose of the purported businesses run by the defendants was to fraudulently collect application fees from persons enticed to do so.

5. As a further part of such scheme to defraud the defendants would fail to disclose material facts to persons interested in any one of the defendants’ purported work-at-home businesses, such as, the fact that no one who became

involved with any of the work-at-home businesses made any money from the purported business.

6. As a further part of such scheme to defraud the defendants would, from time to time, make false statements to induce and entice persons to pay the application fee to start the work-at-home business, including some or more of the following:

a. That the defendants' business had so much work on hand that they were paying money per envelope to "home workers" for stuffing and mailing envelopes; whereas, in truth, the defendants had no business in need of mailings by home workers.

b. That the defendants were mailing "paychecks" to home workers on Tuesdays which they would receive by Fridays for completing the mailings; whereas, in truth, the defendants paid no one for mailings.

c. That home workers could earn from \$2,900 to \$5,000 per week with the defendants' purported work-at-home business; whereas, in truth, there were no home workers who made any money from such work-at-home businesses.

d. That the application fees were "money-back guaranteed," and, further, that the defendants would make refunds to home workers after they received their third "paycheck"; whereas, in truth, the defendants discouraged

refund requests by establishing a practice of requiring difficult procedures of anyone requesting refunds and, in reality, made only a very few refunds to those individuals perceived by the defendants as a risk of reporting the defendants to the authorities.

7. As a further part of such scheme to defraud, the defendants used the United States mails in furtherance of the scheme to defraud by mailing advertisements to various individuals in mass mailings, and further, caused the use of the mails by receiving the payments of fees from individuals through the mails.

8. As a further part of the scheme to defraud, the defendants, DANIEL JOSIC and JEREMY JOSIC, fraudulently collected, at least, \$2 million during the period from approximately March 1999 through June 2003.

9. Beginning on or about March 1, 1999, and continuing through on or about June 30, 2003, the exact dates being unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants, DANIEL JOSIC, JEREMY JOSIC, and DONNA M. BOMBARD, did knowingly and willfully conspire together and with each other to commit an offense against the United States as follows:

Mail Fraud, in violation of Title 18, United States Code, Section 1341.

MANNER AND MEANS

10. Defendants employed the following manner and means to attain the objective of the conspiracy:

a. The defendants obtained the services of a mass mailing company to send flyers to various individuals which offered an opportunity to make money from a work at home business stuffing and mailing envelopes.

b. The defendants sent “starter kits” to various individuals containing booklets to be stapled, or envelopes, advertisements, and mailing lists, to make it appear there was a legitimate mailing business from which the individuals could make income as promised by stapling booklets, or stuffing and mailing the envelopes.

c. The defendants used various business names, as mentioned in paragraph 3 of this Indictment, to avoid undue attention to any one company name used by the defendants in the scheme to defraud.

d. The defendants caused thousands of individuals to send them fees for starter kits to begin the supposed work at home mailing business.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, one or more of the co-conspirators committed, and caused to be committed, overt acts in

the Northern District of Ohio, Eastern Division, and elsewhere, including but not limited to the following:

11. On January 13, 2001, the defendant, DANIEL JOSIC, opened a commercial mail box at Mail Boxes Etc., in Akron, Ohio, for the receipt of mail in the name of Omni Publishing.

12. On February 17, 2001, the defendant, DANIEL JOSIC, opened a bank account at the Ohio Savings Bank, Akron, Ohio in the name of Omni Publishing Corporation.

13. On March 20, 2001, the defendant, DANIEL JOSIC, opened a commercial mail box at Mail Boxes Etc., in Akron, Ohio, for the receipt of mail in the name of Monitor Publishing.

14. On August 14, 2001, the defendant, DANIEL JOSIC, opened a commercial mail box at Mail Boxes Etc., in Fairview Park, Ohio, for the receipt of mail in the name of Horizon Publishing.

15. The Grand Jury adopts as overt acts each of the acts committed as stated in counts 2 through 13 of this Indictment.

In violation of Title 18, United States Code, Section 371.

COUNTS 2 through 7

The Grand Jury further charges:

1. The Grand Jury herewith re-alleges as if fully set forth herein, all of the allegations contained in Paragraphs 1 through 8 of Count 1 of this Indictment.

2. On or about the following dates, in the Northern District of Ohio, Eastern Division, the defendants, DANIEL JOSIC, JEREMY JOSIC, and DONNA M. BOMBARD, for the purpose of executing such scheme and artifice to defraud and to obtain money, and attempting to do so, did knowingly cause money orders in the following amounts, from the following individuals, to be delivered by mail to Horizon Publishing, 21759 Lorain Road, #345, Fairview Park, Ohio 44126:

Count	Date	Sender	Amount
2	9/7/2001	Karla Clark, Wayne, Oklahoma	\$169
3	9/9/2001	Eric Brackett, Indianapolis, In.	\$170
4	9/10/2001	Heidi Peck, McConnellsburg, Pa.	\$169
5	10/6/2001	James C. Milam, St. Louis, Mo.	\$79
6	11/25/2001	Larry Muradian, Altadena, Ca.	\$169
7	11/29/2001	Paul Keetle, Arlington, Tx.	\$79

In violation of Title 18, United States Code, Sections 1341 and 2.

COUNTS 8 through 13

The Grand Jury further charges:

1. The Grand Jury herewith re-alleges as if fully set forth herein, all of the allegations contained in Paragraphs 1 through 8 of Count 1 of this Indictment.

2. On or about the following dates, in the Northern District of Ohio, Eastern Division, the defendants, DANIEL JOSIC, JEREMY JOSIC, and DONNA M. BOMBARD, for the purpose of executing such scheme and artifice to defraud and to obtain money, and attempting to do so, did knowingly cause checks or money orders in the following amounts, from the following individuals, to be delivered by mail to Monitor Publishing, 566 White Pond Drive, C #319, Akron, Ohio 44320:

Count	Date	Sender	Amount
8	8/20/2001	David Casey, Goldsboro, NC	\$79
9	8/26/2001	Pamela Pack, Cumming, Ga.	\$79
10	8/27/2001	Nicole Cook, Groton, Ct.	\$119
11	9/10/2001	Karen Woods, Orlando, Fl.	\$169
12	9/10/2001	Kimberly Beasley, Memphis, Tn.	\$169
13	9/11/2001	Yvette Rhoads, Corydon, In.	\$169

In violation of Title 18, United States Code, Sections 1341 and 2.

COUNT 14

(Money Laundering Conspiracy)

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, the allegations of paragraphs 1 through 8 of Count 1 of this Indictment.

2. Beginning on or about March 1, 1999, and continuing through on or about June 30, 2003, the exact dates being unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, the defendants, DANIEL JOSIC and JEREMY JOSIC, did knowingly and willfully conspire together and with each other to conduct and attempt to conduct financial transactions involving property that represented the proceeds of specified unlawful activity, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, with the intent to promote the carrying on of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(I).

3. For the purpose of the preceding paragraph, the specified unlawful activity consisted of mail fraud, in violation of Title 18, United States Code, Section 1341.

MANNER AND MEANS

4. Defendants employed the following manner and means to attain the objectives of the conspiracy:

(a) The defendants used various bank accounts for the collection and disbursement of monies obtained from their scheme to defraud. The defendants used such accounts to collect monies from persons falling victim to their scheme and to pay for expenses of promoting the scheme.

(b) The defendant, JEREMY JOSIC, contracted with companies for printing and supplying mailing lists for use in promoting the defendants' scheme.

(c) The defendants used a company called "The Mailing House," (a dba for YEA, Inc.) in Oceanside, California, to print and mail flyers to persons whose names appeared upon mailing lists purchased by the defendants and used by the defendants to continue and promote their scheme.

(d) The defendants used a company called "America's Classified," in Spring Hill, Florida, as a source for mailing lists used by the defendants in connection with continuing and promoting their scheme.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, one or more of the co-conspirators committed, and caused to be committed, overt acts in

the Northern District of Ohio, Eastern Division, and elsewhere, including but not limited to the following:

5. On February 17, 2001, the defendant, DANIEL JOSIC, opened a bank account at the Ohio Savings Bank, Akron, Ohio in the name of Omni Publishing Corporation.

6. The Grand Jury adopts as overt acts each of the acts committed as stated in counts 15 through 18 of this Indictment.

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

COUNTS 15 - 18

(Money Laundering)

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein, the allegations of paragraphs 1 through 8 of Count 1 of this Indictment.

2. On or about the dates listed below, in the Northern District of Ohio, Eastern Division, the defendants, DANIEL JOSIC and JEREMY JOSIC, knowingly engaged in, and attempted to engage in, monetary transactions affecting interstate commerce, to wit, writing checks, drawn on the Ohio Saving Bank in Akron, Ohio, and causing them to be negotiated, in the amounts of money listed below, for the purpose of promoting their scheme described herein, and which

funds were derived from specified unlawful activity, to wit, mail fraud in violation of Title 18, United States Code, Section 1341:

Count	Date	Amount	Payee
15	10/1/2001	\$1,877.60	America's Classified
16	1/1/2002	\$1,782.96	The Mailing House
17	1/5/2002	\$1,213.76	America's Classified
18	1/25/2002	\$826.79	The Mailing House

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A).

FORFEITURE COUNT

The Grand Jury further charges:

For the purpose of alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), the allegations of Count 1 are incorporated herein by reference. As a result of the foregoing offense, defendants DANIEL JOSIC, JEREMY JOSIC and DONNA M. BOMBARD shall forfeit to the United States any and all property, real and personal, which constitutes or is derived from proceeds traceable to such violation; including, but not limited to, the following:

1. the amount the defendants fraudulently collected as part of the scheme to defraud [to wit: at least \$2 million].
2. Real property located at 1565 Scenic Hollow Drive, Rochester Hills,

Oakland County, Michigan, more particularly described as: Lot 49, North Oaks- A Singh Development, as recorded in Liber 210, Pages 30 through 35, of Plats, Oakland County Records. Permanent Parcel Number: 15-04-206-009. [DANIEL JOSIC]

Substitute Assets: In the event that any property subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), as a result of any act or omission of the defendants:

1. cannot be located upon exercise of due diligence;
2. has been transferred or sold to, or deposited with a third party;
3. has been placed beyond the jurisdiction of this Court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) [as incorporated by 28 U.S.C. § 2461(c)], to seek forfeiture of any other property of the defendants, up to an amount equivalent to the value of the property forfeitable under 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

A TRUE BILL.

United States v. Daniel Josic, et al.

A TRUE BILL.

FOREPERSON

GREGORY A. WHITE
UNITED STATES ATTORNEY