

THE SCHEME

3. Between on or about September 22, 2001 and in or about February 2005, defendant

ERIC KELLER

devised and intended to devise a scheme to defraud UPS, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

It was part of the scheme that:

4. Defendant ERIC KELLER created a succession of at least 12 UPS shipping accounts using fraudulent information for the purpose of shipping candy to ebulkandy customers. When one of defendant ERIC KELLER's UPS shipping accounts was in danger of suspension for non-payment, defendant KELLER abandoned the UPS shipping account at risk, opened another UPS shipping account using fraudulent information, and repeated the process. At the time he opened the UPS shipping accounts, defendant KELLER had no intention of paying UPS for shipping services.

5. By these fraudulent means, defendant ERIC KELLER defrauded UPS of approximately \$154,581.

6. On or about the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, defendant

ERIC KELLER,

for the purpose of executing this scheme and attempting to do so, knowingly caused to be delivered by the United Parcel Service, a commercial interstate carrier, according to directions

thereon, from ebulkcandy.com LLC, to the persons described below in the Eastern District of Pennsylvania, the packages listed below, each mailing constituting a separate count:

COUNT	DATE (on or about)	DESCRIPTION
1.	January 10, 2002	Package to M.R. in Drexel Hill, PA using UPS shipping account ebulkcandy.com.
2.	February 21, 2002	Package to D.D. in Downingtown, PA, using UPS shipping account ebulkcandy.com.
3.	March 18, 2002	Package to L.W. in Philadelphia, PA, using UPS shipping account ebulkcandy.com.
4.	April 8, 2002	Package to L.H. in Pottstown, PA, using UPS shipping account njcandy.com.
5.	August 29, 2003	Package to E.D. in Norwood, PA, using UPS shipping account Jordan Distributers.
6.	December 22, 2003	Package to R.W. in Downingtown, PA, using UPS shipping account named Gifts Direct.
7.	January 13, 2004	Package to D.M. in Collingdale, PA, using UPS shipping account named Gifts Direct.
8.	March 31, 2004	Package to T.S. in Philadelphia, PA, using UPS shipping account named Photo Express.

COUNT	DATE (on or about)	DESCRIPTION
9.	July 14, 2004	Package to M.B. in Allentown, PA, using UPS shipping account named Package Expediting.
10.	September 3, 2004	Package to F.W. in Philadelphia, PA, using UPS shipping account named Wedding Planner Supply.

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

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY