

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO. 07 - 394**
v. : **DATE FILED:** 7-13 -07
QUANTINA MOORE-PERRY : **VIOLATION:**
: **18 U.S.C. § 1343 (wire fraud - 1 count)**
: **Notice of forfeiture**

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times relevant to this indictment:

1. QVC, Inc., of Studio Park, West Chester, Pennsylvania, sold through its television station and on its website, consumer items, including ladies purses and handbags, housewares, jewelry, and electronic items.

2. From in or about March 2005, through in or about November 2005, defendant

QUANTINA MOORE-PERRY

devised and intended to devise a scheme to defraud QVC, 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:

3. Defendant QUANTINA MOORE-PERRY opened QVC account number

██████████ and used this account number to order more than 1800 items over the internet from

the QVC website.

4. Defendant QUANTINA MOORE-PERRY exploited a flaw in the QVC system by ordering, then immediately cancelling, items from the QVC website. The flaw allowed her to receive a credit for the items cancelled, but did not prevent the delivery of more than 1800 items to the defendant in North Carolina, for which she never paid.

5. By this method, defendant QUANTINA MOORE-PERRY received approximately \$412,679 in merchandise, much of which she then re-sold.

6. Between in or about March 2005, and in or about November 2005, in the Eastern District of Pennsylvania and elsewhere, defendant

QUANTINA MOORE-PERRY,

for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce signals and sounds, that is, computer internet transmissions from North Carolina to Pennsylvania.

In violation of Title 18, United States Code, Section 1343.

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 1343, set forth in this information, defendant

QUANTINA MOORE-PERRY

shall forfeit to the United States of America any property that constitutes, or is derived from, proceeds obtained directly or indirectly from the commission of such offense, including, but not limited to, the sum of \$412,679.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2).

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**