

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO. 09-\_\_\_\_\_**  
**v.** : **DATE FILED: \_\_\_\_\_**  
**JOHN WILLIAM SNYDER** : **VIOLATIONS:**  
: **18 U.S.C. § 1343 (wire fraud - 3 counts)**  
: **Notice of forfeiture**

**INFORMATION**

**COUNTS ONE THROUGH THREE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

1. From in or about November 2005 through in or about March 2007, defendant JOHN WILLIAM SNYDER managed Cobra Command, Inc. (“CCI”), a paintball business at 307 Swartley Road, in Hatfield, Pennsylvania. Defendant SNYDER was not an owner of CCI.

**THE SCHEME**

2. From in or about 2003 through in or about February 2007, defendant JOHN WILLIAM SNYDER devised and intended to devise a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

**MANNER AND MEANS**

3. It was part of the scheme that defendant JOHN WILLIAM SNYDER:  
a. solicited people to invest money with him by falsely representing to investors, orally and in writing, that they would receive a high rate of return on their investments after he obtained access to millions of dollars in his off-shore accounts, when in fact, defendant SNYDER did not have any such funds in off-shore accounts and did not have any

intention of repaying his investors;

b. solicited investors to invest money with him by falsely representing to investors that he would sell them an ownership interest in CCI, when in fact, he did not have any authority to sell an ownership interest in CCI;

c. solicited a vendor to provide him with money by falsely representing to the vendor that defendant SNYDER would sell paintball equipment to the vendor, when in fact, defendant SNYDER did not provide the vendor with such paintball equipment and had no intention of doing so;

d. solicited vendors to provide him with paintball equipment for CCI by falsely representing to vendors that he would send them payments for such equipment, when in fact, he did not pay them for the equipment;

e. spent most of the money given to him by investors and vendors on his gambling and personal expenses; and

f. assured investors and vendors that he would repay them in full, well knowing that he could not do so.

4. Between in or about 2003 and in or about February 2007, as a result of his fraudulent scheme, defendant JOHN WILLIAM SNYDER defrauded investors and vendors of money amounting to a total loss of approximately \$2,404,635.

5. On or about each of the dates below, in the Eastern District of Pennsylvania and elsewhere, defendant

**JOHN WILLIAM SNYDER,**

for the purpose of executing the scheme described above, and attempting to do so, knowingly

caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below, specifically wire transfers of money, each transmission constituting a separate count:

<u>COUNT</u>	<u>DATE</u>	<u>AMOUNT</u>	<u>FROM</u>	<u>TO</u>
1	02/12/04	\$20,000	Maryland	Pennsylvania
2	08/07/04	\$40,000	Florida	Pennsylvania
3	12/19/06	\$50,000	Pennsylvania	New York

All 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 violations of Title 18, United States Code, Section 1343, set forth in this information, defendant

**JOHN WILLIAM SNYDER**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, including, but not limited to the sum of approximately \$2,404,635.

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 of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), 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 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).



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**LAURIE MAGID**  
**United States Attorney**