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U.S. DISTRICT COURT E.D.N.Y.
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BROOKLYN OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

- against -

KOMMUNIKATIE SERVICE
BUITENLAND, B.V., TRENDS SERVICE IN
KOMMUNIKATIE, B.V., and ERIK
DEKKER, individually and as an Officer of
TRENDS SERVICE IN KOMMUNIKATIE,
B.V., and KOMMUNIKATIE SERVICE
BUITENLAND, B.V.,

Defendants.

GLASSER, J.

GOLD, M.J.
2770

CV 16

Civil Action No. 16-_____

DECLARATION OF JOSEPH R. BIZZARRO

I, Joseph R. Bizzarro, have personal knowledge of the facts set forth below, and if called as a witness I would testify as follows:

1. I am a Postal Inspector with the United States Postal Inspection Service ("USPIS") and have been so employed for approximately eight (8) years. I am currently assigned to the Department of Justice Mail Fraud Team of the USPIS in Washington, D.C. I have conducted numerous criminal investigations involving violations of 18 U.S.C. § 1301 (Importing or Transporting Lottery Tickets), 18 U.S.C. § 1302 (Mailing Lottery Tickets or Related Matter), 18 U.S.C. § 1341 (Mail Fraud), 18 U.S.C. § 1343 (Wire Fraud), 39 U.S.C. § 3005 (False Representations and Lotteries), and related statutes. I also have successfully completed various training programs provided by the USPIS and the Federal Bureau of Investigation, including Seizures, Money Laundering and Asset Forfeiture.

2. The facts set forth in this affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, information from other individuals including other law enforcement officers, complainants, and other parties, witness interviews, and my review of documents, public records, USPIS records, and other sources.

Background

3. I am the lead United States Postal Inspector on the investigation into Trends Service in Kommunikatie, B.V., (“Trends”), Kommunikatie Service Buitenland, B.V., (“KSB”) and Erik Dekker (collectively, “Defendants”).

4. Defendants act as a hub for multiple international direct mail fraud schemes, receiving and processing hundreds of thousands of victim responses each year. All of the schemes include fraudulent solicitations mailed from outside the United States to potential victims in the United States.

5. The solicitations use various fraudulent tactics designed to induce elderly and vulnerable victims to send money. For example:

- a. Solicitations fraudulently claim that the victim is the sole recipient of the letter, or one of a small number of recipients. In fact, the solicitations are form letters mailed to thousands of recipients.
- b. Solicitations fraudulently claim that they were sent to the individual victim based on information about him or her (such as financial need or a vision that a psychic had about the victim). In fact, the victims’ names and addresses appear on a mailing list.

- c. Solicitations fraudulently claim that the individual recipient has already won, or will soon win or receive, cash or valuable prizes. In fact, the victims have won nothing, there is no lottery, and the victims will receive no cash or prize.
 - d. Solicitations fraudulently claim that products and services offered for sale will bring wealth to the recipient. In fact, the advertised products and services do not bring wealth to the purchasers as promised.
6. The solicitations make these fraudulent representations to induce victims to make payments, usually ranging from \$15 to \$55, in order to receive the promised money or prize.
7. In reality, after making the payment, none of the victims ever receive the promised money or anything of value.
8. The solicitations often contain inconspicuous fine print that purports to set out terms and conditions. In many cases, these difficult-to-read “disclaimers” simply reiterate and reinforce the misrepresentations in the main body of the solicitation. *See, e.g.*, Compl. Ex. C at 6. In other solicitations, these small-font passages directly contradict the claims in the main body of the solicitation. For example, solicitations claim that the recipient has already been confirmed the winner of a check or prize in bold, prominent lettering, but then explain in inconspicuous text that the prize drawing has not yet taken place or that there is no prize drawing and the victim is agreeing to purchase an item that is not mentioned in the regular-size font. *See, e.g.*, Compl. Ex. D at 6.
9. The solicitations each contain a purportedly personalized letter, a response card with an order form, and a return envelope pre-addressed to post office (“P.O.”) boxes located in the Netherlands. Victims fill out the response card and provide their credit card information or

enclose payment in the form of cash, check, or money order. Responses are sent through the United States mail in pre-printed return envelopes provided with the solicitation. The envelopes are addressed to P.O. boxes in the Netherlands that are registered with the Dutch Postal Service to Trends and KSB. Defendants control over fifty P.O. boxes in the Netherlands which they use in furtherance of the mail fraud schemes.

10. Trends and KSB open the mail, review and sort it, and record the victim's response, payment method, and amount in a customer database. They handle the victim payments by, for example, forwarding the checks on to other entities and arranging for the cash to be deposited in a Dutch bank. Hundreds of thousands of victims' responses and payments are processed by the Defendants each year on behalf of multiple international direct mail fraud schemes. These services are known in the direct mail industry as "caging" services.

11. Defendants identify which recipients send money in response to the solicitations. As a result of the information that Defendants gather, record, and transmit or forward, these victims are then bombarded with numerous additional, similar solicitations.

12. Defendants receive revenues for their role in the fraud schemes.

The Investigation

13. The investigation began in December 2015, when U.S. postal inspectors conducted an operation at the United States Postal Service New York International Service Center (the "New York ISC") located at John F. Kennedy International Airport in Jamaica, New York. The inspectors identified mail being sent from locations in the United States to locations in the Netherlands. All international mail between the United States and the Netherlands is processed by the United States Postal Service ("USPS") at the New York ISC.

14. From observing the mail going from the United States to the Netherlands through the New York ISC over a two-day period, on December 29 and 31, 2015, I and other law enforcement personnel counted more than 10,000 pieces of letter mail that were pre-addressed return envelopes to P.O. boxes in the Netherlands. More than 6,000 of these mailings were pre-addressed to P.O. boxes registered to either Trends or KSB.

15. Subsequent observations have confirmed that pre-printed return envelopes addressed to P.O. boxes in the Netherlands constituted more than 50 percent of the total letter mail volume from the United States to the Netherlands; this proportion is highly unusual and not typical of international first-class mail.

16. Based on my training and experience, such a volume of pre-printed return envelopes addressed to foreign P.O. boxes is evidence of an international direct mail fraud scheme. Such mail is likely to contain monetary remittances and filled-out response cards sent by victims in response to fraudulent solicitations.

17. It is extremely unlikely that a legitimate business would use P.O. boxes and caging services in another country, such as the Netherlands, to process mailed responses from U.S. consumers. Such practices require the responding consumers to purchase international mail postage; the response rate is therefore lower, because it costs more for consumers to mail the response cards. In addition, using a caging service located outside the United States makes it more difficult to process payments from U.S. consumers, because checks drawn on U.S. accounts must be returned to the U.S. for deposit in the U.S. bank. Paying to mail each U.S. check from the Netherlands to a bank in the United States increases operating costs. A

legitimate direct mail business would thus achieve lower profit margins by using a foreign caging service.

18. The investigation also gathered evidence by reviewing Determinations of Non-Mailability that have been issued by the USPIS and mailed to Defendants' P.O. boxes. A Determination of Non-Mailability ("DON") is an administrative process undertaken by the USPS, pursuant to Title 39, United States Code, Section 3005 (False Representations; Lotteries), which authorizes the USPS to take administrative action to enjoin fraud schemes operating through the mail. Section 3005 states in pertinent part:

Upon evidence satisfactory to the Postal Service that any person is engaged in conducting a scheme or device for obtaining money or property through the mail by means of false representations, including the mailing of matter which is nonmailable under [Title 39] section 3001(d), (h), (i), (j), or (k) of this title, or is engaged in conducting a lottery, gift enterprise, or scheme for the distribution of money or of real or personal property, by lottery, chance, or drawing of any kind, the Postal Service may issue an order which . . . requires the person or his representative to cease and desist from engaging in any such scheme, device, lottery, or gift enterprise.

19. Mail subject to a DON is seized and destroyed, pursuant to the rules delineated in Title 39, Code of Federal Regulations, Part 952.

20. DONs are conducted at the five international airports in the United States that have been designated as ISCs, including the New York ISC. The process is frequently initiated after U.S. Customs and Border Protection inspects inbound foreign mail and finds lottery-related solicitations, resulting in referral to the USPIS.

21. Mass mail solicitations intercepted through the DON process travel from their various countries of origin through the international postal system and arrive at ISCs in the United States. Based on my training and experience, I have learned the hallmarks of mass

mailing fraud schemes. These fraudulent mailing “campaigns” can be identified as groups of dozens—and usually hundreds or thousands—of pieces of letter mail, all in identical envelopes and all being mailed to residents of the United States from foreign countries. The envelopes are brightly colored, or they bear brightly colored or eye-catching designs or text. For each group of identical envelopes, CBP inspects the contents of two sample solicitations to determine if there is a violation. Based on my training and experience, I have learned that the mail pieces with identical envelopes are all part of the same fraudulent mailing campaign and the solicitations contained inside are generally identical except for the potential victim’s name and address. Attached hereto as Exhibit 1 is a true and correct copy of a photograph of pieces of letter mail that were identified as part of a fraudulent mailing campaign; the solicitations in this campaign were prepared overseas for distribution in the United States.¹

22. Once the USPIS determines that incoming international mail violates either 18 U.S.C. § 1302 or 39 U.S.C. § 3001(k), it issues a DON. The USPIS mails the DON to the return address provided in the improper solicitation, along with a sample solicitation and an explanation that the solicitation violated either 18 U.S.C. § 1302 or 39 U.S.C. § 3001(k). *See* Compl. Ex. A.

23. The investigation determined that, in 2015 alone, approximately 70 DONs were issued for fraudulent mailing campaigns that used P.O. boxes controlled by Trends and KSB. Each DON was made based on the seizure of at least dozens—and usually hundreds or thousands—of identical solicitations that were being mailed to potential victims throughout the United States. The return envelopes contained in the solicitations were pre-addressed to P.O.

¹ The fraudulent mailing campaign pictured in Exhibit 1 was not identified through the DON process; Exhibit 1 is simply a representative example of what a fraudulent mailing campaign looks like.

boxes located in the Netherlands and registered to Trends or KSB. In 2015, through the DON process, the USPIIS seized and destroyed more than 100,000 pieces of mail that violated 18 U.S.C. § 1302 or 39 U.S.C. § 3001(k) and contained pre-preprinted return envelopes addressed to P.O. boxes controlled by Defendants.

24. Prior to 2015, the USPIIS issued and mailed DONs based on numerous additional improper solicitations and mailed them to P.O. boxes controlled by Trends—approximately 4 in 2012, 61 in 2013, and 2 in 2014. In total, as part of these 2012-14 DONs, the USPIIS seized and destroyed more than 160,000 pieces of mail that violated 18 U.S.C. § 1302 or 39 U.S.C. § 3001(k) and contained pre-preprinted return envelopes addressed to P.O. boxes controlled by Trends. Based on my training and experience, the DON numbers from 2012 through 2014 are not indicative of the actual volume of the fraudulent mailing campaigns for which Defendants provided caging services during that time period, because—even in high-volume years—the DONs never represent more than a small percentage of the total lottery-related, fraudulent, or otherwise unlawful mail coming into the United States. These numbers do, however, illustrate that Trends and Dekker have been engaging in mail fraud schemes since at least 2012.

25. Other major sources of evidence in this investigation include witness interviews, victim complaints, business and public records, and evidence obtained from the Federal Trade Commission.

26. In addition, portions of this investigation are being conducted in cooperation with the Dutch Fiscal Intelligence and Investigation Division (“FIOD”), which has provided information and assistance relevant to the contents of this declaration pursuant to the Mutual Legal Assistance Treaty with the Netherlands. Our investigation team has been coordinating

with law enforcement agents at FIOD. At the same time as this § 1345 action is filed, the Dutch authorities plan to take action to shut down Defendants' P.O. boxes in the Netherlands.

27. Based on the evidence gathered in the investigation, I estimate that, on any given day, Defendants are likely to receive at least 1,000 responses from victims, but on most days the number is significantly higher. I also estimate that Defendants receive over 530,000 victim payments per year, sent in response to solicitations containing the types of misrepresentations described above. The majority of the solicitations request payment of \$50 or \$55; however some solicitations direct consumers to send smaller amounts, such as \$15 or \$25. Approximately 28 percent of the mailed responses do not contain payments at all. I estimate an average of \$35 for each payment mailed to Defendants, which would mean payments totaling over \$18 million annually are mailed to the Defendants from victims in the United States.

28. Defendants have been conducting caging services for international mail fraud schemes since at least 2012. The USPS records show that DONs were mailed to P.O. boxes registered to Trends each year starting in 2012. The Federal Trade Commission's "Consumer Sentinel" database contains complaints about fraudulent solicitations containing return envelopes addressed to Trends' and KSB's P.O. boxes dating back to 2012. Consumer Sentinel is a repository of all complaints received by the Federal Trade Commission and its partnering agencies.

29. Defendants continue to conduct caging services for international mail fraud schemes into the present.

30. I am aware that courts have long regarded factually similar schemes as mail fraud. *See, e.g., United States v. Getto*, 729 F.3d 221 (2d Cir. 2013); *United States v. Sommer*, 815 F.2d

15 (2d Cir. 1987); *United States v. Weingold*, 844 F. Supp. 1560 (D.N.J. 1994); *United States v. White*, 150 F. 379 (D. Md. 1906). I also am aware that a fraudster is not able to escape liability for mail fraud by targeting vulnerable or gullible victims. *See United States v. Thomas*, 377 F.3d 232, 243 (2d Cir. 2004).

The Fraudulent Solicitations

31. Since at least as early as 2012, Defendants have engaged in multiple mail fraud schemes that send fraudulent solicitations to thousands of victims throughout the United States.

32. Exhibits A-H attached to the Complaint are true and correct copies of DONs including fraudulent solicitations intercepted by the USPIS at the New York ISC. The names of the recipients have been redacted to protect their privacy. These solicitations all include response cards and return envelopes that direct victims to send money to P.O. boxes in the Netherlands that are registered to Trends or KSB.

33. One common type of solicitation informs recipients that they have won a substantial amount of cash or other valuable prize, such as a car or jewelry. The solicitations misrepresent that the recipient will receive the prize in exchange for a processing fee, usually ranging from \$15 to \$55. The solicitations provide reference numbers, such as a “payment shipping number” or “pre-assigned claim number,” and use the recipient’s name repeatedly to create the false impression of a letter personalized to the individual recipient and suggest that the recipient is the sole winner rather than the recipient of a mass mailing. True and correct copies of DONs including this type of solicitation are attached to the Complaint as Exhibits A-E.

34. Another common type of solicitation offers for sale products or services that are guaranteed to bring the recipient wealth. The solicitations first attempt to obtain the victim’s

trust by misrepresenting that the victim has won a large sum of money. The solicitations are written to give the impression that they are personalized to the recipient, for example: by repeatedly using the recipient's name; by representing that the sender has personal knowledge of the individual recipient; and by representing that the recipient was selected to receive the mailing based on a reason other than the fact that his or her name appears on a mailing list. Victims are then urged to purchase a "guaranteed," "secret" method for winning lotteries and other games of chance. True and correct copies of DONs including this type of solicitation are attached to the Complaint as Exhibits F & G.

35. A third category of solicitations purports to be from a person with psychic or clairvoyant powers who promises to use their abilities to improve the victim's financial and personal circumstances. The solicitations often state that the psychic has seen the individual recipient winning large sums of money through the lottery. The solicitations urge the recipient to purchase various supernatural and divinatory objects or services in order to achieve the predicted wealth. A true and correct copy of a DON including this type of solicitation is attached to the Complaint as Exhibit H.

36. Despite the purported personalization, each solicitation is mailed out to thousands of potential victims; the letters are identical except for the recipient's name and address. Portions of the solicitations are often printed at an angle and in a typeface that makes them appear handwritten, but identical "notes" appear in the solicitations sent to other recipients. The purportedly handwritten notes may appear, for example, as exclamations in the margins of a letter or in the main text to highlight a particular point. *See, e.g.,* Compl. Ex. F at 6, 9-12.

37. Based on my experience and training as a Postal Inspector, I believe that the individual recipients' names and addresses are inserted into form letters by use of the mail merge function found in most word processing software. The repeated use of individuals' names throughout the letters leads victims to believe that the letters are personalized, when in fact they are not. The investigation also uncovered an instance in which the template form letter itself was mailed out to a potential victim with the German words for "first name," "last name," and "road" in place of the recipient's name and address. A true and correct copy of the template form letter is attached hereto as Exhibit 2.

38. The following paragraphs describe examples of fraudulent solicitations gathered through the DON process.

39. The Midas Financial Group Solicitation: One solicitation which purports to be from the Midas Financial Group fraudulently announces that the recipient has been designated a "GUARANTEED Nominated Beneficiary" of a trust and claims in the heading "USD FIFTEEN MILLION US DOLLARS Confirmed." It informs the recipient that their "status is locked in" and instructs them to send an administrative fee of \$14.87 in order to receive a guaranteed cash award. It asserts "YOU ARE BENEFICIARY, THIS IS NOT A MISTAKE"; the solicitation also contains a barcode and tells the recipient to "check your personal Trust Fund Guarantee number." See Compl. Exs. A & B.

- a. The solicitation misrepresents that it is a personalized communication sent only to the person or persons who have already been designated to receive a financial distribution from a trust that contains \$15 million in assets. In fact, the same solicitation was mailed to thousands of potential victims. A "disclaimer" in small

print notes that the victim will receive a “fractional share of [the] aggregate profit distribution,” reinforcing the false impression that the victim is the beneficiary of a trust and will soon receive money from the trust.

- b. The solicitation contains a response card that directs victims to send in \$14.87 as an “administration fee.” It contains a return envelope pre-addressed to a P.O. box that is controlled by Trends.
- c. The USPIS gathered evidence of this mailing campaign on two separate occasions:
 - i. Initially, on February 27, 2015, 5,604 outwardly identical pieces of mail containing this solicitation were intercepted at the New York ISC. The USPIS issued a DON and mailed it to Trends’ P.O. box with a sample solicitation on May 7, 2015. *See* Compl. Ex. A. USPS tracking records show that the DON was delivered on May 13, 2015.
 - ii. Subsequently, on May 1, 2015, 2,959 outwardly identical pieces of mail containing this solicitation were intercepted at The New York ISC. The USPIS issued a DON and mailed it to Trends with a sample solicitation on May 28, 2015. *See* Compl. Ex. B. USPS tracking records show that the DON was delivered on June 6, 2015.

40. The Merchandise Processing Center Solicitation: Another solicitation fraudulently leads victims to believe that they have won a 2015 Audi A6 sedan that will soon be delivered to their homes. The solicitation purports to be an “entitlement” and asserts “Your assigned Freight Bin contains 2015 AUDI A6 SEDAN retail value of \$65,485.00 as insured for

this or other merchandise entitlement.” It asks the recipient to mark a box choosing between the 2015 Audi A6 or a \$64,485 bank check. *See* Compl. Ex. C.

- a. The solicitation conveys the impression that it is a personalized communication sent only to the person or persons who have already won a 2015 Audi A6 sedan in a prize competition. In fact, the same solicitation was mass mailed to thousands of potential victims. This response card contains a statement in small, blurry print which explains that the victim is agreeing to purchase an item from a list which includes the Audi. However, it also asserts “the item a recipient is entitled to purchase has been determined before each mailing”; therefore, if a victim were to read this fine print, it would merely reinforce the overall false impression that the recipient will receive the Audi if he or she makes the requested payment.
- b. The solicitation contains a response card that directs victims to send in a \$20.00 “acquisition fee.” It contains a return envelope pre-addressed to a P.O. box that is controlled by Trends.
- c. On May 27, 2015, 1,055 outwardly identical pieces of mail containing this solicitation were intercepted at the New York ISC. The USPIS issued a DON and mailed it to Trends’ P.O. box with a sample solicitation on July 24, 2015. *See* Compl. Ex. C. USPS tracking records show that the DON was delivered on July 29, 2015.

41. The Financial Transfer Institute Solicitation: A solicitation from A. Ferguson of the Financial Transfer Institute fraudulently informs recipients that they have won a check. It contains a purported “payment agreement,” under which A. Ferguson agrees to release the check

for \$30,000 to the person who returns the personal code coupon RFG-924 186. The solicitation leads the potential victim to believe that he or she is the sole, lucky recipient who has received that code, by promising “One single person had indeed received this coupon . . . It’s you and you alone!” *See* Compl. Exs. D & E.

- a. The solicitation conveys the impression that it is a personalized communication sent only to the person or persons who have already been designated to receive a \$30,000 check. In fact, the same solicitation was mailed to thousands of potential victims. Hard-to-read fine print contradicts the rest of the solicitation, explaining that the prize drawing has not yet taken place and stating that the “guarantee for cash winnings” is a piece of jewelry.
- b. The solicitation contains a response card that directs victims to send \$50 for the “GUARANTEE FOR CASH WINNINGS” and an additional \$5 priority processing. It contains a return envelope pre-addressed to a P.O. box that is controlled by KSB.
- c. The USPIS gathered evidence of this mailing campaign on two separate occasions:
 - i. On June 30, 2015, 720 outwardly identical pieces of mail containing this solicitation were intercepted at the New York ISC. The USPIS issued a DON and mailed it to KSB’s P.O. box with a sample solicitation on August 21, 2015. *See* Compl. Ex. D. USPS tracking records show that the DON was delivered on August 28, 2015.

- ii. Subsequently, on August 16, 2015, 881 outwardly identical pieces of mail containing this solicitation were intercepted at the New York ISC. The USPIS issued a DON and mailed it to KSB's P.O. box with a sample solicitation on September 15, 2015. *See* Compl. Ex. E. USPS tracking records show that the DON was delivered on September 19, 2015.

42. The Magister Davids Solicitation: A solicitation that purports to be from "Magister Davids" entices potential victims by holding out the false promise of a \$36,000 check: "[Victim name], now it is an official fact: You have been declared MAIN WINNER and SOLE RECIPIENT of a ONE-TIME-ONLY CHECK of 36,000.00 dollars!" The solicitation urges the recipient to purchase a secret method that will allow him or her to consistently win the lottery and other games of chance. The option to purchase the secret method is described as an exclusive opportunity: "YOU have this fantastic possibility because I suggested your name as one possible candidate." *See* Compl. Ex. F.

- a. The solicitation conveys the impression that it is a personalized communication sent only to the person who has already won \$36,000. It also misrepresents that the recipient is receiving the solicitation because Magister Davids personally selected his name. In fact, the same solicitation was mailed to thousands of potential victims. The fine print explains that, contrary to the representations elsewhere in the solicitation, the contest is still open and the prize draw has not yet occurred.

- b. The solicitation contains a response card that urges victims to purchase “my ‘PERSONAL PASSPORT FOR WEALTH’” for \$50 and to pay an additional \$5 for priority processing. It contains a return envelope pre-addressed to a P.O. box that is controlled by KSB.
- c. The USPIS gathered evidence of the Magister Davids mailing campaign on two separate occasions:
 - i. On June 2, 2015, 430 outwardly identical pieces of mail containing this solicitation described above were intercepted at the Chicago O’Hare International Airport ISC (“Chicago ISC”). The USPIS issued a DON and mailed it to KSB’s P.O. box with a sample solicitation on June 26, 2015. *See* Compl. Ex. F. USPS tracking records show that the DON was delivered on July 1, 2015.
 - ii. Previously, on April 22, 2015, 326 outwardly identical pieces of mail containing a different Magister Davids solicitation were intercepted at the Chicago ISC. The USPIS issued a DON and mailed it to KSB’s P.O. box with a sample solicitation on June 2, 2015. *See* Compl. Ex. G. USPS tracking records show that the DON was delivered on June 5, 2015.

43. The Olivia Kramer Solicitation: Another example appears to be a follow-up fraudulent solicitation that is mailed to victims who have already made an initial payment. It acknowledges the victim’s previous payment, purports to confirm that the first check to the victim for \$25,000 is being processed, and claims that the victim will also receive an additional

check for \$22,500. The solicitation further claims that the victim has now been placed in direct communication with Olivia Kramer, a woman who has “extraordinary powers” to predict winning lottery numbers. The victim is urged to send more money so that Olivia Kramer can help the victim continue to win. *See* Compl. Ex. H.

- a. The solicitation conveys the impression that it is a personalized communication sent to the victim because Olivia Kramer “had the feeling that [the victim] really and urgently needed [her] help.” It asserts that Olivia Kramer is in direct contact with the individual victim and is personally focusing her psychic powers on helping the individual victim. In fact, the same solicitation was mailed to thousands of potential victims. A small-print disclaimer explains that the victim has not yet won the \$22,500, in direct contradiction to representations elsewhere in the solicitations.
 - b. The solicitation contains a response card that urges victims to pay \$50 for a consultation with Olivia Kramer and to pay \$5 for express service. It contains a return envelope pre-addressed to a P.O. box that is controlled by KSB.
 - c. On March 25, 2015, 569 outwardly identical pieces of mail containing this solicitation were intercepted at the Chicago ISC. The USPIS issued a DON and mailed it to KSB’s P.O. box with a sample solicitation on May 15, 2015. *See* Compl. Ex. H. USPS tracking records show that the DON was delivered on May 20, 2015.
44. The schemes involve dozens of different fraudulent mailing campaigns that are mailed out in the names of many different firms and individuals. The solicitations described

above and sent in the names of Financial Transfer Institute, Merchandise Processing Center, Midas Financial Group, Magister Davids, and Olivia Kramer are merely representative examples.

45. Although the DONs cited above uncovered more than 260,000 pieces of mail that were part of the fraud schemes, the total number is much larger. Based on my training and experience, and my observations of mail conditions at the New York ISC, this represents a small percentage of the total lottery-related, fraudulent, or otherwise unlawful mail coming into the United States. These numbers show that, on a given day, hundreds and sometimes thousands of the same solicitation—which are identical but for the recipient’s name and address—are being mailed to potential victims throughout the United States as part of the Defendants’ direct mail fraud schemes. The total annual numbers are undoubtedly far larger.

Trends, KSB, and Erik Dekker

46. Based on evidence gathered in the investigation, I learned that Trends and KSB are business entities registered in The Netherlands. Using information obtained from Dutch law enforcement partners through the Mutual Legal Assistance Treaty (“MLAT”), I learned that Trends has been registered in the Netherlands since January 1995, and KSB has been registered in the Netherlands since November 2013. Trends and KSB are both registered to the same physical address in Utrecht, the Netherlands. I also determined that Erik Dekker is the sole owner of both Trends and KSB, via a holding company called Stecha Holding, B.V.

47. I searched the internet and identified the website of Trends as www.trendsservice.nl. I reviewed the English pages of the website and English translations of the Dutch pages of the website. I determined that the services provided by Trends include what

are known as “caging” services in the direct mail industry, such as the handling of payments, processing mail, and data-entry. For example, the website states, “Data-entry: With great ease we process your responses. Fil[il]ed in coupons, reply cards, name and address modifications, we process everything so your database is completely up to date and ready to use.” Trends also advertises direct mailing services, which include printing, packing, and mailing the items. In addition, Trends advertises what are known in the industry as “fulfillment services,” including storing products in its warehouses, and ordering, selecting, packing, and shipping goods. Based on the evidence gathered in the investigation and my training and experience I believe that Trends is providing caging services in support of the fraudulent mail schemes at issue here. True and correct copies of screenshots from Trends’ website are attached hereto as Exhibit 3.

48. Trends and KSB registered with the Dutch Postal Service, a private entity, in order to obtain use of the P.O. boxes that are crucial to the mail fraud schemes. The P.O. boxes, numbering more than fifty, are located in different cities and localities across the Netherlands.

49. Based upon my training and experience as a Postal Inspector, upon Trends’ statements about its services contained on its website, and upon evidence obtained from our Dutch law enforcement partners through the MLAT, I believe that upon receipt of the responses, Trends and KSB open the mail, review and sort it, and record the victim’s response, payment method, and amount in a customer database. Defendants identify which recipients send money in the customer database and transmit or forward that information on to other entities. They handle victim payments by, for example, forwarding the checks on to other entities and arranging for the cash to be deposited in a Dutch bank. Although KSB does not have a website, it is

registered to the same physical address as Trends and the two business entities share Erik Dekker as the owner. I believe that KSB and Trends perform the same caging services.

50. Defendants know the multiple mailings for which they provide caging services are fraudulent because they receive and process the victims' payments and response cards. Even if Defendants saw only the response cards without seeing the entire solicitation, many of the response cards are fraudulent on their face because they offer "secret" or "exclusive" methods for sale and misrepresent that the recipients have already been declared the sole winner of a lottery or sweepstakes. *See* Compl. Exs. B, C, & D. Defendants know based on the volume of victim responses they receive that the solicitations are mailed to thousands of potential victims.

51. Defendants know that victims are defrauded by the solicitations, because victims send thousands of handwritten letters to P.O. boxes controlled by Defendants. The letters reveal that the victims are deceived by the solicitations' false claims that they have won or will soon receive money or prizes, or that they will obtain other great fortune. In addition, victims send thousands of complaints saying that they sent in the requested money but never received the promised money or prizes, or the item they did receive was worthless. True and correct copies of victim letters are attached to the Complaint as Exhibits I through M. The names of the victims have been redacted to protect their privacy.

52. Defendants also know of the fraud, because they received approximately 70 DONs in 2015 notifying them that the solicitations violated United States criminal statutes, 18 U.S.C. § 1301 or 39 U.S.C. § 3001(k), and providing them with examples of the violative solicitations.

53. Despite receiving notice from the DONs that the solicitations were fraudulent, Defendants have continued to further the fraud.

54. The mail fraud schemes that Defendants perpetrate operate internationally. While the responses are mailed to Defendants' P.O. boxes in the Netherlands, the solicitations come into the United States from countries all over the world. In my training and experience, perpetrators of fraudulent schemes operated under this direct mail/caging service model will simply open a new P.O. box account when one account is "burned" by high volumes of consumer complaints, enforcement actions, or other negative exposure. International borders are not an impediment, particularly in the Netherlands, where numerous other countries are in close proximity. If Defendants are not enjoined from continuing to victimize U.S. residents, they could simply move their operations to a new country or elsewhere in the Netherlands.

Victims

55. The investigation has revealed that victims send thousands of handwritten letters and complaints to Defendants each year. Often victims initially express their gratitude and relief for the expected prize or award and describe the financial woes that they believe will soon be alleviated. Other disgruntled victims complain that they did not receive the money or prizes they were promised, despite having sent in the required fees, often numerous times. Many of the victims send payments repeatedly in response to each new solicitation; these victims believe that if they comply with the fee requests they will receive a life-changing payout.

56. The letters reveal that the victims are generally elderly people on fixed incomes who are desperate for financial assistance. In some letters, victims cite medical problems or the size of their Social Security benefits to explain why a payment is less than the requested amount.

The letters also demonstrate that, at least initially, the victims believe the false claims in the solicitations, for example that they have won the lottery or that they are receiving personal correspondence directly from a psychic.

57. Investigators at the Federal Trade Commission have interviewed numerous victims of the fraud schemes as part of a related investigation. One such victim, B.J., is a 78-year-old woman who lives in Arizona. During the summer and fall of 2014, she sent \$25 checks on at least two occasions to a P.O. box controlled by Trends in response to solicitations that purported to be from a company called Keller, Sloan & Associates. A true and correct copy of a letter that B.J. received is attached hereto as Exhibit 4. B.J. believed the representations in the letters that she had won various cash prizes. The letters stated that, in order to receive the prizes, she was required to send a \$25 payment. B.J. never received the promised award, but she began to receive many additional solicitations with return envelopes addressed to P.O. boxes not registered to Trends or KSB.

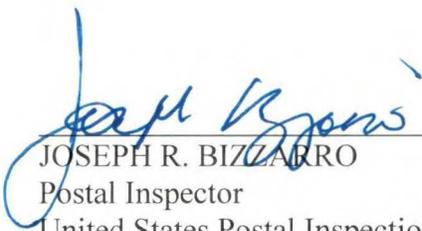
58. Another victim, J.G., is an 80-year-old woman who lives in Washington. She spent substantial time at home taking care of her ill husband in 2014, and began responding to Publishers Clearinghouse sweepstakes offers. She then began to receive mail with return addresses in foreign countries, especially the Netherlands. She too received mail from Keller, Sloan & Associates which stated that she had won large cash prizes and that she must send \$25 to receive the money. A true and correct copy of a letter that J.G. received is attached hereto as Exhibit 5. The return envelope was preaddressed to a P.O. box in the Netherlands controlled by Trends. J.G. sent at least two \$25 checks to that P.O. box, but she never received money in return. Instead, she was inundated with additional solicitations—including some with return

envelopes addressed to P.O. boxes registered to Trends and KSB, and others addressed to P.O. boxes not registered to Trends or KSB. She responded to many of these additional solicitations by mailing checks.

59. I have identified numerous victims who reside in the Eastern District of New York, but victims are located all throughout the United States.

60. Trends, KSB, and Dekker provide caging services in support of multiple international mail fraud schemes. The numerous misrepresentations in the solicitations at issue include false claims that the recipients have won a lottery or sweepstakes, false claims about the personalized nature of the solicitations, false claims about the reason for contacting the recipient, and falsely described products and services. The fraud schemes use the United States mail to victimize Americans. These facts establish that the Defendants are engaging in and furthering schemes that constitute mail fraud.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on May 27, 2016, in Washington, D.C.



JOSEPH R. BIZZARRO
Postal Inspector
United States Postal Inspection Service

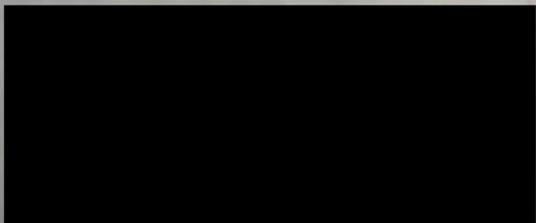
**EXHIBIT 1 TO
DECLARATION
OF JOSEPH R.
BIZARRO**

Friday the 13th will soon be upon us!

Friday the 13th will soon be upon us!
As we must act, please answer rapidly!!!
A very large sum of money is involved!

PRSR STD
U.S. POSTAGE
PAID

Cleveland, OH



PA1004-27 USA

**EXHIBIT 2 TO
DECLARATION
OF JOSEPH R.
BIZARRO**

Madame Soleil

Clairvoyant and Medium
Renowned specialist in games of chance
and financial investments



M510-31 USA

9999999999 999999.9 25003
MRS S.VORNAME S.NACHNAME
S.STRASSE CHANGE S.STRASSE
S.STRASSENZUSATZ
S.STRASSENZUSATZ1
S.STRASSENZUSATZ2
S.PoBox
S.ORT S.REGION 9999

**Yes! The testament of one of the richest men
in the world is ready to divulge the secret of his
immense fortune to you. *It's official!***

**You will now, and for the rest of your life,
have the key that opens the doors to wealth,
success and happiness.**

And here are the proofs.

Dear Mrs S.Nachname,

This is unbelievable and unforeseen news that could shock even the most steadfast of people. And this news concerns you! I can guarantee this to you because I was tasked to communicate this message.

**YES! Your name really is on the testament of
Alexis Onakios as a beneficiary.**

This official document bequeaths to you everything that has created Alexis's wealth, which includes a fleet of oil tankers, companies listed on the stock exchange, and a media empire of radio and television stations.

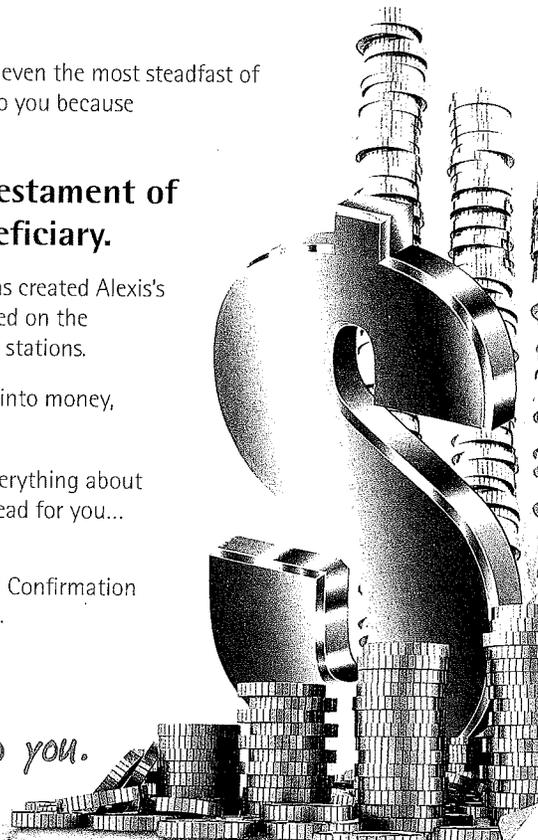
He succeeded in everything. Everything he touched turned into money, but until now, nobody has been able to find out his secret.

You, Mrs S.Nachname, as inheritor could very soon learn everything about his fortune: the dream life that he has led and what lies ahead for you...

If you accept this, all you have to do is to return the Official Confirmation Certificate along with your order form, today would be best.

*But first allow me to explain
everything to you.*

- 1 -



As the old saying goes, money cannot buy happiness, but it helps a lot, especially for people like you who were not born with a silver spoon in their mouth.

Thanks to Alexis' generosity, you too will have an abundance of everything that you have never dared dream of...

Let me repeat this again:

You will finally be able to spend without having to count, live in the lap of luxury and spoil those you love. You will be loved and be able to be part of the world of the rich, without a care in the world.

And above all, you will once and for all be free from the harmful waves that have hindered your past efforts.

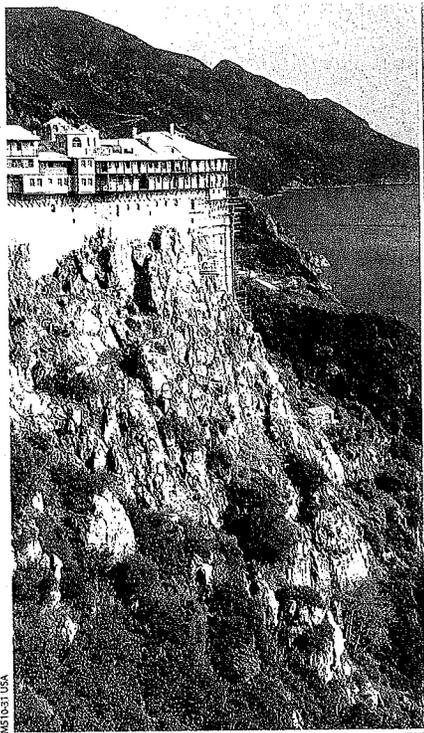
Excuse my enthusiasm, but it is such a pleasure to be able to tell you about happiness. Something like this happens only once in a lifetime, if that often!

Finally, I want to explain something incredible: **how you have become the person benefiting from this gift of love from Alexis Onakios!**

This is the gift of a very old man who saw the end in sight and suffered from remorse for not having done enough for others.

An experienced man, Alexis never missed an opportunity to consult me for many years. Because it is true that my predictions and my advice often enabled him to avoid dangerous situations, and even to profit by making the right choices for future decisions to be made.

Over time, we became friends and he told me about his difficult childhood and about how he discovered the secret of wealth:



He told me, that at 10 years of age he used to deliver fruits and vegetables to his father's customers. Just like all Greek peasants, he only just managed to feed his family... My friend didn't even have shoes!

One day, Alexis was delivering to the monastery that was perched on the slopes of Mount Athos. He put the vegetables in the immense basket that was hung on the end of a thick rope. He told me that he always wanted to see how the monks isolated from the world lived, and so one day he discreetly slipped into the basket. When it was hoisted up, he was gripped by an intense fear of heights, but this disappeared when he saw the surprised faces of the monks.

My friend Alexis stayed in the opulent cloister for several years. That was when he learned to read and write and he would have become a monk too if he was not so afraid of isolation.

On the day he left, Father Serenekos gave him a precious case containing a linen sack and told him: "You will never be unhappy again, I am going to tell you our most precious secret: The Secret of the Mandrake".

He told me that since that day he has succeeded in everything. "The Mandrake made my fortune" was what he repeatedly said to me.

I learned that he passed away two months ago. I opened the envelope to carry out the task that he gave me.
Then I found the monk, who agreed to give me a 10 Mandrakes along with some advice.

He explained how to use them. This is easy and requires no special knowledge.

The most difficult thing for me was to choose the 10 people who were to inherit the Secret of the Mandrake among many deserving people. My final list had 16 names and you were one of them...

When I was concentrating, with the Mandrake in my hand, **I had a vision of a golden light when I pointed my finger to your name.** As the old magic books say: "the Mandrake smelt out the inheritor of the wealth" and it was you! This is a sign of destiny.

This is why I am writing to you today, because I had to complete my mission and respect the will of my friend Alexis.

This is the truth.

Your name is written in black and white on the testament of one of the richest men in the world. This authentic act makes you the inheritor of the most coveted secret that reveals the powers of the Mandrake. **Your destiny is changing as we speak!** You can accept or refuse this great power that has been recognized for centuries. If you accept it, I will send you a small sachet containing the precious, guaranteed genuine Mandrake by return. I will not ask you for any money for this secret - I am not allowed to.

Anyway, it is so valuable that nobody nowadays would be able to afford it. And I have so few of them... But remember, you have to swear not to sell it for any reason, even for a fortune because otherwise you will no longer be able to profit from its magic.

To receive the Mandrake, all you have to do is to return the enclosed Official Confirmation Certificate and the testament that you will have signed, along with your symbolic contribution to the monk.

I will also send you your envelope from Alexis, containing the secret instructions for your Mandrake. His letter will tell you why and how your mandrake will:

- **Protect you from all negative influences, jealousy and envy, and the evil eye**
- **Transform the negative into positive, because this is the greatest fluid catalyser in the world**
- **And how to make everything that you dared not dream of come true: fortune, wealth, success and even love.**

One word of advice: starting now, remain modest, otherwise you will make some people jealous. Read carefully how the Mandrake will protect you from these people.

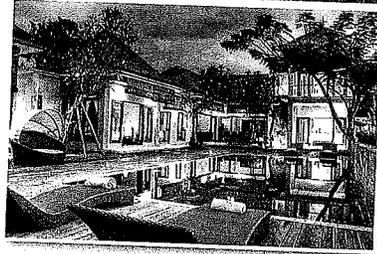
In order for you to receive this fantastic secret as rapidly as possible, I am asking for only a symbolic contribution so I can pay the monk who "raised" the Mandrakes for his work. Only monks know the dimensions that attract money. This special case will enable your Mandrake to multiply your money.

Money will pour in for the rest of your life...

I must also tell you that the testament has to be returned to the executor in a few days and that 9 other people are waiting impatiently. This is why I am asking you to return your request to me within 72 hours. You would be doing both of us a favor if you did this today.

Yours truly,

Madame Soleil



He left me with these mysterious words.

I was very intrigued by this revelation. Like everyone else, I had heard of the magic powers of the Mandrake, but I had never seen one and I thought that it might even be a legend.

Now I wanted to know more and came to realize that hundreds of books have mentioned the Mandrake for more than 2,000 years, starting with the Bible in Genesis, the Song of Songs of King Solomon and even in Egyptian hieroglyphics. A Jewish tradition also claims that it is a tree of Good and Evil, that its fruit is the forbidden fruit of Paradise and that a magic link unites the Mandrake with Man.

Many famous people have used its powers: Alexander the Great, Julius Caesar, Shakespeare, Nostradamus, King Henry VIII and King Charles V.

So, I looked for a Mandrake plant: **IMPOSSIBLE to find!**



The greatest European botanical specialists will explain that according to ancient literature, it is an astonishing plant whose root is shaped like a man and whose fruit is about the size of a bird's egg. This magical plant is believed to have originated on the Mediterranean coast, but no scientist has seen one, let alone grown one. Only several Greek monks and occult practitioners are believed to know about its properties and could grow it (they say "raise" it).

They claim that ancient writings state that the Mandrake could even help people and guarantee them wealth, fame and love.

In the Middle Ages, Italian bankers claimed that a Mandrake in their coffers doubled their money, but it first had to smell money... as a result, they were immensely rich and powerful!

The Mandrake mentioned in history books, religious books and magic books intrigued me for many years.

One day, Alexis summoned me for an important meeting. The rich financier sitting before me seemed old and ill, his fine and costly clothes seemed to be too big for him, he seemed sad... I still remember word for word what he said to me:

"Medicine can no longer do anything for me. Life has given me much but I have not given back much in return... I now want to make a few deserving people happy to make up for lost time. I trust you, my dear Madame Soleil. I would like you to be the executor of my testament, but no heirs have yet been named. **You will add the names of 10 of people who you consider to be worthy of inheriting the Secret of the Mandrake.** These people will become rich and powerful. This way, I can leave this world with a clear conscience... In this envelope these 10 people will find the name of a monk who "raises" Mandrakes and knows how to use them in a positive manner.

But beware! Some very powerful groups are also looking for the Mandrake and they are ready to pay a fortune for a fragment of root. This secret must in no case be used for evil purposes. I am also asking you to insist to the people you will select for my testament that they never sell the Mandrake, even if they are offered millions.

I hereby ask you to give a Mandrake to these 10 people free of charge. Whatever happens, the Mandrakes will not provide less than \$ 25,000.00 the first time and **it guarantees wealth for life.**

You must never be without it, show it to anyone or let anyone touch it because once it is impregnated by the vibrations of the owner, it becomes his servant forever. I know that you understand, my dear Madame Soleil. I am counting on you."



Last Will and Testament

I, the undersigned Alexis Onakios, of sound mind and body, declare that after a long life building an immense fortune without helping others, I have decided to give 10 deserving people a gift, the same that created my fortune. Madame Soleil, to whom I owe so much and who has my complete trust will, in my name, choose and officially inscribe at the bottom of this testament, the names of each of the beneficiaries. These choices may not be opposed or disputed.

I also affirm that these beneficiaries could benefit from a first payment of \$ 25,000.00. This is the first amount that the Mandrake gave me in my youth. Many millions then followed. I have decided that the Mandrake should be given free to my heirs so that happiness may at last smile on them. The only thing that will be asked for is a contribution for the monk's costs.

Madame Soleil will send my 10 heirs:

The Mandrake in its case and the letter that I am leaving her, indicating the simple and safe way of using the Mandrake for 100% guaranteed results.

Each of my heirs must swear not to use the Mandrake's powers for evil and especially not to eat it because that would be dangerous.

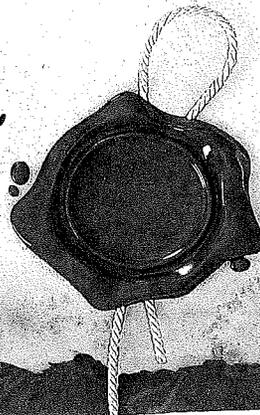
Each heir must also swear not to sell the Mandrake, even for millions. I want to protect my heirs in this way because the Mandrake will be worth more money than any price that could be paid for it.

By giving these people the most jealously guarded secret of the richest and most powerful people in the world, I am asking them to think of me and to pray for me, every time that my secret grants them an immense fortune or genuine love.

I hope that my gift will pardon my faults and that my judge in Paradise will be lenient.

This testament takes effect immediately after my death.

Alexis Onakios



Please sign here to confirm and accept the gift:

X _____

**EXHIBIT 3 TO
DECLARATION
OF JOSEPH R.
BIZARRO**

Trends

Maakt DM makkelijk

- Home
- Direct mail
- Fulfilment
- Printing
- Cases**
- Products
- The organization
- Nieuws
- Contact

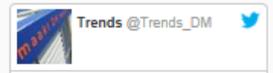
Afhandelen van uw mailing

[Translation: Fulfilling your mailings] -



[Betrouwbare afhandeling van waardevolle mailings](#)

[Translation: Reliable handling of valuable mailings]



Trends_DM RT @Frankwatching: Nog 2 dagen tot de Webwinkel Vakdagen <https://t.co/92u25wHeb2> Laat je inspireren, meld je nu aan! @WebwinkelVakdag <https://t.co/92u25wHeb2> Jan 16 • reply • retweet • favorite

Trends_DM Komt u ons bezoeken op de #WWW16? Wij zijn te vinden op stand L40 op 20 en 21 januari #jaarbeurs #utrecht <https://t.co/0AgYuOuxh5> Jan 16 • reply • retweet • favorite

Personaliseren

Klik hier voor meer info



April 14

Product	1	2	3	4	5
Product 1	1	2	3	4	5
Product 2	1	2	3	4	5
Product 3	1	2	3	4	5
Product 4	1	2	3	4	5
Product 5	1	2	3	4	5

TRENDS

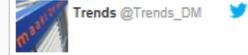
Exhibit 3 to Bizzarro Decl., Page 1 of 6

Afhandelen van uw mailing

Translation: Fulfilling your mailings



Translation: opening mail



Trends_DM RT @Frankwatching: Nog 2 dagen tot de Webwinkel Vakdagen <https://t.co/92u25wHeb2> Laat je inspireren, meld je nu aan! @WebwinkelVakdag <https://t.co/92u25wHeb2>
Jan 16 • reply • retweet • favorite

Trends_DM Komt u ons bezoeken op de #WWV16? Wij zijn te vinden op stand L40 op 20 en 21 januari #jaarbeurs #utrecht <https://t.co/DAgYuOuxh5>
Jan 16 • reply • retweet • favorite

Personaliseren

Klik hier voor meer info



April 14

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	
Maandag																															
Dinsdag																															
Woensdag																															
Donnerdag																															
Vrijdag																															
Zaterdag																															
Zondag																															

Trends DM

Exhibit 3 to Bizzarro Decl., Page 2 of 6

Afhandelen van uw mailing

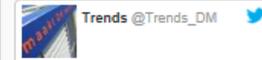
Translation: Fulfilling your mailings



Uitsorteren inhoud mailings



Translation: Sorting mail by subject matter



Trends_DM RT @Frankwatching: Nog 2 dagen tot de Webwinkel Vakdagen <https://t.co/92u25wHeb2> Laat je inspireren, meld je nu aan! @WebwinkelVakdag <https://t.co/0AgYuOuxh5> Jan 18 • reply • retweet • favorite

Trends_DM Komt u ons bezoeken op de #WWW18? Wij zijn te vinden op stand L40 op 20 en 21 januari #jaarbeurs #utrecht <https://t.co/0AgYuOuxh5> Jan 18 • reply • retweet • favorite

Personaliseren

Klik hier voor meer info



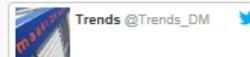
Afhandelen van uw mailing

Translation: Fulfilling your mailings



Scheiden bestelformulier en waardepapieren

Translation: Separating order forms and valuable papers



Trends_DM RT @Frankwatching: Nog 2 dagen tot de Webwinkel Vakdagen <https://t.co/92u25wHeb2> Laat je inspireren, meld je nu aan! @WebwinkelVakdag <https://t.co/92u25wHeb2>
Jan 18 • reply • retweet • favorite

Trends_DM Komt u ons bezoeken op de #WWW18? Wij zijn te vinden op stand L40 op 20 en 21 januari #jaarbeurs #utrecht <https://t.co/0AgYuOuxh5>
Jan 18 • reply • retweet • favorite

Personaliseren

Klik hier voor meer info



Handle your mailing - Trends DM - Windows Internet Explorer

http://www.trendsservice.nl/en/sample-sites/handleyourmailing.html

File Edit View Favorites Tools Help

Trends

Maakt DM makkelijk

Home Direct mail Fulfilment Printing **Cases** Products The organization Nieuws Contact

Afhandelen van uw mailing

Translation: Fulfilling your mailings



[Data-entry](#)

Trends @Trends_DM

Trends_DM RT @Frankwatching: Nog 2 dagen tot de Webwinkel Vakdagen <https://t.co/92u25wHeb2> Laat je inspireren, meld je nu aan! @Webwinke/Vakdag <https://t.co/0AgYuOuxh5>
Jan 18 • reply • retweet • favorite

Trends_DM Komt u ons bezoeken op de #WWW18? Wij zijn te vinden op stand L40 op 20 en 21 januari #jaarbeurs #utrecht <https://t.co/0AgYuOuxh5>
Jan 18 • reply • retweet • favorite

Personaliseren

Klik hier voor meer info



er ds

Copyright © 2016 Trends DM.



Search bar with 'Zoek...' placeholder and a magnifying glass icon.

Data-entry

With great ease we process your responses. Filled in coupons, reply cards, name and address modifications, we process everything so your database is completely up to date and ready to use.



Trends @Trends_DM

Trends_DM RT @Frankwatching: Nog 2 dagen tot de Webwinkel Vakdagen <https://t.co/92u25wHeb2> Laat je inspireren, meld je nu aan! @WebwinkelVakdag <https://t.co/0AgYuOuxh5>

Jan 18 • reply • retweet • favorite

Trends_DM Komt u ons bezoeken op de #WWW18? Wij zijn te vinden op stand L40 op 20 en 21 januari #jaarbeurs #utrecht <https://t.co/0AgYuOuxh5>

Jan 18 • reply • retweet • favorite

Personaliseren

Klik hier voor meer info



2014

Maandag	1	8	15	22	29
Dinsdag	2	9	16	23	30
Woensdag	3	10	17	24	31
Donnerdag	4	11	18	25	
Vrijdag	5	12	19	26	
Zaterdag	6	13	20	27	
Zondag	7	14	21	28	

Trends

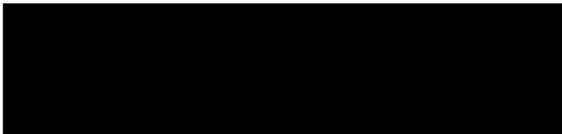
**EXHIBIT 4 TO
DECLARATION
OF JOSEPH R.
BIZARRO**

OFFICIAL NOTIFICATION

DATE OF NOTIFICATION: October 31, 2014



This document was validated on the above date and issued to the confirmed recipient prize winner named within this document. Valid only to party addressed below. Not transferable.



APPROVED FOR RELEASE

Joseph Steelman
Prize Director

Official Notification
Payments Office

Sweepstakes
Administrators

Processing Division

Keller, Sloan & Associates
P.O. Box 208
3980 CE Bunnik
The Netherlands

By my signature below I do confirm and attest:

1. You have won a GUARANTEED CASH PRIZE payment per disclosed terms and conditions noted within. Your check will be paid by bank check cashable at any banking institution.
2. Further important information for your considerations. Upon claiming your GUARANTEED CASH PRIZE you can accept and receive documents regarding accessing sponsoring agencies distributions totaling \$1,899,575.80 for the permissions and publishing processing fee noted herein.

Be it further known that in compliance with the form enclosed with disclosed terms and conditions, there is no requisite purchase for cash claim and all award decisions are deemed final and irrevocable.

AS A GUARANTEED CASH PRIZE WINNER, YOU ARE REQUIRED TO SIGN AND RETURN RELEASE FORM 110(b) PER STATED INSTRUCTIONS ON REVERSE NO LATER THAN THE POSTED DEADLINE.

Our licensed SECURITY CENTER has been alerted to process FORM 110(b) immediately upon receipt. Your payment document will be processed within 5 days of receipt and the bank notified and authorized to issue you a CHECK FOR CASH. Please also be aware that payments in excess of \$600.00 require us to issue a Department of the Treasury 1099-Miscellaneous Income Form to big cash claimants and winners.

GUARANTEED WINNER GUARANTEED WINNER

In addition, once the aforementioned document is entered into our records, your access to publishing and permissions document will be released to you for the \$1,899,575.80 in cash payments provided you select this optional benefit and remit the amount due for these services.

ALL CLAIM DEADLINES TO FILE ARE ENFORCED WITHOUT EXCEPTION.

Therefore, I ask that you now immediately direct your attention to FORM 110(b) which is a special Claim and Entitlement work order prepared for 

Be it further known that in compliance with Form 110(b) with disclosures of terms and conditions all award decisions are confirmed by independent judges and it is the sole responsibility of the sponsoring sweepstakes to comply with the legal requirements of all governmental agencies. By proclamation and my signature below, I do swear and affirm that the information in the above entitled action is both fair and accurate to the best of my knowledge, as duly entered on the day and date so entered:

X Joseph Steelman
Joseph Steelman - Prize Director

Date: October 31, 2014

INFORMATION FOR YOU:

Keller, Sloan & Associates researches and compiles entry data for financial opportunities including but not limited to, sweepstakes and contest opportunities totaling the advertised amount in cash and prizes offered to the public by independent sponsors. KSA does not sponsor these opportunities and is not responsible for payment. KSA does not assist in entry but does provide all requisite information and instructions for respondent to review and determine which opportunities are of interest.

To introduce our comprehensive report, Keller, Sloan & Associates offers a guaranteed cash prize to every respondent. There is no purchase necessary or required to claim this cash prize. KSA cash prizes and odds are: \$1,000.00 (1:150,000), \$50.00 (1:1,000), \$1.00 (1:1), \$100.00 (1:2,000) and \$250.00 (1:2,000). To claim guaranteed cash prize without purchase, simply return this mailing using your own envelope.

Compiled information is believed to be accurate at the time of publication. In the event reported information is incorrect, refund is limited to cost of report. Offer void where prohibited. Respondent must be 18 years old or older to participate. Satisfaction guaranteed or your money back, no questions asked, within 30 days of purchase. Send your refund request to address on reverse. Different graphic representations of this offer may be used at KSA's discretion. If paying by check, your account may be electronically debited for the amount of check. In the unlikely event a check is returned as NSF, account may be electronically debited for the face amount plus the state allowable fee. We may send additional offers and may provide respondent information to other companies. If you wish to not receive these offers, simply return this mailing to address on reverse marked 'do not mail' next to the name and address.

**EXHIBIT 5 TO
DECLARATION
OF JOSEPH R.
BIZARRO**

CONFIRMED PRIZE NOTIFICATION LETTER

Cash Winner Identification and Claimant Transfer Paper

Keller, Sloan & Associates, PO Box 208, 3980 CE Bunnik, The Netherlands
PREMIUM REGISTRY DIVISION

IMPORTANT: Individual recipient of contact must be printed in area below. This is a confirmed and documented statement of WINNER VERIFICATION for a prize of Cash to be paid with reply before the deadline as indicated on page 2.

The office of administration and accounting will initiate all proceedings pertaining to the CASH PRIZE you have won, and will issue a check for the Full Amount due you as guaranteed by the rules which now designate you a formal Winner.

The Full Amount:

VERIFICATION LETTER MESSAGE OCTOBER 30, 2014

FINALIZED & VERIFIED

Dear [REDACTED]

Pursuant to the headline above and through which we are now contacting you via this dated correspondence, please understand that this is NOT a preliminary or qualification letter of cash prize status; **YOU HAVE WON A CASH PRIZE!**

This letter constitutes actual designation of [REDACTED] as a cash prize winner! May we offer our warmest wishes at this moment from the management and executive offices, as well as our entire organization and staff of the KSA control office.

Please be assured of the accuracy of this documentation!

Your name was identified among a tiny percentage of ALL eligible individuals who could have received this notice. The fact that you have won a cash prize from KSA must be thrilling and somewhat overwhelming - we ask that you read carefully. Do not skip ahead. Your response to this letter is MANDATORY to claim the cash prize you have been selected to receive.

To initiate issuance of your Prize Check, you must RETURN THE ACCOMPANYING DOCUMENT before the deadline date specified on the back of this letter according to the rules and terms herein. Failure to do so will invalidate the prize confirmation and result in forfeiture of the Check awaiting dispatch to you directly by secured mail.

We would like to proceed with resolution of your cash prize quickly!

[#1] Your cash prize will be drawn and paid in single lump sum. (Section A / Prize Winner Validation)

[#2] Sweepstakes report documentation for the total aggregate funds amount of \$943,543.54 as noted above is awaiting

your reply with proceeding fee (Section B / IRDRF) for outright access to win the amount listed above. [This is not a mistake.]

The total amount, \$943,543.54, being awarded by independent prize sponsors is confirmed and will be resolved at final proceedings pending. We are delighted to provide notification of the winners total endowment amount, in writing, and to issue upon your reply and payment of the processing fee, full report documents and entrant procedures for the maximum potential aggregate funds as filed by this recorded letter and validated at \$943,543.54.

Please take a moment to read and complete the accompanying paperwork carefully. We are prepared to process and make delivery of the cash prize you've already won. Make sure to follow all instructions and requirements, and inspect that your name and address is correct as it appears on record. USE THE REPLY ENVELOPE PROVIDED AND RETURN YOUR FORM TO: KSA, P.O. Box 208, 3980 CE Bunnik, The Netherlands

Joseph Steinhilber
Sincerely: Financial Documents Officer

copy of (original) to: CHIEF FINANCIAL OFFICER

KSA-F09

INFORMATION FOR YOU:

Keller, Sloan & Associates researches and compiles entry data for financial opportunities including but not limited to, sweepstakes and contest opportunities totaling the advertised amount in cash and prizes offered to the public by independent sponsors. KSA does not sponsor these opportunities and is not responsible for payment. KSA does not assist in entry but does provide all requisite information and instructions for respondent to review and determine which opportunities are of interest.

To introduce our comprehensive report, Keller, Sloan & Associates offers a guaranteed cash prize to every respondent. There is no purchase necessary or required to claim this cash prize. KSA cash prizes and odds are: \$1,000.00 (1:150,000), \$50.00 (1:1,000), \$1.00 (1:1), \$100.00 (1:2,000) and \$250.00 (1:2,000). To claim guaranteed cash prize without purchase, simply return this mailing using your own envelope.

Compiled information is believed to be accurate at the time of publication. In the event reported information is incorrect, refund is limited to cost of report. Offer void where prohibited. Respondent must be 18 years old or older to participate. Satisfaction guaranteed or your money back, no questions asked, within 30 days of purchase. Send your refund request to address on reverse. Different graphic representations of this offer may be used at KSA's discretion. If paying by check, your account may be electronically debited for the amount of check. In the unlikely event a check is returned as NSF, account may be electronically debited for the face amount plus the state allowable fee. We may send additional offers and may provide respondent information to other companies. If you wish to not receive these offers, simply return this mailing to address on reverse marked 'do not mail' next to the name and address.