

FILED
U.S. DISTRICT COURT
INDIANAPOLIS DIVISION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA 2018 FEB 21 AM 11:10
INDIANAPOLIS DIVISION

SOUTHERN DISTRICT
OF INDIANA
LAURA A. BRIGGS
CLERK

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 V.)
)
 SHERRY GORE,)
)
 Defendant.)

CAUSE NO.

1 18-cr-0046 JMS -DML

INFORMATION

The United States Attorney charges that:

Introduction

At all times relevant to this Information:

1. Beginning in at least December 2002, SHERRY GORE conspired with others known and unknown to the United States to advance a large-scale, international, direct-mail scheme that induced victims to send money for falsely promised services and misrepresented objects.

2. The direct-mail scheme mailed fraudulent solicitations to consumers across the United States. The solicitations gave the impression that they were individualized letters from world-renowned psychics. The letters fraudulently represented that the psychics had visions or otherwise determined through the use of psychic powers that each letter recipient had the opportunity to achieve great wealth and happiness with the psychic's assistance. Many of the solicitations stated that a psychic had seen the letter recipient winning money in a lottery. The solicitations urged the recipient to purchase various supernatural objects or personalized astrological services to achieve the predicted wealth.

3. In reality, no letter recipient ever received a personalized service or object, as the letters sent were all nearly identical solicitations sent every month to thousands of recipients throughout the United States, and the purportedly unique supernatural objects were mass produced trinkets with no supernatural properties. GORE knew that the solicitations consumers received were not individualized communiques from psychics.

4. In furtherance of the direct-mail scheme, GORE specifically sent letter-recipient victims a series of five collections letters if their checks were returned for insufficient funds. GORE sent the collection letters using the names of fictitious collections and legal-services employees, and she threatened victims in the letters with escalating consequences, including the initiation of legal proceedings. GORE took these actions knowing that the purported senders of the collection letters were fabricated, the consequences of nonpayment did not escalate, and the threat of legal proceedings was false.

5. GORE and her co-conspirators engaged in the direct-mail scheme for the purpose of enriching themselves with the victim payments sent in response to the fraudulent solicitations and threatening collections letters that used fictitious names.

Count One

(Conspiracy to Use a Fictitious Name for the Purpose of Committing Mail Fraud)
(Title 18, United States Code, Section 371)

6. Between at least December 2002 and November 2014, in Morgan County, in the Southern District of Indiana, and elsewhere, the Defendant, SHERRY GORE, did knowingly and intentionally conspire, combine, confederate, and agree together with other persons, known and unknown to the United States, to commit certain offenses against the United States, that is:

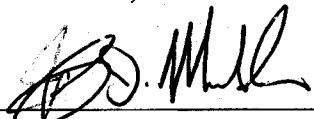
to use a fictitious name for the purpose of conducting a scheme and artifice to defraud and for obtaining money by means of materially false and fraudulent pretenses and

representations, and thereafter, to execute the scheme and artifice so devised, to place and cause to be placed in authorized depositories for mail matter one or more matters and things to be sent and delivered by the United States Postal Service, in violation of Title 18, United States Code, Sections 371 and 1342.

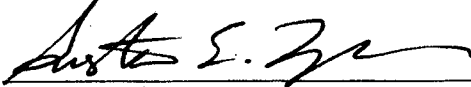
Overt Acts

In furtherance of the conspiracy and to achieve its purpose, GORE committed and caused to be committed, in the Southern District of Indiana and elsewhere, certain overt acts to effect the purpose of the conspiracy, including, but not limited to, the following overt act: On or about January 31, 2014, GORE mailed a letter from the Southern District of Indiana purporting to be from a fictitious person with the title "Director/Legal Services-Collections" threatening legal proceedings against Ohio victim I.K. unless victim I.K. submitted payment for a falsely promised service.

All of which is in violation of Title 18, United States Code, Section 371.



JOSH J. MINKLER
United States Attorney



GUSTAV W. EYLER
Acting Director
U.S. Department of Justice
Consumer Protection Branch