

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

08 - 21044 CR - HICK

MAGISTRATE JUDGE  
O'SULLIVAN

CASE NO.

18 U.S.C. § 371  
18 U.S.C. § 1341  
18 U.S.C. § 1343  
18 U.S.C. § 2326  
18 U.S.C. § 2

UNITED STATES OF AMERICA

vs.

UNDER SEAL

JEFFREY ALLAN PEARSON

a/k/a "Paul Clayton,"

a/k/a "Tim Harris,"

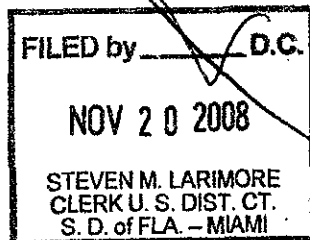
a/k/a "Ray Garrett,"

and

STEPHEN DOUGLAS SCHULTZ

a/k/a "Allen Pheifer,"

Defendants.



INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At various times relevant to this Indictment:

1. The defendants operated a series of companies in Costa Rica that marketed and sold to United States residents business opportunities to own and operate beverage and greeting card sale display racks. The business opportunities the defendants sold cost thousands of dollars each, and most purchasers paid at least \$10,000. Each business opportunity company operated for several

months. After one company closed, the next opened. The various companies used bank accounts, office space, a printing company, and other services in the Southern District of Florida and elsewhere.

2. USA Beverages, Inc. ("USA Beverages"), was a Florida and New Mexico Corporation. USA Beverages sold business opportunities to own and operate coffee beverage sale display racks. USA Beverages rented office space in Las Cruces, New Mexico, to make it appear to potential purchasers that USA Beverages' operations were fully within the United States. However, USA Beverages was actually operated in Costa Rica.

3. Twin Peaks Gourmet Coffee, Inc. ("Twin Peaks"), was a Florida and Colorado corporation. Twin Peaks sold business opportunities to own and operate coffee beverage sale display racks. Twin Peaks Gourmet Coffee rented office space in Fort Collins, Colorado, to make it appear to potential purchasers that Twin Peaks' operations were fully within the United States. However, Twin Peaks was actually operated in Costa Rica.

4. Cards-R-Us, Inc. ("Cards-R-Us") was a Nevada corporation that sold business opportunities to own and operate greeting card sale display racks. Cards-R-Us rented office space in Reno, Nevada, to make it appear to potential purchasers that Cards-R-Us' operations were fully within the United States. However, Cards-R-Us was actually operated in Costa Rica.

5. Premier Cards, Inc. ("Premier Cards"), was a Colorado and Pennsylvania corporation. Premier Cards sold business opportunities to own and operate greeting card sale display racks. Premier Cards rented office space in Philadelphia, Pennsylvania, to make it appear to potential purchasers that Premier Cards' operations were fully within the United States. However, Premier Cards was actually operated in Costa Rica.

6. The Coffee Man, Inc., a/k/a Continental Coffee or Continental Java ("Coffee Man"), was a Colorado corporation that sold business opportunities to own and operate coffee beverage sale display racks. Coffee Man rented office space in Denver, Colorado, to make it appear to potential purchasers that Coffee Man's operations were fully within the United States. However, Coffee Man was actually operated in Costa Rica.

7. Powerbrands Distributing Company ("Powerbrands") was a Wisconsin corporation that sold business opportunities to own and operate "energy drink" sale display racks. Powerbrands rented office space in Glendale, Wisconsin, and Palm Beach Gardens, Florida, to make it appear to potential purchasers that Powerbrands' operations were fully within the United States. However, Powerbrands was actually operated in Costa Rica.

8. USA Beverages, Twin Peaks, Cards-R-Us, Premier Cards, Coffee Man, and Powerbrands ("the companies") employed various types of sales representatives, including "fronters," "closers," and "references." A "fronter" spoke to potential purchasers when the prospective purchaser initially contacted the company in response to an advertisement. A "closer" subsequently spoke to potential purchasers to close deals. "References" spoke to potential purchasers about the financial success they purportedly had experienced since purchasing one of the business opportunities.

9. Defendant **JEFFREY ALLAN PEARSON**, a/k/a "Paul Clayton," a/k/a "Tim Harris," a/k/a "Ray Garrett," was a salesman for and manager of USA Beverages. **PEARSON**, using other assumed names, operated, managed, and worked as a salesman for Twin Peaks, Cards-R-Us, Premier Cards, Coffee Man, and Powerbrands. He was also listed on Costa Rican corporate documents as the president of Twin Peaks.

10. Defendant **STEPHEN DOUGLAS SCHULTZ, a/k/a "Allen Pheifer,"** was an employee of USA Beverages who typically discussed with potential customers the locations available for placement of the merchandise stands in their area. **SCHULTZ** also worked with Twin Peaks and Cards-R-Us.

**COUNT 1**  
**(Conspiracy: 18 U.S.C. §§ 371, 2326)**

1. Paragraphs 1 through 10 of the General Allegations section of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around May 2005, through the date of this Indictment, in Miami-Dade, Broward, and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendants,

**JEFFREY ALLAN PEARSON,**  
**a/k/a "Paul Clayton,"**  
**a/k/a "Tim Harris,"**  
**a/k/a "Ray Garrett,"**  
**and**  
**STEPHEN DOUGLAS SCHULTZ,**  
**a/k/a "Allen Pheifer,"**

in connection with the conduct of telemarketing, did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate and agree with others known and unknown to the Grand Jury to commit certain offenses against the United States, that is:

(a) to knowingly and with intent to defraud devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that they were false and fraudulent when made, and to deposit and cause to be deposited matter to be sent and delivered by a private and commercial

interstate carrier, and to take and receive matter delivered by a private and commercial interstate carrier, for the purpose of executing the scheme, in violation of Title 18, United States Code, Section 1341;

(b) to knowingly and with intent to defraud devise and intend to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that they were false and fraudulent when made, and transmitting and causing to be transmitted certain wire communications in interstate and foreign commerce, for the purpose of executing the scheme, in violation of Title 18, United States Code, Section 1343.

#### **PURPOSE OF THE CONSPIRACY**

3. It was the purpose of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves by obtaining money from prospective business opportunity purchasers by means of materially false statements and representations and the concealment of material facts concerning, among other things, the geographic location from which the companies operated, the expected profits of the business opportunities they sold, the services the companies would provide to purchasers, and the authenticity of company references.

#### **MANNER AND MEANS OF THE CONSPIRACY**

The manner and means by which the defendants and their co-conspirators sought to accomplish the objects and purpose of the conspiracy included, among others, the following:

4. The companies advertised the business opportunities through the Internet and in newspapers. The advertisements promoted distributorships for coffee, greeting cards, and energy drinks. The advertisements included earnings claims, such as "\$40K-\$400K Profit Potential

Yearly.” Some advertisements claimed that the business opportunities had already established national accounts.

5. The advertisements urged readers to call a toll-free number for more information. The toll-free number appeared to potential purchasers to be a number in the United States, but the call was in fact routed to Costa Rica. Potential purchasers who called the companies were initially connected to a frontier, who described the business opportunity and screened out potential purchasers who did not have the necessary amount of funds available.

6. The companies then arranged for interested potential purchasers to receive by overnight delivery service promotional packets that contained glossy brochures and other sales materials falsely describing the firms as companies located in the United States.

7. Usually after receiving the promotional packet, interested potential purchasers spoke by telephone to a closer, who, in some cases, was defendant **JEFFREY ALLAN PEARSON** using an assumed name. The phone numbers for closers were toll-free numbers that gave no indication to consumers that they were connecting to telephones in Costa Rica. The closer further described the business opportunity and closed the sale.

8. The sales representatives encouraged potential purchasers, before making a decision, to call certain “references,” who were characterized by the sales representatives as prior business opportunity purchasers. The phone numbers for references appeared to potential purchasers to be domestic numbers connecting within the United States, whereas in fact the calls generally were routed to Costa Rica.

9. The sales representatives also encouraged potential purchasers, before making a decision, to call certain “locators,” who were characterized by the sales representatives as third

parties who worked with the companies to find high-traffic locations for the merchandise display racks. In some cases, the purported locator was defendant **STEPHEN DOUGLAS SCHULTZ** using an assumed name.

10. The sales representatives provided potential purchasers with instructions for wiring and otherwise transferring funds to the companies as payment for the business opportunities. Purchasers followed these instructions and sent money to certain addresses and bank accounts, some of which were located within the Southern District of Florida.

11. To fraudulently induce others to purchase the business opportunities, the defendants and their co-conspirators made, and caused others to make, numerous materially false statements, and omitted and concealed, and caused others to omit and conceal, numerous material facts, including, among others, the following:

**Materially False Statements**

- a. That the companies were based in and operated out of the United States;
- b. That purchasers would likely earn substantial profits by purchasing one of the business opportunities;
- c. That prior purchasers of the business opportunities were earning substantial profits from their businesses;
- d. That purchasers would sell a guaranteed minimum amount of merchandise, such as greeting cards and beverages;
- e. That the business opportunity worked with locators familiar with the prospective purchaser's area who would secure or had already secured high-traffic locations for the prospective purchaser's merchandise stands;

f. That the profits of the companies were based in part on the profits of the business opportunity purchasers, thus creating the false impression that the companies had a stake in the purchasers' success and in finding good locations;

g. That the companies were established years earlier, had a significant number of distributors across the country, and had a track record of success;

h. That purchasers would receive their merchandise racks, merchandise, and locations promptly;

i. That certain "references," whom the companies' sales representatives encouraged potential purchasers to call, had previously purchased one of the business opportunities offered and were making profits in line with or exceeding the companies' promises;

j. That a limited number of distributorships were available in any one particular area, and that potential purchasers must act quickly to secure the area.

**Omission/Concealment of Material Facts**

k. That the companies were operated almost entirely out of Costa Rica;

l. That the frontiers and closers worked in Costa Rica;

m. That funds sent to the companies' United States addresses and United States bank accounts would be forwarded to Costa Rica and elsewhere;

n. That the companies were receiving complaints from prior purchasers about non-delivery of merchandise and merchandise racks, the failure to find good locations, and the companies' non-existent customer support;

o. That the companies had been in business only a short time, and were merely operating under the names of older, unrelated, now-defunct companies;



p. That the locators had not secured locations for the merchandise racks as described;

q. That the references whom potential purchasers were encouraged to contact had not in fact purchased the business opportunities;

r. That many of the references resided in Costa Rica rather than the United States; and

s. That the company in which potential purchasers were considering investing was one in a series of similar companies that operated for a short period of time and then ceased to do business.

#### OVERT ACTS

In furtherance of the conspiracy and to achieve the objects and purpose thereof, at least one of the co-conspirators committed, and caused to be committed, in the Southern District of Florida and elsewhere, at least one of the following overt acts, among others:

1. In or about June 2005, **JEFFREY ALLAN PEARSON** traveled from Costa Rica to Florida with a co-conspirator and deposited money into an account at a Wachovia bank in the Southern District of Florida to be used for depositing money from customers who purchased the USA Beverages business opportunity.

2. In or around June 2005, **STEPHEN DOUGLAS SCHULTZ** in Costa Rica, using the name "Allen Pheifer," spoke by telephone with M.W. in Cincinnati, Ohio, to describe locations available in M.W.'s area for the placement of USA Beverages coffee displays.

3. On or about June 20, 2005, **JEFFREY ALLAN PEARSON** in Costa Rica, using the name "Paul Clayton," spoke by telephone with M.W. in Cincinnati, Ohio, to describe the USA Beverages business opportunity and encourage M.W. to purchase a distributorship.

4. On or about July 18, 2005, **STEPHEN DOUGLAS SCHULTZ** in Costa Rica, using the name "Allen Pheifer," called D.T. in Urbandale, Iowa, to describe locations available in D.T.'s area for the placement of USA Beverages coffee displays.

5. On or about July 21, 2005, **JEFFREY ALLAN PEARSON** in Costa Rica, using the name "Paul Clayton," called D.T. in Urbandale, Iowa, to describe the USA Beverages business opportunity and encourage D.T. to purchase a distributorship.

6. On or about November 10, 2005, **JEFFREY ALLAN PEARSON** caused to be filed with the State of Colorado an "Article of Reinstatement" form for Twin Peaks, listing a new address of 123 North College Avenue in Ft. Collins, Colorado.

7. On or about February 14, 2006, **JEFFREY ALLAN PEARSON** caused \$3,750 to be paid to a company in Miami, Florida, hired to print and send Twin Peaks sales packets.

8. On or about April 18, 2006, **JEFFREY ALLAN PEARSON** sent an email to a former employee of USA Beverages informing him that **PEARSON** and **STEPHEN DOUGLAS SCHULTZ** were involved in "our own . . . coffee deal" and asking whether the former employee would be interested in working with them.

9. On or about September 27, 2006, **JEFFREY ALLAN PEARSON** caused a sales packet to be sent by FedEx on behalf of Cards-R-Us from Reno, Nevada, to M.T. in Olathe, Kansas.

10. On or about November 1, 2006, **JEFFREY ALLAN PEARSON** caused a sales packet to be sent by FedEx on behalf of Cards-R-Us from Reno, Nevada, to K.N. in Granite Bay, California.

11. On or about November 15, 2006, **JEFFREY ALLAN PEARSON** caused a sales packet to be sent by FedEx on behalf of Cards-R-Us from Reno, Nevada, to M.W. in Athens, Alabama.

12. On or about January 25, 2007, **JEFFREY ALLAN PEARSON** caused \$12,000 to be transferred from a bank account in the name of Cards-R-Us to a bank account in the name of Real Business Limitada, of which **STEPHEN DOUGLAS SCHULTZ** was the president.

13. On or about April 3, 2007, **JEFFREY ALLAN PEARSON** caused corporate registration documents for Premier Cards to be sent via FedEx from Jacksonville, Florida, to the Colorado Secretary of State's office in Denver, Colorado.

14. On or about June 27, 2007, **JEFFREY ALLAN PEARSON** caused a sales packet to be sent by DHL Express on behalf of Premier Cards to D.G. in Port Richey, Florida.

15. On or about May 21, 2007, **JEFFREY ALLAN PEARSON** caused a sales packet to be sent by DHL Express on behalf of Premier Cards to M.L. in Hartville, Ohio.

16. On or about September 11, 2007, **JEFFREY ALLAN PEARSON** caused a sales packet to be sent by DHL Express on behalf of Premier Cards to K.S. in Downingtown, Pennsylvania.

17. On or about September 1, 2008, **JEFFREY ALLAN PEARSON** traveled with an accomplice from Costa Rica to Palm Beach Gardens, Florida, and withdrew \$6,000 from a bank account in the name of Powerbrands.

18. On or about September 1, 2008, **JEFFREY ALLAN PEARSON** visited rented office space in Palm Beach Gardens, Florida, to be used to make it appear as though Powerbrands operated in the United States.

All in violation of Title 18, United States Code, Sections 371 and 2326.

**COUNTS 2-13**  
**(Mail Fraud: 18 U.S.C. §§ 1341, 2326, and 2)**

1. Paragraphs 1 through 10 of the General Allegations section of this Indictment are alleged and incorporated by reference as though fully set forth herein.

2. From in or around May 2005, through the date of this Indictment, in the Southern District of Florida, and elsewhere, the defendants,

**JEFFREY ALLAN PEARSON,**  
a/k/a "Paul Clayton,"  
a/k/a "Tim Harris,"  
a/k/a "Ray Garrett,"  
and  
**STEPHEN DOUGLAS SCHULTZ,**  
a/k/a "Allen Pheifer,"

in connection with the conduct of telemarketing, did knowingly and with intent to defraud devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that they were false and fraudulent when made, and for the purpose of executing such scheme and artifice to defraud, did deposit and cause to be deposited matter to be sent and delivered by a private and commercial interstate carrier, and took and received matter delivered by a private and commercial interstate carrier.

### **PURPOSE OF THE SCHEME AND ARTIFICE**

3. It was the purpose of the scheme for defendants and their co-schemers to unlawfully enrich themselves by obtaining money from prospective business opportunity purchasers by means of materially false statements and representations and the concealment of material facts concerning, among other things, the geographic location from which the companies operated, the expected profits of the business opportunities they sold, the services the companies would provide to purchasers, and the authenticity of company references.

### **MANNER AND MEANS OF THE SCHEME AND ARTIFICE**

4. Paragraphs 4 through 11 of the Manner and Means section of Count 1 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein as a description of the scheme and artifice.

### **USE OF THE MAILS**

5. On or about the dates specified as to each Count below, the below-identified defendants, for the purpose of executing and in furtherance of the aforesaid scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did deposit and cause to be deposited matter, to be sent and delivered by a private and commercial interstate carrier, and took and received the matter, delivered by a private and commercial interstate carrier.

COUNT	DEFENDANT(S)	APPROX. DATE	DESCRIPTION OF ITEM
2	JEFFREY ALLAN PEARSON and STEPHEN DOUGLAS SCHULTZ	June 24, 2005	Check for \$17,500 sent via FedEx by M.W. from Ohio to Pompano Beach, Florida, as payment for a USA Beverages business opportunity.
3	JEFFREY ALLAN PEARSON and STEPHEN DOUGLAS SCHULTZ	July 20, 2005	Sales packet sent via DHL Express on behalf of USA Beverages from Fort Lauderdale, Florida, to D.T. in Urbandale, Iowa.
4	JEFFREY ALLAN PEARSON and STEPHEN DOUGLAS SCHULTZ	August 30, 2005	Check for \$7,050 sent via FedEx by B.R. from Pennsylvania to Pompano Beach, Florida, as partial payment for a USA Beverages business opportunity.
5	JEFFREY ALLAN PEARSON and STEPHEN DOUGLAS SCHULTZ	January 25, 2006	Sales packet sent via DHL Express on behalf of Twin Peaks from Miami-Dade County, Florida, to W.B. in Oklahoma City, Oklahoma.
6	JEFFREY ALLAN PEARSON and STEPHEN DOUGLAS SCHULTZ	March 2006	Sample of coffee sent via DHL Express on behalf of Twin Peaks from Miami-Dade County, Florida, to K.C. in Lake St. Louis, Missouri.

<b>COUNT</b>	<b>DEFENDANT(S)</b>	<b>APPROX. DATE</b>	<b>DESCRIPTION OF ITEM</b>
7	<b>JEFFREY ALLAN PEARSON and STEPHEN DOUGLAS SCHULTZ</b>	April 3, 2006	Checks and money orders totaling \$10,000 sent by A.R. in California via U.S. Mail to Medley, Florida, as payment for a Twin Peaks business opportunity.
8	<b>JEFFREY ALLAN PEARSON and STEPHEN DOUGLAS SCHULTZ</b>	January 22, 2007	Sales packet sent via DHL Express on behalf of Cards-R-Us from Miami, Florida, to T.P. and K.P. in Forsyth, Illinois.
9	<b>JEFFREY ALLAN PEARSON and STEPHEN DOUGLAS SCHULTZ</b>	February 6, 2007	Sales packet sent via DHL Express on behalf of Cards-R-Us from Miami, Florida, to P.H. in Knoxville, Tennessee.
10	<b>JEFFREY ALLAN PEARSON</b>	January 22, 2008	Sales packet sent via DHL Express on behalf of Coffee Man from West Palm Beach, Florida, to N.B. in Franklin, Wisconsin.
11	<b>JEFFREY ALLAN PEARSON</b>	February 18, 2008	Sales packet sent via DHL Express on behalf of Coffee Man from West Palm Beach, Florida, to M.J. in Winfield, Missouri.
12	<b>JEFFREY ALLAN PEARSON</b>	September 2, 2008	Check for \$18,000 sent via DHL Express by R.A. in Winfield, Missouri to West Palm Beach, Florida, as payment for a Powerbrands business opportunity.
13	<b>JEFFREY ALLAN PEARSON</b>	September 2, 2008	Sales packet sent via DHL Express on behalf of Powerbrands from West Palm Beach, Florida, to W.M. in Wilmington, North Carolina.

All in violation of Title 18, United States Code, Sections 1341, 2326, and 2.

**COUNTS 14-20**  
**(Wire Fraud: 18 U.S.C. §§ 1343, 2326, and 2)**

1. Paragraphs 1 through 10 of the General Allegations section of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around May 2005, through the date of this Indictment, in the Southern District of Florida, and elsewhere, the defendants,

**JEFFREY ALLAN PEARSON,**  
a/k/a "Paul Clayton,"  
a/k/a "Tim Harris,"  
a/k/a "Ray Garrett,"  
and  
**STEPHEN DOUGLAS SCHULTZ,**  
a/k/a "Allen Pfeifer,"

in connection with the conduct of telemarketing, did knowingly and with intent to defraud devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that they were false and fraudulent when made, and did transmit and cause to be transmitted, by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds.

**PURPOSE OF THE SCHEME AND ARTIFICE**

3. It was the purpose of the scheme for defendants and their co-schemers to unlawfully enrich themselves by obtaining money from prospective business opportunity purchasers by means of materially false statements and representations and the concealment of material facts concerning, among other things, the geographic location from which the companies operated, the expected profits



of the business opportunities they sold, the services the companies would provide to purchasers, and the authenticity of company references.

**MANNER AND MEANS OF THE SCHEME AND ARTIFICE**

4. Paragraphs 4 through 11 of the Manner and Means section of Count 1 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein as a description of the scheme and artifice.

**USE OF THE WIRES**

5. On or about the dates specified as to each Count below, the below-identified defendants, for the purpose of executing and in furtherance of the aforesaid scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted, by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds.

<b>COUNT</b>	<b>DEFENDANT(S)</b>	<b>APPROX. DATE</b>	<b>DESCRIPTION OF WIRE COMMUNICATION</b>
14	<b>JEFFREY ALLAN PEARSON and STEPHEN DOUGLAS SCHULTZ</b>	November 28, 2005	Electronic mail including an invoice for printing services for Twin Peaks sent from Miami, Florida, to <b>JEFFREY ALLAN PEARSON</b> in Costa Rica.
15	<b>JEFFREY ALLAN PEARSON and STEPHEN DOUGLAS SCHULTZ</b>	June 29, 2006	Electronic mail including an invoice for printing services for Cards-R-Us sent from Miami, Florida, to <b>JEFFREY ALLAN PEARSON</b> in Costa Rica.

COUNT	DEFENDANT(S)	APPROX. DATE	DESCRIPTION OF WIRE COMMUNICATION
16	<b>JEFFREY ALLAN PEARSON and STEPHEN DOUGALS SCHULTZ</b>	January 31, 2007	Electronic mail including an invoice for mailing services for Cards-R-Us sent from Miami, Florida, to <b>JEFFREY ALLAN PEARSON</b> in Costa Rica.
17	<b>JEFFREY ALLAN PEARSON</b>	May 2007	Telephone call between a co-schemer in Costa Rica and N.M. in Boca Raton, Florida, regarding Premier Cards.
18	<b>JEFFREY ALLAN PEARSON</b>	June 1, 2007	Wire transfer of \$31,888.94 by N.M. from Boca Raton, to Banco Interfin S.A. as payment for a Premier Cards business opportunity.
19	<b>JEFFREY ALLAN PEARSON</b>	October 2007	Telephone call between a co-schemer in Costa Rica and K.S. in Okeechobee, Florida, regarding Premier Cards.
20	<b>JEFFREY ALLAN PEARSON</b>	October 17, 2007	Wire transfer of \$45,723.23 by K.S. from Okeechobee, Florida, to a bank in Costa Rica as payment for a Premier Cards business opportunity.

All in violation of Title 18, United States Code, Sections 1343, 2326, and 2.

**FORFEITURE ALLEGATIONS**

1. Counts 1 through 20 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(8) and Title 28, United States Code, Section 2461(c).

2. As the result of the offenses alleged in Counts 1 through 20 of this Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(8), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code,

Sections 371, 1341, 1343, and 2326, including but not limited to a 2007 Chevrolet Silverado, VIN 1GCHK23697F502098, and money in the following bank accounts:

BANK	ACCOUNT NUMBER
Wachovia	2000043322358
Bank of America	898005829359
HSBC Bank (Panama)	048186803092
HSBC Bank (Panama)	048232631001
Banco Interfin (Costa Rica)	322674401
Banco Cuscatlan	11710513215551412
Banco Interfin	320732201
Barclays Bank Miami	010040663 sub-acct 5982-4
Banco Improsa SA	36206721 sub-acct 11666
Bank of Butterfield	01250001314
Banco Interfin (Scotiabank)	2130006790
Scotiabank	33973401
Bank of America	0818441309

3. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and by Title 28, United States Code, Section 2461(c).

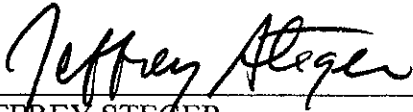
All in violation of Title 18, United States Code, Sections 371, 1341, 1343, 2326, 982(a)(8), 982(b)(1); Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON



R. ALEXANDER ACOSTA  
UNITED STATES ATTORNEY



JEFFREY STEGER  
TRIAL ATTORNEY  
U.S. DEPARTMENT OF JUSTICE



ALAN PHELPS  
TRIAL ATTORNEY

U. S. DEPARTMENT OF JUSTICE