

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)
)
 v.) No. _____
) Violations: Title 18, United
 CLIFFORD J. EDWARDS, JR.) States Code, Section 1341

COUNT ONE

The MARCH 2013 GRAND JURY charges:

1. At times material to this indictment:

a. Defendant CLIFFORD J. EDWARDS, JR., established and operated the following entities: Helping Out, LLC, (also known as “Helping Out”) and the Smiles for Kids Foundation (also known as “Smiles for Kids,” “the Smiles for Kids Foundation, Inc.,” “the Smiles 4 Kids Foundation,” and “Smiles 4 Kids”). Defendant operated these entities from Rockford, Loves Park, and Dakota, Illinois.

b. Defendant CLIFFORD J. EDWARDS, JR., and his agents represented that Helping Out and Smiles for Kids were charitable organizations.

2. From at least as early as June 2010, and continuing to at least June 18, 2013, at Rockford, Loves Park, and Dakota, in the Northern District of Illinois, Western Division, and elsewhere,

CLIFFORD J. EDWARDS, JR.,

defendant herein, knowingly devised and engaged in a scheme to defraud certain individuals (hereinafter “victims”), and to obtain money, funds, credit, and property

belonging to these victims by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described below.

3. It was the object of this scheme that defendant CLIFFORD J. EDWARDS, personally profited by fraudulently obtaining more than \$120,000 from the victims.

4. It was a part of the scheme that defendant CLIFFORD J. EDWARDS, JR., and his agents placed telemarketing type telephone calls to the victims.

5. It was a part of the scheme that defendant CLIFFORD J. EDWARDS, JR., and his agents solicited the victims for donations to Helping Out and Smiles for Kids.

6. It was further a part of the scheme that defendant CLIFFORD J. EDWARDS, JR., and his agents falsely told many of the victims that Helping Out and Smiles for Kids provided benefits to children with cancer.

7. It was further a part of the scheme that defendant CLIFFORD J. EDWARDS, JR., and his agents falsely told some of the victims that Helping Out provided benefits to under-privileged children.

8. It was further a part of the scheme that defendant CLIFFORD J. EDWARDS, JR., and his agents falsely told many of the victims that Smiles for Kids provided benefits to children with cleft palates and facial deformities.

9. It was further a part of the scheme that by making the representations referenced in paragraphs 6, 7, and 8 above, defendant CLIFFORD J. EDWARDS, JR., and his agents created the false pretense that money donated by the victims to Helping Out and Smiles for Kids would fund benefits for children with cancer, under-privileged children, and children with cleft palates and facial deformities.

10. It was further a part of the scheme that defendant CLIFFORD J. EDWARDS, JR., and his agents sent, and caused to be sent, through the United States Mails, parcels which contained pledge statements, sponsor confirmations, sponsor reminders, and return envelopes addressed to Helping Out and Smiles for Kids.

11. It was further a part of the scheme that defendant CLIFFORD J. EDWARDS, JR., and his agents also sent, and caused to be sent, through the United States Mails, pamphlets and letters which described Helping Out, Smiles for Kids, and their purported activities.

12. It was further a part of the scheme that defendant CLIFFORD J. EDWARDS, JR., and his agents caused the victims to send, through the United States Mails, checks and money orders, payable to Helping Out and Smiles for Kids.

13. It was further a part of the scheme that, instead of using the funds donated by the victims to benefit children with cancer, under-privileged children, and children with cleft palates and facial deformities, defendant CLIFFORD J. EDWARDS, JR., used the funds donated by the victims to pay his own personal expenses and the expenses of operating Helping Out and Smiles for Kids.

14. On or about February 15, 2011, at Dakota, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an

envelope containing a check, in the amount of \$20, payable to Helping Out, drawn on the bank account of "Victim C," that envelope being delivered to: Helping Out, P.O. Box 265, Dakota, Illinois;

In violation of Title 18, United States Code, Section 1341.

COUNT TWO

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.

2. On or about February 18, 2011, at Dakota, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an envelope containing a check, in the amount of \$35, payable to Helping Out, drawn on the bank account of "Victim F," that envelope being delivered to: Helping Out, P.O. Box 265, Dakota, Illinois 61018;

In violation of Title 18, United States Code, Section 1341.

COUNT THREE

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.

2. On or about February 22, 2011, at Dakota, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an envelope containing a check, in the amount of \$25, payable to Helping Out, drawn on the bank account of "Victim D," that envelope being delivered to: Helping Out, P.O. Box 265, Dakota, Illinois 61018;

In violation of Title 18, United States Code, Section 1341.

COUNT FOUR

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.
2. On or about February 22, 2011, at Dakota, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an envelope containing a check, in the amount of \$50, payable to Helping Out, drawn on the bank account of "Victim G," that envelope being delivered to: Helping Out, P.O. Box 265, Dakota, Illinois 61018;

In violation of Title 18, United States Code, Section 1341.

COUNT FIVE

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.

2. On or about June 1, 2011, at Dakota, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did place and cause to be placed in a post office an envelope to be delivered by mail, according to the direction thereon, to "Victim A," at an address in Naperville, Illinois, that envelope containing a sponsor confirmation, a letter entitled "Helping Out One Child at a Time!", and a return envelope addressed to Helping Out, P.O. Box 265, Dakota, IL 61018;

In violation of Title 18, United States Code, Section 1341.

COUNT SIX

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.

2. On or about June 1, 2011, at Dakota, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did place and cause to be placed in a post office an envelope to be delivered by mail, according to the direction thereon, to "Victim B," at an address in Chicago, Illinois, that envelope containing a sponsor confirmation, a letter entitled "Helping Out One Child at a Time!", and a return envelope addressed to Helping Out, P.O. Box 265, Dakota, IL 61018;

In violation of Title 18, United States Code, Section 1341.

COUNT SEVEN

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.

2. On or about December 14, 2011, at Rockford, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an envelope containing a check, in the amount of \$10, payable to The Smile for Kids Foundation, drawn on the bank account of "Victim M," that envelope being delivered to: The Smiles for Kids Foundation, Inc., 7431 E. State St # 305, Rockford, IL 61108;

In violation of Title 18, United States Code, Section 1341.

COUNT EIGHT

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.

2. On or about December 22, 2011, at Rockford, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an envelope containing a check, in the amount of \$25, payable to Smiles for Kids, drawn on the bank account of "Victim T," that envelope being delivered to: The Smiles for Kids Foundation, Inc., 7431 E. State St # 305, Rockford, IL 61108;

In violation of Title 18, United States Code, Section 1341.

COUNT NINE

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.
2. On or about December 31, 2011, at Dakota, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an envelope containing a check, in the amount of \$35, payable to Helping Out, drawn on the bank account of "Victim E," and a sponsor reminder, that envelope being delivered to: Helping Out, P.O. Box 265, Dakota, Illinois 61018;

In violation of Title 18, United States Code, Section 1341.

COUNT TEN

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.

2. On or about January 17, 2012, at Rockford, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an envelope containing a check, in the amount of \$10, payable to Smiles for Kids Foundation, Inc., drawn on the bank account of "Victim H," that envelope being delivered to: The Smiles for Kids Foundation, Inc., 7431 E. State St # 305, Rockford, IL 61108;

In violation of Title 18, United States Code, Section 1341.

COUNT ELEVEN

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.

2. On or about January 18, 2012, at Rockford, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an envelope containing a money order, listing "Victim R" as the remitter, in the amount of \$10, payable to The Smile for Kids Foundation, that envelope being delivered to: The Smiles for Kids Foundation, Inc., 7431 E. State St # 305, Rockford, IL 61108;

In violation of Title 18, United States Code, Section 1341.

COUNT TWELVE

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.

2. On or about January 21, 2012, at Rockford, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an envelope containing a check, in the amount of \$35, payable to Smiles for Kids Foundation, Inc., drawn on the bank account of "Victim L," that envelope being delivered to: The Smiles for Kids Foundation, Inc., 7431 E. State St # 305, Rockford, IL 61108;

In violation of Title 18, United States Code, Section 1341.

COUNT THIRTEEN

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.

2. On or about January 23, 2012, at Rockford, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an envelope containing a check, in the amount of \$25, payable to Smiles for Kids Foundation, drawn on the bank account of "Victim I," that envelope being delivered to: The Smiles for Kids Foundation, Inc., 7431 E. State St # 305, Rockford, IL 61108;

In violation of Title 18, United States Code, Section 1341.

COUNT FOURTEEN

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.
2. On or about January 23, 2012, at Rockford, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an envelope containing a check, in the amount of \$30, payable to Smiles for Kids Foundation, Inc., drawn on the bank account of "Victim K," that envelope being delivered to: The Smiles for Kids Foundation, Inc., 7431 E. State St # 305, Rockford, IL 61108;

In violation of Title 18, United States Code, Section 1341.

COUNT FIFTEEN

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.

2. On or about January 30, 2012, at Rockford, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an envelope containing a check, in the amount of \$10, payable to The Smiles for Kids Foundation, Inc., drawn on the bank account of "Victim J," that envelope being delivered to: The Smiles for Kids Foundation, Inc., 7431 E. State St # 305, Rockford, IL 61108;

In violation of Title 18, United States Code, Section 1341.

COUNT SIXTEEN

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.

2. On or about February 1, 2012, at Rockford, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an envelope containing a check, in the amount of \$25, payable to The Smiles for Kids Foundation, Inc., drawn on the bank account of "Victim N," that envelope being delivered to: The Smiles for Kids Foundation, Inc., 7431 E. State St # 305, Rockford, IL 61108;

In violation of Title 18, United States Code, Section 1341.

COUNT SEVENTEEN

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.

2. On or about February 1, 2012, at Rockford, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an envelope containing a check, in the amount of \$25, payable to Smiles Foundation, Inc., drawn on the bank account of "Victim O," that envelope being delivered to: The Smiles for Kids Foundation, Inc., 7431 E. State St # 305, Rockford, IL 61108;

In violation of Title 18, United States Code, Section 1341.

COUNT EIGHTEEN

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.

2. On or about February 1, 2012, at Rockford, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an envelope containing a check, in the amount of \$15, payable to The Smiles for Kids Found., drawn on the bank account of "Victim P," that envelope being delivered to: The Smiles for Kids Foundation, Inc., 7431 E. State St # 305, Rockford, IL 61108;

In violation of Title 18, United States Code, Section 1341.

COUNT NINETEEN

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.

2. On or about February 1, 2012, at Rockford, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an envelope containing a check, in the amount of \$25, payable to Smiles for Kids Foundation, drawn on the bank account of "Victim S," that envelope being delivered to: The Smiles for Kids Foundation, Inc., 7431 E. State St # 305, Rockford, IL 61108;

In violation of Title 18, United States Code, Section 1341.

COUNT TWENTY

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this indictment are realleged and incorporated herein as if fully set forth.

2. On or about February 3, 2012, at Rockford, in the Northern District of Illinois, Western Division,

CLIFFORD J. EDWARDS, JR.,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be delivered by mail, according to the direction thereon, an envelope containing a check, in the amount of \$10, payable to Smile for Kids Foundation, drawn on the bank account of "Victim Q," that envelope being delivered to: The Smiles for Kids Foundation, Inc., 7431 E. State St # 305, Rockford, IL 61108;

In violation of Title 18, United States Code, Section 1341.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY