

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
JUSTIN JORDAN	:	VIOLATIONS:
CHRISTOPHER COOK	:	18 U.S.C. § 1341 (mail fraud - 9 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
		Notice of Forfeiture

INFORMATION

COUNTS ONE THROUGH NINE

(Mail Fraud)

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

Introduction

1. “Company A” was a company based in Radnor, Pennsylvania, engaged in interstate commerce, that provided turn-key, in-plant repair, and equipment parts inventory and storeroom management services for industrial, commercial, and educational facilities throughout the United States. Company A’s services provided clients with procurement, inventory analysis and management, surplus materials disposal, receiving and distribution, storeroom management, warranty tracking and recovery, and management reporting by managing client storerooms both on-site and virtually.

2. “Company B” was an pharmaceutical company, engaged in interstate commerce, headquartered in New York City, New York, with offices in locations throughout the world, including New Brunswick, New Jersey.

3. Company A entered into a contractual services agreement with Company B, pursuant to which Company A was hired to provide inventory management and purchasing services for Company B at Company B’s New Brunswick, New Jersey office.

4. Defendant JUSTIN JORDAN was employed by Company A and worked as Company A’s Site Manager at Company B’s storeroom in New Brunswick, New Jersey.

5. Defendant CHRISTOPHER COOK was employed as an instrument technician, either directly by Company B or through a contracting agency that staffed him at Company B, and worked on-site at Company B’s New Brunswick, New Jersey offices.

6. Co-schemer “D.S.” was employed by Company A, and worked on-site at Company B’s storeroom in New Brunswick, New Jersey.

7. The UPS Store, Inc. was a wholly owned subsidiary of the United Parcel Service which was a franchisor of retail shipping, postal, printing and business services centers. UPS Stores, which engaged in interstate commerce, existed in locations throughout the United States, Puerto Rico, and Canada.

8. The United States Postal Service (“USPS”) was an independent agency of the United States federal government, engaged in interstate commerce, responsible for providing postal services and the receipt, transport, and delivery of the mails in and throughout the United States.

9. TD Bank, Wells Fargo Bank, and Bank of America were financial institutions engaged in interstate commerce, the deposits of which were insured by the Federal Deposit Insurance Corporation.

THE SCHEME

10. From in or about July 2008, through in or about December 2014, defendants

JUSTIN JORDAN, and CHRISTOPHER COOK

devised and intended to devise a scheme to defraud, and to obtain monies through false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

It was part of the scheme that:

11. Defendant JUSTIN JORDAN worked as a Site Manager for Company A. His responsibilities included overseeing the purchasing, ordering, and receiving process in Company B's storeroom. Accordingly, he determined which items and materials to order and purchase on Company B's behalf, submitted the orders to Company A, selected the vendor who would provide the necessary items to Company A, and received the invoices submitted by the vendors as well as the shipping receipts when items were delivered to Company B.

12. Between August 14, 2007, and July 7, 2014, in order to enrich himself, defendant JUSTIN JORDAN created, registered, and incorporated four sham vendor companies with the New Jersey Department of State, secured mailing addresses for the sham companies, and opened bank accounts in the names of the sham companies (more fully described below).

13. Defendant JUSTIN JORDAN caused Company A to purchase unnecessary

and non-existent items and materials from his sham companies, falsely entered into Company A's computers that Company B had received the items, and caused Company A to issue and mail checks to the bank accounts of the sham companies which he controlled. Company A then billed Company B for the purchased non-existent items.

14. To further the scheme and conceal its existence, defendant JUSTIN JORDAN recruited defendant CHRISTOPHER COOK and co-schemer "D.S.," both of whom worked on-site at Company B, to also create and register their own respective sham vendor companies for the purpose of causing Company A to order unnecessary and non-existent items and materials, and to thereafter receive payment from Company A.

15. Defendant CHRISTOPHER COOK created, registered, and incorporated one sham vendor company with the New Jersey Department of State (described below), and D.S. created, registered, and incorporated two sham vendor companies, one with the Delaware Department of State and the other with the Pennsylvania Department of State (also described below). Both defendant CHRISTOPHER COOK and D.S. subsequently obtained mailing addresses for their respective sham vendor companies, and opened bank accounts in the sham vendor company names, which they controlled.

16. On or about the following dates, defendants JUSTIN JORDAN and CHRISTOPHER COOK, and D.S., registered and incorporated, and caused to be registered and incorporated, a total of seven fictitious businesses variously in the Commonwealth of Pennsylvania, and the States of New Jersey and Delaware, to serve as sham vendors as part of the scheme to defraud Company A and Company B, as follows:

<u>Dates</u>	<u>Defendant/Schemer</u>	<u>Sham Vendor Company</u>	<u>Address(es) Used</u> <i>(USPS or UPS)</i>
August 14, 2007	JUSTIN JORDAN	"Joruccio LLC" ("Joruccio")	PO Box 971 Piscataway, NJ 08855 <i>(USPS Post Office Box)</i>
February 19, 2014	JUSTIN JORDAN	"Vedco Supply LLC" ("Vedco Supply")	3171 Route 9 North, #303 Old Bridge NJ 08857 <i>(UPS Store # 4635)</i> PMB119 1056 Highway 9 South Parlin, NJ 08859 <i>(UPS Store # 5280)</i>
May 9, 2014	JUSTIN JORDAN	"Creso LLC" ("Creso")	518-7 Old Post Rd, #357 Edison, NJ 08817 <i>(UPS Store # 2947)</i>
July 7, 2014	JUSTIN JORDAN	"Galloway Distributors LLC" ("Galloway Distributors")	579B Raritan Rd, #108 Roselle, NJ 07203 <i>(UPS Store # 5821)</i>
April 25, 2014	D.S.	"I & E Supply LLC" ("I & E Supply")	1866 Leithsville Rd, #259 Hellertown PA 18055 <i>(UPS Store # 4803)</i>
February 26, 2013	D.S.	"Industry Best LLC" ("Industry Best")	PO Box 3254 Bethlehem, PA 18017 <i>(USPS Post Office box)</i>
November 1, 2012	CHRISTOPHER COOK	"JDD Industrial Supplies LLC" ("JDD Industrial Supplies")	PO Box 1354 New Brunswick, NJ 08901 <i>(USPS Post Office Box)</i>

17. Defendants JUSTIN JORDAN and CHRISTOPHER COOK, and D.S., opened or caused to be opened bank accounts at financial institutions for their respective sham vendor companies as follows:

<u>Defendant/Schemer</u>	<u>Fictitious Business</u>	<u>Bank Account Information</u>
JUSTIN JORDAN	Joruccio	TD Bank, account ending in 8986

<u>Defendant/Schemer</u>	<u>Fictitious Business</u>	<u>Bank Account Information</u>
JUSTIN JORDAN	Vedco Supply	Wells Fargo Bank, account ending in 3215
JUSTIN JORDAN	Creso	TD Bank, account ending in 2358
JUSTIN JORDAN	Galloway Distributors	Wells Fargo Bank, account ending in 0147
D.S.	I&E Supply	Wells Fargo Bank, account ending in 7494
D.S.	Industry Best	Bank of America, account ending in 1922
CHRISTOPHER COOK	JDD Industrial Supplies	TD Bank, account ending in 6579

18. Defendants JUSTIN JORDAN and CHRISTOPHER COOK, and D.S., generated purchase orders from Company A, on behalf of Company B, for bogus unnecessary and non-existent product from the sham vendor companies that they, respectively, controlled.

19. Defendant JUSTIN JORDAN then “sold” the bogus product from the sham vendor companies that he, defendant CHRISTOPHER COOK, and D.S. controlled to Company A, which then “sold” the same bogus product to Company B at a mark-up.

20. Subsequently, defendant JUSTIN JORDAN marked as “received” the bogus product that never actually physically arrived by signing, or causing to be signed, a packing slip acknowledging the receipt of the bogus product, causing Company A to generate invoices to Company B for the bogus product.

21. Defendant JUSTIN JORDAN generated invoices corresponding to the bogus product that he caused to be purchased from the sham vendor companies that he and

defendant CHRISTOPHER COOK and D.S. respectively controlled, and submitted these invoices to Company A – his employer – for processing and payment.

22. Company A subsequently made payment to the sham vendor companies, either by mailing checks to the listed mailing addresses for each fictitious vendor company or via electronic automated clearing house (“ACH”) wire transfer, into the bank accounts of the fictitious vendors, all of which were controlled by defendants JUSTIN JORDAN and CHRISTOPHER COOK, and D.S.

23. On or about the following dates, defendants JUSTIN JORDAN and CHRISTOPHER COOK, and D.S., submitted or caused to be submitted fraudulent invoices which caused Company A to send checks via the United States Postal Service made out to the sham vendor companies, and to wire money via ACH transfer to the sham vendor company bank accounts, in the amounts listed below:

<u>Defendant/Schemer</u>	<u>Fictitious Business</u>	<u>Invoice Date Ranges</u>	<u>Total Amount Invoiced from Company A to Company B (approximate)</u>	<u>Total Amount Paid by Company A to Sham Vendor Companies (approximate)</u>
JUSTIN JORDAN	Joruccio	3/9/09 – 7/24/12	\$575,611.27	\$452,243.37
JUSTIN JORDAN	Vedco Supply	2/10/14 – 2/2/14	\$92,901.31	\$72,570.33
JUSTIN JORDAN	Creso	4/4/14 – 12/4/14	\$129,655.31	\$97,517.14
JUSTIN JORDAN	Galloway Distributors	6/30/14 – 11/10/14	\$93,430.20	\$74,538.34
D.S.	I&E Supply	5/2/14 – 12/3/14	\$65,169.76	\$51,031.96
D.S.	Industry Best	5/3/13 – 5/19/14	\$159,748.27	\$125,841.62
CHRISTOPHER COOK	JDD Industrial Supplies	11/27/12 – 4/1/14	\$132,642.20	\$99,404.14
			TOTAL: \$1,249,158.32	TOTAL: \$973,146.90

24. As a result of the fraudulent scheme, Company B paid Company A approximately \$1,214,307 for the bogus product.

25. On or about the dates shown below, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JUSTIN JORDAN, and
CHRISTOPHER COOK**

for the purpose of executing the scheme described above, and aiding and abetting such, and attempting to do so, knowingly caused to be delivered by the United States Postal Service mail according to the directions thereon, the following items, each mailing constituting a separate count:

<u>Count</u>	<u>Defendant</u>	<u>Date (On or About)</u>	<u>Description</u>
1	JUSTIN JORDAN	6/7/2012	Letter containing check from Company A to Joruccio for \$7,672.14
2	JUSTIN JORDAN	10/18/2012	Letter containing check from Company A to Joruccio for \$18,395.99
3	JUSTIN JORDAN	8/21/2014	Letter containing check from Company A to Galloway Distributors for \$13,866.49
4	JUSTIN JORDAN	6/26/2014	Letter containing check from Company A to Creso for \$6,737.79
5	JUSTIN JORDAN	9/11/2014	Letter containing check from Company A to Creso for \$10,688.29
6	JUSTIN JORDAN	6/4/2014	Letter containing check from Company A to Vedco Supply for \$11,443.20
7	JUSTIN JORDAN	9/11/2014	Letter containing check from Company A to Vedco Supply for \$10,264.90

<u>Count</u>	<u>Defendant</u>	<u>Date (On or About)</u>	<u>Description</u>
8	CHRISTOPHER COOK	12/5/2013	Letter containing check from Company A to JDD Industrial Supplies for \$11,746.79
9	CHRISTOPHER COOK	1/16/2014	Letter containing check from Company A to JDD Industrial Supplies for \$13,963.59

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

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1341, as set forth in this information, defendants

JUSTIN JORDAN and CHRISTOPHER COOK

shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to the commission of such offenses, including but not limited to the sum of up to \$1,214,307.00.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

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

ZANE DAVID MEMEGER
UNITED STATES ATTORNEY