

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

LUCKY DOG LLC, D/B/A INDEPENDENT
CATALOGUE SERVICES, DESTINY
MERCHANDISE LLC D/B/A PREMIUM
OPPORTUNITIES & INCENTIVES,
PREMIER CAGING SERVICES, MICHAEL
SHINE, MEAGAN QUINN SHINE, and
MELISSA PINELLI, individually and as
officers, employees, and agents of LUCKY
DOG LLC, DESTINY MERCHANDISE
LLC and PREMIER CAGING SERVICES,

Defendants.

COMPLAINT

Civil Action No.

Plaintiff, the UNITED STATES OF AMERICA, by and through its undersigned counsel,
for its complaint in the above-entitled action, alleges as follows:

INTRODUCTION

1. The United States brings this action for a temporary restraining order, preliminary and permanent injunctions, and other equitable relief pursuant to 18 U.S.C. § 1345, in order to enjoin the ongoing commission of criminal mail fraud in violation of 18 U.S.C. §§ 1341 and 1349. The United States does so to prevent continuing and substantial injury to the victims of fraud.

2. Since at least 2011, and continuing to the present, Defendants are and have been using the U.S. Mail to engage in predatory mail fraud schemes that primarily affect the elderly and vulnerable; over this time, these schemes have duped victims into sending more than ten million dollars in purported fees for the processing of cash prizes, valuable items, or other premiums that they are promised, but will never receive.

3. To carry out these schemes, Defendants procure mailing lists of potential consumers (the victims) throughout the United States and used these lists to create and send dozens of deceptive direct mail solicitations that falsely and fraudulently notify recipients that they have won or were eligible to win large amounts of money and other valuable prizes.

4. As a result, the victims are fraudulently induced to pay money for falsely promised cash awards and luxury prizes.

5. The false solicitations direct the victims to send money to pay purported processing fees associated with their promised winnings and prizes, and victims are provided pre-addressed return envelopes which the victims are instructed to use to return their payments.

6. Although many if not all of the solicitations communicate to the victims that they have been individually selected, the mailings are, in fact, identical, mass-produced form letters sent to the victims based on their inclusion in mass-mailing lists targeted to vulnerable consumers.

7. None of the victims who responded to the deceptive solicitations have been sent large cash awards or the other valuable prizes that they were promised.

8. These solicitations have been and are being sent to recipients in at least forty-one states via U.S. Mail, and the responses sent, also via U.S. Mail, to Post Office boxes in Providence, Rhode Island.

9. As a result of these schemes, between March 2011 and the date of this Complaint, which dates being approximate and inclusive, recipients of these fraudulent solicitations have sent a total of over \$10,500,000.00 to various entities belonging to, and operated by, Defendants Michael Shine, Meagan Shine, and Melissa Pinelli, via U.S. Mail to Post Office (PO) Boxes in Providence, RI.

JURISDICTION AND VENUE

10. The Court has subject matter jurisdiction over this action pursuant to 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345.

11. Venue is appropriate in this district pursuant to 28 U.S.C. § 1391(b)(2).

PARTIES

12. Plaintiff, the UNITED STATES OF AMERICA is a sovereign and body politic.

13. Defendant LUCKY DOG LLC is a Limited Liability Company organized and operating under the laws of the State of Rhode Island and Providence Plantations. Its Articles of Organization were filed with the Rhode Island Secretary of State on or about January 12, 2012, with Defendant Michael Shine as the listed registered agent, and a registered agent business address of 43 Armistice Boulevard, Pawtucket, RI 02860. On January 17, 2012, a fictitious business name statement for Lucky Dog, LLC was filed with the Rhode Island Secretary of State, for use of the name Independent Catalogue Services (“ICS”). The terms Lucky Dog, ICS, or Lucky Dog/ICS as used herein refer to the same entity, unless otherwise specified.

14. Defendant DESTINY MERCHANDISE, LLC is a Limited Liability Company organized and operating under the laws of the State of Rhode Island and Providence Plantations. Its Articles of Organization were filed with the Rhode Island Secretary of State on or about October 12, 2016, with Defendant Meagan Shine as the listed registered agent, and a registered agent business address of 411 Atwells Avenue, Suite 2, Providence, RI 02909. On November 16, 2016, a fictitious business name statement for Destiny Merchandise, LLC was filed with the Rhode Island Secretary of State, for use of the name Premium Opportunities & Incentives (“POI”). The terms Destiny Merchandise, Destiny, Destiny/POI or POI, as used herein refer to the same entity, unless otherwise specified.

15. 411 Atwells Avenue, Providence, RI 02909 is owned by Defendant Michael Shine, the husband of Defendant Meagan Shine. A sign on the door reads “On-Site Service Corp., Lucky Dog LLC, 409 Atwells Ave LLC.”

16. Defendant PREMIER CAGING SERVICES is a Limited Liability Company organized and operating under the laws of the State of Rhode Island and Providence Plantations. Its Articles of Organization were filed with the Rhode Island Secretary of State on or about June 6, 2012, by Defendant Melissa Pinelli.

17. Defendant MICHAEL SHINE is an owner, operator, manager, and the registered agent of Lucky Dog, LLC, and the wife of Defendant Meagan Shine.

18. Defendant MEAGAN QUINN SHINE (nee Quinn) is the wife of Michael Shine and an owner, operator, manager, and the registered agent of Destiny Merchandise, LLC.

19. Defendant MELISSA PINELLI, is owner, operator, and manager of Premier Caging Services.

THE EVOLUTION OF THE LUCKY DOG/ICS ENTITY INTO DESTINY/POI AND THE CONTINUED ROLE OF DEFENDANTS IN PERPETRATING THE SCHEME

20. The entities used by the Defendants to carry out the scheme alleged herein have evolved over time.

21. Lucky Dog/ICS was itself the third iteration of a direct mail solicitation company owned or operated by the Shines.

22. PacNet Services Ltd., a company operating out of Canada, provided payment processing services to Lucky Dog through approximately September 21, 2016, and remained in communication with Lucky Dog until October of 2016.

23. On September 22, 2016, the United States Government, Department of Treasury’s Office of Foreign Assets Control (OFAC) designated PacNet Group along with 24 entities and 12

individuals associated with PacNet, including PacNet Services Ltd., as a “Transnational Criminal Organization.” As a result, any U.S. persons were prohibited from engaging in transactions with these PacNet entities. The designations were based on a non-judicial allegation that PacNet conspired in fraudulent activities of “Direct Mail” marketers active in the United States and elsewhere. <https://www.treasury.gov/press-center/press-releases/Pages/jl5055.aspx>. The OFAC sanctions against PacNet and associated individuals were lifted in the end of 2017 because the principal of PacNet declared a completed disassociation with PacNet (except to wind down its affairs) and PacNet was dissolved.

24. Subsequent to the PacNet dissolution, Lucky Dog took steps to minimize its connection with PacNet, which could readily be identified as a customer of PacNet.

25. These included, but were not limited to, on September 28, 2016, changing the registered agent of Lucky Dog from Michael Shine to Meagan Shine, and, on October 12, 2016, incorporating Destiny Merchandise, LLC.

26. Although efforts were made to make it appear as if Lucky Dog had ceased to operate, in fact, Destiny/POI was created in its place to continue sending out the mailings and receiving victim payments. However, given the fact that Lucky Dog had been engaged in fraudulent mailing activity for at least 4 years, Lucky Dog had established vendor relationships with businesses, such as printers and mailers, that were necessary to perpetrate the fraud.

27. As a result, Destiny/POI, continues to carry on the direct mail solicitation schemes previously handled by Lucky Dog and its predecessor entities.

28. Notwithstanding changes in name or corporate form, Defendants have carried out, and are carrying out, a continuing mail fraud solicitation scheme, individually and through the entities named herein.

29. As set forth *infra*, defendants carry out varying roles in mailing the solicitations, as well as processing victim returns.

DEFENDANTS' FRAUDULENT SCHEMES

30. Tens of thousands of fraudulent lottery or prize-related solicitations are mailed to American victims nearly every day. These solicitations take many forms, but all contain misrepresentations that are designed to trick elderly or otherwise vulnerable victims by making false and fraudulent claims that the individual recipient has already won or will soon win a large cash prize that will be disbursed once the recipient has paid a small fee. In some instances, the solicitations falsely represent that the recipient was personally selected and that personalized efforts on the recipient's behalf already have been taken. In reality, the solicitations are mass mailed to recipients whose names and contact information were acquired from a mailing list.

31. Defendants' fraudulent schemes involved multiple components that are common to lottery/solicitation schemes of this type: direct mailers, list brokers, cagers, and payment processors; their roles are generally as follows:

- *Coordinators/Direct Mailers.* Direct mailers orchestrate the schemes. Among other things, they create, or acquire and approve solicitation packets (including the outside envelope, fraudulent solicitation, remittance slip, and payment return envelope), obtain mailing "lead" lists, and orchestrate the scheme's logistics with the other participants. The direct mailers also pay the other participants for their role conducting the schemes.
- *Cagers.* Cagers, a "caging service" or "caging agent," are affiliated or third-party service providers to the direct mail industry that receives and handles customer (or in this case, victim) payments sent by mail. The caging service or agent also often rents postal mailboxes and receives victims' payments and responses to the solicitations. The services provided by the caging service may include opening the envelopes, processing payments, correcting recipient addresses, processing returned mail, providing lockbox services, and depositing funds and the associated data processing for each of these services. The caging service does not fulfill promises made to the victims.

- *List Brokers.* In the direct mail industry, list brokers work with clients who mail solicitations, as well as list owners, who possess mailing lists. List brokers receive a commission based upon the fee the mailer pays to the list owner. List brokers provide the lists that mailers need to reach likely customers, and can assist by recommending or filtering lists, and accessing databases of mailing lists, or owners with privately held lists.
- *Payment Processors.* Payment processors receive victim payments from the cagers, including checks and credit card information, process the payments and distribute the proceeds to the direct mailers.

32. In the context of this case, Premier Caging Services, the caging service/agent, worked with the direct mailers/coordinators of mass-mailed solicitations, Lucky Dog/ICS and Destiny/POI.

33. At various times relevant to this complaint, Defendants have carried out overlapping functions with respect to coordination, arrangements for an orchestration of direct mailing, caging and payment processing.

34. Defendants' solicitations are designed to look like formal notifications from a legitimate, genuine prize processor. In truth, however, the defendants' mail fraud schemes involve a consortium of individuals and entities who play various roles in creating, personalizing, printing and mailing the solicitations, as well as opening, processing and tracking victim returns.

35. Recipients of these solicitations are led to believe that payment of nominal processing or entry fees by the recipient will result in receipt of the promised prizes or goods, and in response send payments in the provided mailers that accompany the solicitation.

36. These mailers are received and processed by the caging service.

37. After victim responses are opened by the caging service, the funds are then typically sent to a payment processor. Payment processors collect and process the payments and distribute the proceeds to the participants of the mail fraud scheme. The payment processor can also be used

to distribute payments to third party vendors and service providers as directed by the perpetrators of the scheme.

A. Independent Catalogue Services (“ICS”) and Premium Opportunities and Incentives (“POI”) Solicitations

38. In the current iteration of Defendants’ scheme, individuals are contacted via U.S. Mail with solicitations indicating that they are entitled to claim a large amount of money in a lottery or a valuable item. In the mailings, recipients are or were instructed to send money, frequently by a deadline, to Independent Catalogue Services (ICS) via U.S. Mail to PO Box 6487, Providence, RI and/or Premium Opportunities & Incentives (POI) via U.S. Mail to Post Office (PO) Box 6267, Providence, RI in advance of receiving their purported winnings or prizes. The individuals are told that the money they are directed to send is for the payment of processing fees on their winnings.

39. The direct mail solicitations are replete with misrepresentations and deceptive statements designed to convince victims to send a payment.

40. The mailings are printed on official-looking or certificate paper, and frequently contain other language and details designed to make them appear official or legitimate, including bar codes; document control numbers; printing that appears to be rubber stamped, such as the phrase “authorized document;” highlighted text; bank-check style typeface and formatting; and identification and other codes.

41. The solicitations use selectively-emphasized text and graphics to create the false overall impression that recipients are receiving notices that they are already winners of substantial awards. Many emphasize that the prize has been “confirmed” or “approved.” In reality, not only have recipients not won any prize, the direct mailers have done nothing to verify that the recipients are eligible for such a prize.

42. All of the solicitations purport to inform potential victims that they are receiving individualized, urgent notices that they have won a large cash prize or valuable item. To receive the prize or award, the solicitations direct recipients to return a payment. The payment is characterized in multiple ways, including as a “document” or “processing” fee.

43. The misimpression that the recipients have won a prize is further reinforced by text and graphics that make the solicitations appear unique and personalized, when in fact they are nothing more than form letters. The solicitations frequently bear what are designed to look like unique account codes, validation codes or graphics that look like handwritten notes or marks from the solicitations’ sender. Despite misrepresentations that they are unique notices, thousands of nearly identical copies of each solicitation packet are sent to potential victims.

44. The solicitations stress an urgent response is required and that the pending wealth will be jeopardized if the recipient does not act quickly to return the fee. Solicitations note a “response deadline,” are marked “deadline enforced,” or “no extensions!” Again, in reality, there is no prize, and there is no deadline for submission of a payment.

45. Defendants attempt to absolve themselves of responsibility by including disclaimers on their solicitations. Some disclaimers describe—vaguely—the solicitations’ supposed actual offer, a report on sweepstakes entry opportunities (which, in reality, is also never provided). Nonetheless, the disclosures are presented in a manner that substantially reduces or eliminates their effectiveness, including generally being printed in smaller print in a dense “boilerplate” fashion in the footer, or on the back side or last page of the solicitations, where they are less likely to be seen. As a result, the disclaimers do not overcome the multiple design elements and language on the face of the solicitations that provide the overall impression that the recipients will receive substantial monetary awards or items of value if they pay the fee.

46. ICS and POI have sent and are sending multiple mailings, each with a different appearance, to a single victim, reporting winnings and requesting that a fee be sent to ICS and POI.

47. Three solicitations sent by POI to one individual, D.M., a 68 year old resident of Highland, Indiana, are typical and representative of this scheme:

- a. The first of these, shown below and captioned “Imminent Prize Opportunity” listed the recipient’s name, and stated that he “ha[d] been positively identified and ASSIGNED PERSONAL ID # 80027675217 for the Win-Opportunities totaling ***** \$3,000,000.00.” Above a bank-check style box to the right, the phrase “Status confirmed for” appears above the boxed figure “\$3,000,000.00.” The notice also told the recipient that “to finalize all necessary procedures required for delivery of your over \$3,000,000.00 in cash and prize entry directives, simply complete Requisition Form POI-16B and return it to POI in the enclosed envelope with the document fee. . .”

Imminent Prize Opportunity

Has been POSITIVELY IDENTIFIED and ASSIGNED PERSONAL ID # 80027675217 for the Win-Opportunities Totaling:

******* \$3,000,000.00**

DEADLINE ENFORCED **A**

FINAL DETAILS HAVE BEEN CONFIRMED. YOUR REPLY IS REQUIRED BY:

10/25/17

No Extensions!

PERSONAL ID:

☒ **80027675217**

STATUS CONFIRMED FOR:

☒ **\$3,000,000.00**

POI_16F81

ISSUING OFFICE:

PREMIUM, OPPORTUNITIES & INCENTIVES
P.O. BOX 8267, PROVIDENCE, RI 02940

AUTHORIZED DOCUMENT

DETAILS:

Personal ID Verification: Filed and Approved

Dear [REDACTED]:

It gives us great pleasure to inform you of this great opportunity! You have been specifically chosen to receive as of today, 10/11/2017, WIN-OPPORTUNITIES TOTALING OVER \$3,000,000.00.

[REDACTED] by signing below you acknowledge you are 18 years of age or older. You acknowledge that you understand your failure to reply by stated deadline will result in forfeiture of this opportunity. You confirm that your address is correct (or has been corrected by you). We cannot be held responsible for delivery to a wrong address.

According to our records passing on in depth and complex data verification process, you have been successfully selected and specifically assigned the following Personal Identification Number: 80027675217

*** [REDACTED] PIN: 80027675217

*** RE: \$3,000,000.00 WIN-OPPORTUNITIES

[REDACTED] to finalize all necessary procedures required for delivery of your over \$3,000,000.00 in cash and prize entry directives, simply complete Requisition Form POI-16B and return it to POI in the enclosed envelope with the Document Fee postmarked by 10/25/2017.

Sincerely,

POI Research Team

POI does not sponsor any sweepstakes, make any award of cash or prizes, nor do they enter you into any sweepstakes. POI searches for and creates a Report of Entry Directives and Procedures of eligible sweepstakes and markets that are conducted by independent sponsors providing entry information including sponsor's deadline for entry. This is not a sweepstakes or award notification and does not guarantee any winnings. You must not yet have a prize and this is not a prize notification. We use all due diligence to create the Report and the entry information regarding the independent sponsor. The Report you are seeing will detail all necessary instructions to enter into the millions of dollars in cash and prizes offered by independent sponsors in millions of sweepstakes. See Reverse Side for Solicitation Policy.

DETACH AND RETURN REQUISITION FORM IN THE ENCLOSED ENVELOPE. SEE REVERSE SIDE FOR COMPLETE DETAILS.

- b. A second solicitation from POI to the same recipient, D.M., captioned "REPORTING AND ENTRY DETAILS- URGENT NOTICE, RESPOND AT ONCE," stated that "The office of delivery assurance is contacting you regarding >>>\$2 MILLION<<<". The notice went on to inform the recipient that "we have been directed to inform you of your inclusion in a high cash value and fine jewelry disbursement," and declared that "you have been chosen to receive a Magnetic Hematite Bracelet valued at \$119.00," and "will also receive, via secured shipment, a Sweepstakes Report with details for valid claim as winner to over \$2 million in available cash and prizes." After advising that "a small fee is required to process and ship your Magnetic Hematite Bracelet," the solicitation footer contained the legend "TOTAL AGGREGATE PRIZE DELIVERY DETAILS >>>\$2 MILLION<<<," overprinted with what seems intended to appear as a rubber-stamped "OK." This solicitation is shown below:

OFFICE:
PREMIUM OPPORTUNITIES & INCENTIVES
DELIVERY ASSURANCE
PO BOX 6267, PROVIDENCE, RI 02940

NON-TRANSFERABLE



ISSUE NO:
H 1902818

ACCOUNT STATUS: ACTIVE

- REPORTING & ENTRY DETAILS -
URGENT NOTICE / READ AND RESPOND AT ONCE

SECURED DELIVERY FOR: [REDACTED]

*****@POI-MIXED AADC 065 3 1359

[Barcode]

The Office of Delivery Assurance
is Contacting You Regarding:

>>> \$2 MILLION <<<

\$2,000,000.00
SWEEPSTAKES ENTRY DETAILS

DELIVERY CODE: ☒ 80028004126 // [REDACTED]

DEADLINE TO REPLY: October 27, 2017

POI_04FB1

FILE ON RECORD

Dear [REDACTED]:

On behalf of third-party cash/prize sponsors, we have been directed to inform you of your inclusion in a high cash value and fine jewelry disbursement.

There are 2 PARTS to this disbursement:

- ❖ ①. You have been chosen to receive a Magnetic Hematite Bracelet valued at \$119.00.
- ❖ ②. You will also receive, via secured shipment, a Sweepstakes Report with details for valid claim as winner to over \$2 million in available cash and prizes. No purchase is necessary to win.

[REDACTED] it is extremely important that you mail back your Acceptance Form below at once to make your claim. Deadlines are affixed to these cash-bearing sweepstakes that you must adhere to. Be advised, a small fee is required to process and ship your Magnetic Hematite Bracelet.

Thank you for your time and attention. We await your reply.

Sincerely, *please respond ASAP!*

Premium, Opportunities & Incentives

\$ AMOUNT:

PRIZE DELIVERY NOTICE

TOTAL AGGREGATE
PRIZE DELIVERY DETAILS

>>> \$2 MILLION <<<

OK

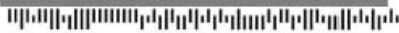
POI does not sponsor any sweepstakes, make any award of cash or prizes nor do they enter you into any sweepstakes. POI searches for and prepares a Report of Entry Disburses and Procedures of available sweepstakes and contests that are conducted by independent sponsors providing entry information including sponsor set deadlines for entry. This is not a sweepstakes or award notification and does not guarantee any winnings. You have not yet won a prize and this is not a prize notification. We use all due diligence to compile the Report and the entry particulars required by the independent sponsors. The Report you are ordering will detail all necessary instructions to enter into the millions of dollars in cash and prizes offered by independent sponsors in nationwide sweepstakes. See Reverse Side for Satisfaction Policy.

- c. A third solicitation from POI to the same recipient, D.M., and shown below, was titled "FINANCIAL ADVISORY," above a bank-check style box containing the figure \$3,000,000 above the words "cash prize amount."

04:29:13 
POI_07FB1

FROM:
PREMIUM, OPPORTUNITIES & INCENTIVES
PO Box 6267
Providence, RI 02940

TO:
*****AUTO**MIXED AANC DAS A 2305

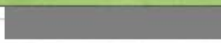


FINANCIAL ADVISORY

\$

3,000,000.00

CASH PRIZE AMOUNT

VERIFIED RECIPIENT	STATUS	RESPONSE DEADLINE
	*** APPROVED ***	JUNE 15, 2017

June 1, 2017

Dear 

The purpose of this communication is to inform  that they are eligible to receive entry directives reporting \$3,000,000.00 in win-opportunities by third party sponsors with all necessary details.

According to our records ensuing an in depth and complex data verification process, you have been selected to receive a Premium Offer Allocation with your Entry Directives. An Elegant Crystal Heart Pendant for a Report Fee of \$25. POI specifically assigned the following **PERSONAL IDENTIFICATION NUMBER:**


PIN: 11003069233 ***

RE: \$3,000,000.00

 to finalize all necessary procedures required for complete delivery of your Premium Offer Allocation of over \$3,000,000.00 in cash and prize entry directives and Crystal Heart Pendant, simply complete Form POI_07FB1 and return it to POI in the enclosed envelope with \$25.00 Report Fee postmarked by 06/15/17. We will not process your request without the required document fee and signed form on page 2.

Sincerely,

POI Financial Advisory Commission Team

COPY FILED

Detach and Return Signature Page (form POI_07FB1) in the Enclosed Envelope.
See reverse side for complete details.

PURCHASE DOES NOT IMPROVE YOUR CHANCES OF WINNING.

POI does not sponsor any sweepstakes, make any award of cash or prizes nor do they enter you into any sweepstakes. POI searches for and prepares a Report of Entry Directives and Procedures of available sweepstakes and contests that are conducted by independent sponsors providing entry information including sponsor set deadlines for entry. This is not a sweepstakes or award notification and does not guarantee any winnings. You have not yet won a prize and this is not a prize notification. We use all due diligence to compile the Report and the entry particulars required by the independent sponsors. The Report you are ordering will detail all necessary instructions to enter into the millions of dollars in cash and prizes offered by independent sponsors in nationwide sweepstakes. See Reverse Side for Satisfaction Policy.

48. In total, between April 2017 and February 2018, which dates being approximate and inclusive, D.M. received approximately 32 letters from POI, P.O Box 6267, Providence, RI. Based on the wording in the letters, D.M. believed he had won cash prizes of up to \$3,000,000.00. One letter specifically stated “This document confirms that [D.M.] can claim entitlements totaling the over \$3,000,000.00 stated.” In addition to cash prizes of between \$2 and \$3 million, and those referenced above, some letters indicated that D.M. was entitled to receive, among others items, an Antiqued Magnifier Pendant on 18 inch chain, a Crystal Pendant and Pen Set, a Good Luck Sun Pendant, a Swarovski crystal bracelet, and a Cultured Pearl Necklace valued at \$119.00.

49. In each case, in order to claim these prizes, D.M. believed he was required to complete an enclosed form and return it along with a specified “processing fee”. D.M. followed the directions outlined in the letters and, in each case, returned the completed form along with his payment via U.S. Mail to POI, P.O Box 6267, Providence, RI.

50. Between April 2017 and February 2018, which dates being approximate and inclusive, D.M. mailed a total of 31 completed forms along with specified fees totaling \$805.00 via U.S. Mail to POI, P.O Box 6267, Providence, RI

51. D.M. did not receive any large cash awards or other valuable prizes.

52. In another instance, illustrative of the POI and ICS schemes, POI sent solicitations to D.W., a 75 year old resident of Sterling Heights, Michigan.

53. Throughout 2018, D.W. received multiple solicitations from POI, including the following:

- a. D.W. stated that he received a letter from POI dated 2/23/2018 indicated he was entitled to a cash prize of \$3,000,000.00. The letter instructed D.W. to “remit Report Fee of \$25 for \$3,000,000.00 in Cash and Prize Opportunities”.
- b. D.W. received a second letter from POI on 3/6/2018 stating “Over \$3,000,000.00 in cash and prize win-opportunities are available” and that “\$3,000,000.00 is ready

and available for shipment.” The letter also stated “Failure to submit timely and complete entries will disqualify an entry for the aforementioned win-opportunities in excess of \$3,000,000.00”.

54. Believing he had won a large cash prize, D.W. returned the form along with a Western Union money order for \$25.00 via U.S. Mail to POI, P.O Box 6267, Providence, RI on or about March 2, 2018.

55. D.W. mailed a total of 15 completed forms along with specified fees totaling \$390.00 via U.S. Mail to POI, P.O Box 6267, Providence, RI. D.W. did not receive any large cash awards or other valuable prizes.

56. In another instance, illustrative of the POI schemes, POI sent solicitations to S.F., an 82 year old resident of North Waterboro, Maine.

57. Between 2017 and 2018, S.F. received multiple solicitations from POI, including the following:

- a. One letter informed S.F. that “Over \$3,000,000.00 in cash and prize win-opportunities are available”. The letter instructed S.F. to “Sign and return the attached form with your \$30 for your Premium Offer program allocation”. The letter also stated “Failure to submit timely and complete entries will disqualify an entry of the aforementioned win-opportunities in excess of \$3,000,000.00.”
- b. S.F. received a second letter dated February 16, 2018 from POI, listing a cash prize in the amount of \$3,000,000.00 and in which she was listed as a “Verified Recipient”. The letter instructed S.F. to “complete Form POI_07FB1 and return it to POI in the enclosed envelope with \$25.00 Report Fee postmarked by 3/2/18” in order to “finalize all necessary procedures required for complete delivery of your Premium Offer Allocation of over \$3,000,000.00 in cash...”
- c. S.F. received an identical letter dated April 16, 2018 POI, listing a cash prize in the amount of \$3,000,000.00 and in which she was listed as a “Verified Recipient”. The letter directed S.F. to “complete Form POI_07FB1 and return it to POI in the enclosed envelope with \$25.00 Report Fee postmarked by 4/30/18” in order to “finalize all necessary procedures required for complete delivery of your Premium Offer Allocation of over \$3,000,000.00 in cash...”

58. In each case, S.F. believed she had won a cash prize and returned the completed form along with the amount requested.

59. S.F. sent a total of \$735.00 to POI in response to the solicitations. S.F. did not receive any large cash awards or other valuable prizes.

60. In another instance, illustrative of the POI schemes, POI sent solicitations to J.F., an 81 year old resident of Greeley, Colorado.

61. In 2018, J.F. received multiple solicitations from POI, P.O Box 6267, Providence, RI, including the following:

- a. A letter dated 3/23/2018, stating: “your WIN opportunity totaling over \$3,000,000.00 is confirmed...” The letter instructed J.F. to “Sign and return the attached document with a \$35 fee in the envelope provided.” The letter also stated “Failure to submit entries before deadlines may result in permanent cancellation of aforementioned cash and prize opportunities in excess of \$3,000,000.00;”
- b. a second letter dated 3/26/2018 in which J.F. was informed that “YOU ARE ELIGIBLE FOR \$3,000,000.00” and “must remit Report Fee of \$25 for \$3,000,000.00 in Cash and Prize Opportunities...;”
- c. a third letter dated 3/20/2018 in which J.F. was informed “of your inclusion in a high cash value and fine jewelry disbursement.” The letter stated that J.F. was “chosen to receive a Cultured Pearl Pendant Necklace valued at \$119.00” and “a Sweepstakes Report with details for valid claim as winner to over \$2 million in available cash and prizes;”
- d. a fourth letter dated 4/3/2018 in which J.F. was instructed to “Sign, detach and enclose with noted report fee in the return envelope provided postmarked by 4/16/2018 and receive our gift to you of our good luck Sun Pendant in gold tone.”

62. In each case, J.F. believed he had won a cash prize or the specified jewelry and returned the completed form along with the amount requested.

63. J.F. did not receive any large cash awards or other valuable prizes, including but not limited to the sun or cultured pearl pendants.

64. In another instance, illustrative of the POI schemes, POI sent solicitations to V.G.E., an 85 year old resident of Pine Bluff, Arizona.

65. V.G.E. received numerous letters from POI, all of which indicated she was entitled to a cash prize of \$3,000,000.00.

66. V.G.E. mailed 110 checks totaling \$2,825.00 to POI between December 2016 and April 2018. V.G.E. did not receive any large cash awards or other valuable prizes.

67. All victims identified to date report a similar series of events leading to their sending money to Lucky Dog/ICS and/or Destiny/POI. The victims reported that they were contacted via U.S. Mail and by letter, were told they were entitled to claim a large amount of money in a lottery. In the mailing, they were instructed to send money to Independent Catalogue Services (ICS) via U.S. Mail to PO Box 6487, Providence, RI and/or Premium Opportunities & Incentives (POI) via U.S. Mail to PO Box 6267, Providence, RI in advance of receiving their purported winnings. The victims were told that the money they were directed to send was for the payment of processing fees on their winnings.

68. Further examples of solicitations issued in the name of both ICS and POI are annexed as **Exhibits A** through **T** to this Complaint, and are incorporated by reference herein.

69. The solicitations referenced and depicted in paragraphs 46 through 67 and depicted in Exhibits A through T are representative, typical, and consistent with the mailings made by ICS and POI throughout their conduct of this scheme, and are true and accurate copies of actual mailings sent by ICS and POI.¹

70. In the mailings referenced above, POI included inconspicuous fine print on the front and back of their solicitations that purported to set out terms and conditions. Mailings recovered

¹ Consistent with Federal Rule of Civil Procedure Rule 5.2 and Local Rule Gen. 102, the name and address of the victim-recipient of these mailings has been redacted for public filing

to date contained language in small type in the footer that reads, or is identical in sum and substance, to the following:

Purchase Does Not Improve Your Chances of Winning. POI does not sponsor any sweepstakes, make any award of cash or prizes nor do they enter you into any sweepstakes. POI searches for and prepares a Report of Entry Directives and Procedures of available sweepstakes and contests that are conducted by independent sponsors providing entry information including sponsor set deadlines for entry. This is not a sweepstakes or award notification and does not guarantee any winnings. You have not yet won a prize and this is not a prize notification. We use all due diligence to compile the Report and the entry particulars required by the independent sponsors. The Report you are ordering will detail all necessary instructions to enter into the millions of dollars in cash and prizes offered by independent sponsors in nationwide sweepstakes. See Reverse Side for Satisfaction Policy.

71. These “disclaimers” were printed in light colors, small font, and block text, making them barely legible. In many cases, these difficult-to-read “disclaimers” directly contradicted the claims in the main body of the solicitation. For example, solicitations claimed that the recipient has already been confirmed as the winner of a prize in bold, prominent lettering in the main body of the solicitation, but then stated that the sender does “not sponsor any sweepstakes, make any award of cash or prizes nor do they enter you into any sweepstakes”. Based on the formatting, recipients were highly unlikely to see, let alone read and understand the print in the disclaimers, and the perpetrators of the scheme designed the mailings with this intent. These disclaimers did not dispel the overall impression conveyed by the solicitations that the recipient would receive millions of dollars and/or valuable items if the recipient paid the processing fee.

VOLUME OF RESPONSES RECEIVED

72. POI (and its predecessor ICS) received and receives significant volumes of mail in response to these solicitations.

73. For example, in or about June, 21, 2018, POI received approximately 133 pieces of mail per day through the Main Post Office in Providence, RI.

74. In or about October 22, 2018, POI received approximately 386 pieces of mail per day through the Main Post Office in Providence, RI.

75. Even extrapolating from the lower of these estimates, POI receives almost 50,000 responsive mail pieces per year.

INVOLVEMENT OF INDIVIDUAL DEFENDANTS

76. The individual Defendants own and operate the entity Defendants which are small, closely held business entities that have no known business purpose apart from direct mail solicitation and caging. They are aware by virtue of the operation of the business of its nature and conduct.

77. Defendants Michael and Meagan Shine operate the mailing business, obtain leads, and receive and obtain proceeds obtained from the solicitations.

78. Defendant Melissa Pinelli operates caging services for the scheme, collects responsive mail, and, upon information and belief, deposits funds from victims into financial institutions.

79. Email correspondence shows that the Lucky Dog entities and affiliated Defendants, including Michael Shine, Meagan Shine and Melissa Pinelli have been using the known emails for several years, including but not limited to the period between 2012 and 2017 to facilitate the mailings sent to victims and other aspects of the enterprise.

80. This correspondence includes, but is not limited to:

- a. Communications with Empire Software Solutions, a data company that, since at least 2012, has operated a data service that facilitates fraudulent direct mail schemes by providing mailing list management services and helping the operators of mail fraud schemes track and optimize their solicitations;

- b. Communications with PacNet Services Ltd, some of which related to issues with “multi-buyers” a term for a person who receives and responds to multiple mailings, and which, as described above, was shut down for its role in the perpetration of fraudulent mailing schemes.
- c. Communications seeking mailing lists and discussing mailing strategies.

81. These email communications involve each of the Defendants and contain extensive discussions of procuring, approving, requesting, and arranging for the printing and mailing of mail solicitations of the type described above in paragraphs 45 through 68, as well as arrangements for payment and collection.

82. Mail addressed to the P.O. Boxes to which ICS and POI solicitation responses are directed is collected and taken to the 411 Atwells Avenue address, where Lucky Dog is listed on the door, and where Destiny Marketing/POI is registered.

83. This collection and transport includes multiple occasions on which Defendant Melissa Pinelli has been observed entering the Providence Main Post Office located at 24 Corliss Street, Providence, RI where she retrieved the mail addressed to PO Box 6267, Providence, RI, and took it to 411 Atwells Avenue, Providence, Rhode Island.

84. Upon information and belief, Defendants collect and deposit the proceeds of these solicitations and share and receive payment from the proceeds.

DEFENDANTS’ KNOWLEDGE THE FRAUD

85. Defendants Michael and Meagan Shine, Melissa Pinelli, Lucky Dog/ICS and Destiny/POI know that their mass-mailed solicitation packets contain false and misleading statements that convince victims to send payments.

86. Defendants Michael and Meagan Shine, Melissa Pinelli, Lucky Dog/ICS and Destiny/POI know that the thousands of form letters mailed to potential victims each year do not result in thousands upon thousands of individuals becoming millionaires.

87. Defendants Michael and Meagan Shine, Melissa Pinelli, Lucky Dog/ICS and Destiny/POI know and/or approve the language, graphics and selectively emphasized text contained in their mailings to intentionally mislead recipients into believing that they have won a prize in order to get victims to send the Defendants payments.

88. Defendants Michael and Meagan Shine, Melissa Pinelli, Lucky Dog/ICS and Destiny/POI know that solicitations' indicia of legitimacy, uniqueness and personalization are nothing more than marketing tricks.

89. Defendants Michael and Meagan Shine, Melissa Pinelli, Lucky Dog/ICS and Destiny/POI know the solicitations are form letters mailed to thousands of people, despite the graphics and text used to make the solicitations appear otherwise.

90. Defendant Melissa Pinelli and Premier Caging Services know that the solicitations mailed as part of the scheme are false and misleading.

91. Email correspondence reflects requests and inquiries by Defendants to printers and preparers of solicitations to victims, seeking to ensure that victims can be sent multiple solicitations that are internally consistent (e.g. that do not list differing prize amounts).

92. Email correspondence further reflects multiple notifications from vendors and suppliers of government investigations and enforcement actions against similar mail solicitation businesses.

HARM TO VICTIMS

93. Victims, especially elderly and vulnerable victims, suffer financial losses from the mail fraud scheme that defendants perpetrate.

94. Many victims send payments in response to defendants' schemes multiple times, each time expecting a large cash payout or valuables in return.

95. In addition to monetary losses, Defendants' victims suffer disappointment when the expected prize never arises.

96. Defendants' fraudulent schemes are ongoing. Absent injunctive relief by this Court, defendants will continue to cause injury to recipients of these solicitations.

COUNT I

(18 U.S.C. § 1345 – Injunctive Relief)

97. The United States repeats, re-alleges and incorporates by reference paragraphs 1 through 96 of this Complaint as if fully set forth herein.

98. By reason of the conduct described herein, defendants violated, are violating and are about to violate 18 U.S.C. §§ 1341 and 1349 by executing a scheme or artifice to defraud for obtaining money or property by means of false or fraudulent representations with the intent to defraud, and, in so doing, use the U.S. Mail.

99. Title 18 of the United States Code, Section 1345, authorizes the United States to “commence a civil action in any Federal court to enjoin” persons who are “violating or about to violate” the provisions of the federal fraud statutes, including 18 U.S.C. § 1341, which criminalizes mail fraud. *See* 18 U.S.C. § 1345(a)(1)(A). Section 1345 further provides that a district court “shall proceed as soon as practicable” and “*may . . . enter such a restraining order or prohibition, or take such other action, as is warranted to prevent a continuing and substantial injury to the*

United States or to any person or class of persons for whose protection the action is brought.” 18 U.S.C. § 1345(b) (emphasis added).

100. Upon a showing that defendants are committing or about to commit mail fraud, the United States is entitled, under 18 U.S.C. § 1345, to a temporary restraining order, a preliminary injunction and a permanent injunction restraining all future fraudulent conduct and any other action that this Court deems just in order to prevent a continuing and substantial injury to the victims of fraud.

101. On the basis of the facts alleged herein, Defendants’ conduct should be enjoined pursuant to 18 U.S.C. § 1345.

PRAYER FOR RELIEF

WHEREFORE, plaintiff, the United States of America, requests of the Court the following relief:

- A. That the Court issue an order, pursuant to 18 U.S.C. § 1345, pending a hearing and determination on the United States’ application for a preliminary injunction, that Defendants, their agents, officers and employees, and all other persons and entities in active concert or participation with them are temporarily restrained from:
- i. committing mail fraud, as defined by 18 U.S.C. § 1341;
 - ii. using the U.S. Mail, or causing others to use the U.S. Mail, to distribute any advertisements, solicitations, or promotional materials, or to send or receive payments in response to any advertisements, solicitations, or promotional materials that:
 - (a) represent, directly or indirectly, expressly or impliedly that the recipient has won, will win, is eligible to win, or will receive cash, awards, prizes or items of value;
 - (b) represent, directly or indirectly, expressly or impliedly that the recipient will receive delivery of cash, awards, prizes or items of value in return for payment of a fee;
 - (c) offer for sale information regarding sweepstakes or lotteries;

- (d) represent, directly or indirectly, expressly or impliedly, that the recipient of the solicitation was specifically selected to receive the mailing based on a reason other than the fact that the recipient's name appears on a mailing list;
 - (e) purport to be sent from fictional companies, departments, organizations or individuals;
 - (f) conceal the names of the actual companies, organizations or businesses sending the solicitation; or
 - (g) contain any other false or misleading representations;
 - iii. using the U.S. Mail to receive, handle, open, or forward any mail that responds, by sending payment or otherwise, to materials described in Paragraph (ii)(a)-(g), *supra*;
 - iv. selling, offering for sale, leasing or offering for lease any lists individuals or mailing lists of any type compiled from individuals who have responded via the U.S. Mail to any of the materials described in Paragraph (ii)(a)-(g), *supra*;
 - v. performing "caging services" on mail received via the U.S. Mail in response to any of the materials described in Paragraph (ii)(a)-(g), *supra*, including opening mail received from recipients of the materials described in Paragraph (ii)(a)-(g); entering or inputting data about recipients of the materials described in Paragraph (ii)(a)-(g) into a database or forwarding such data; handling, forwarding, or depositing payments received from recipients of the materials described in Paragraph (ii)(a)-(g), including currency, bank checks, certified checks, money orders, or credit card charge authorizations; or handling or forwarding any mail received from recipients of the materials described in Paragraph (ii)(a)-(g);
 - vi. performing or engaging in payment processing services on mail and payments received in response to the materials described in Paragraph (ii)(a)-(g), *supra*, including handling, forwarding, or depositing payments received from those responding to any of the materials described in Paragraph (ii)(a)-(g), including currency, bank checks, certified checks, money orders, or credit card charge authorizations;
 - vii. destroying, deleting, removing, or transferring any and all business, financial, accounting and other records concerning defendants' operations and the operations of any other corporate entity owned or controlled, in whole or in part, by defendants.
- B. That the Court further order, pursuant to 18 U.S.C. § 1345, that within 2 days from defendants' receipt of this Temporary Restraining Order and Order to Show Cause,

Defendants shall provide copies of this Temporary Restraining Order and Order to Show Cause to all direct mailers, list brokers, data managers, printer/distributors, mailing houses, caging services, and/or payment processors with which they do business regarding the materials described in Paragraph (A)(ii)(a)-(g), *supra*, informing them that they are subject to the temporary restraining order as an entity in active concert or participation with defendants, and within 7 days from defendants' receipt of the Temporary Restraining Order and Order to Show Cause, defendants shall provide proof of such notice to the Court and the United States, including the name and addresses of the entities and/or individuals to whom the notice was sent, how the notice was sent, and when the notice was sent.

- C. That the Court further order that, pursuant to 18 U.S.C. § 1345, the United States Postal Service is authorized to detain:
 - i. Any mail matter containing or consisting of envelopes sent in response to any of the materials described in Paragraph (A)(ii)(a)-(g), *supra*, that is directed to any address within the United States;
 - ii. any of the materials described in Paragraph (A)(ii)(a)-(g), *supra*, and any substantially similar advertisements, solicitations, and promotional materials that are deposited into the U.S. Mail by defendants, their agents, officers or employees, or any other persons or entities in active concert or participation with them.
- D. That the Court issue a preliminary injunction on the same basis and to the same effect.
- E. That the Court issue a permanent injunction on the same basis and to the same effect.

[THE REMAINDER OF THIS PAGE IS INTENTIONALLY BLANK]

F. That the Court grant such other and further relief as it may deem just and proper.

Dated: Providence, Rhode Island
December 11, 2018

Respectfully submitted,

FOR THE UNITED STATES

STEPHEN G. DAMBRUCH
United States Attorney

By: /s/ Zachary A. Cunha
ZACHARY A. CUNHA (Bar No. 7855)
Assistant United States Attorney
50 Kennedy Plaza, 8th Floor
Providence, RI 02906
(401) 709-5000
Zachary.Cunha@usdoj.gov

INDEPENDENT CATALOG SERVICES
PO BOX 6487, PROVIDENCE, RI 02940

REQUISITION 15ICS-08

AWARD CLAIM ENCLOSED-OPEN IMMEDIATELY!

ICSI 08A3

REQUISITION 15ICS-08

NOTICE OF INTENT TO DELIVER
UNAWARDED PRIZES

IMMEDIATE NOTICE TO: [REDACTED]

ASSET IDENTIFICATION: \$3,015,450.00

CONFIRMATION PROCESSING
UPON RECEIPT OF
VALID CLAIM

DATE OF ISSUE
12/12/2016

KEEP FOR RECORD FOR YOUR RECORDS

Dear [REDACTED]:

As executive director of Independent Catalogue Services, it brings me great pleasure to inform you of this momentous opportunity that has been bestowed upon you on this day, 01/12/2016.

With no exceptions, full eligibility to over \$3,015,450.00 in cash & prize opportunities by third party sponsors.

According to our records ensuing an in depth and complex data verification process, you have been successfully selected and specifically assigned the following PERSONAL IDENTIFICATION NUMBER:

***** [REDACTED] *****

complete delivery of your over \$3,015,450.00 in cash & prize entry Catalogue Services in the enclosed envelope with \$20.00 document fee Postmarked by 01/26/2016.

Sincerely,

[Signature]
Executive Director

RE: \$3,015,450.00***
PIN: 11001823018

to finalize all the necessary procedures required for complete delivery of your over \$3,015,450.00 in cash & prize entry Catalogue Services in the enclosed envelope with \$20.00 document fee

APPROVED
CATALOG SERVICES

COMPLETE & DETACH THE BOTTOM PORTION

INDEPENDENT CATALOG SERVICES
PO BOX 9887, PROVIDENCE, RI 02240

1790

Approval Acceptance Form

DISBURSEMENT ELIGIBILITY AMOUNT: \$3,015,450.00

DATE: 01/11/2016
ACCOUNT NUMBER: 310031053
DEADLINE: 01/23/2016

OFFICIALLY APPROVED

KEEP TOP PORTION FOR YOUR RECORDS

Dear [REDACTED],

The following letter acknowledges your approved status to access unclaimed funds that must be distributed by third party vendors. In excess of \$3,015,450.00. Please take the time to read it carefully.

[REDACTED], Independent Catalogue Services, an Independent Sweatshops Reporting firm, closely considered your name for disbursement eligibility. We are pleased to inform you that you have been granted Full Approval to pursue these funds. In the last few weeks your status has been granted Full Approval to pursue these funds. To ensure it's validity review, simply return the Approval Confirmation amount GUARANTEED along with a processing fee (by cash, cheque, or postal order made out to Independent Catalogue Services). Your response must be received in our office no later than 01/23/2016.

By these actions you will receive the proprietary Consolidated Research Report we have prepared for you with specific instructions on how to claim the over \$3,015,450.00 in disbursement opportunities.

[REDACTED], once again be advised, full approval to this documentation has been given. Full access to the over \$3,015,450.00 disbursement eligibility awaits you. I urge you to respond immediately!

Yours Sincerely,
[Signature]
Managing Director

COMPLETE & DETACH THE BOTTOM PORTION

OFFICIALLY APPROVED

1-6-11

Approval Acceptance Form Enclosure

1790

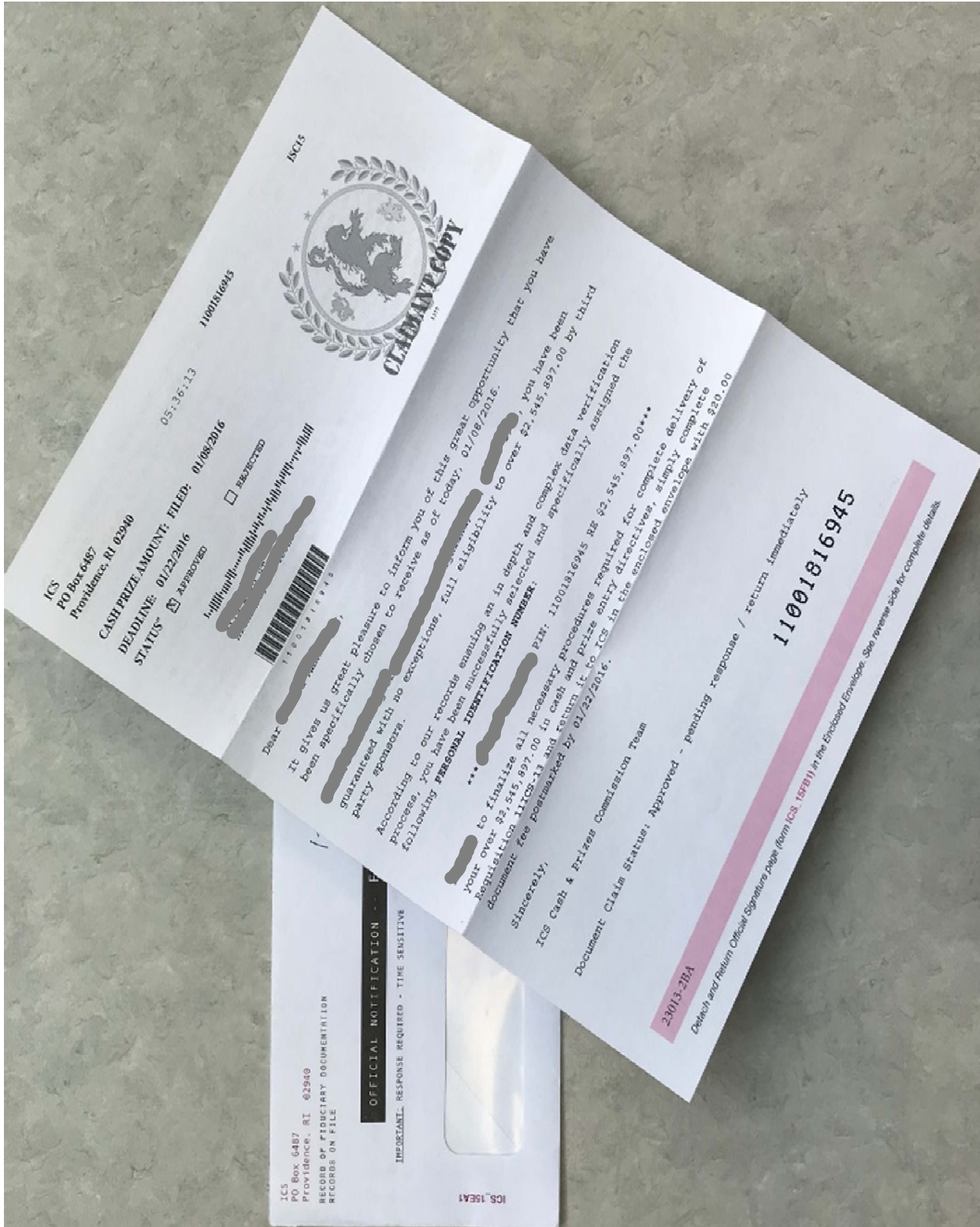


EXHIBIT D



EXHIBIT F

QUANTITY:	1
DEADLINE:	TIME-SENSITIVE
ID:	ICS_04ER1
STATUS:	CASH APPROVED

1264

TOTAL IDENTIFIED UNAWARDED PRIZES OVER
******* \$3,015,450.00 *******

DESIGNATED RECIPIENT
[REDACTED]

FINANCIAL STATEMENT
ENCLOSED
This statement has been prepared for the sole recipient listed on this document. Any other use of this document by individuals said listed are forfeit under the agreement. **KEEP THIS PAGE FOR YOUR RECORDS**

OFFICIAL NOTIFICATION OF UNAWARDED CASH AND PRIZES IS HEREBY ACKNOWLEDGED AND PRIZES IN THE AMOUNT OF NO LESS THAN \$3,015,450.00.
NOTIFICATION OF AVAILABLE UNAWARDED CASH AND PRIZES
- RETAIN THIS COPY FOR YOUR RECORDS -
over \$3,015,450.00 in prizes, and as of January 15th, 2016, legally eligible to enter and receive the FULL AMOUNT described herein.

CONFIDENTIAL DOCUMENT

DO NOT DELAY OPENING - RESPONSE REQUIRED

INDEPENDENT CATALOG SERVICES
PO BOX 6487 PROVIDENCE, RI 02840
PAPERS INSIDE CONCERN A FINANCIAL MATTER
CAREFULLY SEALED TO PROTECT CONTENTS AS SENT
SIGNATURE REQUIRED

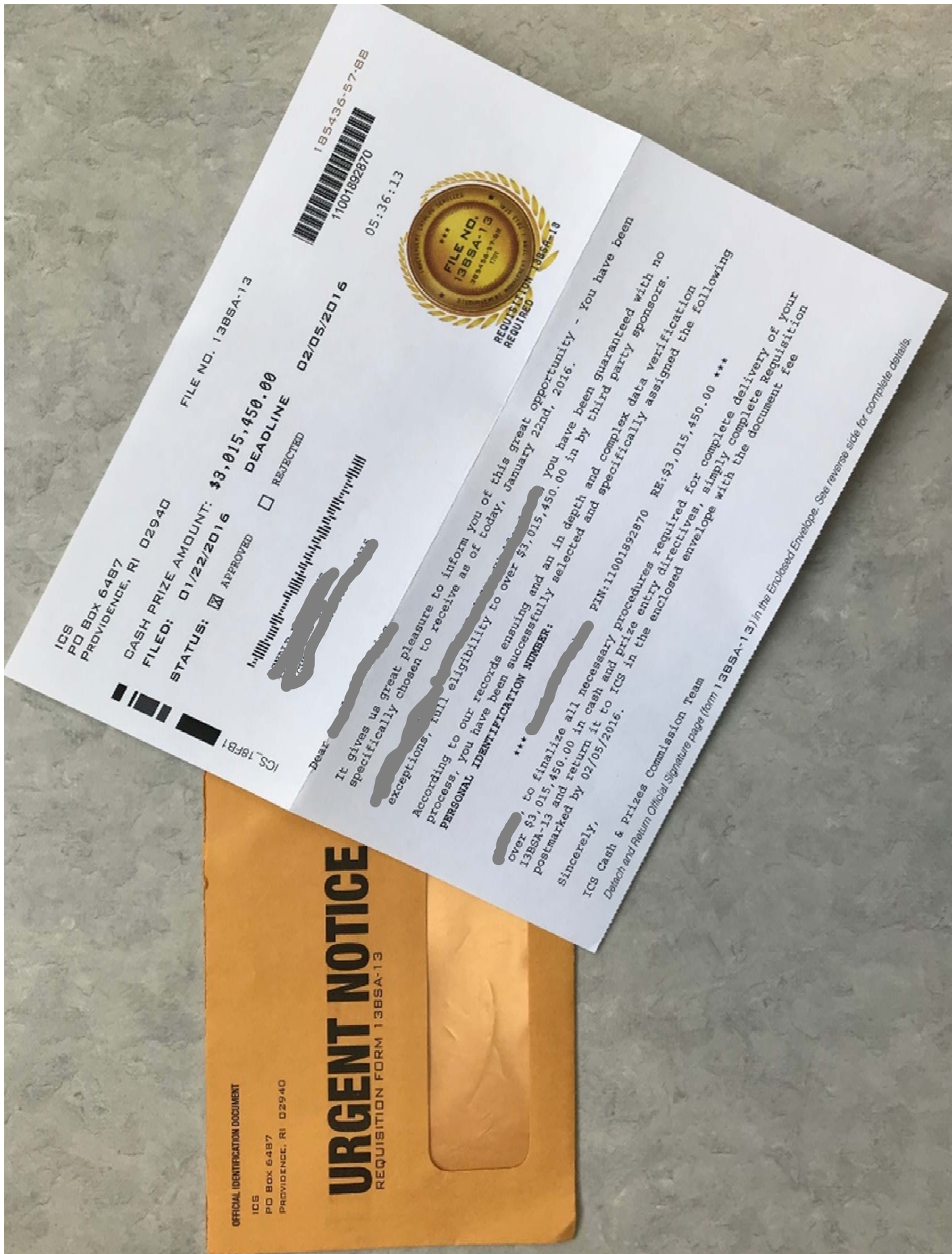
CONFIDENTIAL DOCUMENT

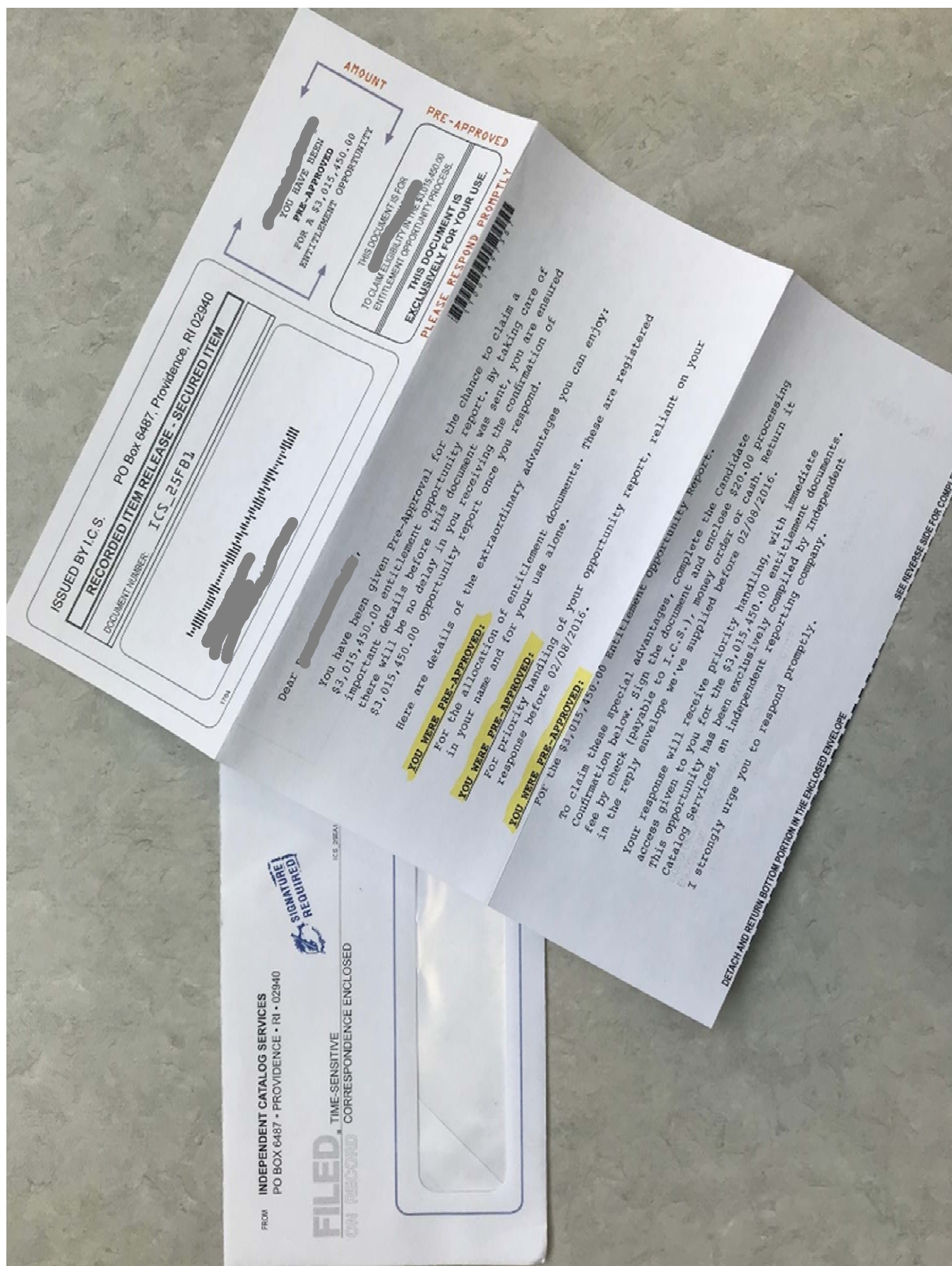
NOTIFICATION OF AVAILABLE UNAWARDED CASH AND PRIZES
Your prompt payment guarantees immediate reporting of these monies, documented completely with all necessary entry and claim instructions including deadlines.

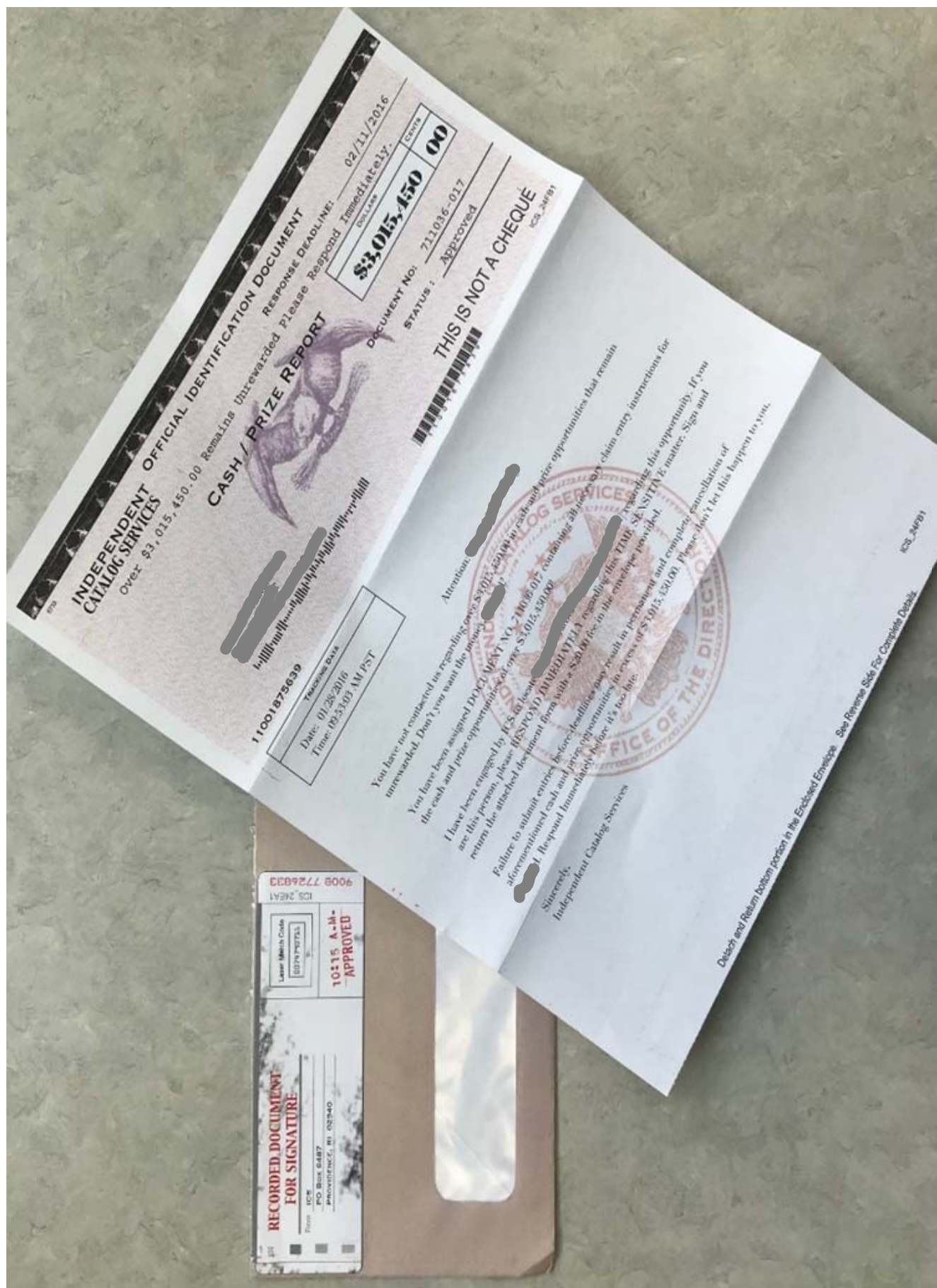
UNDER PERSONAL IDENTIFICATION NUMBER 11001857725
This opportunity is reserved for you
INTERNATIONAL AWARD OPPORTUNITIES DUTY CONFIRMS THE FOLLOWING: **CONFIDENTIAL DOCUMENT**

TOTAL AWARDS OVER: \$3,015,450.00
STATUS / DISPOSITION: *** Approved / Verified ***
RESPONSE REQUIRED: (X) Yes / No
APPROVED (SIGNATORY): [REDACTED]
NOTIFICATION TIME / DATE: 12:32 PM on 01/15/2016
PERSONAL ID NUMBER: 11001857725
RETURN BY: 01/29/2016

FORM / ICS-29FB1
* CERTIFIED COPY * DOCUMENT ATTACHED IS A TRUE AND CORRECT COPY OF THE DOCUMENT ON FILE *
* CERTIFIED COPY * DOCUMENT ATTACHED IS A TRUE AND CORRECT COPY OF THE DOCUMENT ON FILE *
* CERTIFIED COPY * DOCUMENT ATTACHED IS A TRUE AND CORRECT COPY OF THE DOCUMENT ON FILE *







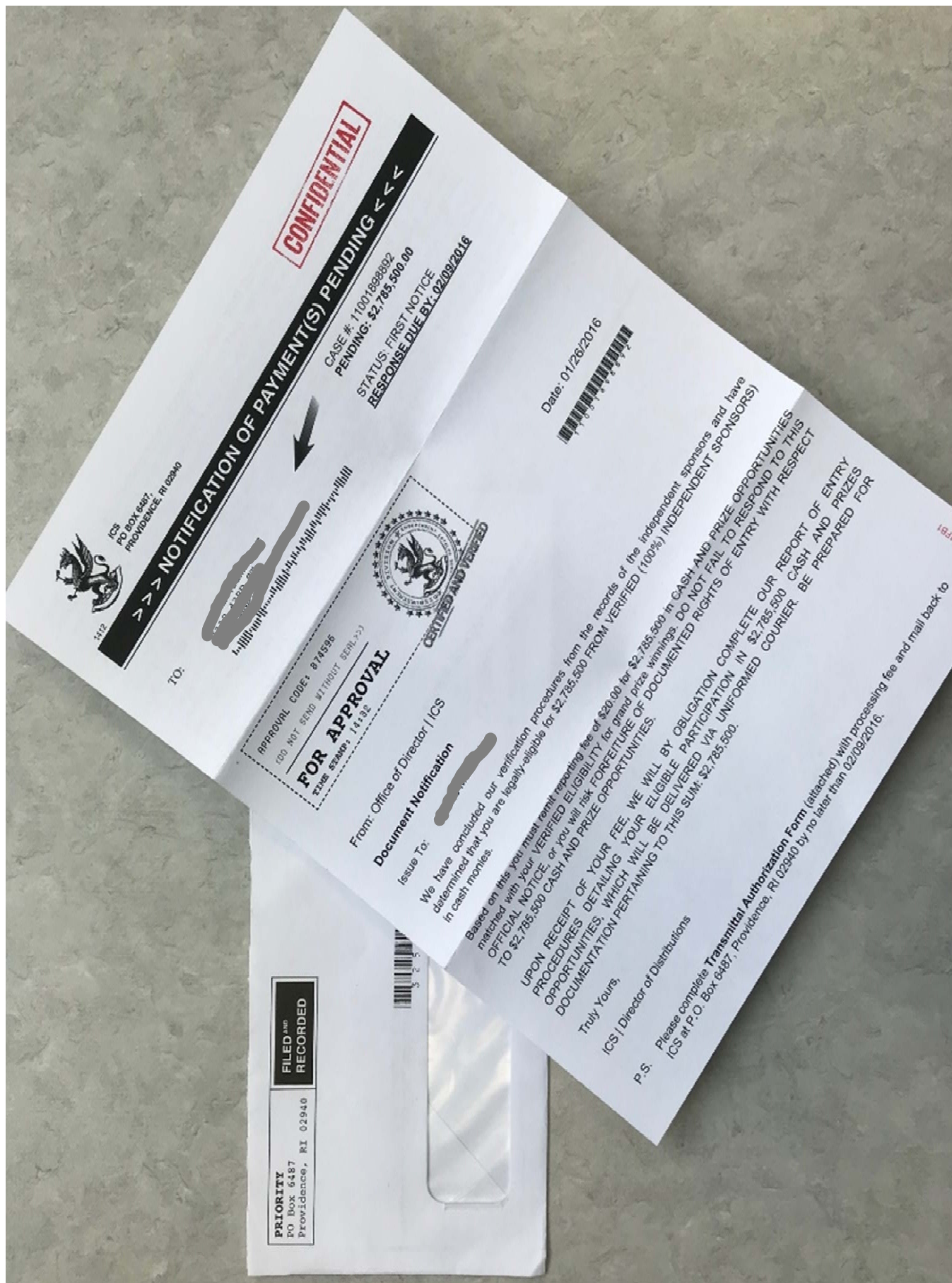


EXHIBIT M

EXHIBIT N

FINANCIAL ADVISORY

ICS / PO Box 6487 / Providence, RI 02940
 04:29:13
 FILED: 01/27/2016
 STATUS: ☒ APPROVED ☐ REJECTED

CASH PRIZE AMOUNT: \$2,545,897.00
 DEADLINE: 02/10/2016

11001902221

ICS-17FB2

CLAIMANT COPY

Dear

The purpose of this communication is to inform you that your entry, which has been guaranteed with no exceptions, full eligibility to over \$2,545,897.00 by third party sponsors.

According to our records ensuring an in depth and complex data verification process, you have been successfully selected and specifically assigned the following **PERSONAL IDENTIFICATION NUMBER**:

*** [REDACTED] ***
 PIN: 11001902221 RE \$2,545,897.00***

Over \$2,545,897.00 in cash and prize entry directives, simply complete Requisition I11CS-13 and return it to ICS in the enclosed envelope with \$20.00 document fee and signed form on page 2

Sincerely,
 ICS Financial Advisory Commission Team

Document Claim Status: Approved - pending response / return immediately

11001902221

FINANCIAL ADVISORY - FORM: A23013-21A
 Detach and Return Official Signature page (form ICS-17FB2) in the Enclosed Envelope. See reverse side for complete details.

ICS
 PO Box 6487
 Providence, RI 02940
 RECORD OF FIDUCIARY DOCUMENTATION
 RECORDS ON FILE

NON-TRANSFERABLE - INTENDED FOR ADDRESSEE

ICS 17EA2

EXHIBIT P

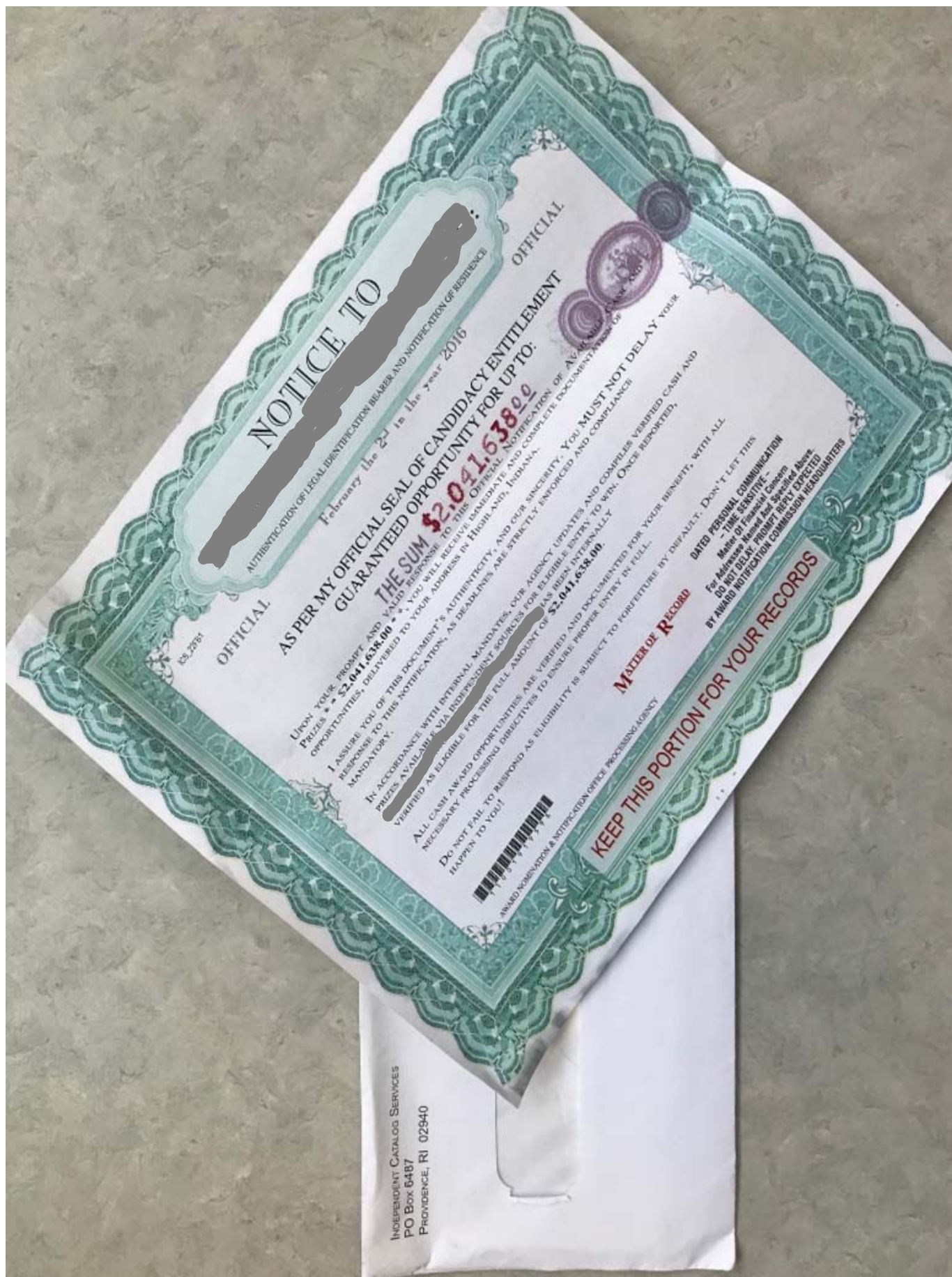
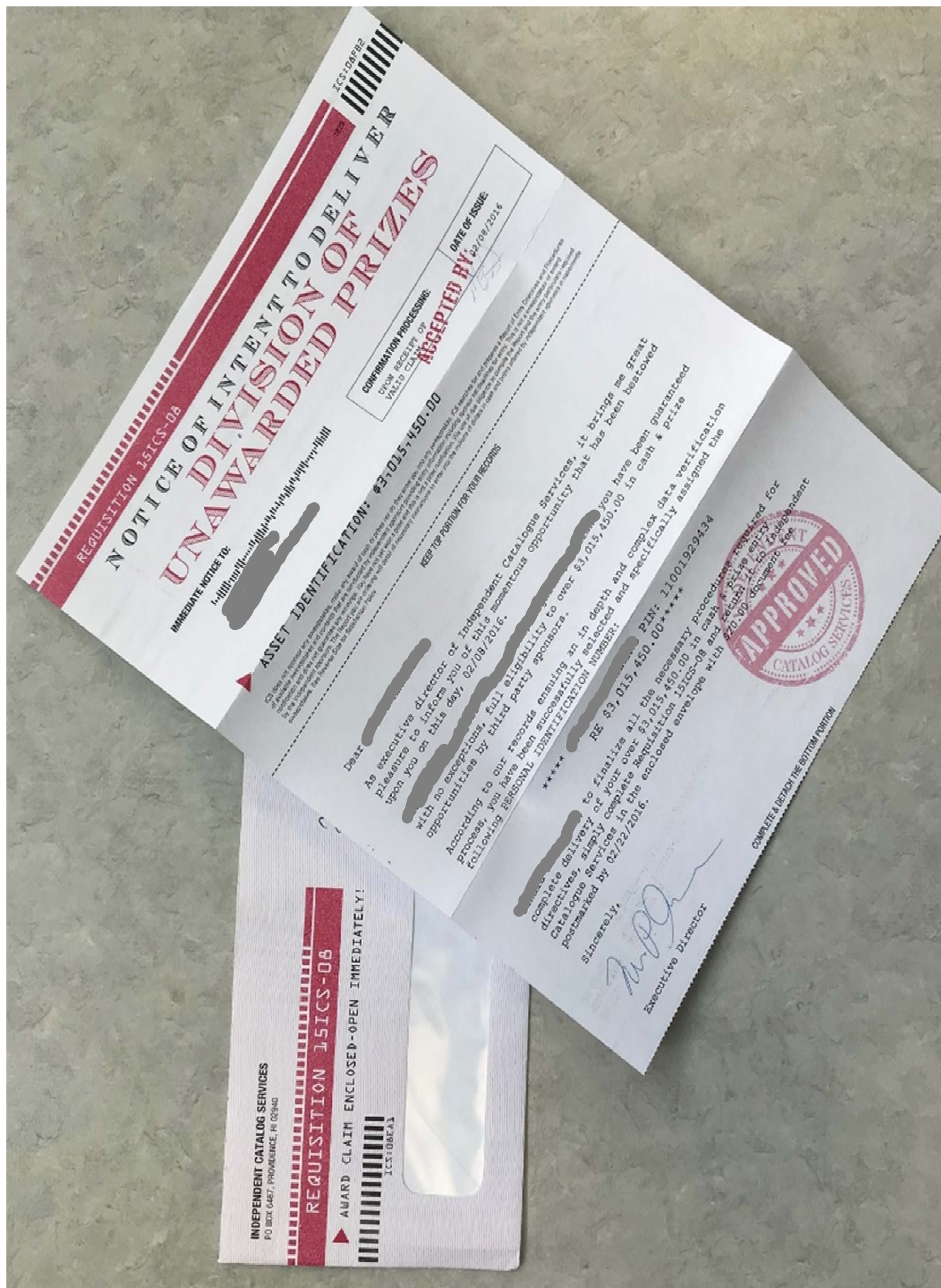


EXHIBIT R



INDEPENDENT CATALOG SERVICES
PO BOX 5467
PROVIDENCE, RI 02940

D7

QUANTITY: 1
DEADLINE: TIME-GENITIVE
ID: ICS_04E01
STATUS: CASH APPROVED

NOTIFICATION OF UNAWARDED CASH AND PRIZES OVER:
***** \$3,479,021.00 *****
NOTIFICATION OF UNAWARDED CASH AND PRIZES IS HEREBY ACKNOWLEDGED AND PRIZES IN THE AMOUNT OF NO LESS THAN \$3,479,021 ARE GUARANTEED BY INDEPENDENT SPONSORS

DESIGNATED PSENY CONSUMER ID:
[REDACTED]

KEEP THIS ENTIRE PAGE FOR YOUR RECORDS

APPROVED FOR RELEASE
ICS
NO BUL-A037
Providence, RI 02940

\$3,479,021.00 IN WIN-OPPORTUNITIES

INDEPENDENT CATALOG SERVICES
Providence, RI 02940

"SEE BELOW FOR DETAILS REGARDING THIS DOCUMENT"

NOTIFICATION OF AVAILABLE UNAWARDED CASH AND PRIZES

HAS BEEN RECOGNIZED WITH REGARDS TO THE AMOUNT OVER \$3,479,021.00 IN PRIZES - AND AS OF 02/05/2016 DENIED TO ENTER TO WIN THE FULL AMOUNT AND RECEIVE THE FULL AMOUNT DESCRIBED HEREIN.

THIS OPPORTUNITY IS RESERVED FOR YOU UNDER PERSONAL IDENTIFICATION NUMBER 110919155443. YOUR PROMPT ATTENTION GUARANTEES IMMEDIATE PROCESSING OF YOUR REPORT OF ENTRY DIRECTIVES AND PROCEDURES. AVAILABLE CASH AND PRIZES WITH ALL NECESSARY INSTRUCTIONS INCLUDING RUSH PROCESSING

DOCUMENT TRACKING
No: 0258-66528

KEEP YOUR RECORDS

ICD does not incur any responsibility, make any amount of cash or prizes nor do they enter you into any investigations. ICD services for you packages a Report of Entry Directives and Procedures of 50 pages. A check is made by independent sponsors showing you are a member of the ICS network and have been approved for entry. This is not a guarantee of award collection and does not constitute any money showing and no money prize will be awarded unless you follow the instructions. Use all the opportunity to receive the money and prize. Any instructions received by the Independent Sponsors in California Investigations. See Forming Step for Submission Policy.

OFFICIAL'S
UNA