

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
HUNTINGTON

COPY - The original was filed in  
the Clerk's Office at Charleston on

OCT - 8 2014

TERESA L. DEPPNER, CLERK  
U.S. District Court  
Southern District of West Virginia

UNITED STATES OF AMERICA

v.

CRIMINAL NO.

3:14-cr-00215  
18 U.S.C. § 1341

MARK ANTHONY

I N F O R M A T I O N

The United States Attorney Charges:

1. From in or about May 2004 through in or about January 2013 (the "Scheme Period"), defendant MARK ANTHONY from time to time solicited investments from Victim One and from Victim One's wife, Victim Two (together, the "Victims"). The Victims were senior citizens who resided near defendant MARK ANTHONY, in and around Point Pleasant, Mason County, West Virginia. Defendant MARK ANTHONY falsely represented to the Victims that he was affiliated with financial products companies that sold annuities and accepted investments in money market accounts. Defendant MARK ANTHONY further falsely represented to the Victims that if they gave him funds to invest in these annuities and money market accounts on their behalf, he would invest their funds in these annuities and money market accounts and they would earn a substantial return on their investments.

2. On various occasions during the Scheme Period, the Victims gave defendant MARK ANTHONY funds to invest on their behalf. These funds totaled approximately \$210,000. Defendant MARK ANTHONY represented to the Victims that he invested these funds on their behalf in annuities and money market accounts. In truth and fact, however, defendant MARK ANTHONY appropriated the funds given to him by the Victims to his own benefit, using them for his own personal expenses and purchases.

3. On various occasions during the Scheme Period, defendant MARK ANTHONY mailed documents to the Victims, through the United States Postal Service (USPS), for the purpose of executing his scheme. On certain occasions, defendant MARK ANTHONY mailed the Victims checks that were purportedly income from the investments that he had made on their behalf. In truth and fact, these checks represented payments from defendant MARK ANTHONY's personal funds, which he sent the Victims to maintain the pretense that he had invested the Victims' funds for them in legitimate financial products. Defendant MARK ANTHONY made such mailings to Victim Two through the USPS as late as in or about December 2012 (Victim One passed away in or around 2007, leaving Victim Two widowed).

4. From time to time during the Scheme Period, defendant MARK ANTHONY also mailed the Victims fraudulent

Internal Revenue Service Forms 1099-MISC that reflected purported income from the Victims' investment accounts. Defendant MARK ANTHONY mailed these fraudulent Forms 1099-MISC to maintain the pretense that he had invested the Victims' funds for them. Defendant MARK ANTHONY made such a mailing to Victim Two through the USPS as late as in or about January 2013.

5. All of defendant MARK ANTHONY's mailings to the Victims were mailed to and from locations in and around Mason County, West Virginia, in the Southern District of West Virginia. All of the Victims' transfers of funds to defendant MARK ANTHONY were made by means of checks that the Victims presented to defendant MARK ANTHONY in and around Mason County, West Virginia, within the Southern District of West Virginia.

6. Wherefore, defendant MARK ANTHONY, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice and attempting to do so, did knowingly place in post offices and authorized depositories for mail matter, matter and things to be sent and delivered by the Postal Service, and did knowingly cause to be delivered by mail

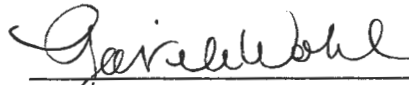
according to the direction thereon, such matter and things.

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

UNITED STATES OF AMERICA

R. BOOTH GOODWIN II  
United States Attorney

By:



STEVEN R. RUBY

GABRIELE WOHL

Assistant United States Attorneys