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DISTRICT OF UTAH

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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

vs.

DARON HOWELL FORDHAM,
a.k.a; Southboy, Daron Destiny,
Paul Park, James Parker, Daron Howell,
and Darren Fordham
Defendant.

**SEALED
INDICTMENT**

Counts 1-6: 18 U.S.C. § 1341 (Mail
Fraud)

Case: 2:18-cr-00481
Assigned To : Benson, Dee
Assign. Date : 10/24/2018
Description: USA V. SEALED

The Grand Jury charges:

I. BACKGROUND

At all times relevant to this Indictment:

1. Defendant DARON HOWELL FORDHAM ("FORDHAM") opened and maintained Private Mailboxes at Commercial Mail Receiving Agencies in Utah, California, and Nevada. The Private Mailboxes show the authorized signer as Daron Fordham and show at least one of several authorized business names including: Holiday Certificates of America,

Park Publishers and Distributors (“Park Publishers”), Premium Promotions, Reward Promotions, Unlimited Gift Cards & Rewards, and others.

2. A Private Mailbox for Park Publishers maintained a mailing address located in Park City, Utah, at a UPS Store, and was the business address used to receive monies from individuals throughout the United States seeking to invest in a direct mail program offered by FORDHAM through various business names.

3. FORDHAM was the registered signer on the mailbox agreement at the Commercial Mail Receiving Agency at a UPS Store in Park City, Utah where mailings for Park Publishers were sent.

4. FORDHAM negotiated, and caused to be negotiated, financial instruments payable to one or more business names through a check cashing account which was held with Celebrity Financial LLC, doing business as Sherman Oaks Check Cashing, in Sherman Oaks, California.

5. FORDHAM, through many business names, obtained approximately \$1,594,517.14 related to at least eight (8) promotional companies which included at least \$203,866.25 directly related to Park Publishers.

II. THE SCHEME AND ARTIFICE TO DEFRAUD

6. Beginning on a date unknown to the grand jury, but at least on or about January 1, 2014, to on or about January 31, 2015, in the Central Division of the District of Utah and elsewhere,

DARON HOWELL FORDHAM,

defendant herein, with others known and unknown to the grand jury, knowingly devised and intended to devise, and did aid and abet therein, a scheme and artifice to defraud and to

obtain money by means of false and fraudulent pretenses, representations promises and omissions of material facts.

7. In executing and attempting to execute the scheme and artifice to defraud, and in furtherance thereof, FORDHAM knowingly deposited and caused to be deposited in an authorized depository for mail a matter or thing to be sent and delivered by the United States Postal Service or by any private or commercial interstate carrier, according to the directions thereon, in violation of 18 U.S.C. § 1341 (Mail Fraud).

III. MANNER AND MEANS OF SCHEME AND ARTIFICE TO DEFRAUD

8. In execution and in furtherance of the scheme and artifice to defraud, FORDHAM, on or about May 19, 2014, opened, or caused to be opened, Private Mailbox number 265 at the UPS Store located at 1776 Park Ave., Park City, UT 84060, using the business name "Park Publishers and Distributors" and listing Daron Fordham as the applicant and box holder. FORDHAM also mailed, and caused to be mailed, promotional mailer materials through the U.S. Mail using a mailer service located in Sherman Oaks, California.

9. The promotional materials were sent by mail to individuals throughout the United States, including individuals in the District of Utah. The mailer materials offered an opportunity to make money through a "direct partner program" called "Paul Park's Profit Program", listing a Park City, Utah address as the company address for responses. FORDHAM's mailer induced individuals ("investors") to send money, including checks and money orders to Park Publishers at 1776 Park Ave. Suite 265, Park City, UT 84060 and to call 1-800-933-1542, a telephone number controlled by FORDHAM, to make an electronic payment. Many of the individuals who invested in the scheme were elderly or disabled.

10. To induce individuals to invest, the mailers FORDHAM sent, or caused to be sent, made the following fraudulent claims and guarantees:

- a. "I'll Show You How You Can Earn Up To A 976% Return (Or More) On Your Money In Less Than 120 Days - - - And Without You Even Having To Lift A Finger To Do Any Work At All";
- b. "You can make a 976% return (or more) on your money in less than 90 days without doing any work. All you have to do is invest in the printing and mailing of our hot-selling FREE CRUISE FOR TWO VOUCHERS (like the one included with this letter) that are used by businesses all across the country. WE DO ALL THE WORK! You decide how many Mailing Spots you want now and you'll receive your Principal Check & PROFIT Check in less than 90 days. Trust me. You'll be upset if you miss this one.";
- c. "You Have The Rare Opportunity To Invest In Our FREE CRUISE FOR TWO Vouchers Direct Mail Promotion With Us. Yes! We'll Do All The Work & Your Money Is 100% Guaranteed!";
- d. "Wow! You Can Make 10 TIMES Your Money (or More) In Less Than 120 Days. You Can't Make This Kind Of Money Anywhere!";
- e. "Wow! You can invest just \$500 and get a whopping gross return of \$5,570.00 with \$5,070.00 of it being PURE PROFIT FOR YOU. **That's over a 1,000% return on your money.**";
- f. "Look. This is an amazing business proposal for you. Best of all, you have to do exactly **nothing** but send me a check for the amount of Mailing Spots you would like to purchase.";
- g. "We have decided to offer these 10 Ad Spots at a 25% discount off each one...but we only have 10 available at this discounted rate...consider yourself SPECIAL to receive this offer. The special code word "**BLUE TIGER**" is what you'll use when calling about this SPECIAL OFFER."

11. As part of the scheme and artifice to defraud, FORDHAM:

- a. directed and caused to be directed, the UPS Store in Park City, Utah to forward, or caused to be forwarded, all mail received at the UPS Store to an address in Sherman Oaks, California;
- b. received and transacted financial instruments, checks and money orders, under false pretenses and cashed them through a financial entity called

Celebrity Financial LLC, a money service business doing business as Sherman Oaks Check Cashing located in Sherman Oaks, California;

- c. negotiated or caused to be negotiated between January and November 2014 at least \$1,596,642.14 in checks and money orders related to eight (8) fraudulent promotional schemes, including Park Publishers.;
- d. obtained at least \$203,866.25 through the Park Publishers fraudulent promotional mailer scheme;
- e. when refunds were requested, or on the date of the promised dividend payment FORDHAM provided customers a previously unmentioned gift card voucher equal to the investment, which could only be used towards an additional business venture by Park Publishers or its affiliate partners and a full credit refund certificate which investors could not redeem for any monetary value, good, or service;
- f. eventually closed the Park City, Utah, Private Mailbox so that victims' letters requesting a refund or inquiring as to the promised return on their investment were returned as undeliverable. The 1-800 number was also disconnected, leaving the victims unable to contact Park Publishers.

Counts I - VI
18 U.S.C. § 1341 and 2(b)
(Mail Fraud)

12. The allegations set forth above are incorporated herein by reference and realleged as though fully set forth herein.

13. On or about the dates set forth below, in the Central Division of the District of Utah and elsewhere,

DARON HOWELL FORDHAM,

did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud and obtain money by means of materially false and fraudulent pretenses, representations and promises and did knowingly deposit and cause to be deposited in an authorized depository for mail a matter or thing to be sent and delivered by the United States Postal Service and by any private or commercial interstate carrier, according to the directions thereon, and caused

to be deposited items to be sent and delivered by private and commercial interstate carriers to an authorized Commercial Mail Receiving Agency in the District of Utah, as set forth below:

COUNT	DATE	SENDER	ADDRESSEE	AMOUNT	MAILING DESCRIPTION
1	8/29/2014	G.B. Las Vegas, NV	Park Distributors Park City, UT	\$1,000.00	U.S. Postal Money Order
2	10/21/14	M.C. Johnson City, TN	Park Distributors Park, City, UT	\$500.00	Money Gram Money Order
3	10/25/14	T.C. Orange, CA	Park Distributors Park City, UT	\$500.00	Money Gram Money Order
4	11/7/14	G.C. Los Angeles, CA	Park Distributors Park City, UT	\$3750.00	Check
5	10/27/14	A.K. Ontario, CA	Park Distributors Park City, UT	\$1000.00	Order Form
6	6/20/14	W.S. Pittsburgh, PA	Park Distributors Park City, UT	\$3997.00	Check

All in violation of 18 U.S.C. § 1341 and 2(b).

NOTICE OF INTENT TO SEEK FORFEITURE

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of any offense in violation of 18 U.S.C. § 1341, as set forth in this Indictment, the defendant shall forfeit to the United States of America all property, real or personal, that constitutes or is derived from proceeds traceable to the scheme to defraud. The property to be forfeited includes, but is not limited to, the following:

- A money judgment equal to the value of any property, real or personal, constituting or derived from proceeds traceable to the scheme to defraud.

SUBSTITUTE ASSETS

If any of the above-described forfeitable property, as a result of any act or omission of the defendants,

