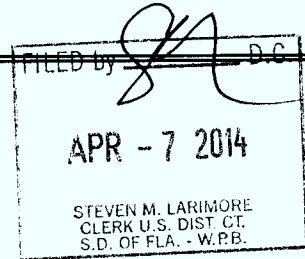


AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Southern District of Florida

United States of America )

v. )

Joseph Signore, and )  
Paul Lewis Schumack II )Case No. 14-8154-DLB )  
)  
)  
)  
)\_\_\_\_\_  
*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Dec. 2011 through March 2014 in the county of Palm Beach in the  
Southern District of Florida, the defendant(s) violated:*Code Section*

18 U.S.C. §§ 1341, 1343, 1349

*Offense Description*Mail fraud, wire fraud, conspiracy to commit mail and wire fraud  
Count 1, conspiracy to commit mail and wire fraud, 18 USC 1349  
Counts 2 - 5, mail fraud, 18 USC 1341  
Counts 6 - 12, wire fraud, 18 USC 1343

This criminal complaint is based on these facts:

See attached affidavit of Special Agent Waldo Longa, Federal Bureau of Investigation

☒ Continued on the attached sheet.\_\_\_\_\_  
*Complainant's signature*Special Agent Waldo Longa, FBI  
*Printed name and title*

Sworn to before me and signed in my presence.

Date: 4-7-14\_\_\_\_\_  
*Judge's signature*City and state: West Palm Beach, FloridaDave Lee Brannon, U.S. Magistrate Judge  
*Printed name and title*

## **AFFIDAVIT**

### **A. INTRODUCTION**

I, Waldo J. Longa, having first been duly sworn, do hereby state the following:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), United States Department of Justice. I have been so employed for 23 years and have worked several complex fraud and money laundering investigations. I am presently assigned to the Miami Division's Palm Beach Office of the FBI. My duties include the investigation of violations of mail fraud, wire fraud and money laundering laws. Through my experience, I have become familiar with large high yield investment fraud and "Ponzi Scheme" cases. During the course of these investigations, I have debriefed both confidential informants and cooperating witnesses regarding the habits and practices of people engaged in various fraud and money laundering activities. I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code (USC), Section 2510 (7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, USC Section 1349.

2. The following information is based on my personal knowledge, discussions with fellow agents, debriefings of cooperating witnesses, and review and analysis of bank and business records. Where the statements of others are related herein, they are related in substance and in part and not verbatim. This affidavit is being prepared only for the purpose of establishing probable cause for the purpose of authorizing the filing of a criminal complaint against both Joseph Signore and Paul Schumack for conspiracy to commit mail and wire fraud in violation of Title 18,

14-8154-DLB

United States Code, Sec. 1349, and the substantive acts of mail fraud and wire fraud in violation of Title 18, United States Code, Secs. 1341, and 1343, respectively, as detailed later in this affidavit. This affidavit does not contain all of the information known to me concerning the offenses. In essence, this investigation involves two companies and their owners selling an investment product through material misrepresentations, and guaranteeing the buyer/investor that their investment would more than triple after three years. After speaking with witnesses, reviewing contracts, business records, and reviewing bank records, it has become apparent that the subjects of this investigation have been running a "Ponzi Scheme" since at least January 2012. The principals of this fraudulent investment operation have been making guaranteed monthly payments to investors not with revenue or profits, but with existing investor funds or new investor funds. As of January 2014, an investor list reflected that approximately \$70.9 million has been raised from investors by the subjects with bank records showing that for the last approximate year and a half the operation generated what appears to be minimal revenue of less than \$100,000. Bank records also reflect that the vast majority of the money raised from investors was used to pay previous investors. As the scheme progresses and new investors become involved, the gross monthly guaranteed payments grow in kind requiring more new investors to cover the payments.

## **B. FACTS**

### **Evidence of Fraud**

3. Our investigation has shown that subject Joseph SIGNORE (hereafter referred as SIGNORE) and Laura SIGNORE opened several bank accounts for their corporations, JCS Enterprises Services, Inc., JCS Enterprises, Inc., JOLA, Inc., and MyGeebo, Inc., and used these bank accounts to operate a "Ponzi Scheme." Paul SCHUMACK (hereafter referred as

14-8154-DLB

SCHUMACK), and Christine SCHUMACK also opened bank accounts in the names of TBTI, Inc. and have been operating these accounts in support of the above “Ponzi Scheme” operated by the SIGNORES.

4. Joseph and Laura SIGNORE, are the owners of JCS Enterprises Services, Inc. (JCS) located at 15132 Park of Commerce Blvd., Suite 102, Jupiter, Florida. Having previously been registered as a corporation in Delaware, JCS Enterprises, Inc. was registered as a foreign corporation in Florida. On or about June 29, 2011, JCS Enterprises, Inc. changed its name to JCS Enterprises Services, Inc. JCS sells virtual concierge machines (VCM). JCS and its sales team at TBTI marketed the sale of VCMs to investors throughout the United States, utilizing various salesmen in Florida and around the country. These VCMs were also sold through various seminars around the country run by SCHUMACK. A VCM is a standalone machine with a monitor display. The unit allows the user to view advertisements, purchase products or print retail coupons. VCMs are viable for any business that wants to let their customers order products without having to interact with a cashier. The VCMs are sold via a “passive program” and an “aggressive program.” Through the passive program, an investor could purchase a VCM for \$3,500 and receive a guaranteed \$300 payment per month for 36 months. The VCM would be placed somewhere in the United States to be used by the public and have enough built-in advertising revenue to support the payments to investors. Through the aggressive program, the investors place the VCMs wherever they choose and receive whatever advertising revenue their machine produces.

5. However, a cooperating witness (hereafter “CW1”) reported that he/she began working for JCS in June 2013 and became doubtful that JCS was generating enough advertising revenue to

14-8154-DLB

support JCS's investment programs. CW1 believed old investors were being paid with new investor money. CW1 spoke to CW2, an independent contractor hired by SIGNORE to develop the software used by the VCMs. CW2 was also asked by SIGNORE to build JCS's database. In approximately October 2013, CW2 informed CW1 that JCS's database indicated that thousands of people have invested in JCS through the purchase of approximately 16,000 VCMs. The total amount raised by JCS was approximately \$48,000,000. Based on the number of VCMs purchased, JCS would have to return approximately \$4.8 million (16,000 units x \$300) to investors every month. After reviewing a list provided by JCS's Vice President of Sales and Marketing, CW1 estimated the total number of machines placed by JCS nationwide was less than 100 as of August 2013. CW1 also believed that only less than approximately 46 machines have been placed in Florida with one in Connecticut and one in Texas. After visiting the manufacturing facility for JCS located in Jupiter, CW1 believed that only less than 100 unused VCMs exist in the facility. CW1 also remembered being told that serial numbers were provided to investors when they purchased their machines, therefore thousands of apparently fake serial numbers have been created for machines that CW1 believed do not exist.

6. During a staff meeting in July 2013, SIGNORE advised that JCS was providing investment opportunities in the purchase and installation of VCMs. SIGNORE said it was a great program and that everyone should tell their friends and family about it. SIGNORE advised that for every VCM sold through a referral by an employee, the employee would receive \$400. SIGNORE described two programs, a "passive" and an "aggressive program." According to CW1, many people around the country had invested in the "passive program," but nobody in the company knew anyone that had invested in the "aggressive program."

14-8154-DLB

7. A review of the “Virtual Concierge Buyer Program Agreement” provided by JCS to investors confirms information provided by CW1 concerning the purported source of funds used to pay investors their \$300 monthly payment. According to this agreement, “...for each wall unit purchased the Buyer will receive from the Seller \$300 per month in advertising revenue for 36 consecutive months.” As further set forth below however, after a review of JCS bank records it appears that the company has received very little advertising revenue, and that the true source of the monthly payments to investors has been money collected from other investors.

8. JCS's main salesman of the VCMs is Paul SCHUMACK. SCHUMACK runs his own sales team and is responsible for raising millions of dollars for JCS. CW1 believed SCHUMACK currently makes hundreds of thousands of dollars monthly in commission payments. At one point, CW1 overheard other employees saying that SCHUMACK told his sales team that Walgreens contracted JCS to advertise nationally for Walgreens through VCMs. Through conversations CW1 has had with other executives of JCS, CW1 has been informed that this advertising contract between JCS and Walgreens does not exist.

9. CW3 worked at JCS Enterprises, Inc. (JCS) in Jupiter, Florida from approximately April 2013 through September 2013. Since some of CW3's responsibilities involved sales, CW3 asked employees of JCS, including Laura SIGNORE, on multiple occasions to provide him with a list of locations where the JCS virtual concierge machines (VCMs) were placed, so that he could begin making advertising sales pitches to establishments wanting to advertise on VCMs located closest to them. CW3 became frustrated because he/she was unable to obtain a list of locations from anyone at JCS. It was not until some point within approximately the last 45 days of CW3's employment at JCS that a list of existing VCM locations became available. CW3 believed that

14-8154-DLB

the list only contained approximately 63 locations, including approximately 12 locations outside the state of Florida. CW3 was surprised because he/she had heard Joe SIGNORE say that JCS had sold approximately 10,000 to 12,000 VCMs throughout the country.

10. Concerned about the apparent lack of advertising revenue being generated by JCS, CW3 asked JCS's Vice President for Sales and Marketing, Stephen JOHNSON, how much JCS was generating in advertising revenue. JOHNSON never gave CW3 an answer. CW3 could not get an answer from SIGNORE, either, who became increasingly inaccessible to CW3. CW3 did not have access via company records to see for himself/herself exactly how much advertising revenue JCS generated. CW3 never generated any advertising revenue during the time that he/she was working for JCS. CW3 found it difficult to do so, since he/she could not get sufficient answers regarding the number of existing VCMs and the advertising revenues that each VCM generated.

11. During November 2013, as part of his business relationship with JCS, CW2 traveled to the JCS main office located at 15132 Park of Commerce Blvd., Suite 102, Jupiter, Florida. During this trip, CW2 met with JCS's software engineer, Greg Last Name Unknown (LNU). CW2 met Greg inside JCS's warehouse situated on the same property in Jupiter where the JCS main office is located. After walking thru the facility, CW2 noticed several hundred VCMs, most of which were machines with no internal components. CW2 also noticed that there were no trucks loading these machines for delivery, and realized he never saw trucks loading machines during his previous visits. CW2 asked Greg why there were no trucks and how many machines were actually installed across the country. Greg advised CW2 that not only were there no deliveries scheduled, but establishments were sending their VCMs back because they did not want them anymore. Greg added that he did not know how many machines were installed across the country,

14-8154-DLB

but believed there were approximately 30 machines installed in Florida. During January 2014, CW2 had access to an updated list of investors showing approximately 26,000 VCMs sold with the total amount raised by JCS and TBTI at approximately \$70.9 million.

12. Affiant has obtained relevant bank and brokerage account records covering the period of January 2012 to October 2013 for approximately 23 accounts controlled by the SIGNOREs and SCHUMACKs. After a review of several accounts, including the JCS main account, it appears that very little revenue was produced by JCS, and that investor payments have been made with new investors' money.

13. Affiant has reviewed the transactions in the JCS main account at TD Bank (#4265818571) for the period of January 25, 2012 to September 19, 2013 during which Joseph SIGNORE was the sole authorized signor. This account was closed on or about September 19, 2013 by transferring the balance to other banks, as further described in paragraph 20 below. Total deposits to this account during this period of time were approximately \$40.5 million. Investor deposits directly into this account totaled approximately \$20 million and the remaining \$20 million of deposits were investor funds collected by TBTI and transferred to this JCS account. To pay investors their purported \$300 per month of guaranteed revenue, JCS disbursed directly back to investors approximately \$4 million and an additional approximately \$18.6 million was transferred back to the TBTI account of which most was used to pay investors. Approximately \$10.3 million was also transferred to another JCS account, the majority of which was used to pay investors. A review of this account for any deposits, including wire transfers, shows approximately \$10,000 designated as possible advertising revenue. It should be noted that approximately \$13 million was transferred into the JCS main account via merchant account batch deposits from January 25,



14-8154-DLB

2012 to September 19, 2013. The merchant account records have not been received to date, but it appears that the vast majority of these deposits are from VCM investors and not from revenue based on the even numbered dollar amounts of the deposits and witness statements. However, even if the \$13 million represented revenue from January 25, 2012 to September 19, 2013, that amount would not have been enough to cover the monthly payment of approximately \$4.8 million (16,000 units x \$300) to investors that JCS was paying as of September 2013. Additionally, an outside accountant retained by JCS has informed your affiant that he/she saw less than approximately \$60,000 in advertising revenue flowing into JCS for all of 2012, and that he/she had concerns that the business was a "Ponzi" scheme.

14. Despite the fact that it appears investors are being paid not with advertising revenue, but instead with other investors' monies, bank records show that from January 2012 to October 2013 Joseph and Laura SIGNORE received well over \$800,000 from the JCS main account at TD Bank. Moreover, investor funds were transferred out of this main JCS account at TD Bank into another JCS account at BB&T (#241915654) from which Joseph and Laura SIGNORE withdrew \$374,600. A total of \$114,040.12 was also transferred from the JCS main account at TD Bank and another \$200,000 from the JCS account at BB&T for the purpose of purchasing land and a residence both of which are located in Palm Beach County, Florida. These properties are currently titled in the names of Joseph and Laura SIGNORE. In addition, in March 2013 SIGNORE wire transferred \$26,000 towards the purchase of a Rolls Royce vehicle out of this JCS main account.

15. A review of a JCS Enterprises Manufacturing Account at TD Bank which was opened on December 12, 2011 and closed on September 10, 2013 revealed an average monthly balance of approximately \$20,000. Most of the transactions during this time period appear to be personal

14-8154-DLB

expenses of less than \$1,000 and ATM withdrawals.

16. Affiant has also reviewed the transactions in the TBTI main account at TD Bank (#4267614901) for the period of July 3, 2012 to September 30, 2013, for which Paul and Christine SCHUMACK were the only authorized signors. Investor deposits to this account totaled approximately \$17 million and disbursements back to investors amounted to approximately \$23 million. To make up the shortfall, net transfers into the TBTI account totaling approximately \$11 million were made from JCS accounts. In essence, TBTI collected investor funds, remitted those funds less their commissions to JCS, and then JCS returned a large portions of the funds received back to TBTI for disbursements to investors representing the VCM guaranteed revenue payments. The bank deposit analysis of JCS's bank records refutes SIGNORE's claim to the CWs that JCS was generating large amounts of advertising revenue.

17. Moreover, simple mathematical calculations reveal that the JCS and TBTI business operation is likely a massive Ponzi scheme involving the payment of old investors with new investor funds. For example, each "passive" investment contract involves a purchase of a VCM for \$3,500 with contractual income to the investor of \$300 per month for 36 months. With approximately 26,000 VCMs sold, the revenue stream per month back to investors would require  $\$300 \times 26,000$ , or the sum of \$7,800,000. Yearly,  $\$7,800,000 \times 12$  would require an outlay of \$93,600,000. The three year contract period would require an outlay of  $\$93,600,000 \times 3$ , or the sum of \$280,800,000. These figures may be slightly inflated inasmuch as it is not presently known how many investors chose the "passive program" requiring monthly advertising revenue to the investor of \$300 versus the "aggressive program" requiring no investor payment at all. However, a former JCS insider (CW1) reported that no one inside JCS knew anyone that had

14-8154-DLB

invested in the aggressive program.

18. A review of another JCS account at TD Bank used to receive revenue from credit card merchant accounts revealed that only \$11,749.38 was deposited between March 05, 2013 and September 09, 2013.

19. In September 2013, the JCS main account at TD Bank was closed with a wire transfer of \$10,383,414 to a new JCS Enterprises, Inc. business checking account (#241915654) at BB&T. A review of this account shows money being deposited from investors and payments to old investors with new investor funds. Between September 2013 and October 2013, approximately \$100,000 in checks from this BB&T account was deposited into Laura SIGNORE's personal accounts at SunTrust Bank (#1000137121272 and 1000142942100). Approximately \$199,500 in checks from this BB&T account was deposited into a Joseph and Laura SIGNORE account at SunTrust Bank in the name of JOLA (1000164563628). During the time the JCS main account at TD Bank was opened, another account in the name of JOLA Enterprises, Inc. (#4269614115) was also opened at TD Bank. This additional JOLA Enterprises, Inc. account was funded with checks in the amount of \$18,500 from the JCS main account at TD Bank, as well as \$131,825 in checks from the TBTI main account at TD Bank. SIGNORE was the only authorized signor of this JOLA account which was open from April 10, 2013 to September 9, 2013.

20. On September 10, 2013, another JCS Enterprises, Inc business account was opened at SunTrust Bank (#1000164563602). This account was primarily funded with two check deposits totaling approximately \$3.6 million from the TBTI main account at TD Bank discussed above. Between September 10, 2013 and October 11, 2013, an additional \$105,000 in checks from investors were deposited into this JCS SunTrust account, at which time the account was closed.

14-8154-DLB

This account was closed with an official check in the amount of \$4,435,869.30 written to JCS Enterprises, Inc. and deposited into a new JCS Enterprises, Inc. account at Scottrade, Inc. (#67676374). On October 22, 2013, Joseph and Laura SIGNORE authorized a transfer of \$500,000 from the JCS account at Scottrade to another Scottrade account (#57443916) in the name of My Gee Bo, Inc., of which Joseph and Laura SIGNORE are the only authorized signors.

21. On or about September 30, 2013, Joseph and Laura Signore purchased a residence for \$555,000 in cash located at 14161 64<sup>th</sup> Drive North, Palm Beach Gardens, Florida. This property was purchased with a wire transfer in the amount of \$200,000 from the JCS Enterprises, Inc. business checking account (#241915654) at BB&T, a wire transfer in the amount of \$110,119.27 from the Joseph and Laura SIGNORE account in the name of JOLA (#1000164563628) at SunTrust Bank, and with a wire transfer in the amount of \$225,000 from a Laura Signore personal account at SunTrust Bank. It should be noted, that a check in the amount of \$1,000 written out of the JOLA Enterprises, Inc. account at TD Bank (#4269614115) discussed above, and which was funded by monies from JCS's and TBTI's main accounts, was deposited into escrow for this purchase.

22. Another JOLA Enterprises, Inc. account (#0185140589) was opened at Regions Bank in October 2013. This account was funded with \$12,600 in checks from the JCS Enterprises, Inc account at BB&T containing monies from investors, a check in the amount of \$100,000 from the Joseph and Laura SIGNORE account at SunTrust Bank (1000164563628) in the name of JOLA, a check in the amount of \$50,225 from the TBTI main account at TD Bank (#4267614901), and with a \$191,250.82 cashier's check from SunTrust Bank. A personal account (#0171104372) in the name of Joseph SIGNORE was also opened at Regions Bank funded primarily by the JCS

14-8154-DLB

Enterprises Services, Inc. business checking account (#4367111921) at Seacoast National Bank. During this same time period a safe box (#009247990010150) was opened at Regions bank for Joseph and Laura SIGNORE.

23. On October 08, 2013, a check in the amount of \$1,500,000 was written out of the TBTI, Inc. main account at TD Bank (#4267614901) and signed by Christine SCHUMACK. This check was endorsed by Paul and Christine SHUMACK and deposited into an account at Bank of America (#898008506721) in the names of Paul L. SCHUMACK, Christine Duncan SCHUMACK, Crystal Ann Miller, and Chad P. Wright. On October 28, 2013, an online transfer in the amount of \$1,500,000 was conducted causing this money to be transferred to another Bank of America account (#229048606687) in the name of PSCS Holdings, LLC. This PSCS account was opened on August 26, 2013 with the only authorized signors being Paul and Christine SCHUMACK. In addition, the funds used to open this account was in the form of a check in the amount of \$25,000 written out of the TBTI, Inc. main account at TD Bank (#4267614901) and signed by Christine SCHUMACK. On November 18, 2013, a wire transfer out of the PSCS account was initiated, transferring \$1,495,845.88 to Corporate Title, Inc. for the purchase of Paul and Christine SCHUMACK's residence located at 7725 NW 39<sup>th</sup> Avenue, Coconut Creek, Florida.

24. Soon after the closing of the JCS main account at TD Bank, SIGNORE opened a JCS Enterprises Services, Inc. business checking account (#4367111921) on October 25, 2013 at Seacoast National Bank. JCS initially funded this account with two checks from the JCS Enterprises, Inc. business checking account at BB&T (#241915654) totaling \$450,000, a check in the amount of \$500,000 from the JCS account at Scottrade, Inc. (#67676374), and a check in the amount of \$3,651,500 from the TBTI main account at TD Bank (#4267614901). A review of this

14-8154-DLB

account reflects many investor checks being deposited, as well as many checks written out of this account to pay investors including a check written to TBTI in the amount of \$2,240,000 on November 18, 2013. All of these checks were signed by Joseph SIGNORE. Another business checking account (#4367112141) was opened in the name of JCS Enterprises Services, Inc. at Seacoast National Bank on October 25, 2013. This account was opened by a deposit of an investor check in the amount of \$10,500. Also on October 25, 2013, a JCS Enterprises Services, Inc. business money market account (#4367112061) was opened at this bank using funds from an investor totaling \$10,000. In addition, funds from the JCS Enterprises Services, Inc. business checking account (#4367111921) at Seacoast National Bank were used to open another JOLA Enterprises, Inc. money market account (#0185140546) Regions Bank in November 2013. As of February 2014, this account maintained a balance of approximately \$500,000. A review of JCS records produced under subpoena has revealed that numerous investors mailed in their checks using Federal Express, a commercial interstate carrier.

25. A review of all current bank accounts listed above, controlled by the SIGNOREs or the SCHUMACKs has revealed that either investor checks have been directly deposited in these accounts or checks written by the subjects with investor funds were directly deposited in these accounts. The following are the accounts currently open and controlled by the SIGNOREs or the SCHUMACKs which contain funds from investors:

- 1) TD Bank account number 4267614901 in the name of T.B.T.I., Inc., Paul and Christine SCHUMAK are the signors.
- 2) BB&T Bank account number 241915654 in the name JCS Enterprises, Inc., Joseph and Laura SIGNORE are the signors.

14-8154-DLB

- 3) SunTrust Bank account numbers 1000137121272 and 1000142942100 in the name of Laura SIGNORE.
- 4) Regions Bank account number 0185140589 in the name of JOLA Enterprises, Inc., Joseph and Laura SIGNORE are the signors.
- 5) Regions Bank account number 0185140546 in the name of JOLA Enterprises, Inc., Joseph SIGNORE is the only authorized signor.
- 6) Regions Bank account number 0171104372 in the name of Joseph Signore, Joseph SIGNORE is the only authorized signor.
- 7) Regions Bank safe box (#009247990010150), Joseph and Laura SIGNORE are the signors.
- 8) Scottrade account number 57443916 in the name of MY GEE BO, Inc., Joseph and Laura SIGNORE are the signors.
- 9) Scottrade account number 67676374 in the name of JCS Enterprises, Inc., Joseph and Laura SIGNORE are the signors.
- 10) Seacoast National Bank account number 4367111921 in the name of JCS Enterprises Services, Inc., Joseph and Laura SIGNORE are the signors.
- 11) Seacoast National Bank account number 4367112061 in the name of JCS Enterprises Services, Inc., Joseph and Laura SIGNORE are the signors.
- 12) Seacoast National Bank account number 4367112141 in the name of JCS Enterprises Services, Inc. "M" Account., Joseph SIGNORE is the only signor.
- 13) Bank of America account 005484282038 in the name of T.B.T.I., Inc., Paul and Christine SCHUMACK are the signors.

14-8154-DLB

26. Based on my review of documents, both subpoenaed from JCS Enterprises, Inc. and TBTI, as well as documents provided by investors, whose initials are detailed below, the defendants have used, and caused to be used, the mails and interstate wire communications in connection with the VCM investment program detailed in this affidavit. Some of these transactions are detailed below in the Count charts which detail individual substantive acts of mail and wire fraud:

**MAIL FRAUD**

<b>COUNT</b>	<b>DEFENDANTS</b>	<b>DATE</b>	<b>MAIL MATTER</b>
2	JOSEPH SIGNORE PAUL LEWIS SCHUMACK II	October 25, 2012	Federal Express packet from victim "MB" to TBTI, Boca Raton, FL
3	JOSEPH SIGNORE PAUL LEWIS SCHUMACK II	June 25, 2013	Federal Express packet from victim "MB" to TBTI, Boca Raton, FL
4	JOSEPH SIGNORE PAUL LEWIS SCHUMACK II	September 27, 2013	Federal Express packet from victim "AB" to TBTI, Boca Raton, FL
5	JOSEPH SIGNORE PAUL LEWIS SCHUMACK II	October 29, 2013	Federal Express packet from victim "JS" to TBTI, Boca Raton, FL
6	JOSEPH SIGNORE PAUL LEWIS SCHUMACK II	November 15, 2013	Investor check mailed to victim "AB" by defendant Schumack, Boca Raton, FL

All in violation of Title 18, United States Code, Sec. 1341.



14-8154-DLB

**WIRE FRAUD**

<b>COUNT</b>	<b>DEFENDANTS</b>	<b>DATE</b>	<b>INTERSTATE WIRE COMMUNICATION</b>
7	JOSEPH SIGNORE PAUL LEWIS SCHUMACK II	September 30, 2013	Internet communication from defendant Schumack to investor "AB"
8	JOSEPH SIGNORE PAUL LEWIS SCHUMACK II	December 5, 2013	Wire transfer of \$45,000 from investor "SJ" from Georgia to TBTI's Bank of America account, Boca Raton, FL
9	JOSEPH SIGNORE PAUL LEWIS SCHUMACK II	October 31, 2013	Wire transfer of \$30,000 from investor "AA" from Indiana to TBTI's Bank of America account, Boca Raton, FL
10	JOSEPH SIGNORE PAUL LEWIS SCHUMACK II	November 25, 2013	Wire transfer of \$120,000 from investor "AA" from Indiana to TBTI's Bank of America account, Boca Raton, FL
11	JOSEPH SIGNORE PAUL LEWIS SCHUMACK II	December 5, 2013	Wire transfer of \$90,000 from investor "AA" from Indiana to TBTI's Bank of America account, Boca Raton, FL
12	JOSEPH SIGNORE PAUL LEWIS SCHUMACK II	July 25, 2013	Internet communication from <a href="mailto:info@jcsenterprise.net">info@jcsenterprise.net</a> to investor "RH" in Virginia

All in violation of Title 18, United States Code, Sec. 1343.

**C. CONCLUSION**

27. Based on the above facts, Affiant asserts that there is probable cause to believe that the subjects committed the following crimes: (i) conspiracy to commit mail fraud and wire fraud in violation of 18 U.S.C. §1349, (Count 1); mail fraud in violation of Title 18 U.S.C. § 1341, (Counts 2 through 6), that is, intentionally and with the specific intent to defraud, obtained monies

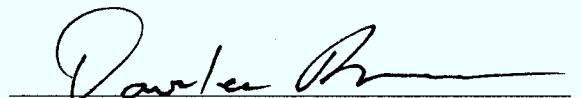
14-8154-DLB

under materially false pretenses and used the mails to accomplish that scheme, and wire fraud with the specific intent to defraud, obtained monies under materially false pretenses and used or caused to be used interstate wire communications, including the internet to accomplish that scheme, 18 U.S.C. §1343 (Counts 7 through 12).

FURTHER YOUR AFFIANT SAYETH NAUGHT

  
Waldo J. Longa, Special Agent, FBI

Sworn to me this 7<sup>th</sup> day of April, 2014.

  
DAVE BRANNON  
UNITED STATES MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
PENALTY SHEET**

Defendant's Name: JOSEPH SIGNORE

Case No. 4-8154-DLB

Count # 1:

18 USC § 1349

Conspiracy to commit mail, and wire fraud

\*Max. Penalty: 20 years' Imprisonment; \$250,000 Fine; 3 years' supervised release; restitution

Counts 2-5:

18 USC § 1341

Mail fraud

\*Max. Penalty: 20 years' Imprisonment; \$250,000 Fine; 3 years' supervised release; restitution

Counts 6-12::

18 USC § 1343

Wire fraud,

\*Max. Penalty: 20 years' imprisonment, \$250,000 Fine; 3 years' supervised release, restitution

Count:

\*Max. Penalty:

Count :

\*Max. Penalty:

**\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
PENALTY SHEET**

Defendant's Name: PAUL SCHUMACK, II

Case No. 14-8154-DLB

Count # 1:

18 USC § 1349

Conspiracy to commit mail, and wire fraud

\*Max. Penalty: 20 years' Imprisonment; \$250,000 Fine; 3 years' supervised release; restitution

Counts 2-5:

18 USC § 1341

Mail fraud

\*Max. Penalty: 20 years' Imprisonment; \$250,000 Fine; 3 years' supervised release; restitution

Counts 6-12::

18 USC § 1343

Wire fraud,

\*Max. Penalty: 20 years' imprisonment, \$250,000 Fine; 3 years' supervised release, restitution

Count:

\*Max. Penalty:

Count :

\*Max. Penalty:

**\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**