

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS  
(KANSAS CITY DOCKET)

**UNITED STATES OF AMERICA,** )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 **ANTHONY RENFROW** )  
 and )  
 **WILLIAM "BILL" FOX,** )  
 )  
 Defendant. )  
 \_\_\_\_\_ )

No. 12-20041-01/02-KHV-DJW

**INDICTMENT**

The Grand Jury charges:

Background

At all times relevant to this Indictment:

**14DailyPlus.com**

1. 14DailyPlus.com was an Internet website that fraudulently offered opportunities for "investors" to join as members and use an "autosurf" form of advertising. 14DailyPlus.com was a company incorporated in Nevada with a registered address in Las Vegas, Nevada.

2. "Autosurfing" is a form of advertising in which "investors" in 14DailyPlus.com were purportedly paid to view an advertiser's website for a certain period of time through the 14DailyPlus.com website.

3. 14DailyPlus.com "autosurf investors" paid a membership fee and were promised a per-site commission return on the fee. "Autosurf investors" could pay an

additional fee to upgrade their level, with commissions based on the member's viewing a minimum number of sites. 14DailyPlus.com offered a return of 14% per day for a period of ten days totaling a 140% return on the investment.

4. To achieve the rate of return, 14DailyPlus.com reportedly pooled the capital investments of all members, which was used to purchase advertising units on the Internet with Fortune 500-type companies. Internet visits to these particular advertisers' websites through 14DailyPlus.com then provided a return on the "investment" into the advertising units.

### **Individuals**

5. Defendant Anthony Renfrow (Renfrow) was the founder of 14DailyPlus.com, which commenced operations in or about March 2006. Success Marketing Systems was a business name utilized by Renfrow for 14DailyPlus.com.

6. Defendant William "Bill" Fox (Fox) was the primary promoter and recruiter of 14DailyPlus.com in the Kansas City metropolitan area beginning in the summer of 2006. Eagle Marketing Group, LLC was incorporated in or about January 2006 in the State of Kansas, with defendant Fox as the registered agent.

### **Financial Institutions**

7. Heritage Community Credit Union was a financial institution in Rancho Cordova, California, the accounts of which were insured by the National Credit Union Share Insurance Fund. Anthony Renfrow d.b.a. Success Marketing Systems established account #XX8622 before January 2006. Anthony Renfrow also established account #XX4422 at Heritage Community Credit Union before January 2006.

8. Bank of America was a financial institution, the deposits of which were insured

by the Federal Deposit Insurance Corporation, with its corporate headquarters in Charlotte, North Carolina, but with branches throughout California, Kansas, Missouri, and elsewhere. Anthony Renfrow d.b.a. Success Marketing Systems established account #XXXXXX4596 in or about August 2006. Anthony Renfrow established account #XXXXXX6504 at Bank of America in or about July 2006.

9. SafePay Solutions, Inc. was a financial institution established in Reno, Nevada, which was an online payment processor that engaged in the business of transmission of funds. SafePay Solutions, Inc. had account XXXXXX1533 and XXXXXX3103 at Bank of America.

10. E-Gold Ltd. was a financial institution operated by Gold and Silver Reserve, Inc., located in Melbourne, Florida, which was an online digital currency business that offered an exchange of e-metal accounts for consumers, which enabled account holders to use gold, silver, or other precious metals as a medium of exchange.

11. Anygoldnow was a financial institution in San Diego, California, that conducted currency exchanges and was a dealer in commodities and precious metals.

### **Scheme to Defraud**

12. During the period from in or about March 2006, to in or about May 2007, in the District of Kansas and elsewhere, RENFROW and FOX, together with each other and others, both known and unknown to the Grand Jury, knowingly devised a scheme to defraud individuals to join 14DailyPlus.com as “investors,” and to obtain money and property by means of material false and fraudulent pretenses, representations and promises made to individuals to convince them to join 14DailyPlus.com.

13. It was part of the scheme to defraud and to obtain money and property by

means of material false and fraudulent pretenses, representations, and promises, and in furtherance of it, that the defendants knowingly and intentionally engaged in and caused the following activities:

- a. Recruited individuals to become investors in 14DailyPlus.com, when in truth and in fact there was no investment vehicle;
- b. Enticed purported investors with the promise of a 14% daily return on the purported investment, when in truth and in fact such a return was completely unrealistic;
- c. Falsely promised a return on the purported investment to be realized by merely clicking on certain web pages for a limited amount of time each day;
- d. Recruited additional “investors” used as the basis for the individuals to receive the “return” on the original “investment,” when in truth and in fact no such returns were made to the “investors”;
- e. Solicited “investment” funds to be paid in cash up to \$9,000, which made the tracing of funds more difficult and avoided currency transaction reporting requirements;
- f. Regularly conducted conference calls via telephone and Internet for recruitment of new “investors” and conveying assurances of the program, when in truth and in fact, these were utilized to lull the individuals into believing the program was a legitimate investment vehicle; and
- g. Promised returns on the “investments” despite having no secured method to process payment of the investment returns.

Count 1

14. Paragraphs 1-13 are incorporated as though fully set out herein.

15. Beginning in or about March 2006, the exact date being unknown to the Grand Jury, and continuing to on or about May 16, 2007, both dates being approximate and inclusive, in the District of Kansas and elsewhere, the defendants,

ANTHONY RENFROW  
and  
WILLIAM "BILL" FOX,

knowingly and intentionally conspired and agreed together and with each other, and with other persons known and unknown to the Grand Jury, to commit the following offenses against the United States: wire fraud, in violation of Title 18, United States Code, Sections 2 and 1343; and engaging in monetary transactions greater than \$10,000, in violation of Title 18, United States Code, Sections 2 and 1957.

**Object of Conspiracy**

16. It was a part and object of the conspiracy that RENFROW, FOX, and their coconspirators, willfully and knowingly devised a scheme to defraud investors through 14DailyPlus.com and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and, for the purpose of executing the scheme to defraud, knowingly and intentionally caused to be transmitted by means of wire communications in interstate and foreign commerce, writings, signs, signals, and sounds for the purpose of executing such scheme to defraud individuals in violation of Title 18, United States Code, Sections 2 and 1343.

17. It was a further part and object of the conspiracy that RENFROW, FOX, and their co-conspirators, knowingly engaged in monetary transactions by, through, and to

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.