

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

01-8135

CASE NO. 18 U.S.C. 371

CR-MIDDLEBROOKS
MAGISTRATE
BANDSTRA

CLARENCE P. ...
5/1

01 SEP 33 P3 31

FILED BY

UNITED STATES OF AMERICA,
Plaintiff,
v.
LARRY BARROW,
Defendant.

INFORMATION

The United States Attorney charges that:

COUNT 1

1. From in or about June 1999, the exact date being unknown to the United States Attorney, and continuing up to on or about January 5, 2000, in the Southern District of Florida and elsewhere, the defendant

LARRY BARROW,

and others did knowingly and willfully conspire, combine, confederate and agree among each other and with other persons both known and unknown to the United States Attorney to:

a. devise a scheme and artifice to defraud and to obtain money and property from consumers by means of false and fraudulent pretenses, representations and promises, using the United States mails and private and commercial interstate carriers, in violation of Title 18, United States Code, Section 1341, and

b. devise a scheme and artifice to defraud and to obtain money and property from consumers by means of false and fraudulent pretenses, representations and promises, using wire communications in interstate and foreign commerce in violation of Title 18, United States Code, Section 1343.

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that defendant LARRY BARROW joined other co-conspirators who incorporated Professional Resource Systems International, Inc. (hereinafter PRSI) in Carson City, Nevada, on or about March 1, 1999 and located the corporate offices in Cocoa Beach, Florida, and subsequently, Boca Raton, Florida.

3. It was further a part of the conspiracy that defendant LARRY BARROW served as the Assistant Executive Director of PRSI and, in that capacity, directly communicated to PRSI customers regarding the products allegedly provided by PRSI and encouraged others to disseminate this information.

4. It was further part of the conspiracy that defendant LARRY BARROW and other co-conspirators would cause to be transmitted, in interstate and foreign commerce by means of wire communications, false and fraudulent representations regarding products to be provided to consumers by PRSI when, in truth and in fact, defendant LARRY BARROW and other co-conspirators knew that such products did not exist.

5. It was further a part of the conspiracy that defendant LARRY BARROW and other co-conspirators would falsely represent or cause false representations to be made to consumers

that for a \$295 application fee, PRSI would provide consumers with a website on the "SOHO system." BARROW falsely represented and caused false representations to be made to consumers that this "SOHO system" included a website, that was analogous to a store in a shopping mall. This website would then be linked to a virtual private network (VPN), an internet shopping mall, where PRSI customers could buy and/or sell goods and services to and from other customers on a network that was alleged to be free from pornography.

6. It was further a part of the conspiracy that defendant LARRY BARROW and other co-conspirators would use interstate and foreign telephone conference call facilities to communicate with thousands of consumers at one time for the purpose of convincing them to pay the \$295 application fee.

7. It was further a part of the conspiracy that defendant LARRY BARROW and other co-conspirators would use interstate and foreign telephone facsimile facilities to send documents containing false and fraudulent representations regarding products and services offered by PRSI to thousands of consumers for the purpose of convincing them to pay the \$295 application fee.

8. It was further a part of the conspiracy that defendant LARRY BARROW and other co-conspirators would cause consumers to place, in authorized depositories for mail matter, \$295 checks and money orders to be sent to the PRSI offices located in Cocoa Beach, Florida and, subsequently, Boca Raton, Florida, by the U.S. Postal Service.

9. It was further a part of the conspiracy that defendant LARRY BARROW and other co-conspirators would: (1) accept and cause to be accepted the \$295 application fees and (2) deposit and cause the fees to be deposited in bank accounts, controlled by PRSI corporate officers and others, that were used for the personal enrichment of defendant LARRY BARROW and other co-conspirators.

OVERT ACTS

In furtherance of the conspiracy, and to effect the objects thereof, in the Southern District of Florida and elsewhere, the defendant and co-conspirators committed the following overt acts, among others:

1. On or about September 19, 1999, in Denver, Colorado, defendant LARRY BARROW and his co-conspirators did organize and arrange a PRSI promotional event that was created to retain consumer interest in and promote the sales of PRSI's "SOHO" systems. During that meeting, BARROW and his co-conspirators made and caused to be made false and fraudulent statements regarding the products that PRSI offered its "SOHO" system customers.

2. On or about October 27, 1999, in Palm Beach County, Florida, defendant LARRY BARROW's co-conspirators did participate in an interstate and foreign conference call and made and caused to be made false and fraudulent representations regarding the products allegedly provided by PRSI.

3. On or about November 10, 1999, in Palm Beach County, Florida, defendant LARRY BARROW's co-conspirators did participate in an interstate and foreign conference call and made and caused to


be made false and fraudulent representations regarding the products allegedly provided by PRSI.

4. On or about December 7, 1999, in Palm Beach County, Florida, defendant LARRY BARROW's co-conspirators did participate in an interstate and foreign conference call and made and caused to be made false and fraudulent representations regarding the products allegedly provided by PRSI.

All in violation of Title 18, United States Code, Section 1371.


GUY A. LEWIS
UNITED STATES ATTORNEY


PAUL F. SCHWARTZ
ASSISTANT UNITED STATES ATTORNEY


PATRICE M. MULKERN
TRIAL ATTORNEY
DEPARTMENT OF JUSTICE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. _____

v.

CERTIFICATE OF TRIAL ATTORNEY*

LARRY BARROW

Superseding Case Information:

Court Division: (Select One)

Miami Key West
 FTL WPB FTP

New Defendant(s) Yes No
Number of New Defendants _____
Total number of counts _____

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the indictment/information attached hereto.

2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) No
List language and/or dialect _____

4. This case will take 0 days for the parties to try.

5. Please check appropriate category and type of offense listed below:
(Check only one) (Check only one)

I	0 to 5 days	<input checked="" type="checkbox"/>	Petty	_____
II	6 to 10 days	_____	Minor	_____
III	11 to 20 days	_____	Misdem.	_____
IV	21 to 60 days	_____	Felony	<input checked="" type="checkbox"/>
V	61 days and over	_____		

6. Has this case been previously filed in this District Court? (Yes or No) No

If yes:
Judge: _____ Case No. _____
(Attach copy of dispositive order)

Has a complaint been filed in this matter? (Yes or No) No

If yes:
Magistrate Case No. _____
Related Miscellaneous numbers: 01-8076-CR-MIDDIE BROOKS
Defendant(s) in federal custody as of _____
Defendant(s) in state custody as of _____
Rule 20 from the _____ District of _____

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the U. S. Attorney's Office prior to April 1, 1999? Yes No If yes, was it pending in the Central Region? Yes No

8. Did this case originate in the Narcotics Section, Miami? Yes No

Paul F. Schwartz
PAUL F. SCHWARTZ
ASSISTANT UNITED STATES ATTORNEY
COURT ID# A5500086

*Penalty Sheet(s) attached

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

Defendant's Name: LARRY BARROW No: _____

Count #: 1 18 U.S.C. 371 Conspiracy to Commit Mail and Wire Fraud

*Max. Penalty: Five (5) years' imprisonment and \$250,000 Fine

Count #:

*Max. Penalty:

Count #:

*Max. Penalty:

Count #:

*Max. Penalty:

Count #:

*Max. Penalty:

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.**