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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
v.
CHRISTOPHER BONGIORNO,
Defendant.

No. SA CR **SACR14-00177**
I N F O R M A T I O N
[18 U.S.C. § 371: Conspiracy]

The United States Attorney charges:

[18 U.S.C. § 371]

A. INTRODUCTION

1. At all times relevant to this Information, defendant CHRISTOPHER BONGIORNO ("BONGIORNO") operated NuBasalt International, Inc. ("NuBasalt") located in Newport Beach, California. NuBasalt purported to be engaged in the production of basalt fiber, which is used to manufacture sucker rods, decking, construction paneling, and insulation materials.

1 B. THE OBJECT OF THE CONSPIRACY

2 2. Beginning in or around 2011, and continuing to in or
3 around 2013, in Orange County, within the Central District of
4 California, and elsewhere, defendant BONGIORNO and D.P.,
5 together with others known and unknown to the United States
6 Attorney, combined, conspired, and agreed with each other to
7 knowingly and intentionally commit an offense against the United
8 States, namely, wire fraud, in violation of Title 18, United
9 States Code, Section 1343.

10 C. THE MANNER AND MEANS OF THE CONSPIRACY

11 3. The object of the conspiracy was carried out, and to
12 be carried out, in substance, as follows:

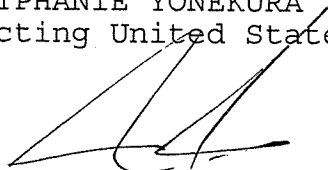
13 a. Defendant BONGIORNO and D.P. contacted
14 prospective investors to solicit them to invest in the
15 development of a machine that would produce basalt fiber faster
16 and cheaper than current technology. Investors were told that
17 their money would be used for the production of the basalt
18 machine and related expenses.

19 b. Instead of using the funds as promised, defendant
20 BONGIORNO and D.P., misappropriated some of the investor funds
21 for their own personal use.

1 D. OVERT ACT

2 4. In furtherance of the conspiracy and to accomplish its
3 object, defendant BONGIORNO and D.P., together with others known
4 and unknown to the United States Attorney, committed and
5 willfully caused others to commit the following overt act, among
6 others, in Orange County, within the Central District of
7 California, and elsewhere: On or about November 16, 2011,
8 defendant BONGIORNO and D.P. caused investor W.M. to wire
9 \$10,000 from his U.S. Bank account in New Mexico to NuBasalt's
10 Bank of America account in Newport Beach, California for an
11 investment in NuBasalt.

12
13 STPHANIE YONEKURA
14 Acting United States Attorney



15
16 f ROBERT E. DUGDALE
17 Assistant United States Attorney
18 Chief, Criminal Division

19 DENNISE D. WILLETT
20 Assistant United States Attorney
21 Chief, Santa Ana Branch Office

22 JOSEPH T. McNALLY
23 Assistant United States Attorney
24 Deputy Chief, Santa Ana Branch Office

25 JENNIFER L. WAIER
26 Assistant United States Attorney
27 Santa Ana Branch Office