

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 19-712</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>JEFFREY D. MARTIN</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1349 (conspiracy to commit securities fraud – 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1348 (securities fraud – 3 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy to commit securities fraud and wire fraud – 1 count)</b>
	<b>:</b>	<b>15 U.S.C. §§ 78j(b) &amp; 78ff and 17 C.F.R. § 240.10b–5 (securities fraud – 2 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 1343 (wire fraud – 5 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
		<b>Notice of forfeiture</b>

**SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this Superseding Indictment:

**Relevant Individuals and Entities**

1. First Power and Light LLC (“FPL”) was a Delaware limited liability company with its principal place of business in Bridgeport, Pennsylvania. FPL was formed in approximately July 2012. Person #1 was the nominal president of FPL. FPL was a solar installation and sales company. In or about April 2015, FPL changed its name to Volt Solar LLC, incorporated in Maryland with an address maintained in Bridgeport, Pennsylvania.

2. First Power and Light Inc. (“FPL Inc.”) was incorporated in the State of Florida on or about July 1, 2013. FPL Inc. had an office in Bridgeport, Pennsylvania. Person #1

was the nominal president of FPL Inc. Unlike FPL, FPL Inc. was a solar power company in name only, with no active business or contracts.

3. Person #2 exercised control over FPL and FPL Inc.

4. Person #3 was a stock promoter. Person #3, who was not a licensed Financial Industry Regulatory Authority (“FINRA”) investment broker, promoted penny stock companies using various business names under his control, including Quantum Financial Investments (“QFI”), in which Person #3 was a co-owner.

5. Person #4 was a co-owner of QFI, who worked at QFI in Glen Cove, New York, promoting stocks. Person #4 was not a licensed FINRA investment broker.

6. Neoterra Enterprises, LLC (“Neoterra”) was a New York limited liability company with its principal place of business in Woodstock, New Jersey. Neoterra was formed in 2010. Person #3 was the principal of Neoterra. Neoterra had no known legitimate business purpose.

7. J.E. Consulting Corp. (“J.E. Consulting”) was a New York corporation with its principal place of business in Thornwood, New York. J.E. Consulting was formed in 2012. Person #4 was the principal of J.E. Consulting. J.E. Consulting had no known legitimate business purpose.

8. Person #5 and Person #6 together owned and operated Program Funding Advisors LLC (“PFA”), a Delaware limited liability company with its principal place of business in Old Brookville, New York. PFA was formed in approximately January 2012. Person #7, Person #5’s wife, was the president of PFA. PFA was in the business of advising businesses on how to promote stock.

9. Mainstream Entertainment, Inc. (“MSEI”) was a Florida corporation with its principal place of business in Orlando, Florida. MSEI is now known as Volt Solar Systems, Inc. MSEI was owned by defendant JEFFREY D. MARTIN’s son, Person #8.

The Federal Securities Laws and SEC Rules and Regulations

10. Initially, the shares of MSEI were “restricted” pursuant to statute and rules and regulations promulgated by the Securities and Exchange Commission (“SEC”). The SEC was an independent agency of the United States government charged by law with preserving honest and efficient markets in securities. The federal securities laws, regulations, and rules were designed to ensure that the financial information of publicly traded companies was accurately recorded and disclosed to the investing public.

11. The MSEI shares were restricted in the sense that they could not be resold in the public market. Restricted securities are, generally, securities acquired in unregistered, private sales. If one wishes to sell restricted securities to the public, certain conditions must, generally, be met, including having current information about the issuing company available to the public. In order to have the restriction removed, Person #2 enlisted the services of Person #9, a lawyer, who agreed to issue a false opinion letter to the effect that certain conditions had been satisfied for the removal of the restriction.

The Conspiracy

12. From at least in or about April 2012, through at least in or about May 2014, in the Eastern District of Pennsylvania and elsewhere, defendant

**JEFFREY D. MARTIN**

together with Person #2, Person #3, Person #4, Person #5, Person #6, Person #10, Person #11, Person #12, and others known and unknown to the grand jury, conspired to commit offenses against the United States, namely, securities fraud, that is, to knowingly and intentionally execute a scheme and artifice (a) to defraud any person in connection with any security of Mainstream Entertainment, Inc., n/k/a Volt Solar Systems, Inc., an issuer with a class of securities registered under Section 12 of the Securities Exchange Act of 1934 (15 U.S.C. § 78l) and that was required to file reports under Section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. § 78o(d)), and (b) to obtain, by means of materially false and fraudulent pretenses, representations, and promises, any money and property in connection with the purchase and sale of any security of Mainstream Entertainment, Inc., n/k/a Volt Solar Systems, Inc., an issuer with a class of securities registered under Section 12 of the Securities Exchange Act of 1934 (15 U.S.C. § 78l) and that was required to file reports under Section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. § 78o(d)), in violation of Title 18, United States Code, Section 1348.

Purposes of the Conspiracy

13. The purposes of the conspiracy were to: (a) defraud the investors; (b) fraudulently obtain investor monies and pay and receive undisclosed commissions; (c) artificially inflate the value of MSEI securities; and (d) enrich the schemers.

Manner and Means

It was part of the conspiracy that:

14. In or about 2012, Person #10 introduced Person #2 to defendant JEFFREY D. MARTIN. Defendant MARTIN was interested in selling MSEI. On or about September 20, 2012, FPL executed a stock purchase agreement, whereby it became the majority shareholder of

MSEI for \$50,000. Related to this transaction, Person #2 also received 50 million shares of MSEI.

15. Thereafter, Person #2 distributed the 50 million shares of MSEI. Among other things, Person #2 distributed 35 million shares to his girlfriend, Person #13, so that he could maintain control over the company. Person #2 also distributed 7.5 million shares to Person #10 and Person #10's two sons, Person #11 and Person #12. The remaining 7.5 million shares were distributed by Person #2 to his associates and to employees of his companies, including Person #14 and Person #15.

16. The conspirators directed the drafting of and drafted false and fraudulent press releases and other communications relating to MSEI and its parent company, FPL, for the purpose of convincing the investing public that FPL and MSEI had more business and were more valuable than they, in fact, were, and to inflate the price of the stock of MSEI. In addition, the conspirators created and disseminated false and fraudulent press releases and prepared and disseminated a Form 8-K securities disclosure filed with the SEC on or about February 8, 2013, all as part of the conspiracy to fraudulently inflate the price of the common stock of MSEI.

17. The conspirators used manipulative stock trading techniques to fraudulently inflate the price of MSEI stock.

18. The conspirators used stock promoters, and non-arms-length trading with related parties, to create the illusion of volume, in order to inflate the stock price and to sell their own shares at inflated prices.

19. The conspirators ensured that any time they wanted to sell free trading shares on the open market, there would be available buyers.

20. Person #5 and Person #6, as well as their company, PFA, fraudulently promoted MSEI stock. Person #5 and Person #6, in turn, directed Person #3 and Person #4 to operate what is known as a “boiler room,” in which, among other things, Person #3, Person #4, and other co-conspirators, known and unknown to the grand jury, cold-called potential investors, for the purpose of getting them to buy shares of MSEI. Among other things, Person #5 and Person #6 paid Person #3 and Person #4 undisclosed commissions for selling shares of MSEI, which Person #3 and Person #4 directed to be paid to QFI, Neoterra, and J.E. Consulting.

21. The boiler room promoters touted MSEI using high pressure sales tactics and misrepresentations about the value of MSEI and its stock.

22. The boiler room promoters did not disclose the commissions paid to them by other conspirators on the sale of MSEI stock to investors on the open market.

23. To conceal the payment of undisclosed commissions, conspirators commonly directed the transfer of such money to PFA to avoid the appearance of a direct payment from other conspirators to Person #3 and Person #4.

24. Conspirators received shares, both restricted and free-trading, of MSEI stock to compensate conspirators for participating in the scheme.

25. The conspirators planned to obtain and obtained money by inflating the volume of trading in and the price of MSEI stock through misleading marketing and stock manipulation, and by preventing the SEC from detecting the scheme or taking regulatory enforcement action against them.

26. Defendant JEFFREY D. MARTIN received approximately \$989,362 in illicit proceeds from the sale of MSEI stock. Defendant MARTIN, or entities controlled by

defendant MARTIN, sent wire transfers of approximately \$685,608 to PFA, which was controlled by Person #5 and Person #6.

27. Person #2 paid kickbacks related to transactions in MSEI stock of approximately \$843,007 to PFA, which was controlled by Person #5 and Person #6.

All in violation of Title 18, United States Code, Section 1349.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1–11 and 14–27 of Count One of this Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. From at least in or about April 2012, through at least in or about May 2014, in the Eastern District of Pennsylvania and elsewhere, defendant

**JEFFREY D. MARTIN**

knowingly and intentionally executed a scheme and artifice (a) to defraud any person in connection with any security of Mainstream Entertainment, Inc., n/k/a Volt Solar Systems, Inc., an issuer with a class of securities registered under Section 12 of the Securities Exchange Act of 1934 (15 U.S.C. § 78l) and that was required to file reports under Section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. § 78o(d)), and (b) to obtain, by means of materially false and fraudulent pretenses, representations, and promises, any money and property in connection with the purchase and sale of any security of Mainstream Entertainment, Inc., n/k/a Volt Solar Systems, Inc., an issuer with a class of securities registered under Section 12 of the Securities Exchange Act of 1934 (15 U.S.C. § 78l) and that was required to file reports under Section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. § 78o(d)).

All in violation of Title 18, United States Code, Sections 1348 and 2.



**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

Relevant Individuals and Entities

1. Defendant JEFFREY D. MARTIN and his co-conspirators communicated false and fraudulent information about penny stocks, and engaged in manipulative trading of those penny stocks, for the purpose of fraudulently inflating the stock prices and reaping illicit gains, all to the detriment of the investing public.

2. Resort Savers, Inc. (“Resort Savers”) was a Nevada corporation with reported business locations in the State of Washington and the People’s Republic of China. Resort Savers’s common stock was a penny stock quoted on the OTC Link (previously known as the “Pink Sheets”) operated by OTC Markets Group, Inc., under the ticker symbol “RSSV.” Resort Savers was an issuer with a class of securities registered under Section 12 of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78l.

3. Axiom Corp. (“Axiom”) was a Nevada corporation with reported business locations in the State of Florida and Hong Kong. Axiom’s common stock was a penny stock quoted on the OTC Link (previously known as the “Pink Sheets”) operated by OTC Markets Group, Inc., under the ticker symbol “AIOM.”

4. Virtual Medical International, Inc. (“Virtual Medical”) was a Nevada corporation with a reported business location in the State of California. Virtual Medical’s common stock was a penny stock quoted on the OTC Link (previously known as the “Pink Sheets”) operated by OTC Markets Group, Inc., under the ticker symbol “QEBR.”

5. Union Bridge Holdings Ltd. (“Union Bridge”) was a Nevada corporation with a reported business location in Hong Kong. Union Bridge’s common stock was a penny stock quoted on the OTC Link (previously known as the “Pink Sheets”) operated by OTC Markets Group, Inc., under the ticker symbol “UGHL.” Union Bridge was an issuer with a class of securities registered under Section 12 of the Exchange Act, 15 U.S.C. § 78l.

6. The SEC was an independent agency of the United States government charged by law with preserving honest and efficient markets in securities. The federal securities laws, regulations, and rules were designed to ensure that the financial information of publicly traded companies was accurately recorded and disclosed to the investing public.

#### The Conspiracy

7. From at least in or about October 2015, through at least in or about December 2019, in the Eastern District of Pennsylvania, the Eastern District of New York, and elsewhere, defendant

#### **JEFFREY D. MARTIN**

together and with Co-Conspirator 1 (“CC-1”), Co-Conspirator 2 (“CC-2”), and Co-Conspirator 3 (“CC-3”), each of whom is known to the grand jury, and with others known and unknown to the grand jury, conspired to commit offenses against the United States, namely:

- a. securities fraud, that is, to knowingly and intentionally execute a scheme and artifice (i) to defraud any person in connection with any security of an issuer with a class of securities registered under Section 12 of the Exchange Act (15 U.S.C. § 78l) and that was required to file reports under Section 15(d) of the Exchange Act (15 U.S.C. § 78o(d)),

and (ii) to obtain, by means of materially false and fraudulent pretenses, representations, and promises, any money and property in connection with the purchase and sale of any security of an issuer with a class of securities registered under Section 12 of the Exchange Act (15 U.S.C. § 78l) and that was required to file reports under Section 15(d) of the Exchange Act (15 U.S.C. § 78o(d)), in violation of Title 18, United States Code, Section 1348;

- b. securities fraud, that is, unlawfully, willfully, and knowingly, directly and indirectly, by use of the means and instrumentalities of interstate commerce and the mails, and the facilities of national securities exchanges, to use and employ manipulative and deceptive devices and contrivances by: (i) employing devices, schemes, and artifices to defraud; (ii) making untrue statements of material facts and omitting to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; and (iii) engaging in acts, practices, and courses of business which operated and would operate as a fraud and deceit upon any person, in connection with the purchase and sale of securities, in violation of Title 15, United States Code, Sections 78j(b) and 78ff, and Title 17, Code of Federal Regulations, Section 240.10b-5; and
- c. wire fraud, that is, knowingly and with the intent to defraud, to devise, and to intend to devise, a scheme and artifice to defraud, and to obtain

money and property by means of materially false and fraudulent pretenses, representations, and promises, and to transmit and cause to be transmitted certain wire communications in interstate and foreign commerce, for the purpose of executing the scheme and artifice, in violation of Title 18, United States Code, Section 1343.

Purposes of the Conspiracy

8. The purposes of the conspiracy were to: (a) defraud the investors; (b) fraudulently obtain investor monies and pay and receive undisclosed commissions; (c) artificially inflate the value of the securities of Resort Savers, Axiom, Virtual Medical, and Union Bridge; and (d) enrich the members of the conspiracy.

Manner and Means

It was part of the conspiracy that:

9. In or about October 2015, CC-1 and CC-2 recruited CC-3 to promote, and to fraudulently sell to investors and prospective investors, the securities of penny stock companies. Generally, a penny stock is a security issued by a very small company that trades at less than \$5 per share. CC-3 created Global Research, LLC (“Global Research”) as an entity through which his and his co-conspirators’ fraudulent activities would be conducted.

10. Defendant JEFFREY D. MARTIN, CC-1, CC-2, and CC-3 agreed with one another and with persons known and unknown to the grand jury to manipulate—or to “pump and dump”—the common stock of Resort Savers, Axiom, Virtual Medical, and Union Bridge (together, the “Manipulated Companies”).

11. The co-conspirators acquired control of the Manipulated Companies and their respective stock.

12. The co-conspirators artificially inflated the market price of, and demand for, the stock of the Manipulated Companies by creating false and misleading information about the Manipulated Companies and their respective securities to be released to the public and to investors and prospective investors in the Manipulated Companies and by manipulative trading of the shares of the Manipulated Companies.

13. CC-3 telephoned investors and prospective investors in the Manipulated Companies, to convince them to buy stock in the Manipulated Companies. CC-3 made fraudulent and material misstatements about the Manipulated Companies and their respective securities in order to convince the investors and prospective investors that the Manipulated Companies and their stock were more valuable than they, in fact, were and to induce the investors and prospective investors to buy the stock.

14. The co-conspirators coordinated stock sales with stock promotions, including widespread e-mail distributions, or “e-mail blasts.” By coordinating stock promotions and stock sales, the co-conspirators were able to increase the price and volume of stock sales by creating the false appearance to investors that there was market interest in the stock being manipulated when, in fact, there was little or no interest in the stock.

15. The co-conspirators engaged in manipulative and deceptive securities transactions, including pre-arranged sales and purchases of stock between or among themselves or other individuals under their control, referred to as “coordinated trading,” in order to create the false appearance of an active and liquid market in the stocks being traded and to artificially

drive up the share price and trading volume. Among other things, stock purchases made by investors and prospective investors contacted by CC-3 were coordinated with stock sales, through communications between or among defendant JEFFREY D. MARTIN, CC-1, and CC-2.

16. The co-conspirators sold stock in the Manipulated Companies, often in a coordinated manner, during and after the promotions in order to maximize profits.

17. The co-conspirators used various accounts, entities, and nominees in order to attempt to prevent the SEC or other regulators from being able to determine the identity of persons receiving the proceeds of the stock manipulations.

18. The co-conspirators used wires and facilities of interstate and foreign commerce in furtherance of the scheme.

#### Overt Acts

In furtherance of the conspiracy and to accomplish its objects, defendant JEFFREY D. MARTIN, CC-1, CC-2, and CC-3, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania, the Eastern District of New York, and elsewhere:

1. On or about September 12, 2016, CC-3 sent an e-mail message to K.J. attaching a Global Research newsletter discussing Global Research's "top recommendations" for stock, including Resort Savers.

2. On or about October 20, 2016, defendant JEFFREY D. MARTIN sold 45,655 shares of Axiom common stock through a brokerage account titled in the name of an entity controlled by defendant MARTIN.

3. On or about October 21, 2016, and after K.J. purchased 41,500 shares of Axiom common stock, CC-3 made a telephone call to K.J. to verify that K.J. had bought the shares.

4. On or about October 25, 2016, defendant JEFFREY D. MARTIN received proceeds from a settled trade of Axiom common stock, in the amount of \$153,807, deposited into a bank account titled in the name of an entity that defendant MARTIN controlled.

5. On or about October 28, 2016, defendant JEFFREY D. MARTIN transferred by wire \$66,970 to a bank account titled in the name of an entity controlled by CC-1 and CC-2.

6. On or about October 28, 2016, an entity controlled by CC-1 and CC-2 transferred by wire \$12,500 to a bank account titled in the name of Global Research.

All in violation of Title 18, United States Code, Section 371.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1–2, 6, and 9–18 of Count Three of this Superseding Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From at least in or about October 2015, through at least in or about December 2019, in the Eastern District of Pennsylvania and elsewhere, defendant

**JEFFREY D. MARTIN**

knowingly and intentionally executed a scheme and artifice (a) to defraud any person in connection with any security of Resort Savers, Inc., an issuer with a class of securities registered under Section 12 of the Securities Exchange Act of 1934 (15 U.S.C. § 78l) and that was required to file reports under Section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. § 78o(d)), and (b) to obtain, by means of materially false and fraudulent pretenses, representations, and promises, any money and property in connection with the purchase and sale of any security of Resort Savers, Inc., an issuer with a class of securities registered under Section 12 of the Securities Exchange Act of 1934 (15 U.S.C. § 78l) and that was required to file reports under Section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. § 78o(d)).

All in violation of Title 18, United States Code, Sections 1348 and 2.



**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 3, 6, and 9–18 and the Overt Acts of Count Three of this Superseding Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From at least in or about December 2015, through at least in or about June 2017, in the Eastern District of Pennsylvania and elsewhere, defendant

**JEFFREY D. MARTIN**

did unlawfully, willfully, and knowingly, directly and indirectly, by use of the means and instrumentalities of interstate commerce, and the facilities of national securities exchanges, use and employ manipulative and deceptive devices and contrivances, in violation of Title 17, Code of Federal Regulations, Section 240.10b–5, by: (a) employing devices, schemes and artifices to defraud; (b) making untrue statements of material facts and omitting to state material facts necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; and (c) engaging in acts, practices and courses of business which operated and would operate as a fraud and deceit upon any person, in connection with the purchase and sale of a security of Axiom Corp.

All in violation of Title 15, United States Code, Sections 78j(b) and 78ff, and Title 17, Code of Federal Regulations, Section 240.10b–5, and Title 18, United States Code, Section 2.

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 4, 6, and 9–18 of Count Three of this Superseding Indictment are re-alleged and incorporated by reference as though fully set forth herein.
2. From at least in or about August 2017, through at least in or about December 2019, in the Eastern District of New York and elsewhere, defendant

**JEFFREY D. MARTIN**

did unlawfully, willfully, and knowingly, directly and indirectly, by use of the means and instrumentalities of interstate commerce, and the facilities of national securities exchanges, use and employ manipulative and deceptive devices and contrivances, in violation of Title 17, Code of Federal Regulations, Section 240.10b–5, by: (a) employing devices, schemes and artifices to defraud; (b) making untrue statements of material facts and omitting to state material facts necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; and (c) engaging in acts, practices and courses of business which operated and would operate as a fraud and deceit upon any person, in connection with the purchase and sale of a security of Virtual Medical International, Inc.

All in violation of Title 15, United States Code, Sections 78j(b) and 78ff, and Title 17, Code of Federal Regulations, Section 240.10b–5, and Title 18, United States Code, Section 2.

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 5–6, and 9–18 of Count Three of this Superseding Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From at least in or about January 2017, through at least in or about December 2019, in the Eastern District of New York and elsewhere, defendant

**JEFFREY D. MARTIN**

knowingly and intentionally executed a scheme and artifice (a) to defraud any person in connection with any security of Union Bridge Holdings Ltd., an issuer with a class of securities registered under Section 12 of the Securities Exchange Act of 1934 (15 U.S.C. § 78l) and that was required to file reports under Section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. § 78o(d)), and (b) to obtain, by means of materially false and fraudulent pretenses, representations, and promises, any money and property in connection with the purchase and sale of any security of Union Bridge Holdings Ltd., an issuer with a class of securities registered under Section 12 of the Securities Exchange Act of 1934 (15 U.S.C. § 78l) and that was required to file reports under Section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. § 78o(d)).

All in violation of Title 18, United States Code, Sections 1348 and 2.

**COUNTS EIGHT THROUGH TWELVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1–6 and the Overt Acts of Count Three of this Superseding Indictment are re-alleged and incorporated by reference as though fully set forth herein.

**The Scheme**

2. From at least in or about October 2015, through at least in or about December 2019, defendant

**JEFFREY D. MARTIN**

devised and intended to devise a scheme to defraud investors in Resort Savers, Inc., Axiom Corp., Virtual Medical International, Inc., and Union Bridge Holdings Ltd., and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

**Manner and Means**

3. The United States re-alleges and incorporates by reference Paragraphs 9 through 18 of Count Three of this Superseding Indictment as a description of the manner and means of the scheme.

**The Wire**

4. On or about each of the dates set forth below, in the Eastern District of Pennsylvania, the Eastern District of New York, Middle District of Florida, and elsewhere, defendant

**JEFFREY D. MARTIN**

for the purpose of executing the scheme described above caused to be transmitted by means of wire communication in interstate and foreign commerce the signals and sounds set forth below, each transmission constituting a separate count:

<b>COUNT</b>	<b>DATE</b>	<b>DESCRIPTION</b>	<b>VENUE</b>
EIGHT	October 20, 2016	an interstate electronic securities transaction (for the purchase of 41,250 shares of Axiom Corp. common stock) from K.J. (in the State of Texas) to a broker-dealer (in the Eastern District of Pennsylvania)	Eastern District of Pennsylvania
NINE	October 28, 2016	a wire transfer from account of Forbes Investment LLLP to account of Program Funding Advisors LLC in the amount of \$66,970	Middle District of Florida
TEN	November 8, 2016	an interstate electronic securities transaction (for the purchase of 7,000 shares of Axiom Corp. common stock) from K.J. (in the State of Texas) to a broker-dealer (in the Eastern District of Pennsylvania)	Eastern District of Pennsylvania
ELEVEN	January 21, 2019	an international text communication from defendant JEFFREY D. MARTIN to CC-1 discussing Resort Savers and Union Bridge and their respective securities	Eastern District of New York
TWELVE	October 29, 2019	an international text communication from defendant JEFFREY D. MARTIN to CC-1 discussing Union Bridge and its securities and avoiding anti-money laundering review by banks	Eastern District of New York

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

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 371, 1343, 1348, and 1349 and Title 15, United States Code, Section 78ff, defendant

**JEFFREY D. MARTIN**

shall forfeit to the United States of America any property that constitutes, or is derived from, proceeds traceable to the commission of such offenses, including, but not limited to, the sum of at least \$10,993,971.30.

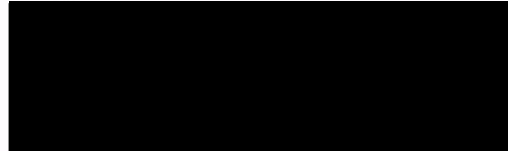
2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

Pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

**A TRUE BILL:**



*Ronald S. Swain for*

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**WILLIAM M. MCSWAIN  
UNITED STATES ATTORNEY**

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

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**THE UNITED STATES OF AMERICA**

vs.

**JEFFREY D. MARTIN**

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**INDICTMENT**

**Counts**

18 U.S.C. § 1349 (conspiracy to commit securities fraud – 1 count); 18 U.S.C. § 1348 (securities fraud – 3 counts); 18 U.S.C. § 371 (conspiracy to commit securities fraud and wire fraud – 1 count); 15 U.S.C. §§ 78j(b) & 78ff and 17 C.F.R. § 240.10b-5 (securities fraud – 2 counts); 18 U.S.C. § 1343 (wire fraud – 5 counts); 18 U.S.C. § 2 (aiding and abetting); Notice of forfeiture



Filed in open court this \_\_\_\_\_ day,  
Of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

Clerk

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Bail, \$ \_\_\_\_\_

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