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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA

BY _____

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRIAN KINGSFIELD,

Defendant.

SACR15-00014
NO. SA CR

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. THE OBJECT OF THE CONSPIRACY

1. Beginning in or around January 2010, and continuing to in or around November 2012, in Orange County, within the Central District of California, and elsewhere, defendant BRIAN KINGSFIELD ("KINGSFIELD"), J.P. and W.A., together with others known and unknown to the United States Attorney, combined, conspired, and agreed with each other to knowingly and intentionally commit an offense against the United States, namely, wire fraud, in violation of Title 18, United States Code, Section 1343.

1 B. THE MANNER AND MEANS OF THE CONSPIRACY

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

4 a. J.P. and W.A. hired defendant KINGSFIELD, who was
5 a stock promoter, to contact prospective investors to solicit
6 them to invest stocks traded on the pink sheets, namely
7 companies with stock symbols SYVN, SYAI, and SNAX. J.P. and
8 W.A. were the majority shareholders of these companies.

9 b. Defendant KINGSFIELD, J.P., and W.A. would
10 manipulate the price and volume of the stocks by coordinating
11 trades between the sellers J.P. and W.A. and the prospective
12 stock purchasers.

13 c. J.P. and W.A. would agree in advance what the
14 purchase price of the shares should be and when the order to
15 purchase the shares should be placed.

16 d. Defendant KINGSFIELD would then, with the intent
17 to defraud, counsel stock purchasers to purchase the stock at
18 the agreed upon price in the hopes that the sellers, J.P. and
19 W.A., would be able to sell their shares.

20 e. Defendant KINGSFIELD did not disclose to
21 customers that he and the sellers were creating the volume in
22 the market and setting the sale price.

23 f. In addition, defendant KINGSFIELD did not disclose
24 to customers that defendant KINGSFIELD received a commission of
25 40% from J.P. and W.A.

26 g. From this conspiracy, defendant KINGSFIELD caused
27 \$1,551,111.21 in loss to investors.

1 C. OVERT ACT

2 3. In furtherance of the conspiracy and to accomplish its
3 object, defendant KINGSFIELD and J.P., together with others
4 known 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 August 17, 2012, J.P.
8 paid defendant KINGSFIELD commissions in the in the amount of
9 \$7,000 from his Aero Financial, Inc. JP Morgan Chase Account in
10 San Diego, California to defendant KINGSFIELD's Mid America
11 Partners, Inc. TD Bank account in Irvine, California. In
12 effectuating such wire transfer, defendant KINGSFIELD caused JP
13 Morgan Chase to transmit an interstate wire communication from
14 the Southern District of California to the Federal Reserve Bank
15 in East Rutherford, New Jersey, for the purpose of processing
16 such wire transfer through the Fedwire payment clearing system,

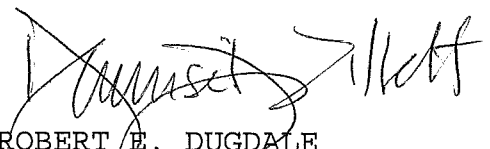
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1 which then forwarded the funds to TD Bank in the Central
2 District of California.

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Acting United States Attorney

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6 
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