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U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
DALE PEARLMAN,  
  
Defendant.

No. SA CR **SACR14-00086**  
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 DALE PEARLMAN ("PEARLMAN") was a co-owner of 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 PEARLMAN and C.B., together  
5 with others known and unknown to the United States Attorney,  
6 combined, conspired, and agreed with each other to knowingly and  
7 intentionally commit an offense against the United States,  
8 namely, wire fraud related to an investment fraud scheme, in  
9 violation of Title 18, United 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 PEARLMAN and C.B. contacted prospective  
14 investors to solicit them to invest in the development of a  
15 machine that would produce basalt fiber faster and cheaper than  
16 current technology. Investors were told that their money would  
17 be used for the production of the basalt machine and related  
18 expenses.


19 b. Instead of using the funds as promised, defendant  
20 PEARLMAN and C.B., misappropriated approximately \$562,000 of  
21 investor funds their own personal use.

1 D. OVERT ACT

2 4. In furtherance of the conspiracy and to accomplish its  
3 object, defendant PEARLMAN and C.B., 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:

8 Overt Act No. 1: On or about October 18, 2011,  
9 defendant PEARLMAN and C.B. caused investor W.A. to wire  
10 \$110,000 from his Eastern Bank account in Massachusetts to  
11 NuBasalt's Bank of America account in Newport Beach, California  
12 for an investment in NuBasalt.

13  
14 ANDRÉ BIROTTE JR.  
United States Attorney

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

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

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22 Deputy Chief, Santa Ana Branch Office

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24 Santa Ana Branch Office