

WARRANT FOR ARREST

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

DOCKET NO: 03-366

MAGIS. NO:

v.

Michael D. Karsch  
SSN: 199-36-8621

NAME & ADDRESS OF INDIVIDUAL TO BE ARRESTED

Michael D. Karsch  
5747 Paddington Way  
Boca Raton, FL 33496

03-5325-AEV  
#2

DOB: 5/14/60

PDID:

FILED by [Signature] D.C.  
MAG. SEC.

WARRANT ISSUED ON THE BASIS OF:

Indictment

DISTRICT OF ARREST

SEP 30 2003

TO: ANY UNITED STATES MARSHAL OR  
OTHER AUTHORIZED OFFICER

CITY

CLARENCE MADDOX  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - W.F.B.

YOU ARE HEREBY COMMANDED to arrest the above-named person and bring that person before  
the nearest available Magistrate Judge to answer to the charge(s) listed below.

DESCRIPTION OF CHARGES

- 18 U.S.C. § 371 (Conspiracy)
- 18 U.S.C. § 1343 (Wire Fraud)
- 18 U.S.C. § 2 (Causing an Act to be Done)
- 18 U.S.C. § 78j(b), 78ff and
- 17 C.F.R. § 240.10b-5 (Securities Fraud)

United States District Court  
For the District of Columbia  
A TRUE COPY  
NANCY MAYER WHITTINGTON, Clerk  
BY [Signature]  
Deputy Clerk

IN VIOLATION OF:

UNITED STATES CODE TITLE & SECTION:

18 U.S.C. §§ 371, 1343, 2, 78j(b) and 78ff and  
17 C.F.R. § 240.10b-5

BAIL FIXED BY COURT:

HWOB

OTHER CONDITIONS OF RELEASE:

ORDERED BY:

Magistrate Judge Kay

SIGNATURE (JUDGE/MAGISTRATE JUDGE)

Maglstrate Judge Alan Kay

DATE ISSUED:

8/20/03

CLERK OF COURT:

Nancy Mayer-Whittington

BY DEPUTY CLERK:

[Signature]

DATE:

AUG 20 2003

RETURN

This warrant was received and executed with the arrest of the above-named person.

DATE RECEIVED

NAME AND TITLE OF ARRESTING OFFICER

SIGNATURE OF ARRESTING OFFICER

DATE EXECUTED

[Signature]

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**Holding a Criminal Term  
Grand Jury Sworn in April 26, 2002**

*03-5325-AEV*

**UNITED STATES OF AMERICA,**

**CRIMINAL NO. 03-366**

v.

**GRAND JURY ORIGINAL**

**BARRY WILLIAM GEWIN,  
MICHAEL D. KARSCH,  
DOMINIC ROELANDT,  
GEORGE RUSSELL TAYLOR,  
LOUIS VAN STILLMAN,  
DAVID A. WOOD and  
FRANKLIN CLINTON WALKER  
Defendants.**

**VIOLATIONS:**

**18 U.S.C. § 371 (Conspiracy);  
18 U.S.C. § 1343 (Wire Fraud);  
18 U.S.C. § 2 (Causing an Act to be Done)  
15 U.S.C. § 78j(b), 78ff and  
17 C.F.R. § 240.10b-5 (Securities Fraud)**

**RECEIVED**

**KOLLAR-KOTELLY, J. GKK**

**INDICTMENT**

**AUG 20 2003**

The Grand Jury charges that:

**NANCY MAYER WHITTINGTON, CLERK  
U.S. DISTRICT COURT**

**COUNT ONE  
CONSPIRACY TO COMMIT SECURITIES AND WIRE FRAUD**

United States District Court  
For the District of Columbia

**INTRODUCTION**

**X TRUE COPY**

At various times relevant to this Indictment:

**NANCY MAYER WHITTINGTON, Clerk  
By *[Signature]*  
Deputy Clerk**

1. In June 2001, 2DOTRADE, a private Nevada corporation, merged with a publicly-traded "shell" company, Moranzo, an entity with no assets or ongoing business operations. After the merger, 2DOTRADE became a publicly-traded company under the symbol "TDOT." The merged and publicly-traded entity will hereinafter be referred to as TDOT. Following the merger, TDOT issued press releases claiming that it was involved in trading goods and commodities valued at over \$300 million, and that it had an anti-anthrax product.

2. The common stock of TDOT was registered with the United States Securities and Exchange Commission (SEC) and traded on the Over the Counter Bulletin Board, a quotation service operated by NASD (formerly the National Association of Securities Dealers, Inc.). TDOT was required by law to file with the SEC detailed and truthful statements regarding its business affairs, including periodic reports on its financial condition and operations.
3. Defendant **BARRY GEWIN** (a.k.a. Barry Peters) was a stock promoter who operated off-shore companies (based outside the United States) used for the receipt, transfer and sale of TDOT stock.
4. Defendant **MICHAEL KARSCH** was a lawyer and the managing director of a "merchant banking" firm, located in Boca Raton, Florida, that provided equity funding for 2DOTRADE to purchase a shell company in exchange for TDOT shares and other consideration.
5. Defendant **DOMINIC ROELANDT** was a stock promoter who operated off-shore companies used for the receipt, transfer and sale of TDOT stock.
6. Defendant **RUSSELL TAYLOR** was the founder of TDOT. At various times, he was the President, Chief Executive Officer, Chief Accounting Officer and Director of TDOT.
7. Defendant **L. VAN STILLMAN** was a lawyer who represented TDOT and also operated an off-shore company used for the receipt and sale of TDOT stock.
8. Defendant **DAVID WOOD** was a stock promoter and the president and owner of a company that promoted the stock of small companies including TDOT.
9. Defendant **CLINTON WALKER** was a stock promoter who was the vice-president of defendant **DAVID WOOD's** company.

### THE CONSPIRACY

10. From in or about August 2000 to in or about January 2002, in the District of Columbia and elsewhere, defendants **BARRY GEWIN, MICHAEL KARSCH, DOMINIC ROELANDT, RUSSELL TAYLOR, L. VAN STILLMAN, DAVID WOOD, CLINTON WALKER**, as well as other persons known and unknown to the Grand Jury, wilfully and knowingly combined, conspired, confederated and agreed together and with each other to commit offenses against the United States of America, to wit:

(a) to wilfully and knowingly, directly and indirectly, by the use of the means and instrumentalities of interstate commerce and of the wires, use and employ, in connection with the purchase and sale of securities, manipulative and deceptive devices and contrivances in violation of Title 17, Code of Federal Regulations, Section 240.10b-5, 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 the 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 a person in connection with the purchase and sale of securities issued by TDOT, in violation of Title 15, United States Code, Section 78j(b) and 78ff; and

(b) having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of material false and fraudulent pretenses, representations and promises, wilfully and knowingly transmit and cause to be transmitted by

means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures and sounds, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

**PURPOSE OF THE CONSPIRACY**

11. It was a purpose of the conspiracy that defendants **BARRY GEWIN, MICHAEL KARSCH, DOMINIC ROELANDT, RUSSELL TAYLOR, L. VAN STILLMAN, DAVID WOOD, CLINTON WALKER**, and their co-conspirators, would enrich themselves through the fraudulent manipulation of TDOT stock and other means.

**MANNER AND MEANS OF THE CONSPIRACY**

12. Defendants **BARRY GEWIN, MICHAEL KARSCH, DOMINIC ROELANDT, RUSSELL TAYLOR, L. VAN STILLMAN, DAVID WOOD, CLINTON WALKER**, and other co-conspirators both known and unknown to the grand jury, used the following manner and means, among others, to accomplish the objects and purpose of the conspiracy, in that the defendants:

(a) secretly gained control of a publicly traded company by pooling money to cause the merger of 2DOTRADE with a publicly traded shell company, thereby causing 2DOTRADE to trade under the symbol "TDOT";

(b) concealed their control and ownership of the majority of TDOT stock;

(c) fraudulently restricted the public supply of TDOT stock in order to control and manipulate its price and volume;

(d) opened secret off-shore nominee brokerage accounts for corruptly receiving and trading TDOT stock;

(e) used fraudulent transactions to set the initial market price at which TDOT stock would begin trading;

(f) inflated the price of TDOT stock through the issuance of false and misleading press releases and by making false and fraudulent claims about TDOT's assets, revenue, and profits in mass e-mails and faxes to the public, as well as postings on the company's Internet web site;

(g) submitted and caused to be submitted false and misleading filings to the SEC; and

(h) enriched themselves by selling their TDOT stock into the market to unsuspecting victim-investors at fraudulently inflated prices.

#### OVERT ACTS

13. In furtherance of the conspiracy and to accomplish the objects thereof, defendants **BARRY GEWIN, MICHAEL KARSCH, DOMINIC ROELANDT, RUSSELL TAYLOR, L. VAN STILLMAN, DAVE WOOD, CLINTON WALKER,** and other co-conspirators both known and unknown to the Grand Jury, committed and caused to be committed, the following overt acts, among others, within the District of Columbia and elsewhere:

#### THE PLANNING PHASE

14. On or about August 9, 2000, defendants **BARRY GEWIN, DOMINIC ROELANDT** and a co-conspirator, met in Barcelona, Spain, to discuss taking small private companies public in the American capital market, secretly controlling those companies, fraudulently promoting the companies to inflate share values, and selling their shares at the artificially inflated prices.

15. In or about late September 2000, defendants **BARRY GEWIN, MICHAEL KARSCH, DOMINIC ROELANDT, RUSSELL TAYLOR, L. VAN STILLMAN, DAVID WOOD, CLINTON WALKER**, and others, agreed to find and finance the purchase of a publicly-listed shell company, which they would then merge with 2DOTRADE, thereby creating the publicly-traded company "TDOT."

16. In or about November 2000, defendant **BARRY GEWIN** formed a nominee corporation in Belize, through which **GEWIN** and others would secretly trade TDOT stock.

#### THE ACQUISITION OF MORANZO

17. In or about April 2001, defendant **BARRY GEWIN** executed a letter of intent to purchase a shell company named "Moranzo, Inc." for \$600,000.

18. In or about April 2001, defendants **BARRY GEWIN, DOMINIC ROELANDT**, and a co-conspirator paid a \$150,000 deposit for the purchase of Moranzo.

#### THE LOCK-UP AGREEMENT

19. On or about May 30, 2001, defendants **BARRY GEWIN, MICHAEL KARSCH, DAVID WOOD, CLINTON WALKER**, and a co-conspirator, discussed plans to inflate the price and volume of TDOT's shares.

20. On or about June 4, 2001, defendants **BARRY GEWIN** and **MICHAEL KARSCH** agreed that **KARSCH's** firm would provide \$450,000 to purchase Moranzo with the understanding that **KARSCH's** firm would, among other things: (1) receive 1.1 million TDOT shares with a guarantee that those shares could be sold for at least \$1 million gross within 60 days; (2) that 10 million TDOT shares would be "locked up," or restricted, from trading for 60 days, or until **KARSCH's** firm grossed at least \$1 million; and (3) in the event that **KARSCH's**

firm did not gross at least \$1 million within 60 days from the sale of TDOT shares, he would be entitled to additional shares from the lock-up until he did gross \$1 million.

21. On or about June 14, 2001, defendant **L. VAN STILLMAN** received delivery of 3,274,600 Moranzo shares, and held 10 million of those shares in his office pursuant to the lock-up agreement.

#### THE DISTRIBUTION OF SHARES

22. On or about June 13, 2001, defendant **BARRY GEWIN** directed defendant **L. VAN STILLMAN** to re-issue Moranzo shares as TDOT shares and distribute them to various entities controlled by defendants **BARRY GEWIN, MICHAEL KARSCH, DOMINIC ROELANDT, L. VAN STILLMAN, DAVID WOOD**, and others.

23. On or about June 14, 2001, defendant **L. VAN STILLMAN** caused the distribution of 3,274,600 TDOT shares to various entities controlled by defendants **BARRY GEWIN, MICHAEL KARSCH, DOMINIC ROELANDT, L. VAN STILLMAN, DAVID WOOD**, and others.

24. On or about July 12, 2001, defendant **BARRY GEWIN** directed defendant **L. VAN STILLMAN** to issue 5 million shares from the 10 million "lock-up" shares to various entities controlled by defendants **BARRY GEWIN, MICHAEL KARSCH, DOMINIC ROELANDT, L. VAN STILLMAN, DAVID WOOD**, and others.

25. On or about September 5, 2001, defendant **RUSSELL TAYLOR** instructed defendant **L. VAN STILLMAN** to distribute the 5 million shares referred to in paragraph 24 to defendant **DAVID WOOD**.



26. On or about September 5, 2001, defendant **L. VAN STILLMAN** did distribute the 5 million shares referred to in paragraphs 24 and 25 to defendant **DAVID WOOD**.

27. On or about September 12, 2001, defendant **L. VAN STILLMAN** directed the transfer agent to distribute 660,800 TDOT shares to various entities controlled by himself and defendant **DAVID WOOD**.

#### THE PROFIT SHARING AGREEMENT

28. Between on or about June 19, 2001 and on or about June 22, 2001, defendants **BARRY GEWIN, DOMINIC ROELANDT**, and others met in Bermuda to open off-shore accounts to secretly trade TDOT shares.

29. Between on or about June 19, 2001 and on or about June 22, 2001, defendants **BARRY GEWIN, DOMINIC ROELANDT**, and others drafted an agreement summarizing the division of profits from their future sale of TDOTRADE stock.

#### THE FRAUDULENT MATCHED TRADE SETTING THE INITIAL PRICE FOR TDOT SHARES

30. On or about June 26, 2001, defendant **CLINTON WALKER** fraudulently entered a "limit order" to buy TDOT shares at a price no greater than \$1.62.

31. Later that same day (within approximately 15 minutes of defendant **CLINTON WALKER**'s limit order), defendant **BARRY GEWIN** caused a Florida securities dealer to post an "ask price" of \$1.25 for TDOT's shares.

32. Also later that same day, defendant **CLINTON WALKER'S** order was filled at \$1.25, and ultimately caused TDOT to have an apparent market capitalization of over \$22 million.

33. On or about June 27, 2001, defendant **DAVID WOOD** communicated to defendant **MICHAEL KARSCH** that the defendants:

- (a) had established an initial market price for TDOT stock;
- (b) were delaying issuing an initial press release until their stock was in tradeable form; and
- (c) would begin engaging in manipulating the price and volume of TDOT stock subsequent to the issuance of the initial press release.

**FALSE FILINGS WITH THE SEC**

34. On or about June 29, 2001, defendants **RUSSELL TAYLOR** and **L. VAN STILLMAN** caused to be filed, through the means and instrumentalities of interstate commerce, a Form SC 14F-1 with the SEC in Washington, DC, falsely stating that "Barrington Ellis" was a Director of TDOT, and that no single beneficial owner or group owned more than 5% of TDOT's common stock.

35. On or about June 30, 2001, defendants **RUSSELL TAYLOR** and **L. VAN STILLMAN** caused to be filed, through the means and instrumentalities of interstate commerce, a quarterly report (Form 10-Q) with the SEC in Washington, DC, which was materially false and misleading in that it failed to disclose that the defendants, as a result of their purchase of the shell company from a stock promoter, controlled approximately 99% of its shares, and failed to disclose the profit guarantee, including the lock-up agreement.

36. On or about July 2, 2001, defendants **RUSSELL TAYLOR** and **L. VAN STILLMAN** caused to be filed, through the means and instrumentalities of interstate commerce, a Form 8-K with the SEC in Washington, DC, falsely naming an individual as a Director of

TDOT, and falsely affirming that no single beneficial owner or group owned more than 5% of TDOT's common stock.

**PRESS RELEASES TOUTING BOGUS CONTRACTS**

37. On or about July 17, 2001, defendant **RUSSELL TAYLOR** caused the issuance of the first TDOT press release falsely stating that TDOT currently held firm contracts "in excess of" \$250 million.

38. On or about July 20, 2001, defendant **RUSSELL TAYLOR** caused the issuance of a TDOT press release falsely stating that TDOT had a \$25 million contract to supply tropical hardwood from Sierra Leone to other countries.

39. On or about July 25, 2001, defendant **RUSSELL TAYLOR** caused the issuance of a TDOT press release falsely stating that TDOT had arranged a \$20 million contract to supply locomotives and spare parts from Brazil to the government of Pakistan.

40. On or about July 29, 2001, defendants **BARRY GEWIN, MICHAEL KARSCH, L. VAN STILLMAN, DAVID WOOD, CLINTON WALKER**, and others met in Charlotte, North Carolina, to discuss further manipulation of TDOT stock and to resolve a dispute among the conspirators concerning the \$1 million guarantee made to **KARSCH's** firm.

41. On or about August 3, 2001, defendant **RUSSELL TAYLOR** caused the issuance of a TDOT press release falsely stating that TDOT had a \$6.4 million contract to supply hardwood flooring from Sierra Leone to the United Kingdom.

42. On or about August 8, 2001, defendant **RUSSELL TAYLOR** caused the issuance of a TDOT press release falsely stating that TDOT had a contract to sell 2,000 metric tons of hard burnt charcoal to customers in Europe and South East Asia.

43. Each of the foregoing press releases was false and misleading in that, among other things, they failed to disclose that TDOT needed, but did not have, the financing to effectuate the contracts.

**DEFENDANTS' STOCK SALES DURING THE CONTRACT PUMP**

44. Between on or about June 26, 2001 and September 30, 2001, defendants **MICHAEL KARSCH, DOMINIC ROELANDT, BARRY GEWIN, DAVID WOOD, CLINTON WALKER, and L. VAN STILLMAN**, fraudulently enriched themselves by selling artificially inflated TDOT shares as follows:

<u>Defendant</u>	<u>Number of Shares Sold</u>	<u>Proceeds from Sale</u>
<b>KARSCH</b>	1.1 million	\$555,191
<b>ROELANDT</b>	1,850,000	\$474,031
<b>GEWIN</b>	489,800	\$181,892
<b>WOOD</b>	303,000	\$154,691
<b>WALKER</b>	101,350	\$54,586
<b>L. VAN STILLMAN</b>	100,000	\$80,000

45. On or about July 27, 2001, defendant **DAVID WOOD** instructed defendant **MICHAEL KARSCH** to temporarily stop selling TDOT stock to prevent the artificially inflated price from declining.

46. On or about August 6, 2001, defendant **DOMINIC ROELANDT** wire transferred \$25,000 to defendant **RUSSELL TAYLOR**.

**PRESS RELEASES TOUTING A BOGUS ANTHRAX PRODUCT**

47. On or about October 31, 2001, at a time of highly publicized anthrax-related deaths and injuries in the United States, defendant **RUSSELL TAYLOR** and others caused the

issuance of a TDOT press release falsely touting the potential efficacy of a product for use against anthrax, for which they purportedly held exclusive distribution rights.

48. On or about November 2, 2001, defendant **RUSSELL TAYLOR** and others caused the issuance of a TDOT press release falsely stating that the purported anti-anthrax product was being tested and that its production was about to commence.

49. On November 8, 2001, defendant **RUSSELL TAYLOR** caused the issuance of a TDOT press release falsely vouching for the accuracy of TDOT's previous press releases.

50. Between in or about July 2001 and in or about November 2001, defendants **BARRY GEWIN, DOMINIC ROELANDT**, and others caused false and misleading statements regarding TDOT to be transmitted to the investing public via mass emails, faxes, and postings on Internet chat forums, and on TDOT's Internet web site.

DEFENDANTS' STOCK SALES DURING THE ANTHRAX PUMP

51. Between on or about October 29, 2001 and on or about November 6, 2001, defendants **BARRY GEWIN, DOMINIC ROELANDT, L. VAN STILLMAN, DAVID WOOD**, and **CLINTON WALKER** fraudulently enriched themselves by selling artificially inflated TDOT shares as follows:

Defendant	Number of Shares Sold	Proceeds from Sale
GEWIN	380,000	\$158,058
ROELANDT	142,500	\$25,985
L. VAN STILLMAN	101,000	\$15,371
WOOD	36,500	\$16,132
WALKER	20,000	\$3,698

**(Conspiracy, in violation of 18 United States Code, § 371 and Aiding and Abetting and Causing an Act to Be Done, in violation of Title 18, United States Code § 2)**

**COUNTS TWO THROUGH SEVEN  
WIRE FRAUD**

**THE SCHEME**

The allegations in paragraphs 1 through 9 which constitute the Introduction and paragraphs 12 through 51 in Count One which constitute the Scheme, are realleged and incorporated by reference as though fully set forth herein.

**PURPOSE OF THE SCHEME**

2. From in or about August 2000 to in or about January 2002, in the District of Columbia and elsewhere, defendants **BARRY GEWIN, MICHAEL KARSCH, DOMINIC ROELANDT, RUSSELL TAYLOR, L. VAN STILLMAN, DAVID WOOD, CLINTON WALKER**, and their co-schemers, caused the issuance of false and fraudulent press releases in order to inflate the price of TDOT stock and enrich themselves from the sale of fraudulently inflated TDOT stock.

**THE WIRE COMMUNICATIONS**

3. On or about the following dates, in the District of Columbia and elsewhere, the below listed defendants and others, for the purpose of executing the scheme, did cause to be transmitted in interstate and foreign commerce, by means of wire communications, certain writings, signs, signals, and pictures, as set forth below:

<u>Count</u>	<u>Defendants</u>	<u>Date</u>	<u>Wire Communication</u>	<u>From</u>	<u>To</u>
2	GEWIN, ROELANDT, TAYLOR, STILLMAN, KARSCH, WOOD, WALKER	7/25/01	wire transmission of a press release from PR Newswire	Charlotte, North Carolina	Washington, DC
3	GEWIN, ROELANDT, TAYLOR, STILLMAN, KARSCH, WOOD, WALKER	8/3/01	wire transmission of a press release from PR Newswire	Charlotte, North Carolina	Washington, DC
4	GEWIN, ROELANDT, TAYLOR, STILLMAN, KARSCH, WOOD, WALKER	8/8/01	wire transmission of a press release from PR Newswire	Charlotte, North Carolina	Washington, DC
5	GEWIN, ROELANDT, TAYLOR, STILLMAN, KARSCH, WOOD, WALKER	8/16/01	wire transmission of a press release from PR Newswire	Charlotte, North Carolina	Washington, DC
6	GEWIN, ROELANDT, TAYLOR, STILLMAN, KARSCH, WOOD, WALKER	10/31/01	wire transmission of a press release from PR Newswire	Charlotte, North Carolina	Washington, DC
7	GEWIN, ROELANDT, TAYLOR, STILLMAN, KARSCH, WOOD, WALKER	11/2/01	wire transmission of a press release from PR Newswire	Charlotte, North Carolina	Washington, DC

**(Wire Fraud, in violation of Title 18, United States Code, § 1343 and Aiding and Abetting and Causing an Act to Be Done, in violation of Title 18, United States Code § 2)**

**COUNT EIGHT**  
**SECURITIES FRAUD**

1. The allegations in paragraphs 1 through 9 which constitute the Introduction and paragraphs 12 through 51 in Count One which constitute the Scheme, are realleged and incorporated by reference as though fully set forth herein.
2. From in or about August 2000 to in or about January 2002, in the District of Columbia and elsewhere, defendants **BARRY GEWIN, MICHAEL KARSCH, DOMINIC ROELANDT, RUSSELL TAYLOR, L. VAN STILLMAN, DAVID WOOD, CLINTON WALKER**, and co-schemers known and unknown, in connection with the purchase and sale of TDOT's stock, wilfully and knowingly, by the use of means and instrumentalities of interstate commerce, the United States mails, and the facilities of national securities exchanges, directly and indirectly did use and employ manipulative and deceptive devices and contrivances in connection with the purchase and sale of securities, in contravention of Rule 10b-5 of the Rules and Regulations promulgated by the Securities and Exchange Commission (Title 17, Code of Federal Regulations, Section 240.10b-5) and did (a) employ a device, scheme and artifice to defraud; (b) make untrue statements of material fact and omit to state material facts necessary in order to make statements made, in light of the circumstances under which they were made, not misleading; and c) engage in acts, practices and courses of business which would and did operate




as a fraud and deceit upon certain persons and entities in connection with the purchase and sale of securities in that the defendants did fraudulently manipulate the price and volume of TDOT stock in order to enrich themselves.

(Securities Fraud, in violation of Title 15, United States Code, Sections 78j(b) and 78ff(a); Title 17, Code of Federal Regulations, Section 240.10b-5; and Aiding and Abetting and Causing an Act to be Done, in violation of Title 18, United States Code, Section 2)

A TRUE BILL

FOREPERSON.

CHRISTOPHER WRAY  
ACTING ASSISTANT ATTORNEY GENERAL, CRIMINAL DIVISION  
U.S. DEPARTMENT OF JUSTICE

  
RAJA CHATTERJEE  
TRIAL ATTORNEY  
FRAUD SECTION  
U.S. DEPARTMENT OF JUSTICE