

1 MELINDA HAAG (CABN 132612)
United States Attorney

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RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

WHA

CR 11 0099

11 UNITED STATES OF AMERICA,

No. ~

12 Plaintiff,

VIOLATION: 18 U.S.C. § 1343 – Wire
Fraud

13 v.

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15 LAWRENCE R. GOLDFARB, and
16 BAYSTAR CAPITAL MANAGEMENT,
LLC,

SAN FRANCISCO VENUE

17 Defendants

E-filing

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19 INFORMATION

20 The United States Attorney charges:

21 On or about and between January 2005 and December 2010, in the Northern District of
22 California, the defendants,

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24 LAWRENCE GOLDFARB and,
BAYSTAR CAPITAL MANAGEMENT, LLC,

25 having devised and intending to devise a scheme and artifice (A) to defraud as to a material
26 matter, and (B) to obtain money by means of materially false and fraudulent pretenses,
27 representations, and promises, for the purpose of executing such scheme and artifice and
28 attempting so to do, did knowingly cause to be transmitted in interstate commerce by wire

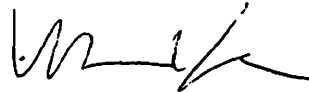
INFORMATION

1 communication certain wire transfers and writings, namely, communications to investors in
2 which the defendants failed to disclose the extent of the distributions from Island Fund, an
3 investment vehicle defendants managed on behalf of investors, and that the defendants had
4 reinvested those distributions into business entities some of which were owned and controlled by
5 the defendants;

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

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8 DATED: 3/1/11

MELINDA HAAG
United States Attorney

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11 MIRANDA KANE
Chief, Criminal Division

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13 (Approved as to form: )
14 JONATHAN SCHMIDT
Assistant United States Attorney