

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

FILED
745-13-1-2014
TAMPA, FLORIDA

UNITED STATES OF AMERICA

v.

NAADIR CASSIM,
JON CRAIG NELSON,
MICHAEL SKILLERN, and
ADRIANA MARIA CAMARGO
a/k/a Adriana Palomino

CASE NO. 8:14-CR
18 U.S.C. § 371
18 U.S.C. § 1956(h)
18 U.S.C. § 1341
18 U.S.C. § 1343
18 U.S.C. § 1957

58-26764

INDICTMENT

SEALED

The Grand Jury charges:

COUNT ONE
(Conspiracy to Commit Mail and Wire Fraud)

Introduction

At times material to this Indictment:

A. Definitions

1. A "boiler room" is a physical office, often located overseas, staffed by telemarketers who purport to be bona-fide stock or commodity brokers. A boiler room sells a variety of commodities, products, and securities that are represented to be valuable but are in fact of minimal value or worthless. When soliciting potential victims, telemarketers work from sales marketing scripts, using false names to hide their true identities. The victim is usually subjected to "hard-sell" tactics over many telephone calls from telemarketers. The boiler room is typically supported by the use of virtual office and telephone diversion services, which are

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used to hide a telemarketer's true location from the victim. By the time a victim has invested funds or purchased a product and discovered the true nature of the transaction, the telemarketer typically stops returning the victim's calls, and victim's funds have been distributed among the telemarketers and others involved in the scheme. Funds paid by victims are used not only to support the lifestyles of those running the boiler room, but also to pay for the infrastructure required to operate the boiler room.

2. "Gold doré" is a bar of semi-purified gold, which can then be further refined into gold bullion.

3. A "correspondent account" is a bank account at a bank, typically a larger bank that offers a large number of financial services, that corresponds to an account at a smaller bank, known as the respondent bank. A correspondent account is used when a respondent bank cannot accept incoming wires from foreign countries and must therefore establish a correspondent account with a larger bank to accept incoming wires of foreign currencies.

B. The Individuals

4. NAADIR CASSIM, a citizen of the United States, was residing in Spain and elsewhere and traveled to the Middle District of Florida in connection with the fraud scheme described herein. NAADIR CASSIM facilitated the sale to victims of purported but in fact nonexistent gold ore or gold doré from mines owned or controlled by conspirators in Montana and Nevada. NAADIR CASSIM directed and controlled this scheme by, among other things, directing and facilitating the

sale to victims of nonexistent gold ore or gold doré from mines owned or controlled by conspirators by overseas boiler rooms, providing victims with instructions for wiring payment for nonexistent gold ore or gold doré from mines owned or controlled by conspirators, sending and causing to be sent to victims via private commercial carriers and other means worthless certificates of ownership and other documentation concerning their purchases of nonexistent gold ore or gold doré from mines owned or controlled by conspirators, receiving funds paid by victims who purchased nonexistent gold ore or gold doré from mines owned or controlled by conspirators, and disbursing and directing the disbursement of victim funds to accounts in the United States and worldwide in order to perpetuate the scheme and to enrich himself and his co-conspirators.

5. JON CRAIG NELSON, a citizen of the United States and a resident of Houston, Texas, together with others, facilitated the sale to victims of purported but in fact nonexistent gold ore or gold doré from mines owned or controlled by conspirators in Montana and Nevada. JON CRAIG NELSON directed and participated in this scheme by, among other things, forming corporate entities in the United States that appeared to be in the business of mining, processing, and selling gold ore and gold doré from mines owned or controlled by conspirators, producing and causing the production of false and fraudulent documentation and information to create the illusion that the corporate entities were mining and processing gold ore and gold doré to be sold, receiving funds paid by victims who purchased nonexistent gold ore or gold doré from mines owned or controlled by

conspirators, and disbursing and directing the disbursement of victim funds to accounts in the United States and worldwide in order to perpetuate the scheme and to enrich himself and his co-conspirators.

6. MICHAEL SKILLERN, a citizen of the United States and a resident of Houston, Texas, together with others, facilitated the sale to victims of purported but in fact nonexistent gold ore or gold doré from mines owned or controlled by conspirators in Montana and Nevada. MICHAEL SKILLERN participated in this scheme by, among other things, producing and causing the production of false and fraudulent documentation and information to create the illusion that the corporate entities were mining and processing gold ore and gold doré to be sold and receiving funds paid by victims who purchased nonexistent gold ore or gold doré from mines owned or controlled by conspirators.

7. ADRIANA MARIA CAMARGO, a/k/a Adriana Palomino, a citizen of the United States and a resident of Spain, together with others, facilitated the sale to victims of purported but in fact nonexistent gold ore or gold doré from mines owned or controlled by conspirators in Montana and Nevada. ADRIANA MARIA CAMARGO, a/k/a Adriana Palomino, participated in this scheme by, among other things, directing and facilitating the sale to victims of nonexistent gold ore or gold doré from mines owned or controlled by conspirators by overseas boiler rooms, sending and causing to be sent to victims via private commercial carriers and other means worthless certificates of ownership and other documentation concerning their purchases of nonexistent gold ore or gold doré from mines owned or

controlled by conspirators, and receiving funds paid by victims who purchased nonexistent gold ore or gold doré from mines owned or controlled by conspirators.

C. The Entities

8. OWN GOLD LLC is a Texas limited liability company, which conspirators created and fraudulently promoted, through boiler rooms overseas, as a legitimate mining and gold ore processing company, but which never actively engaged in mining operations or gold ore processing and never had the ability to perform these functions. On or about October 7, 2011, JON CRAIG NELSON amended the name of J. Craig Nelson LLC to OWN GOLD LLC. On or about August 22, 2012, JON CRAIG NELSON filed a Texas Franchise Tax Public Information Report, which identified him as the President, Treasurer, and Assistant Secretary of the company.

9. OWN GOLD MONTANA INC is a Montana corporation. On or about September 6, 2012, JON CRAIG NELSON created OWN GOLD MONTANA INC and identified himself as the registered agent.

10. MONTANA GOLD AND SAPPHIRES INC is a Montana corporation, incorporated on April 9, 1974. The corporation was placed in inactive status on December 2, 2013.

11. SHUKR HOLDINGS LLC is a Florida limited liability company. On or about November 2, 2012, NAADIR CASSIM filed a 2012 Limited Liability Company Reinstatement form with the Florida Secretary of State identifying himself as the sole managing member of the company and the company's

principal place of business as Orlando, Florida. On or about March 22, 2013, NAADIR CASSIM filed a 2013 Limited Liability Company Annual Report with the Florida Secretary of State identifying himself as the "CEO" and President of the company. NAADIR CASSIM used this corporation to establish bank accounts by which he received funds paid by victims for nonexistent gold ore or gold doré from mines owned or controlled by conspirators, which victim funds he disbursed and caused to be disbursed to accounts in the United States and worldwide in order to perpetuate the scheme and to enrich himself and his co-conspirators.

12. SEXTO SENTIDO LLC is a Texas limited liability company controlled by MICHAEL SKILLERN. On or about April 30, 2012, MICHAEL SKILLERN filed the Certificate of Formation for SEXTO SENTIDO LLC with the Texas Secretary of State and identified himself as the registered agent. MICHAEL SKILLERN held his ownership interest in OWN GOLD LLC in SEXTO SENTIDO LLC.

The Conspiracy

13. Beginning on an unknown date, but at least as early as in or about August 2011, and continuing thereafter, through and including at least February 2014, in the Middle District of Florida and elsewhere,

NAADIR CASSIM,
JON CRAIG NELSON,
MICHAEL SKILLERN,
and
ADRIANA MARIA CARMARGO,
a/k/a Adriana Palomino,

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the defendants herein, knowingly and willfully did combine, conspire, confederate and agree, with one another and with others, both known and unknown to the Grand Jury, to commit certain offenses against the United States, specifically:

a. To devise and intend to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, utilizing the United States mail and private and commercial interstate carriers, in violation of Title 18, United States Code, Section 1341; and

b. To devise and intend to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, utilizing transmissions by means of wire and radio communication in interstate and foreign commerce of any writings, signs, signals, and sounds, in violation of Title 18, United States Code, Section 1343.

Manner and Means of the Conspiracy

14. It was a part of the conspiracy that conspirators would and did create limited liability companies and other corporate entities with the supposed purpose of mining gold ore and producing gold products, including gold doré.

It was further a part of the conspiracy that conspirators would and did solicit potential victims to buy gold ore or gold doré from mines owned or controlled by conspirators, when in fact, such gold ore or gold doré never existed, nor did the conspirators have the ability to mine or process gold ore from the mines they owned or controlled.

15. It was further a part of the conspiracy that conspirators would and did create and establish websites and author and disseminate press releases containing material misrepresentations and the omission of material information about the ability of the conspirators to mine and process gold ore, the active and on-going nature of the conspirators' businesses as gold miners and processors, the production history of gold ore by conspirators from mines owned or controlled by conspirators, the use of victims' funds for the mining and processing of gold ore, the source of gold delivered to purchasers by conspirators, the safety and security associated with the purchase of a gold ore or gold doré from the conspirators, and/or the likely monetary return on the purchase of gold ore or gold doré from the conspirators to fraudulently promote the sale of nonexistent gold ore or gold doré from mines owned or controlled by conspirators to victims both within and outside the United States.

16. It was further a part of the conspiracy that conspirators would and did recruit, instruct, support, and pay telemarketers engaged in the business of placing unsolicited telephone calls to potential and existing victims outside the United States from boiler rooms.

17. It was further a part of the conspiracy that conspirators would and did cause such boiler room telemarketers to sell victims gold ore or gold doré from mines owned or controlled by conspirators, when in fact, such gold ore or gold doré never existed, nor did the conspirators have the ability to mine or process gold ore from the mines they owned or controlled.

18. It was further a part of the conspiracy that conspirators would and did cause the boiler room telemarketers to employ high-pressure and misleading sales techniques when promoting the nonexistent gold ore or gold doré from mines owned or controlled by conspirators to potential and existing victims, including, but not limited to, the making of material misrepresentations and the omission of material information about the ability of the conspirators to mine and process gold ore, the active and on-going nature of the conspirators' businesses as gold miners and processors, the production history of gold ore by conspirators from mines owned or controlled by conspirators, the use of victims' funds for the mining and processing of gold ore, the source of gold delivered to purchasers by conspirators, the safety and security associated with the purchase of gold ore or gold doré from the conspirators, and/or the likely monetary return on the purchase of gold ore or gold doré from the conspirators.

19. It was further a part of the conspiracy that conspirators would and did cause the boiler room telemarketers to indicate to victims that they could purchase gold ore or gold doré from mines owned or controlled by conspirators for a ten to twenty percent discount from the market price, when in fact, such gold ore or gold doré never existed, nor did the conspirators have the ability to mine or process gold ore from the mines they owned or controlled.

20. It was further a part of the conspiracy that conspirators would and did instruct victims and cause the boiler room telemarketers to instruct victims to send payment for nonexistent gold ore or gold doré from mines owned or controlled by conspirators to various accounts opened in the names of the limited liability companies established by conspirators.

21. It was further a part of the conspiracy that conspirators would and did cause victims outside the United States to wire their funds to accounts at financial institutions, located in the Middle District of Florida and elsewhere, to purchase nonexistent gold ore or gold doré from mines owned or controlled by conspirators.

22. It was further a part of the conspiracy that conspirators would and did establish bank accounts inside the United States in order to cause financial institutions to form correspondent accounts in the United Kingdom. Thereafter, conspirators would and did provide victims and cause the boiler room telemarketers to provide victims with correspondent accounts information in order to deceive victims in the United Kingdom regarding the nature of OWN GOLD LLC's presence in the United Kingdom.

23. It was further a part of the conspiracy that conspirators would and did send to victims, via private commercial carriers and other means, worthless certificates of ownership and other documentation purportedly evidencing the victims' purchase of nonexistent gold ore or gold doré from mines owned or controlled by conspirators.

24. It was a further part of the conspiracy that conspirators would and did send, and cause to be sent, via wire transfer, victims' funds to accounts owned and/or controlled by the boiler room telemarketers at financial institutions overseas in order to perpetuate the fraud scheme.

25. It was a further part of the conspiracy that conspirators would and did send, and cause to be sent, via wire transfer, victims' funds to the accounts of conspirators and/or entities controlled by conspirators for conspirators' personal enrichment.

26. It was further a part of the conspiracy that conspirators would and did deliver a small amount of gold doré, none of which was mined from the mines owned or controlled by conspirators, and/or provide refunds to a small number of victims for the purpose of prolonging the viability of the scheme by satisfying a small number of victims in order to defraud additional victims in the future.

27. It was a further a part of the conspiracy that the conspirators would and did conceal, misrepresent, and hide, and cause to be concealed, misrepresented, and hidden, the purpose of acts performed in furtherance of the conspiracy.

Overt Acts

28. In furtherance of the conspiracy and to effectuate the objects thereof, the following overt acts, among others, were committed within the Middle District of Florida, and elsewhere:

a. On or about August 8, 2011, JON CRAIG NELSON opened and caused to be opened the JP Morgan Chase Bank account of J. CRAIG NELSON LLC DBA OWN GOLD (account ending in 9973).

b. On or about September 8, 2011, NAADIR CASSIM and JON CRAIG NELSON entered into a "Sales Agency Agreement," which indicated that OWN GOLD LLC was a "gold producer" and that SHUKR HOLDINGS LLC was its "sales agent." According to the Agreement, as "sales agent," SHUKR HOLDINGS LLC was responsible for the sale of OWN GOLD LLC products and the employment of the boiler room telemarketers needed to complete that task. As compensation for its work, SHUKR HOLDINGS LLC was to receive a 72.5 percent commission of the total gross sales it made for OWN GOLD LLC.

c. On or about September 19, 2011, JON CRAIG NELSON and MICHAEL SKILLERN paid and caused to be paid a lawyer, via a check for \$800.00 from the JP Morgan Chase Bank account of J. CRAIG NELSON LLC DBA OWN GOLD (account ending in 9973), for an opinion on the legality of selling gold ore or gold doré without a license by the U.S. Securities and Exchange Commission or the U.S. Commodity Futures Trading Commission.

d. On or about September 27, 2011, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, a/k/a/ Adriana Palomino, caused victim E.R. in the United Kingdom to wire \$7,191.00 US to the JP Morgan Chase Bank account of J. CRAIG NELSON LLC DBA OWN GOLD (account ending in 9973).

e. On or about September 27, 2011, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, a/k/a/ Adriana Palomino, sent and caused to be sent, via private commercial carrier, to victim E.R. in the United Kingdom a Certificate of Ownership from OWN GOLD LLC purportedly evidencing victim E.R.'s purchase of 5 ounces of gold ore or gold doré from mines owned or controlled by conspirators.

f. On or about October 7, 2011, JON CRAIG NELSON amended the name of his Texas limited liability company, formerly Nelson Network LLC, to OWN GOLD LLC.

g. On or about October 7, 2011, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO a/k/a Adriana Palomino, caused victim M.S. in the United Kingdom to wire \$73,154.75 to the JP Morgan Chase Bank account of OWN GOLD LLC (account ending 0260).

h. On or about October 12, 2011, JON CRAIG NELSON opened and caused to be opened the Comerica Bank account of OWN GOLD LLC.

i. On or about October 26, 2011, JON CRAIG NELSON opened and caused to be opened the JP Morgan Chase Bank account of OWN GOLD LLC (account ending in 0260).

j. On or about December 7, 2011, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO,

a/k/a/ Adriana Palomino, caused victim A.F. in the United Kingdom to wire \$155,664.00 US to the JP Morgan Chase Bank account of OWN GOLD LLC (account ending in 0260).

k. On or about December 16, 2011, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, a/k/a/ Adriana Palomino, sent and caused to be sent, via private commercial carrier, to victim A.F. in the United Kingdom a Certificate of Ownership from OWN GOLD LLC purportedly evidencing victim A.F.'s purchase of 115 ounces of gold ore or gold doré from mines owned or controlled by conspirators.

l. On or about December 17, 2011, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO a/k/a/ Adriana Palomino, sent and caused to be sent, via private commercial carrier, to victim M.S. in the United Kingdom a Certificate of Ownership from OWN GOLD LLC purportedly evidencing victim M.S.'s purchase of 56 ounces of gold ore or gold doré from mines owned or controlled by conspirators.

m. On or about March 23, 2012, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, a/k/a/ Adriana Palomino, caused victim P & F Safepac Company Ltd. in the United Kingdom to wire \$402,560.00 US to the JP Morgan Chase Bank account of OWN GOLD LLC (account ending in 0260).

n. On or about March 30, 2012, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, a/k/a/ Adriana Palomino, sent and caused to be sent, via private commercial carrier, to P & F Safepac Company Ltd. in the United Kingdom a Certificate of Ownership from OWN GOLD LLC purportedly evidencing victim P & F Safepac Company Ltd.'s

purchase of 300 ounces of gold ore or gold doré from mines owned or controlled by conspirators.

o. On or about April 17, 2012, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, *a/k/a/* Adriana Palomino, caused victim P & F Safepac Company Ltd. in the United Kingdom to wire \$81,181.00 US to the JP Morgan Chase Bank account of OWN GOLD LLC (account ending in 0260).

p. On or about April 22, 2012, JON CRAIG NELSON recorded and caused to be recorded nine mining claims covering 1,440 acres in Lincoln County, Nevada, with the U.S. Bureau of Land Management at a cost of \$3,588.50.

q. Beginning in or about June 2012, and continuing until on or about August 20, 2012, JON CRAIG NELSON purchased the debt of MONTANA GOLD AND SAPPHIRES INC for a sum of \$171,607.02 as part of a joint venture between OWN GOLD LLC and MONTANA GOLD AND SAPPHIRES INC to operate a purported mining operation.

r. On or about August 14, 2012, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, *a/k/a/* Adriana Palomino, caused victim D.M. in the United Kingdom to wire £6,533.73 to the Barclays Bank account of U.K. OWN GOLD LTD.

s. On or about September 1, 2012, JON CRAIG NELSON and MICHAEL SKILLERN submitted and caused to be submitted to the U.S. Bureau of Land Management an affidavit regarding the nine mining claims in Nevada held by conspirators, seeking a waiver of \$10,080.00 of annual fees due to the U.S.

Bureau of Land Management, on the ground that less than \$1,200.00 had been spent to develop and work the claims.

t. On or about September 6, 2012, JON CRAIG NELSON formed and caused to be formed the Montana corporation OWN GOLD MONTANA INC.

u. On or about September 18, 2012, JON CRAIG NELSON opened and caused to be opened the Fifth Third Bank account of OWN GOLD LLC.

v. On or about September 26, 2012, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, a/k/a/ Adriana Palomino, sent and caused to be sent, via private commercial carrier, to victim D.M. in the United Kingdom a Certificate of Ownership from OWN GOLD LLC purportedly evidencing victim D.M.'s purchase of 7 ounces of gold ore or gold doré from mines owned or controlled by conspirators.

w. In or about October 2012, NAADIR CASSIM, JON CRAIG NELSON, and MICHAEL SKILLERN made available and caused to be made available a website, located at www.owngold.us, which contained material false and fraudulent misrepresentations and omissions of material facts regarding the nature of OWN GOLD LLC, including the ability of the conspirators to mine and process gold ore, the active and on-going nature of the conspirators' businesses as gold miners and processors, the production history of gold ore by conspirators from mines owned or controlled by conspirators, the use of victims' funds for the mining and processing of gold ore, the source of gold delivered to purchasers by conspirators, the safety and security associated with the purchase of gold ore or

gold doré from the conspirators, and/or the likely monetary return on the purchase of gold ore or gold doré from the conspirators.

x. On or about October 2, 2012, JON CRAIG NELSON wrote a check to "cash" in the amount of \$4,500.00 from the Comerica Bank account of OWN GOLD LLC, and in the memo field he wrote "initial gold for delivery."

y. From on or about October 5, 2012, through and including on or about October 10, 2012, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, a/k/a/ Adriana Palomino, caused victim D.M. in the United Kingdom to wire £7,834.80 to the Metro Bank account of U.K. OWN GOLD LTD.

z. On or about October 8, 2012, NAADIR CASSIM and JON CRAIG NELSON delivered five ounces of gold to victim E.R. in the United Kingdom.

aa. On or about October 9, 2012, NAADIR CASSIM, JON CRAIG NELSON, and ADRIANA MARIA CAMARGO met and discussed OWN GOLD LLC in London, England, United Kingdom.

bb. On or about October 12, 2012, NAADIR CASSIM, JON CRAIG NELSON, and MICHAEL SKILLERN wrote and caused to be written a press release regarding the delivery of gold to victim E.R. The press release falsely stated, "The Company is also pleased to announce that ore remains readily available at its claim and mine sites for customers to retrieve at their pleasure and pursuant to contract, or, as with Mr. [E.R.], the Company is poised to fulfill its obligation to process ore and deliver refined product to its customers." The press release went on to say "The Company's properties are in Nevada and Montana USA with retrievable reserves estimated in the billions of dollars. The Company

has been actively mining for approximately six months and has aggressive plans to expand its operations and accelerate gold, precious metal, and gem production and Company profitability.”

cc. On or about October 31, 2012, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, a/k/a/ Adriana Palomino, caused victim D.M. in the United Kingdom to wire £3,434.80 to the Citibank account of OWN GOLD PLC.

dd. On or about November 2, 2012, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, a/k/a/ Adriana Palomino, sent and caused to be sent, via email, a message to victims setting forth “a special offer,” that is, that if a victim agreed to allow OWN GOLD LLC an additional six months or a year “to extend the delivery date” of the purchased gold doré from mines owned or controlled by conspirators, OWN GOLD LLC would deliver an additional 10% or 15% of gold, respectively, to the victim.

ee. On or about December 21, 2012, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, a/k/a/ Adriana Palomino, sent and caused to be sent, via private commercial carrier, to victim D.M. in the United Kingdom a Certificate of Ownership from OWN GOLD LLC purportedly evidencing victim D.M.’s purchase of 8 ounces of gold ore or gold doré from mines owned or controlled by conspirators.

ff. On or about February 5, 2013, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, a/k/a/ Adriana Palomino, caused victim J.P. in the Middle District of Florida to write a check for \$10,495.80, which was deposited into the Fifth Third Bank account of OWN GOLD LLC.

gg. On or about February 12, 2013, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, a/k/a/ Adriana Palomino, caused victim R.S. in the Middle District of Florida to write a check for \$4,460.00, which was deposited into the Fifth Third Bank account of OWN GOLD LLC.

hh. On or about February 28, 2013, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, a/k/a/ Adriana Palomino, caused victim J.E. in the Middle District of Florida to write a check for \$20,247.00, which was deposited into the Fifth Third Bank account of OWN GOLD LLC.

ii. On or about May 3, 2013, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, a/k/a/ Adriana Palomino, caused victims N.Z and R.Z. in the Middle District of Florida to write a check for \$11,214.90, which was deposited into the Fifth Third Bank account of OWN GOLD LLC.

jj. On or about May 5, 2013, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, a/k/a/ Adriana Palomino, caused victim R.S. in the Middle District of Florida to write a check for \$3,807.00, which was deposited into the Fifth Third Bank account of OWN GOLD LLC.

kk. On or about May 15, 2013, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, a/k/a/ Adriana Palomino, caused victim J.P. in the Middle District of Florida to write a check for \$8,475.78, which was deposited into the Fifth Third Bank account of OWN GOLD LLC.

ll. On or about May 17, 2013, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, *a/k/a/* Adriana Palomino, sent and caused to be sent, via private commercial carrier, to victim J.E. in the Middle District of Florida a Certificate of Ownership from OWN GOLD LLC purportedly evidencing victim J.E.'s purchase of 15 ounces of gold ore or gold doré from mines owned or controlled by conspirators.

mm. On or about June 4, 2013, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, *a/k/a/* Adriana Palomino, sent and caused to be sent, via private commercial carrier, to victim R.S. in the Middle District of Florida a Certificate of Ownership from OWN GOLD LLC purportedly evidencing victim R.S.'s purchase of 3 ounces of gold ore or gold doré from mines owned or controlled by conspirators.

nn. On or about June 4, 2013, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, *a/k/a/* Adriana Palomino, sent and caused to be sent, via private commercial carrier, to victims N.Z. and R.Z. in the Middle District of Florida a Certificate of Ownership from OWN GOLD LLC purportedly evidencing victims N.Z. and R.Z.'s purchase of 9 ounces of gold ore or gold doré from mines owned or controlled by conspirators.

oo. On or about June 21, 2013, NAADIR CASSIM, JON CRAIG NELSON, MICHAEL SKILLERN, and ADRIANA MARIA CAMARGO, *a/k/a/* Adriana Palomino, sent and caused to be sent, via private commercial carrier, to victim J.P. in the Middle District of Florida a Certificate of Ownership from OWN GOLD LLC purportedly evidencing victim J.P.'s purchase of 7 ounces of gold ore or gold doré from mines owned or controlled by conspirators.

pp. On or about August 28, 2013, JON CRAIG NELSON and MICHAEL SKILLERN submitted and caused to be submitted to the U.S. Bureau of Land Management an affidavit regarding the nine mining claims in Nevada held by conspirators, seeking a waiver of \$10,080.00 of annual fees due to the U.S. Bureau of Land Management, on the ground that less than \$5,800.00 had been spent to develop and work the claims.

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

COUNT TWO
(Money Laundering Conspiracy)

Introduction

1. The Grand Jury hereby realleges Paragraphs 1 through 12 of Count One of this Indictment and incorporates such paragraphs by this reference as though fully set forth herein.

The Conspiracy

2. Beginning on an unknown date, but at least as early as in or about August 2011, and continuing thereafter, through and including at least February 2014, in the Middle District of Florida, and elsewhere,

NAADIR CASSIM,
JON CRAIG NELSON,
MICHAEL SKILLERN,
and
ADRIANA MARIA CARMARGO,
a/k/a Adriana Palomino

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the defendants herein, did knowingly and willfully combine, conspire, confederate and agree with one another and with others, both known and unknown to the Grand Jury, to commit certain offenses against the United States, specifically, to transport, transmit, and transfer, and to attempt to transport, transmit, and transfer,

funds from a place in the United States to and through a place outside the United States, and to a place in the United States from and through a place outside the United States, with the intent to promote the carrying on of a specified unlawful activity, that is, mail fraud (18 U.S.C. § 1341) and wire fraud (18 U.S.C. § 1343), in violation of Title 18, United States Code, Section 1956(a)(2)(A).

Manner and Means of Money Laundering Conspiracy

The manner and means by which the conspirators sought to accomplish the objects of the conspiracy included, among others, the following:

3. The Grand Jury hereby realleges Paragraphs 14 through 28 of Count One of this Indictment and incorporates such paragraphs by this reference as though fully set forth herein.

4. It was further a part of the conspiracy that conspirators would and did cause bank accounts to be opened inside and outside of the United States.

5. It was further a part of the conspiracy that conspirators would and did transfer and transmit funds from accounts in the United States to accounts inside and outside the United States via wire transmissions.

6. It was further a part of the conspiracy that conspirators would and did transfer and transmit funds from accounts outside the United States to accounts inside and outside the United States via wire transmissions.

Overt Acts

7. In furtherance of the conspiracy and to effectuate the objects thereof, the following overt acts, among others, were committed within the Middle District of Florida, and elsewhere:

a. On or about March 22, 2012, NAADIR CASSIM caused \$61,080.08 to be wired from the Seaside National Bank & Trust account of SHUKR

HOLDINGS LLC in Orlando, Florida, to an account in the name Chelsemore Management in Cyprus.

b. On or about March 28, 2012, JON CRAIG NELSON and MICHAEL SKILLERN caused \$201,230.00 to be wired from the JP Morgan Chase Bank account of OWN GOLD LLC (account ending in 0260), in Houston, Texas, to an account in the name Alpine Holdings Corporation in St. Vincent and the Grenadines.

c. On or about July 23, 2012, NAADIR CASSIM caused \$9,250.00 to be wired from the Seaside National Bank & Trust account of SHUKR HOLDINGS LLC in Orlando, Florida, to an account in the name Adriana Camargo in Spain.

d. On or about November 21, 2012, NAADIR CASSIM caused \$116,689.00 to be wired from the Seaside National Bank & Trust account of SHUKR HOLDINGS LLC in Orlando, Florida, to an account in the name Chelsemore Management in Cyprus.

e. On or about March 4, 2013, NAADIR CASSIM caused \$40,000.00 to be wired from the Seaside National Bank & Trust account of SHUKR HOLDINGS LLC in Orlando, Florida, to an account in the name Adriana Palomino in Andorra.

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS THREE THROUGH SIX
(Mail Fraud)

Introduction

1. The Grand Jury hereby realleges Paragraphs 1 through 12 of Count One of this Indictment and incorporates such paragraphs by this reference as though fully set forth herein.

The Scheme

2. Beginning on an unknown date, but at least as early as in or about August 2011, and continuing thereafter, through and including at least February 2014, in the Middle District of Florida, and elsewhere,

NAADIR CASSIM,
JON CRAIG NELSON,
MICHAEL SKILLERN,
and
ADRIANA MARIA CARMARGO,
a/k/a Adriana Palomino,

Handwritten initials: JAC and ACE

the defendants herein, did knowingly and willfully devise and intend 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, and to use the mails and private and commercial interstate carriers in furtherance of this scheme and artifice to defraud.

Manner and Means of the Scheme

3. The substance of the manner and means of the scheme and artifice to defraud is described in Paragraphs 14 through 28 of Count One of this

Indictment, and the Grand Jury hereby realleges and incorporates by reference those paragraphs as though fully set forth herein.

Execution of the Scheme

4. On or about the dates set forth below in each count, in the Middle District of Florida and elsewhere, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud, the defendants did knowingly place and cause to be placed in an authorized depository for mail matter, and deposited and caused to be deposited with a private or commercial interstate carrier, the described matter and things, for delivery according to the directions thereon:

COUNT	DATE	NATURE OF MAILING
THREE	December 17, 2011	Mailing of Certificate of Ownership from OWN GOLD LLC from Orlando, Florida, via FedEx, to victim M.S. in the United Kingdom
FOUR	March 30, 2012	Mailing of Certificate of Ownership from OWN GOLD LLC from Orlando, Florida, via FedEx, to victim P & F Safepac Company Ltd. in the United Kingdom
FIVE	June 4, 2013	Mailing of Certificate of Ownership from OWN GOLD LLC from Orlando, Florida, via FedEx, to victim R.S. in Spring Hill, Florida
SIX	June 21, 2013	Mailing of Certificate of Ownership from OWN GOLD LLC from Orlando, Florida, via FedEx, to victim J.P. in Lutz, Florida

In violation of Title 18, United States Code, Sections 1341 and 2.

COUNTS SEVEN THROUGH TEN
(Wire Fraud)

Introduction

1. The Grand Jury hereby realleges Paragraphs 1 through 12 of Count One of this Indictment and incorporates such paragraphs by this reference as though fully set forth herein.

The Scheme

2. Beginning on an unknown date, but at least as early as in or about August 2011, and continuing thereafter, through and including at least February 2014, in the Middle District of Florida, and elsewhere,

NAADIR CASSIM,
JON CRAIG NELSON,
MICHAEL SKILLERN,
and
ADRIANA MARIA CARMARGO,
a/k/a Adriana Palomino,

the defendants herein, did knowingly and willfully devise and intend 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, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing said scheme and artifice to defraud.

Manner and Means of the Scheme

3. The substance of the manner and means of the scheme and artifice to defraud is described in Paragraphs 14 through 28 of Count One of this Indictment, and the Grand Jury hereby realleges and incorporates by reference those paragraphs as though fully set forth herein.

Execution of the Scheme

4. On or about the dates set forth below in each count, in the Middle District of Florida and elsewhere, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud, the defendants did cause to be transmitted by means of wire communication in interstate and foreign commerce the following:

COUNT	DATE	NATURE OF WIRE
SEVEN	March 29, 2012	Wire transfer of \$90,576.00 from the JP Morgan Chase Bank account of OWN GOLD LLC (account ending in 0260) in Houston, Texas, to the Seaside National Bank & Trust account of SHUKR HOLDINGS LLC in Orlando, Florida
EIGHT	April 20, 2012	Wire transfer of \$69,026.74 from the JP Morgan Chase Bank account of OWN GOLD LLC (account ending in 0260) in Houston, Texas, to the Seaside National Bank & Trust account of SHUKR HOLDINGS LLC in Orlando, Florida
NINE	April 26, 2013	Wire transfer of \$88,297.26 from the Comerica Bank account of OWN GOLD LLC in Houston, Texas, to the Seaside National Bank & Trust account of SHUKR HOLDINGS LLC in Orlando, Florida


COUNT	DATE	NATURE OF WIRE
TEN	May 8, 2013	Wire transfer of \$80,790.64 from the Comerica Bank account of OWN GOLD LLC in Houston, Texas, to the Seaside National Bank & Trust account of SHUKR HOLDINGS LLC in Orlando, Florida

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS ELEVEN THROUGH THIRTEEN
(Illegal Monetary Transactions)

1. The substance of the scheme to defraud and its manner and means are described in Paragraphs 1 through 12 and 14 through 28 of Count One of this Indictment. The Grand Jury hereby realleges those paragraphs and incorporates such paragraphs by this reference as though fully set forth herein.

2. On or about the dates set forth below, in the Middle District of Florida and elsewhere,

NAADIR CASSIM,
 JON CRAIG NELSON,
 MICHAEL SKILLERN,
 and
 ADRIANA MARIA CARMARGO, 
 a/k/a Adriana Palomino,

the defendants herein, did knowingly engage and attempt to engage in the described monetary transactions, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, that is, mail fraud, in violation of Title 18, United States Code, Section 1341, and wire fraud, in violation of Title 18, United States Code, Section 1343.

COUNT	DATE	MONETARY TRANSACTION
ELEVEN	July 31, 2012	Purchase of 419 shares of an exchange-traded fund for \$26,870.69 by NAADIR CASSIM through the Investors Capital Corporation account of SHUKR HOLDINGS LLC
TWELVE	August 9, 2012	Wire transfer of \$32,500.00 from the Seaside National Bank & Trust account of SHUKR HOLDINGS LLC in Orlando, Florida, to the PNC Bank account of New Line Motors for the purchase of a 2010 Lexus LX 350
THIRTEEN	November 2, 2012	Wire transfer of \$40,000.00 from the Seaside National Bank & Trust account of SHUKR HOLDINGS LLC in Orlando, Florida, to the Fairwinds Federal Credit Union account of J MacArthur LLC for the purchase of a 2% interest in the Orlando Predators arena football team

In violation of Title 18, United States Code, Sections 1957 and 2.

FORFEITURE

1. The allegations contained in Counts One through Thirteen of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c) as well as Title 18, United States Code, Section 982(a)(1).

2. From their engagement in the violations alleged in Count One, involving a conspiracy to commit mail fraud and wire fraud offenses, contrary to the provisions of Title 18, United States Code, Sections 1341 and 1343, in violation Title 18, United States Code, Section 371, and the violations alleged in Counts Three through Ten, involving substantive mail fraud and wire fraud offenses in

violation of Title 18, United States Code, Sections 1341 and 1343, the defendants shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), all of their right, title and interest in any property, real and personal, constituting or derived from proceeds traceable to such offenses.

3. From their engagement in the violations alleged in Count Two, involving a money laundering conspiracy contrary to the provisions of Title 18, United States Code, Section 1956(h), and Counts Eleven through Thirteen, involving substantive money laundering violations contrary to the provisions of Title 18, United States Code, Section 1957, the defendants shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any and all right, title, and interest they may have in any property, real or personal, involved in such offense, or any property traceable to such property.

4. The specific assets to be forfeited include, but are not limited to, the following:

a. A sum of money equal to the amount of proceeds the defendants obtained as a result of the conspiracy, for which the defendants are jointly and severally liable;

b. A 2010 Lexus LX 350, VIN 2T2BK1BA0AC026356, titled in the name Yousf Cassim, which was derived from proceeds of the violations; and

c. A two percent interest in the Orlando Predators Arena Football Team, in the name of Naadir Cassim, which was derived from proceeds of

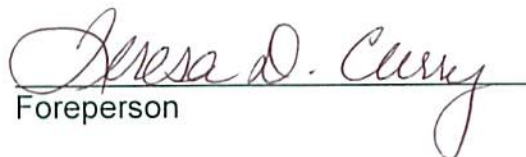
the violations.

5. If any of the property described above, as a result of any act or omission of the defendants:

- 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,


the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 982(b)(1).

A TRUE BILL,


Foreperson

A. LEE BENTLEY, III
United States Attorney

By:


Rachelle DesVaux Bedke
Assistant United States Attorney
Chief, Criminal Division (South)

By:


Sara C. Sweeney
Assistant United States Attorney

By:


Robert A. Mosakowski
Assistant United States Attorney
Chief, Economic Crimes Section

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

vs.

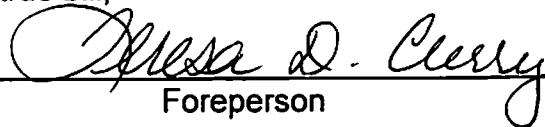
NAADIR CASSIM,
JON CRAIG NELSON,
MICHAEL SKILLERN, and
ADRIANA MARIA CAMARGO
a/k/a Adriana Palomino

INDICTMENT

Violations:

18 U.S.C. §§371, 1956(h), 1341, 1343 and 1957

A true bill,


Foreperson

Filed in open court this 18th day
of February, 2014.

Clerk

Bail \$ _____
