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**FILED**  
AUG 28 2019  
Clerk, U.S. District Court  
District Of Montana  
Missoula

**ATTORNEY FOR PLAINTIFF  
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BUTTE DIVISION**

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**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**CHRISTOPHER FULCO,**  
*aka Christian Anthony,*

**Defendant.**

CR 19- 21 -BU- DLC

**INDICTMENT**

**MAIL FRAUD**

(Counts 1-4)

Title 18 U.S.C. § 1341

(Penalty: 20 years imprisonment,  
\$250,000 fine, and three years supervised  
release)

**WIRE FRAUD**

(Counts 5-13)

Title 18 U.S.C. § 1343

(Penalty: 20 years imprisonment,  
\$250,000 fine, and three years supervised  
release)

**MONEY LAUNDERING**

(Counts 14-15)

Title 18 U.S.C. § 1957

(Penalty: Ten years imprisonment,  
\$250,000 fine, three years supervised  
release)

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	<b>SECURITIES FRAUD</b> <b>(Count 16)</b> <b>Title 15 U.S.C. §§ 78j(b) and 78ff</b> <b>Title 17 C.F.R. § 240.10b-5</b> <b>(Penalty: 20 years imprisonment,</b> <b>\$5,000,000 fine, three years supervised</b> <b>release)</b>
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THE GRAND JURY CHARGES:

COUNTS 1-13  
MAIL AND WIRE FRAUD

THE SCHEME TO DEFRAUD

Beginning in approximately February 2014, and continuing until approximately March 2019, at Bozeman, within Gallatin County, in the State and District of Montana, and elsewhere, including New York, the defendant, CHRISTOPHER FULCO, *aka Christian Anthony*, executed a material scheme and artifice to defraud, and for obtaining money by means of material false and fraudulent pretenses and representations, in that Fulco solicited funds from various investors, representing those funds would be used to purchase shares of stock and cover various associated costs and fees, but failed to purchase the stock and instead used the funds for personal expenses.

COUNTS 1-4  
USE OF THE MAIL

On or about the dates listed in the table below, at Bozeman, within Gallatin County, in the State and District of Montana, and elsewhere, the defendant,

CHRISTOPHER FULCO, *aka Christian Anthony*, for the purpose of executing the aforementioned material scheme and artifice to defraud, and for obtaining money by means of material false and fraudulent pretenses and representations, did knowingly cause to be delivered by mail any matter and thing, to wit, checks from John Doe (full name withheld to protect privacy) in Montana, in the amounts listed in the table below, to Fulco in New York, in violation of 18 U.S.C. § 1341.

Count	Date	Check Number	Mailed From	Mailed To	Amount
1	12/30/2017	3410	Montana	New York	\$20,000
2	1/19/2018	3414	Montana	New York	\$20,000
3	2/14/2018	5243	Montana	New York	\$64,000
4	3/30/2018	3415	Montana	New York	\$25,000

COUNTS 5-13  
INTERSTATE WIRES

On or about the dates in the table below, at Bozeman, within Gallatin County, in the State and District of Montana, and other places, the defendant, CHRISTOPHER FULCO, *aka Christian Anthony*, for the purpose of executing the aforementioned material scheme and artifice to defraud, and for obtaining money by means of material false and fraudulent pretenses and representations, did knowingly cause to be transmitted in interstate commerce wire communications, specifically transfers from a bank account belonging to John Doe (full name withheld to protect privacy) in Montana to Fulco's Citibank account in New York, in violation of 18 U.S.C. § 1343.

Count	Date	Transaction	Amount
5	4/11/2018	Wire transfer from John Doe's account to Fulco's account ending in 2176	\$17,500
6	4/23/18	Wire transfer from John Doe's account to Fulco's account ending in 2176	\$28,750
7	4/30/18	Wire transfer from John Doe's account to Fulco's account ending in 2176	\$7,550
8	5/4/2018	Wire transfer from John Doe's account to Fulco's account ending in 2176	\$3,000
9	5/11/2018	Wire transfer from John Doe's account to Fulco's account ending in 2176	\$11,325
10	6/26/2018	Wire transfer from John Doe's account to Fulco's account ending in 2176	\$56,000
11	7/17/2018	Wire transfer from John Doe's account to Fulco's account ending in 2176	\$26,275
12	7/25/2018	Wire transfer from John Doe's account to Fulco's account ending in 2176	\$20,000
13	8/2/2018	Wire transfer from John Doe's account to Fulco's account ending in 2176	\$45,000

COUNT 14  
MONEY LAUNDERING

On or about April 5, 2018, in the Eastern District of New York, the defendant, CHRISTOPHER FULCO, *aka Christian Anthony*, knowingly engaged in a monetary transaction by, through, or to a financial institution, with criminally derived property of a value greater than \$10,000, affecting interstate or foreign commerce, that is, he wired \$11,000 from his Citibank account, account number ending in 2176, such money having been derived from specified unlawful activity, that is mail fraud as described in count 4 above, in violation of 18 U.S.C. § 1957.

COUNT 15  
MONEY LAUNDERING

On or about June 27, 2018, in the Eastern District of New York, the defendant, CHRISTOPHER FULCO, *aka Christian Anthony*, knowingly engaged in a monetary transaction by, through, or to a financial institution, with criminally derived property of a value greater than \$10,000, affecting interstate or foreign commerce, that is, he withdrew \$13,000 from his Citibank account, account number ending in 2176, such money having been derived from specified unlawful activity, that is wire fraud as described in count 10 above, in violation of 18 U.S.C. § 1957.

COUNT 16  
SECURITIES FRAUD

Beginning in approximately February 2014, and continuing until approximately March 2019, at Bozeman, within Gallatin County, in the State and District of Montana, and elsewhere, including New York, the defendant, CHRISTOPHER FULCO, *aka Christian Anthony*, willfully and knowingly, directly and indirectly, by use of the means and instrumentalities of interstate commerce, and of the mails, used and employed, in connection with the purchase and sale of securities, manipulative and deceptive devices and contrivances, in violation of 17 C.F.R. § 240.10b-5, by: (a) employing devices, schemes, and artifices to defraud; (b) making untrue statements of material fact and omitting to

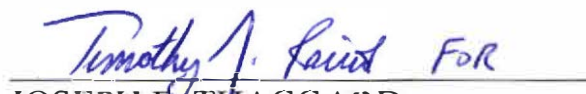
state material facts necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; and (c) engaging in acts, practices, and courses of business which operated and would operate as a fraud and deceit upon persons, to wit, FULCO engaged in a scheme to mislead various investors by representing their funds would be used to purchase shares of stock and cover various associated costs and fees, but failed to purchase the stock and instead used the funds for personal expenses, in violation of 15 U.S.C.

§§ 78j(b) and 78ff and 17 C.F.R. §§ 240.10b-5.

A TRUE BILL.

FOREPERSON

  
KURT G. ALME  
United States Attorney

 FOR  
JOSEPH E. THAGGARD  
Criminal Chief Assistant U.S. Attorney

WARRANT \_\_\_\_\_

BAIL \_\_\_\_\_

CRM/SUM: ✓ Sept 24 2102am / KLD