

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon.
 :
 v. : Criminal No. 17-
 :
 NARIS CHAMROONRAT : 18 U.S.C. § 371

INFORMATION

The defendant having waived in open court prosecution by Indictment, the Acting United States Attorney for the District of New Jersey charges:

Relevant Individuals and Entities

1. At all times relevant to this Information:
 - a. Defendant NARIS CHAMROONRAT was a citizen of the United States and Thailand. CHAMROONRAT owned and controlled Nonko Trading (“Nonko”), an online day-trading firm.
 - b. Co-conspirator #1 (“CC#1”) was responsible for, among other things, soliciting investors for Nonko. CC#1 also operated an online securities trading training program.
 - c. Co-conspirator #2 (“CC#2”) was responsible for soliciting investors for Nonko. CC#2 worked for CC#1 in connection with the securities trading training program.
 - d. Co-conspirator #3 (“CC#3”) was responsible for soliciting investors for Nonko. In addition, CC#3 performed marketing work for Nonko, including web design, online advertising and social media.

e. Company A was a provider of electronic trading software that maintained computer servers in or around Carteret, New Jersey. From in or about 2012 through in or about September 2014, Nonko provided its customers access to Company A's trading software.

f. Logix Software Company Limited ("Logix") was a Thailand-based provider of electronic trading software that CHAMROONRAT, CC#1 and CC#2 launched in or around September 2014.

The Conspiracy

2. From at least as early as in or about December 2013 through in or about June 2015, in the District of New Jersey and elsewhere, defendant

NARIS CHAMROONRAT

knowingly and willfully conspired and agreed with others to commit an offense against the United States, to wit: securities fraud, contrary to Title 15, United States Code, Sections 78j(b) and 78ff, and Title 17, Code of Federal Regulations, Section 240.10b-5.

Object of the Conspiracy

3. It was a part and object of the conspiracy that CHAMROONRAT and others, directly and indirectly, by the use of means and instrumentalities of interstate commerce, and of the mails, and of facilities of national securities exchanges, would and did use and employ, in connection with the purchase and sale of securities, manipulative and deceptive devices and contrivances in contravention of Title 17, Code of Federal Regulations, Section 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.

Overview of the Conspiracy

4. Between in or about December 2013 and in or about June 2015, CHAMROONRAT and his co-conspirators orchestrated a scheme to defraud hundreds of investors worldwide through his operation of Nonko Trading, a purported day trading firm. CHAMROONRAT and his co-conspirators solicited individual investors to open day-trading accounts with Nonko and to wire thousands of dollars to Nonko for the purpose of funding those accounts. But rather than using those deposits to fund securities brokerage accounts, CHAMROONRAT and his co-conspirators simply stole the victims' money. To cover up the theft, CHAMROONRAT provided the victims with online trading simulator, or "demo," accounts, and falsely represented to the investors that those accounts were real accounts to be used for trading securities. Through this scheme, CHAMROONRAT and his co-conspirators misappropriated at least \$1.4 million from over 260 investors residing in over 30 countries worldwide. The victims of the scheme included at least 180 investors from the United States, including individuals in New Jersey.