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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
 :  
 v. : Mag. No. 17-5015 (TJB)  
 :  
 SCOTT NEWSHOLME :

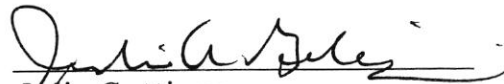
I, Julie Gettings, the undersigned complainant being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

  
Julie Gettings  
Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
September 5, 2017  
Trenton, New Jersey

  
HONORABLE TONIANNE J. BONGIOVANNI  
UNITED STATES MAGISTRATE JUDGE

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SEP 5 - 2017

AT 8:30 \_\_\_\_\_ M  
WILLIAM T. WALSH  
CLERK

**ATTACHMENT A**

Count One  
(Mail Fraud)

On or about April 13, 2016, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

SCOTT NEWSHOLME,

having knowingly and intentionally devised and intended to devise a scheme and artifice to defraud investment clients (the "Victims") to obtain money and property from the Victims by means of materially false and fraudulent pretenses, representations, and promises, and for purposes of executing and attempting to execute this scheme, did cause to be sent and delivered by a private and commercial interstate carrier, and did cause to be delivered by such carrier according to the direction thereon, a check transmitted to Victim 5 via the United States Postal Service, in the amount of approximately \$89,442.77.

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

Count Two  
(Wire Fraud)

On or about July 14, 2014, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

SCOTT NEWSHOLME,

having knowingly and intentionally devised and intended to devise a scheme and artifice to defraud the Victims to obtain money and property from the Victims by means of materially false and fraudulent pretenses, representations, and promises, and for purposes of executing and attempting to execute this scheme, did cause to be transmitted, by means of wire communication in interstate and foreign commerce, writings, signs, signals, and pictures, namely, a wire transfer to Victim 1 in the amount of approximately \$600.00.

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

Count Three  
(Securities Fraud)

From in or about July 2007 to in or about December 2016, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

SCOTT NEWSHOLME,

knowingly and willfully used and employed, 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, namely, that defendant NEWSHOLME, among other things, received investment funds from the Victims and, rather than invest the funds in securities on the Victims' behalf, as he had represented to them, misappropriated the funds for his own personal use and to further his fraudulent scheme.

In violation of Title 15, United States Code, Sections 78j(b) and 78ff, Title 17, Code of Federal Regulations, Section 240.10b-5, and Title 18, United States Code, Section 2.