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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON BENJAMIN SCHARF,

Defendant.

CR No. 18-18CR00711-GW
I N F O R M A T I O N
[18 U.S.C. § 1349: Conspiracy to
Commit Wire Fraud]

The United States of America charges:

COUNT ONE

[18 U.S.C. § 1349]

Beginning at least in or about February 2013 through at least in or about December 2015, within the Central District of California, and elsewhere, defendant JASON BENJAMIN SCHARF did knowingly and willfully combine, conspire, confederate, and agree with others to commit wire fraud, that is, knowingly and with the intent to defraud, having devised and intending to devise, and willfully participated in, a scheme and artifice to defraud binary options investors in Cititrader and Citrades, and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, and the concealment of material facts, knowingly

1 transmit and cause to be transmitted by means of wire communication
2 in interstate and foreign commerce, writings, signs, pictures, and
3 sounds for the purpose of executing the scheme and artifice in
4 violation of Title 18, United States Code, Section 1343.

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6 SANDRA MOSER
Acting Chief, Fraud Section
Criminal Division
7 U.S. Department of Justice

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11 ANKUSH Khardori
Trial Attorney