

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA,**

**v.**

**AHMAD HARIS TAJYAR,**

**Defendant.**

**Case No. 24-cr-**

**VIOLATION:**

**18 U.S.C. § 1349**

**(Conspiracy to Commit Wire Fraud)**

**FORFEITURE**

**18 U.S.C. § 981(a)(1)(C)**

**28 U.S.C. § 2461(c)**

**21 U.S.C. § 853(p)**

**INFORMATION**

The United States charges that:

**Background**

At times relevant to this Information:

1. The defendant, AHMAD HARIS TAJYAR, was a resident of California, and he served as the Managing Partner and sole owner of Bright Light Marketing Inc. d/b/a Investor Relations Partners. Investor Relations Partners was an investor relations and corporate communications firm founded by TAJYAR in and around 2015.

2. On June 4, 2009, the Securities and Exchange Commission (“SEC”) filed a civil action against TAJYAR, alleging that in connection with an insider trading scheme TAJYAR realized illegal trading profits of about \$924,000. *SEC v. Tajyar*, 09-CV-3988 (C.D. Cal.). TAJYAR settled the case, and the court permanently enjoined TAJYAR from, among other things “employ[ing] any device, scheme, or artifice to defraud” or “mak[ing] any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in

the light of the circumstances under which they were made, not misleading” “in connection with the purchase or sale of any security[.]”

3. On or about March 30, 2010, TAJYAR was indicted on two counts of conspiracy to commit securities fraud and thirteen counts of securities fraud in connection with two insider trading conspiracies. *See United States v. Tajyar*, Case 10-CR-313 (C.D. Cal.). TAJYAR pleaded guilty to two counts of conspiracy to commit securities fraud and received a 40-month sentence of imprisonment on or about November 30, 2012.

4. Minerco, Inc. (“Minerco”) traded publicly under the stock symbol MINE in the Over-the-Counter-Markets (“OTC”) as a penny stock. Minerco was promoted as being in the business of developing and distributing psilocybin mushrooms, also known as magic mushrooms or psychedelic mushrooms.

5. BOBBY SHUMAKE JAPHIA, also known as Robert Samuel Shumake Jr., Robert Japhia, and Shaman Bobby Shu, (“SHUMAKE”) controlled all aspects of Minerco from in or around October 2019 until at least in or around June 2021.

6. At some point while doing work for Minerco, TAJYAR became aware that SHUMAKE had misdemeanor convictions related to a mortgage fraud scheme. TAJYAR also knew that there were multiple negative news articles about SHUMAKE on the internet, such as a March 18, 2018 article titled: “Judge calls businessman Robert Shumake ‘a criminal’” and an article from December 28, 2018 titled: “\$252K taken at airport is latest scandal for Southfield businessman” that stated: “Robert Shumake, a Southfield businessman, is embroiled in a federal forfeiture case in Charlotte, North Carolina.”

7. JULIUS JENGE served as the publicly identified CEO of Minerco from in or around October 2019 until at least in or around June 2021. SHUMAKE asked JENGE to be the CEO of Minerco.

**COUNT ONE**  
**Conspiracy to Commit Wire Fraud**  
**(18 U.S.C. § 1349)**

8. Paragraphs 1 through 7 of this Information are realleged and incorporated by reference as though fully set forth herein.

9. From at least in or around November 2019 through in or around June 2021, TAJYAR did knowingly and intentionally, that is, with the intent to advance the conspiracy, combine, conspire, and agree with SHUMAKE, JENGE, and other individuals, known and unknown, to commit: wire fraud, that is, to knowingly, and with the intent to defraud, having devised and intending to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing such pretenses, representations, and promises were false and fraudulent when made, transmit and cause to be transmitted, by means of wire communications in interstate commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1349.

**Purpose of the Conspiracy**

10. It was the purpose of the conspiracy for TAJYAR, and his co-conspirators, including SHUMAKE and JENGE, to artificially and fraudulently increase and maintain the share price of, and demand for, Minerco stock to unjustly enrich themselves and to conceal the scheme by: (a) issuing and causing to be issued materially false and misleading statements to the public relating to Minerco; (b) concealing material facts from the investing public; and (c) concealing the scheme from regulators, law enforcement, and the investing public.

Manner and Means of the Conspiracy

11. The manner and means by which TAJYAR, and his co-conspirators, known and unknown, sought to accomplish the object of the conspiracy included, among other things, the following:

a. It was a part of the conspiracy that TAJYAR, SHUMAKE, and JENGE issued and caused to be issued press releases about Minerco, at least some of which contained materially false and misleading information in an effort to make Minerco appear as a legitimate company and increase the share price of Minerco stock.

b. It was further a part of the conspiracy that TAJYAR, SHUMAKE, and JENGE concealed SHUMAKE's involvement with Minerco to the public given SHUMAKE's past criminal fraud convictions and multiple negative news stories about SHUMAKE.

c. It was further a part of the conspiracy that TAJYAR and SHUMAKE concealed TAJYAR's work for Minerco given TAJYAR's past criminal conviction and regulatory history.

**(Conspiracy to Commit Wire Fraud, in violation 18 U.S.C. § 1349)**

**FORFEITURE ALLEGATIONS**

12. The allegations contained in paragraphs 1-11 of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

13. Upon conviction of Count One of this Information, the defendant, AHMAD HARIS TAJYAR, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the offense alleged in Count One, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c). The

property to be forfeited includes, but is not limited to, the following:

a. A money judgment in the amount of \$28,250.00.

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

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

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 pursuant to Title 21, United States Code, Section 853(p).

**(Criminal Forfeiture, pursuant to Title 18, United States Code, Section 981(a)(1)(C); Title 28, United States Code, Section 2461(c); and Title 21, United States Code, Section 853(p))**

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