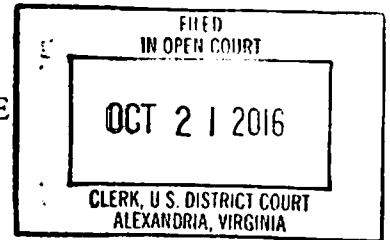


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division



UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 1:15-CR-178-2-AJT
)	
MICHAEL J. RANGLES,)	Count 1: Money Laundering Conspiracy
)	(18 U.S.C. § 371)
Defendant.)	

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

1. Beginning on a date unknown to the United States, but from at least in or about 2008 through in or about June 2015, the Defendant, MICHAEL J. RANGLES, conspired with others to commit an offense against the United States, specifically international transaction money laundering in violation of 18 U.S.C. 1956(a)(2)(B)(i); that is, the Defendant and others did knowingly and willfully conspire to transport, transmit and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States and to a place in the United States from and through a place outside the United States knowing that the monetary instrument or funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activities.

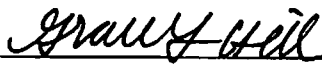
2. As part of this conspiracy, in or about February 2013, the Defendant and others knowingly and willfully conspired to wire transfer \$250,000 from Bank Rietumu in Latvia to City National Bank in the United States, knowing that these funds represented the proceeds of securities fraud, and knowing that such transfer, which was fraudulently represented to Bank

Rietumu to constitute payment of attorney's fees, was designed in whole or in part to conceal and disguise the source, ownership and control of the proceeds of the securities fraud.

3. One of RANGLES' co-conspirators committed an overt act in the Eastern District of Virginia to effect the object of the conspiracy; that is, in or around November 2008, Roger G. Coleman opened an account with a brokerage firm by mailing an application to the firm's address at Merrifield, Virginia, within the Eastern District of Virginia. Shares of Bryn Resources, Inc., were deposited into this brokerage account and proceeds from the sale of those shares were ultimately transferred from this brokerage account to an account at HSBC Bank in Panama controlled by RANGLES and his co-conspirators.

(In violation of Title 18, United States Code, Section 371.)

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