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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA

BY _____

UNDER SEAL

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

September 2016 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT MARK SEIBERT,
aka "John Grey,"

Defendant.

No. SA CR 17-

SACR17-00105-JLS

I N D I C T M E N T

[18 U.S.C. § 1341: Mail Fraud;
18 U.S.C. § 1343: Wire Fraud;
18 U.S.C. § 2(a): Aiding and
Abetting; 18 U.S.C. § 2(b):
Causing an Act to Be Done]

The Grand Jury charges:

COUNTS ONE THROUGH FOURTEEN

[18 U.S.C. §§ 1341, 2(a), (b)]

A. INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

1. Defendant ROBERT MARK SEIBERT, also known as "John Grey" ("SEIBERT"), individually and through Universal Stock Transfer, National Discount Marketers, and New Global Promotions, Inc., offered to sell stock in various companies.

1 B. THE SCHEME TO DEFRAUD

2 2. Beginning in or around 2013, and continuing to the
3 present, in Orange and Riverside Counties, within the Central
4 District of California, and elsewhere, defendant SEIBERT and
5 others known and unknown to the Grand Jury, knowingly and with
6 the intent to defraud, devised, participated in, and executed a
7 scheme to defraud investors as to material matters and to obtain
8 money from investors, by means of materially false and
9 fraudulent pretenses, representations, and promises, and the
10 concealment of material facts.
11

12 3. The fraudulent scheme was designed to operate, and did
13 operate, as follows:

14 a. Through false and fraudulent statements and
15 written materials, defendant SEIBERT and others, doing business
16 as Universal Stock Transfer, National Discount Marketers, and
17 New Global Productions, Inc., offered to sell stock to victims
18 in companies such as Intertech Solutions, Radio Shack, New
19 Global Energy, SnackHealthy, Inc., Uranium Energy Group, and
20 Organovo Holdings.
21

22 4. To execute the aforementioned scheme, defendant
23 SEIBERT, together with others known and unknown to the Grand
24 Jury, knowingly engaged in fraudulent and deceptive acts,
25 practices and devices, and caused false and deceptive statements
26 to be communicated to, and material information to be concealed
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1 and omitted from, victims, including, without limitation, the
2 following false statements:

3 a. That defendant SEIBERT, through Universal Stock
4 Transfer, National Discount Marketers, and New Global
5 Productions, Inc., had stock in other companies for sale, often
6 at a discount from the current market price for the stock;
7

8 b. That money sent by victims would be used to
9 purchase shares of stock from defendant SEIBERT, through
10 Universal Stock Transfer, National Discount Marketers, and New
11 Global Productions, Inc.;

12 c. That upon receipt of the purchase price, defendant
13 SEIBERT, through Universal Stock Transfer, National Discount
14 Marketers, and New Global Productions, Inc., would issue to
15 victims a certificate evidencing their ownership of the
16 purchased shares of stock; and
17

18 d. That defendant SEIBERT, through Universal Stock
19 Transfer, National Discount Marketers, and New Global
20 Productions, Inc., would return money to victims if they did not
21 earn a profit on the stock they purchased within thirty days.
22

23 5. At the time defendant SEIBERT made and caused these
24 statements to be made to victims, such statements were false,
25 and defendant SEIBERT knew they were false, in that:

26 a. Defendant SEIBERT, through Universal Stock
27 Transfer, National Discount Marketers, and New Global
28

1 Productions, Inc., did not own, hold, or control any stock in
2 other companies for sale;

3 b. Money sent by victims was not used to purchase
4 stock;

5 c. Victims did not receive a certificate of
6 ownership of stock, or any shares of stock; and

7 d. Victims did not receive their money back after
8 thirty days, or any time thereafter despite never receiving the
9 promised shares of stock.
10

11 6. By devising, executing, and participating in the above
12 scheme, defendant SEIBERT induced at least 90 victims to send
13 more than \$1 million to defendant SEIBERT.

14 C. USE OF THE MAILS

15 7. On or about the following dates, in Orange County,
16 within the Central District of California, and elsewhere, for
17 the purpose of executing and attempting to execute the above-
18 described scheme to defraud, defendant SEIBERT willfully caused
19 the following items to be placed, and aided and abetted the
20 placing of the following items, in an authorized depository for
21 mail matter to be sent and delivered by the United States Postal
22 Service, or by commercial interstate carrier, according to the
23 directions thereon:
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| <u>COUNT</u> | <u>DATE</u> | <u>ITEM MAILED</u> |
|--------------|-------------|---|
| 1 ONE | 3/4/13 | Check no. 4119 in the amount of \$8,000 from victim C.G. to Universal Stock Transfer |
| 2 TWO | 4/24/13 | A cashier's check in the amount of \$15,000 from victim G.C. to Universal Stock Transfer |
| 3 THREE | 10/29/13 | Check no. 7362 in the amount of \$12,000 from victim C.S. to Universal Stock Transfer |
| 4 FOUR | 5/1/14 | Check no. 5618 in the amount of \$7,500 from victim G.C. to Universal Stock Transfer |
| 5 FIVE | 8/28/14 | Check no. 5645 in the amount of \$5,000 from victim G.C. to Universal Stock Transfer |
| 6 SIX | 11/9/14 | Check no. 9911 in the amount of \$25,000 from victim A.K. to Universal Stock Transfer |
| 7 SEVEN | 11/2/15 | Check no. 1104 in the amount of \$5,000 from victim J.L. to National Discount Marketers |
| 8 EIGHT | 12/3/15 | Check no. 1109 in the amount of \$2,000 from victim J.L. to National Discount Marketers |
| 9 NINE | 4/14/16 | Check no. 10299 in the amount of \$1,250 from victim H.C. to National Discount Marketers |
| 10 TEN | 7/29/16 | A cashier's check in the amount of \$10,000 from victim R.J. to National Discount Marketers |
| 11 ELEVEN | 11/5/16 | Check no. 7499 in the amount of \$5,000 from victim S.P. to National Discount Marketers |
| 12 TWELVE | 11/23/16 | Check no. 7378 in the amount of \$4,000 from victim S.P. to National Discount Marketers |
| 13 THIRTEEN | 4/11/17 | Check no. 2965 in the amount of \$20,500 from victim J.M. to New Global Promotions, Inc. |

| 1 | <u>COUNT</u> | <u>DATE</u> | <u>ITEM MAILED</u> |
|----|--------------|-------------|--|
| 2 | FOURTEEN | 5/25/17 | Check no. 8245 in the amount of \$2,100 |
| 3 | | | from victim L.D. to New Global Promotions, |
| 4 | | | Inc. |
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COUNTS FIFTEEN AND SIXTEEN

[18 U.S.C. §§ 1343, 2(a)]

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3 8. The Grand Jury repeats, realleges, and incorporates
4 paragraphs 1 through 6 of this Indictment as though fully set
5 forth herein in their entirety.

6 C. USE OF INTERSTATE WIRE COMMUNICATIONS

7 9. On or about the dates set forth below, in Riverside
8 County, within the Central District of California, and
9 elsewhere, defendant SEIBERT, together with others known and
10 unknown to the Grand Jury, for the purpose of executing and
11 attempting to execute the above-described scheme to defraud,
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