

FILED

MAR -4 2019

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT

for the

Northern District of California

**SEALED
BY COURT ORDER**

United States of America)
v.)
Eastern Metal Securities and Rodger Nils-Jonas Karlsson, a/k/a)
"Steve Heyden", "Euclid Diodorus", "Joshua Millard", Lars)
Georgsson", "Krister Joelsson", "Paramon Larasoft", and "Kent)
Westerberg",)

Case No.

3 19 70335

JCS

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of from at least 2013 up to and including the present, in the county of San Francisco in the Northern District of California, the defendant(s) violated:

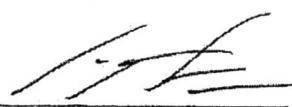
<i>Code Section</i>	<i>Offense Description</i>
15 U.S.C. §§ 78j(b) and 78ff	Securities Fraud;
17 C.F.R. § 240.10b-5	
18 U.S.C. § 1343;	Wire Fraud; and
18 U.S.C. § 1956(a)(1)(B)(i)	Laundering of Monetary Instruments

This criminal complaint is based on these facts:

Please see attached affidavit of IRS Special Agent Jeremiah Haynie.

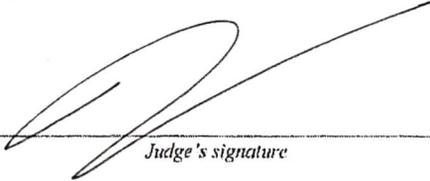
Sworn to before me telephonically.

Continued on the attached sheet.

Approved as to form 
Assistant United States Attorney William Frentzen


Complainant's signature
Special Agent Jeremiah Haynie
Printed name and title

Date: 3/4/2019


Judge's signature
Hon. Joseph C. Spero, U.S. Chief Magistrate Judge
Printed name and title

City and state: San Francisco, CA

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Jeremiah Haynie, being duly sworn, state:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a criminal complaint against EASTERN METAL SECURITIES, and its owner ROGER NILS-JONAS KARLSSON, also known as “Steve Heyden,” “Euclid Diodorus,” “Joshua Millard,” “Lars Georgsson,” “Krister Joelsson,” “Paramon Larasoft,” and “Kenth Westerberg” (hereafter, “KARLSSON”).

2. I am a Special Agent with the Criminal Investigation Division of the Internal Revenue Service (“IRS-CI”) and have been so employed since February 2002. My professional duties include conducting investigations of violations of internal revenue laws and related statutes. I hold a bachelor’s degree in business administration from Alma College. I have been trained at the Federal Law Enforcement Training Center in the laws of search and seizure, and in the use of search warrants. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. I have been the affiant for numerous federal search and seizure warrants that involved varied criminal conduct including alleged tax violations, money laundering, unlicensed money transmitting business violations, wire fraud, access device fraud, and mail fraud.