

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION**

UNITED STATES OF AMERICA

INFORMATION

v.

CASE NO. 3:16cr1/MCR

TRENTON S. SOMMERVILLE
_____ /

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

A. THE CHARGE

Between on or about January 1, 2011, and on or about December 31, 2014,
in the Northern District of Florida and elsewhere, the defendant,

TRENTON S. SOMMERVILLE,

did knowingly and willfully devise, and intend to devise, a scheme to defraud and
for obtaining money and property by means of material false and fraudulent
pretenses, representations, and promises, and for the purpose of executing this
scheme, did cause wire communications to be transmitted in interstate commerce,
to wit, on or about November 30, 2012, a monetary transfer via check from First
Capital Partners Inc. to the Internal Revenue Service in the amount of \$100,000.

B. SCHEME TO DEFRAUD

It was part of the scheme to defraud that:

FILED IN OPEN COURT THIS

1/21/16
**CLERK, U.S. DISTRICT
COURT, NORTH DIST. FLA**

1. Defendant **TRENTON S. SOMMERVILLE** procured funds from investors in the following entities or ventures over which he controlled and had signatory authority (collectively “investment funds”):

- a. Concordis Group Inc. (“Concordis”), which Defendant **TRENTON S. SOMMERVILLE** represented to be a captive insurance company whose shares were publicly traded over-the-counter;
- b. Aleato Gaming Inc. (“Aleato”), which Defendant **TRENTON S. SOMMERVILLE** represented to be offering the purchase of limited partnerships in slot machines located in the Caribbean;
- c. Four Kings Gaming Inc. and Four Kings Club Ltd., doing business as King of Clubs (“Four Kings”), which Defendant **TRENTON S. SOMMERVILLE** represented to be building a gambling club (or casino) in Trinidad; and
- d. Playmaster Inc. and Playmaster N.V. (“Playmaster”), which Defendant **TRENTON S. SOMMERVILLE** represented to be operating a lottery in St. Maarten.

2. Defendant **TRENTON S. SOMMERVILLE** did business using the entities First Capital Partners Inc. (“FCP”) and “IGE,” over which he controlled and had signatory authority.

3. At the direction of Defendant **TRENTON S. SOMMERVILLE**, investors used interstate wire communications to send funds to bank accounts in Destin, Florida, controlled by Defendant **TRENTON S. SOMMERVILLE** held in the names of Aleato, Concordis, FCP, or IGE. On occasion, investors sent Defendant **TRENTON S. SOMMERVILLE** funds in the form of checks, which were deposited into those accounts.

4. Defendant **TRENTON S. SOMMERVILLE** comingled investment funds from various ventures, and he failed to maintain an accurate accounting of how much had been invested or spent for each venture.

5. Defendant **TRENTON S. SOMMERVILLE** did not advise investors, and concealed from investors, that he would take a salary and pay for certain personal expenses with the investment funds. Defendant **TRENTON S. SOMMERVILLE** falsely assured some investors 100 percent of their funds would be used for the entity or venture in which they were investing.

6. Defendant **TRENTON S. SOMMERVILLE** embezzled investment funds without investors' knowledge or consent by, among other things:

- a. making personal expenditures directly from corporate accounts which held investment funds;
- b. transferring investment funds from corporate accounts to his personal account;

- c. withdrawing investment funds in the form of cash from corporate accounts and depositing the cash into his personal accounts;
- d. providing investment funds through corporate checks to a family member who was not employed or involved in any of the business ventures, for the family member's personal benefit; and
- e. using investment funds from investors to pay other investors who asked for a refund of their investments.

7. Between on or about January 1, 2011, and on or about December 31, 2014, Defendant **TRENTON S. SOMMERVILLE** embezzled at least \$745,037 from at least 10 investors.

8. Using interstate wire communications, Defendant **TRENTON S. SOMMERVILLE** converted the embezzled investment funds to his own use, and the use of others not entitled to the funds, by paying for, among other things:

- a. his personal federal income tax debts owed to the Internal Revenue Service ("IRS");
- b. a \$30,000 fine issued by the State of South Carolina to Defendant **TRENTON S. SOMMERVILLE** and FCP for securities violations;

- c. repayments for a personal loan;
- d. homeowners association fees, property taxes, and luxury furniture for his residence in Destin, Florida;
- e. a family member's personal credit card payments and fertility treatments;
- f. a nanny, maid, landscaper, and pool services;
- g. membership to the Legendary Yacht Club and the Destin Health and Fitness Club; and
- h. the purchase of Tacos Y'all LLC, a taco stand in Destin, Florida.

In violation of Title 18, United States Code, Section 1343.

COUNT TWO

Between on or about June 1, 2007, and on or about May 7, 2012, in the Northern District of Florida and elsewhere, the defendant,

TRENTON S. SOMMERVILLE,

a resident of Okaloosa County, Florida, did willfully attempt to evade and defeat the payment of a tax due and owing by him to the United States of America in the amount of approximately \$549,789.56 for the tax years 2004 through 2010, by failing to pay said tax to the Internal Revenue Service, by failing to file tax returns with the Internal Revenue Service for the tax years 2007 through 2010, by

concealing and attempting to conceal from the Internal Revenue Service the nature, source, and extent of his income and assets, and by other means.

In violation of Title 26, United States Code, Section 7201.

CRIMINAL FORFEITURE

The allegations in Count One of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. From the defendant's engagement in the violation alleged in Count One of this Information, the defendant,

TRENTON S. SOMMERVILLE,

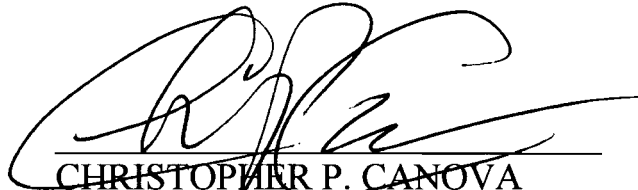
shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all of the defendant's right, title, and interest in any property, real and personal, constituting, and derived from, proceeds traceable to such offense.

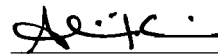
If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred or sold to, or deposited with, a third person;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or

v. has been commingled with other property that cannot be
divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code,
Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c),
to seek forfeiture of any other property of said defendant up to the value of the
forfeitable property.



CHRISTOPHER P. CANOVA
Acting United States Attorney

ALICIA H. KIM
Assistant United States Attorney

1/21/16

DATE