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CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRADFORD L. HUEBNER, aka Brad and Bradley
RUDOLPH M. COENEN, aka Rudy
CHARLES N. EMMENECKER, aka Charlie
MICHAEL L. TEADT, aka Mike

Defendants.

INDICTMENT

3:12 CR 443
Cr. No.

Title 18, United States Code,
Sections 1001(a)(2), 1343,
1349, and 1957;
Title 31, United States Code,
Sections 5313, 5322(b),
and 5324(a)(3).

JUDGE ZOUHARY

MAG. JUDGE JAMES R. KNEPP II

The Grand Jury charges:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. BRADFORD L. HUEBNER is a resident of Ottawa Hills, Ohio who has engaged in a number of businesses. BRADFORD HUEBNER has installed himself as the Chairman of the Board of "Energy Saver Advisors, LLC," d/b/a "BH Group" and d/b/a "Commercial Energy Products" (collectively referred to as "the BH Group").
2. The "BH Group" was formed by BRADFORD HUEBNER to market and sell the Iraqi official currency, the "dinar," to individuals as an investment. The BH Group offices are located

ORIGINAL

at 17 N. St. Clair Street in Toledo, Ohio. In December 2010, BRADFORD HUEBNER filed paperwork registering the BH Group as a money service business specializing in the sale of Iraqi dinar.

3. CHARLES N. EMMENECKER is a self-styled entrepreneur who resides in Sylvania, Ohio. In recent years, CHARLES EMMENECKER has primarily marketed and sold a health-related beverage described as "Xango." In August 2010, CHARLES EMMENECKER merged his direct-marketing business with BRADFORD HUEBNER's dinar business, which BRADFORD HUEBNER and MICHAEL TEADT were operating. By this time, BRADFORD HUEBNER had allied himself with a Jacksonville, Florida based resident by the name of RUDOLPH COENEN, in connection with marketing two non-existent "hedge funds" to both the BH Group's dinar customers, as well as CHARLES EMMENECKER's Xango distribution list.

4. MICHAEL L. TEADT is a resident of Maumee, Ohio and has involved himself in various businesses in the Toledo area. MICHAEL TEADT eventually assumed the job title of "Director of Business Development" for BH Group and regularly worked out of the St. Clair Street offices of the BH Group. MICHAEL TEADT entered into a conspiracy with BRADFORD HUEBNER regarding the sale of Iraqi dinar currency in July 2010.

5. RUDOLPH M. COENEN is a resident of Jacksonville, Florida and holds himself out as a currency expert and former Vice President at JP Morgan Chase. RUDOLPH COENEN has variously claimed to be a former Marine who was wounded in combat during the first Gulf War, as well as a Purple Heart recipient. In fact, RUDOLPH COENEN worked for JP Morgan Chase for a total of one day as an Account Executive/Loan Officer and not as a Vice President, never served in the first Gulf War, was never wounded in combat, and never received a Purple Heart. RUDOLPH COENEN was instrumental in developing materially false and misleading

statements regarding the Iraqi dinar currency and in falsifying information regarding the two non-existent hedge funds.

6. The Iraqi dinar currency is the official currency of the State of Iraq. As of the date of this Indictment, the dinar traded at a rate of 1,170 dinar to \$1.00 USD.

7. The term “revaluation” (casually shortened to “RV” in dinar-sales parlance), refers to the contention that at some point in the near future, the dinar will rise against the U.S. dollar, a circumstance which will enrich earlier purchasers of the dinar. BRADFORD HUEBNER, CHARLES EMMENECKER, RUDOLPH COENEN and MICHAEL TEADT repeatedly advanced claims to potential investors over the telephone, through web pages, and through a weekly internet conference call that even relatively small investors in the dinar would, following the “revaluation” or “RV,” become wealthy overnight.

8. A “redenomination” of the dinar refers to an actual proposal by the Central Bank of Iraq, announced as recently as June 21, 2011, to re-print the currency to remove three zeroes from the physical dinar banknotes as a matter of convenience. A redenomination of the Iraqi currency would not lead to a revaluation by the same amount, and may have no effect on the currency’s value. Under a redenomination, a new currency replaces an old currency, but the value remains the same. Under the proposed redenomination, the Iraqi government would issue a new dinar note that will be equivalent to 1000 current dinars. The exchange rate would be 1.17 new dinars to the dollar, equivalent to 1,170 current dinars to the dollar.

9. A “hedge fund” is an investment vehicle similar to a “mutual fund” in that investor money is pooled and the fund managers invest those funds in financial instruments in an effort to achieve a positive return. Many hedge funds seek to profit in all kinds of markets by pursuing leveraging and other speculative investment practices that may increase the risk of investment loss. Beginning in December 2010, BRADFORD HUEBNER, CHARLES EMMENECKER,

RUDOLPH COENEN and MICHAEL TEADT began marketing two non-existent hedge funds to investors and members of the BH Group. The non-existent hedge funds were presented as being run by BRADFORD HUEBNER and RUDOLPH COENEN. Hedge fund “seats” or “placements” in the non-existent hedge funds were sold to investors for \$750.00 each.

10. BH Group was formed by BRADFORD HUEBNER with the purpose to market and sell Iraqi dinar currency, two non-existent hedge funds, and Xango health-related products. In order to add an air of legitimacy to its operations, the BH Group maintained plush offices overlooking Toledo’s minor league baseball stadium in downtown Toledo, Ohio. The BH Group maintained a website (www.thebhgroup.org) to market and sell the dinar, two non-existent hedge funds, and Xango health-related products.

11. Bayshore Capital Investments, LLC (a/k/a CDI Financial) (a/k/a Coenen Diversified Investments, Inc.) was formed by RUDOLPH COENEN with the purpose to deceive investors as to the development and operation of two non-existent hedge funds being promoted and marketed by BH Group. In fact, such hedge funds were never formed and funds collected from the sale of “seats” or “placements” in the non-existent hedge funds were collected illegally by BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT.

12. The ability of prospective investors to apply for “seats” or “placements” on the non-existent hedge funds was predicated upon being a member of the BH Group and required the individual investor to have purchased a substantial quantity of dinar directly from BRADFORD HUEBNER.

13. BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT often discussed during the weekly telephone conference calls with potential investors, an “Overseas Investment Protection Act” which they alleged to be administered by the United States Department of the Treasury in order to protect investors and reimburse citizens

concerning investments in the Iraqi stock market and Iraqi dinar. In fact, no “Overseas Investment Protection Act” or similar Act exists.

14. BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT often discussed during weekly telephone conference calls with potential investors, Executive Order 13303 which they alleged to protect the right of U.S. citizens who invest in Iraqi dinar currency. In fact, Executive Order 13303 protects assets of the Development Fund of Iraq (DFI) and other Iraqi assets from legal attachments or liens. The Coalition Provisional Authority created the DFI in 2003 in order to promote the transparent use of Iraqi funds for purposes benefiting the people of Iraq. Any assertion that Executive Order 13303 promotes, protects, or regulates the sale of, or investment in, Iraqi dinar is false.

15. BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT often discussed during weekly telephone conference calls with potential investors, the U.S. Department of the Treasury holding the Iraqi dinar, further alleging the Department of the Treasury held trillions of Iraqi dinar for investment purposes. In fact, the U.S. Department of the Treasury does not hold any Iraqi dinar for investment purposes and holds only a nominal amount for use in daily operations.

16. BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT often discussed during weekly telephone conference calls with potential investors, the U.S. Department of the Treasury’s involvement in the future exchange of Iraqi dinar to U.S. dollars for U.S. citizens and alleged that the Department of the Treasury would facilitate the exchange of dinar for U.S. citizens. In fact, the U.S. Department of the Treasury is not involved in any aspect of dinar exchange nor is it planned for the Department of the Treasury to be involved in redeeming or exchanging dinar following a redenomination, should a redenomination occur.

COUNT 1
CONSPIRACY TO COMMIT WIRE FRAUD
(18 U.S.C. § 1349)

Paragraphs 1 to 16 of the General Allegations are incorporated by reference herein.

Beginning on or about August 2010 and continuing through the date of this Indictment, in the Northern District of Ohio, Western Division and elsewhere, BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT, together with other conspirators, both known and unknown to the Grand Jury, knowingly combined, conspired, confederated and agreed together, and with each other, to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and to transmit and cause to be transmitted, by means of wire, radio and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purposes of executing such scheme and artifice and attempting to do so, in violation of Title 18, United States Code, Section 1343, all in violation of Title 18, United States Code, Section 1349.

PURPOSE AND OBJECT

It was the purpose and object of the conspiracy that BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT, and others known and unknown to the Grand Jury, would enrich themselves through the promotion and sale of the Iraqi dinar currency and of two non-existent hedge funds, by the dissemination of material falsehoods conveyed by interstate wire communications, including pages on the internet, through email, and via a weekly telephone conference call for investors in the Iraqi dinar and the non-existent hedge funds.

It was further the purpose and object of the conspiracy that BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT and others known and unknown to the Grand Jury, would aggressively market the Iraqi dinar and the non-existent

hedge funds, to the point where their customers numbered in the tens of thousands, both in the United States and in foreign countries, thereby greatly increasing gross revenues to over \$24 million U.S. dollars in less than a two-year period. In addition, the Iraqi dinar gross sales were materially enhanced by the merger of BRADFORD HUEBNER's dinar and hedge fund sales list with CHARLES EMMENECKER's Xango distribution list.

MANNER AND MEANS

The manner and means by which the conspiracy was advanced included the following:

BRADFORD HUEBNER, RUDOLPH COENEN, and CHARLES EMMENECKER conducted a weekly interstate conference call via telephone in which they discussed matters involving the current status of the Iraqi dinar, two non-existent hedge funds, and Xango health-related products, and made materially false and misleading representations to prospective investors and members of the BH Group. These conference calls were recorded live and were available to the public through BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT's website, www.thebhgroup.org, or by listening to a recording of the call via telephone.

BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT sold and offered to sell Iraqi currency, known as the dinar, by making material false statements and representations, including but not limited to the following:

- false claims made regarding U.S. Department of the Treasury dinar holdings
- false claims made regarding the U.S. Department of the Treasury's involvement and future involvement in the dinar and dinar exchange post "revaluation"
- false claims made regarding Executive Order 13303
- false claims made regarding RUDOLPH COENEN's military service
- false claims made regarding RUDOLPH COENEN's background/employment

- false claims made regarding the Overseas Investment Protection Act
- false claims made regarding Bayshore's Wall Street office
- false claims made regarding the formation of two hedge funds.

BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT presented with each investor's purchase of dinar, a "certificate of authenticity", claiming the dinar currency was "guaranteed to be 100% authentic and of non-criminal origin. The notes have been checked on a De La Rue counting and authentication machine." In fact, the machine referenced in this statement does not guarantee the authenticity of the dinar currency or its non-criminal origin, according to the De La Rue company. In fact, BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT knew the statement to be false.

BRADFORD HUEBNER, RUDOLPH COENEN, and CHARLES EMMENECKER, publicly advertised in interstate commerce that they were creating two Iraq and Middle East-related hedge funds, for which they offered "seats" or "placements" at the price of \$750.00 each. The hedge funds were never created, and in most cases, the \$750.00 was never returned to individual investors, because BRADFORD HUEBNER and RUDOLPH COENEN spent the proceeds, much of it on personal expenditures.

BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT operated the conspiracy through two businesses. BH Group is a registered money service business and was operated primarily to sell dinar, market BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT's non-existent hedge funds and promote and sell Xango health-related products. Bayshore Capital Investments, LLC was located at 3390 Kori Road, Suite 5, Jacksonville, Florida. Bayshore Capital Investments, LLC, was operated primarily to sell "seats" or "placements" in

BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT's non-existent hedge funds.

As a result of the false representations made by BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT, investors lost approximately \$23,788,485.71 from dinar sales and approximately \$722,415.00 resulting from the sale of non-existent hedge fund "seats" or "placements" through the BH Group.

ACTS IN FURTHERANCE OF THE CONSPIRACY

In order to effectuate the objects of the conspiracy, BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT engaged in the following overt acts, among others in the Northern District of Ohio, Western Division and elsewhere:

1. In or about December, 2009, BRADFORD HUEBNER began selling the Iraqi dinar to investors.
2. On or about September 20, 2010, in an email, BRADFORD HUEBNER and CHARLES EMMENECKER discussed the legitimacy of the business activities involving the dinar.
3. In or about September or October, 2010, CHARLES EMMENECKER began contributing to the investor teleconference calls, which regularly contained material misstatements regarding the Iraqi dinar, the non-existent hedge funds, and Xango health-related products promoted by the defendants.
4. On or about October 5, 2010 to on or about December 31, 2010, BRADFORD HUEBNER and MICHAEL TEADT made mutual misrepresentations to the Ohio Department of Job and Family Services (OJFS) by falsifying employment documents causing the improper payment of a significant amount of money (\$4,387.50) to enable the BH Group to defray employment expenses concerning MICHAEL TEADT's employment in dinar sales. In fact,

MICHAEL TEADT was ineligible for this OJFS program because he was employed by another employer during the same period. For the period February 1, 2010 to December 31, 2010, MICHAEL TEADT earned approximately \$89,701.62 from this employer. Both BRADFORD HUEBNER and MICHAEL TEADT knew this employment made MICHAEL TEADT ineligible for the OJFS program.

5. On or about October 8, 2010, MICHAEL TEADT deposited \$550.00 into PNC Bank account ending in 3387, and subsequently wrote check number 12495 payable to BRAD HUEBNER dated October 8, 2010, in the amount of \$770.00.

6. On December 2, 2010, BRADFORD HUEBNER deposited \$2,500.00 in currency at Bank of America in Temperance, Michigan at 4:45 pm. On the same date, MICHAEL TEADT received \$9,110.00 in currency from BRADFORD HUEBNER which represented currency received from dinar sales. MICHAEL TEADT deposited the \$9,110.00 in currency into his personal bank at PNC Bank in Toledo, Ohio at 4:38 pm. On or about December 2, 2010, MICHAEL TEADT then wrote check #12518, payable to BRADFORD HUEBNER, through his business Energy Saver Advisors account in the amount of \$9,100.00 in an attempt to evade the filing of a Currency Transaction Report (CTR) and conceal the nature of the income.

7. On December 10, 2010, BRADFORD HUEBNER deposited \$6,360.00 in currency at Bank of America in Temperance, Michigan at 5:38 pm. On the same date, MICHAEL TEADT received \$9,530.00 in currency from BRADFORD HUEBNER which represented currency received from dinar sales. MICHAEL TEADT deposited the \$9,530.00 in currency into his personal bank at PNC Bank in Toledo, Ohio at 5:32 pm. On or about December 10, 2010, MICHAEL TEADT then wrote check #12519, payable to BRADFORD HUEBNER, through his business Energy Saver Advisors account in the amount of \$9,430.00 in an attempt to evade the filing of a Currency Transaction Report (CTR) and conceal the nature of the income.

8. On December 13, 2010, BRADFORD HUEBNER deposited \$7,940.00 in currency at Bank of America in Temperance, Michigan at 12:00 pm. BRADFORD HUEBNER then made an additional deposit on December 13, 2010 of \$5,970.00 in currency at Bank of America in Temperance, Michigan at 5:04 pm. On the same date, MICHAEL TEADT received \$8,940.00 in currency from BRADFORD HUEBNER which represented currency received from dinar sales. MICHAEL TEADT deposited the \$8,940.00 in currency into his personal bank at PNC Bank in Toledo, Ohio at 4:43 pm. On or about December 13, 2010, MICHAEL TEADT then wrote check #12530, payable to BRADFORD HUEBNER through his business Energy Saver Advisors in the amount of \$8,930.00 in an attempt to evade the filing of a Currency Transaction Report (CTR) and conceal the nature of the income.

9. On or about January 19, 2011, BRADFORD HUEBNER registered Energy Saver Advisors, LLC, d/b/a BH Group, as a registered Money Service Business with the Financial Crimes Enforcement Network (FinCEN) by filing FinCEN Form 107 (Registration of a Money Service Business) with the classification as a “currency dealer or exchanger”. BRADFORD HUEBNER registered as a money service business for the sole purpose of misusing the registration. BRADFORD HUEBNER misrepresented what the registration actually meant and failed to follow most of the legal requirements as required for money service businesses.

10. On May 7, 2011, BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER and MICHAEL TEADT conducted a presentation referred to as the “Hedge Fund – 101 Road Show” in Toledo, Ohio. During the presentation, BRADFORD HUEBNER and RUDOLPH COENEN repeatedly made materially false and misleading statements regarding the Iraqi dinar and two non-existent hedge funds.

11. On May 20, 2011, RUDOLPH COENEN withdrew \$25,000.00 in currency from the Bayshore Capital Investments, LLC bank account held at Wells Fargo Bank. Also on May 20,

2011, RUDOLPH COENEN traveled to Orlando, Florida and purchased a 2008 Hyundai Santa Fe for \$18,785.00 for which he paid in currency.

12. During the course of the conspiracy, BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT made numerous knowingly false and misleading statements about the United States Department of the Treasury's purchase of and ownership of Iraqi dinar currency which BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT knew to be false. False and misleading statements made by BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT on this subject include, but are not limited to, the following:

a. On or about April 25, 2011, during a conference call, BRADFORD HUEBNER stated, "Now when you basically start counting up the trillions of dollars that the U.S. Government will make in the next decade selling Iraqi oil to other countries, the money that it will make on the appreciation of all the dinars they will buy from us, the appreciation on the 3.7 trillion dinars they own, and all the tax money they'll receive when we cash in our dinars, I say to you, what deficit."

b. On or about April 25, 2011, during a conference call, RUDOLPH COENEN stated, "You know, guys, when – you know, we're [referring to the United States government] holding about 3.7 trillion dinars. We're the first to hold that much. We own the Iraqi dinar; Iraq doesn't own it. And I want everybody to realize this, the country doesn't own it. We printed it, we enforced it, we distributed it, we got it throughout the banking system, we handed it to their sites. We own that currency and – and don't get me wrong, we owned – we put in at least 2 trillion dollars into that country. We own that country. We are the ones who enhanced policy."

c. On or about May 23, 2011, during a conference call, RUDOLPH COENEN

stated, "And we know that the dollar is a formidable tradable currency in the market, but we know that the dollar has been trying to hedge itself against every other currency, and I think if we're [referring to the United States government] holding that 3.7 to 4 trillion dinars in our reserve or reserve account that it would be in the best interest that the dollar be hedged against the Iraqi currency and the Iraqi currency hedged against the dollar."

d. On or about May 31, 2011, during a conference call, CHARLES EMMENECKER stated, "...and the fact we [referring to the United States government] hold in our treasury 3 to 5 trillion dinar."

e. On or about May 31, 2011, during a conference call, BRADFORD HUEBNER stated, "Yeah, and keeping the dinar through the treasury so that they can gain any appreciation, they [referring to the United States government] can use that. Let's say there's a trillion dollars between the investors here to go along with their 3.7 trillion. That gives them a lot of dinar to make them issue electronic money for all of that, those dinar and then they could use that money to buy their oil and triple their money on the oil."

f. On or about June 6, 2011, during a conference call, RUDOLPH COENEN stated, "You know, it wasn't in the best interest for the plan to complete itself when George Bush was in commission because, you know, this Iraqi dinar, even though we're [referring to the United States government] holding 3.7 trillion doll - dinars in our foreign reserve account."

g. On or about June 13, 2011, during a conference call, BRADFORD HUEBNER stated, "And - and I - that's what gets me incensed when people ask me, well, do you think this is a scam and I - I come right back how about 5,500 of our service people, tens of thousands wounded, hundreds of billions of dollars and we [referring to the United States government] own 3.7 trillion dinar and our - our embassy is the largest embassy and they doubled the size of it in the Green Zone in Baghdad and our troops aren't going anywhere, so..."

h. On or about June 27, 2011, during a conference call, BRADFORD HUEBNER stated, "...if they're [referring to the United States government] tripling their money on the oil sales and they bought 3.7 trillion at pennies, just you know, a pittance, and then they get the other 1.3 trillion for digital money..."

i. On or about July 18, 2011, during a conference call, BRADFORD HUEBNER stated, "I mean when - when the oil doesn't really cost them that much and - and here the United States has 3.7 trillion dinars in their coffers and I - I still say and - and I know it will happen very soon the U.S. Treasury will make its move, you mark my words, to get the triple zero note into their coffers so that they can use those as petrol dollars and triple their money on oil sales around the world and take advantage of any further if reval - or a revaluation of the Iraqi dinar after the first flush."

j. On or about August 29, 2011, during a conference call, CHARLES EMMENECKER stated, "...that the US Treasury holds nearly 4 trillion in--in our treasury..."

k. Contained within the "Dinar 101" informational video, BRADFORD HUEBNER stated, "...with the US Government estimated to have 3.7 trillion in its coffers."

13. During the course of the conspiracy, BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT made numerous knowingly false and misleading statements regarding Executive Order 13303 and the order's relation to United States citizens' ownership of Iraqi dinar currency which BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT knew to be false. False and misleading statements made by BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT on this subject include, but are not limited to, the following:

a. On or about May 9, 2011, during a conference call, BRADFORD HUEBNER

stated, "Another rumor that has been flying around this week was that President Obama has rescinded George W. Bush's presidential order 13303 that allowed all Americans the right to purchase the Iraqi dinar and a variety of other assets related to Iraq. There is absolutely no truth to this juicy one either."

b. On or about August 1, 2011, during a conference call, BRADFORD HUEBNER stated, "Now regarding the dinar investment itself, first, I want all of you to know that your dinar investment is totally legal, it is protected by George W. Bush's Presidential Order 13303 and all I advise you to do is to keep it in a safe and secure place."

c. On or about August 29, 2011, during a conference call, BRADFORD HUEBNER stated, "They can use these dinars to buy petrol using the petrol dollars and pretty much triple their money there so why would they want to let them go right back to the Central Bank of Iraq to have those advantages when Americans and with the American government that under Presidential Order 13303 that gave us this opportunity in the first place and that's where you know I said that..."

14. During the course of the conspiracy, BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT made numerous knowingly false and misleading statements regarding RUDOLPH COENEN's military service which BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT knew to be false. False and misleading statements made by BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT on this subject include, but are not limited to, the following:

a. On or about April 11, 2011, during a conference call, CHARLES EMMENECKER stated, "Well, BRAD (referring to BRADFORD HUEBNER), let me - let's just give a little background here. I think that RUDY (referring to RUDOLPH COENEN) is more

qualified than I ever thought you - both you and I served in the Service, it was a long time ago and RUDY (referring to RUDOLPH COENEN) has - has a background of being in Iraq; he left part of his shoulder there.”

b. On May 7, 2011, during a presentation in Toledo, Ohio, BRADFORD HUEBNER stated, "...my partner, RUDY COENEN (referring to RUDOLPH COENEN)...RUDY (referring to RUDOLPH COENEN) is a very bright guy and has been in the industry for a long time. ...veteran of the first Gulf War, took a bullet over there for us. Shrapnel affected his liver and he ended up having a liver transplant.”

c. On or about June 27, 2011, during a conference call, RUDOLPH COENEN stated, "You know guys, I want to tell you something. You know, I was in Iraq in '91, '90, '91, and I suffered, all you know I suffered an injury and because of that I had to have a liver transplant and so this whole plan started way back, you know twenty years ago, but it's affected my life.”

d. On or about June 27, 2011, during a conference call, RUDOLPH COENEN stated, “The average American is not going to understand it, but those that are informed like us and us informing those people who need to know understand the sacrifice, that I myself and the other 150,000 soldiers that have been deployed in that theatre of operation have given of themselves.”

e. On or about June 27, 2011, during a conference call, CHARLES EMMENECKER stated, "And RUDY (referring to RUDOLPH COENEN) gave, he lost part of his shoulder. Anybody wants to verify that, I said RUDY (referring to RUDOLPH COENEN) how bad was it and he said, well a 50 caliber machine gun went through here. We saw it.”

f. On or about June 27, 2011, during a conference call, BRADFORD HUEBNER stated, “Hey CHARLIE (referring to CHARLES EMMENECKER), I appreciate it and I’m going

to make one last statement here and I'm glad RUDY's (referring to RUDOLPH COENEN) off the line and I think everybody can see how passionate he is. When someone attacks you from the shadows of the internet and has unfounded accusations I just want to tell you I shared a very private moment with RUDY (referring to RUDOLPH COENEN) about what really happened that one day in Iraq and RUDY (referring to RUDOLPH COENEN) was a Sergeant First Class leading an armored patrol unit. He took his vehicle up on a knoll, got out, his radio man was right behind him, there was another guy right behind him. RUDY (referring to RUDOLPH COENEN) had his binoculars up looking out over the horizon and he heard a crack and instinctively turned a bit and immediately a 50 caliber machine gun bullet ripped through his shoulder, went right on back and ripped into the face of his radio man and then lodged right in the heart or chest of the guy behind him killing both of those men. RUDY (referring to RUDOLPH COENEN) was laying there in Iraq bleeding to death. He was rushed to the nearest town where he was given a transfusion where he contacted Hep C that eventually led to the loss of his liver."

g. On or about June 27, 2011, during a conference call, RUDOLPH COENEN stated, "She's (his wife) been through a lot. She's been through a liver transplant with me. She's been through a couple of theaters of operation when I was in the Marine Corps. She's been in through the ins and outs of this economy with me and she's been with me."

h. On or about July 11, 2011, during a conference call, RUDOLPH COENEN stated, "...I was in the military for 12 years. I held high positions when I decided to leave the Marine Corps, and I have friends who have now escalated their positions and I speak to them all the time."

15. During the course of the conspiracy, BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT made numerous knowingly false and

misleading statements regarding RUDOLPH COENEN's education, training and prior employment which BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT knew to be false. False and misleading statements made by BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT on this subject include, but are not limited to, the following:

a. On or about February 28, 2011, during a conference call, BRADFORD HUEBNER stated, "...and our currency dinar specialist and good friend RUDY COENEN (referring to RUDOLPH COENEN), former VP of J.P. Morgan."

b. On or about March 7, 2011, during a conference call, CHARLES EMMENECKER stated: "...we try to put some ideas on the call and then we rely upon experts who have been there, done that, and not only has RUDY (referring to RUDOLPH COENEN) been to - to Iraq and back but he's also been there in the international world of currency and businesses and - and, RUDY (referring to RUDOLPH COENEN), you've got some wonderful things to talk about tonight."

c. On or about March 21, 2011, during a conference call, RUDOLPH COENEN stated, "You know, I've been a currency trader for many years and I even scratch my head and say, well, why haven't they pushed the button yet. I mean everything seems to be done. You know, I talk to my guys on Wall Street. You know, I'm very well connected on the street, and there's quite a few of us that are very well invested and we even say, hey, what is holding these guys back."

d. On or about March 28, 2011, during a conference call, RUDOLPH COENEN stated, "...but being having been on Wall Street and the perspectives and the associations that I have..."

e. On or about April 11, 2011, during a conference call, CHARLES

EMMENECKER stated, "CHARLIE EMMENECKER (referring to CHARLES EMMENECKER), the Moderator, and one of the hosts of this call along with the Chairman of the Board of the BH Group, the hardworking, tireless, never-ending, I'm gonna get her done BRAD HUEBNER (referring to BRADFORD HUEBNER), and we have RUDY COENEN, RUDOLPH COENEN, the foreign – foreign currency trader formerly with JP Morgan Chase and now the – the actual director of a lot of different financing organizations and with a new hedge fund group that's being marketed through the BH Group."

f. On May 7, 2011, during a presentation in Toledo, Ohio, BRADFORD HUEBNER stated, "...my partner, RUDY COENEN (referring to RUDOLPH COENEN)...RUDY (referring to RUDOLPH COENEN) is a very bright guy and has been in the industry for a long time. ...He's worked for J.P. Morgan Chase, I think it's Legrand is another company, and he actually left J.P. Morgan to go serve in the first Gulf War and then came back and worked for Legrand and then J.P. Morgan hired him back."

g. On or about June 27, 2011, during a conference call, RUDOLPH COENEN stated, "...when I was hired by Morgan Chase it was under their chartered banking license which is something you don't realize, sir. You need to investigate. When you work for a bank you fall under their licensing agreement. You don't have to have your personal trader's license unless you are going to apply for it and you are going to be part of the SEC or NASEC..."

h. On or about July 5, 2011, during a conference call, RUDOLPH COENEN stated, "...being an investment advisor and having been doing this as an analyst and a trader for, you know, over fifteen years, the first thing I was taught when I hit the floor was do not trade on emotion, do not let emotion make your decision, and I made that mistake many, many times."

i. On or about August 15, 2011, during a conference call, CHARLES EMMENECKER stated, "...there's a couple guys on the internet saying that you were never at

JP Morgan Chase, you know, that you didn't trade. Well, the facts are you were not a trader, so let's give this a little bit of what you did, which I know and BRAD (referring to BRADFORD HUEBNER) knows what you did, but just so some of these people understand your background and – and what your job was.” RUDOLPH COENEN responded, “Yes, I held various positions at JP Morgan Chase. I started out as an analyst with JP Morgan Chase. I analyzed all of their star portfolio investments that they had and what I really looked at was all of the – what they call transfer investment buys that are sold off to other banking entities, international banking entities, and I would look at what the various holdings within the – within the investment and I would analyze it for its return and its profitability so when we would go and sell these investments I could basically give them an analytical view of what we felt the percentages were gonna be...”

16. During the course of the conspiracy, BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT made numerous knowingly false and misleading statements regarding the existence of an “Overseas Investment Protection Act” administered by the United States Department of the Treasury which BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT knew to be false. Any assertion that an “Overseas Investment Protection Act” or similar Act exists or is administered by the United States Department of the Treasury is false. False and misleading statements made by BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT on this subject include, but are not limited to, the following:

a. On or about April 11, 2011, during a conference call, CHARLES EMMENECKER stated, “...hang on, hang on. We have - we have the Marshall Plan to protect the - a percentage of the assets going, so that goes all the way back to World War II, if I'm not mistaken, so let's clarify the - sum of the risk that's not really here.” RUDOLPH COENEN

responded, "Yeah. I mean, you know, in the hedge fund with - with the Overseas Investment Protection Act protects 90 percent of your investment in the fund. So let's - I'll give you an example. You invest a million dollars and there's a sectarian war, there's sectarian strife in the nation. All I do is I go back to the U.S. Government and say, you know what, I want to pull my million dollars out of Iraq and - because I'm not very comfortable with it being there and they'll return \$900,000 to me. So you take a - you take a \$100,000 loss but at least you're protected \$900,000. Where do you get that type of protection in any mutual fund or any ETF here in the United States..."

b. On May 7, 2011, during a presentation in Toledo, Ohio, RUDOLPH COENEN responded to the following question, Unknown Voice asked, "I have a lot of questions, (inaudible) percent guaranteed payback to the government. And then also if we revalued at \$1 or under \$1 how is that going to affect the contracts?" RUDOLPH COENEN responded, "There is what's being called the Overseas Protection Act. It was created back in the martial time in World War II and it was created for us Americans when we went into a country to liberate them or we were going to take over the country that when investment dollars come in that those investment dollars would be protected by the United States. So in Iraq 90 percent of our investment is protected by the Overseas Act. So let me give you an example. I invest \$1 million in Iraq and all of a sudden they have sectarian warfare, corrupt government and I'm not happy with my investment. All I do is go back to the U.S. Treasury Department and I tell them you know what I'm going to pull whatever I can out of Iraq, but I'm probably going to take a 40 percent loss, they'll cover it. So if I take, if I lose \$500,000 they will give me my 900,000 back and I'll lose only 100,000. I'll lose 10 percent of my investment, which right now you can't get in any mutual fund."

17. During the course of the conspiracy, BRADFORD HUEBNER, RUDOLPH COENEN,

CHARLES EMMENECKER, and MICHAEL TEADT made numerous knowingly false and misleading statements regarding the existence of a Bayshore Capital Investments, LLC office located on Wall Street in New York, New York (Wall Street) which BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT knew to be false. No physical office of Bayshore Capital Investments, LLC on Wall Street existed. False and misleading statements made by BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT on this subject include, but are not limited to, the following:

a. On or about April 18, 2011, during a conference call, RUDOLPH COENEN stated, "You know, we have offices on Wall Street, we have offices in Jacksonville."

b. On or about April 18, 2011, during a conference call, BRADFORD HUEBNER stated, "We've got an office on Wall Street. You'll be able to get in contact with that within a few days. So we're moving ahead very fast."

c. On or about May 23, 2011, during a conference call, BRADFORD HUEBNER stated, "Well, you know, that doesn't stop us, CHARLIE (referring to CHARLES EMMENECKER), from, we still have our offices in Wall Street, you know, and it's very important for us to have those offices because, you know, there's a portion of our business where we have to be on Wall Street to perform some functions."

18. During the course of the conspiracy, BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT made numerous knowingly false and misleading statements regarding the existence of two Iraqi and Middle East-related hedge funds related to the BH Group and Bayshore Capital Investments, LLC which BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT knew to be false. BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES

EMMENECKER, and MICHAEL TEADT sold “seats” or “placements” in the two non-existent hedge funds to members of the BH Group and other prospective investors for \$750.00 per seat. No hedge funds were formed by BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT; nor did the two hedge funds exist during the time frame of the conspiracy. False and misleading statements made by BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT on this subject include, but are not limited to, the following:

a. On or about February 28, 2011, during a conference call, RUDOLPH COENEN stated, “You know, all of those are hedged into this hedge fund so that's why it's a very unique hedge fund and the SEC approvals are taking a lot longer because we keep putting amendments to them.”

b. On May 7, 2011, immediately following a presentation in Toledo, Ohio by RUDOLPH COENEN and BRADFORD HUEBNER regarding non-existent hedge funds, an IRS-CI undercover agent sought to purchase Iraqi dinar currency by approaching BRADFORD HUEBNER. BRADFORD HUEBNER stated, “The guy in the yellow shirt, he’s the dinar salesman” (referring to MICHAEL TEADT). The IRS-CI undercover agent then approached MICHAEL TEADT and engaged in a conversation which led to the purchase of \$980.00 worth of Iraqi dinar currency. During the transaction, MICHAEL TEADT indicated knowledge of the dinar sales business and the non-existent hedge funds. For example, MICHAEL TEADT stated with regard to the dinar sales business, “we’re getting it from a place called Dinar Trade.” MICHAEL TEADT then gave considerable detail about Dinar Trade’s owner, “Ali”. MICHAEL TEADT then told the IRS-CI undercover agent that with regard to the non-existent hedge funds, “the requirements are as follows, essentially the hedge funds...the answer to your question is we recommend you have at least 4 million dinar. The hedge fund according to the agreement that

you sign, has to RV at \$1 per dinar. So essentially, if it does so, you will have 4 million dollars at the time it RV's...which is a broad way of saying Joe Biden has a shitload and doesn't want to pay [referring to taxes]...what we're saying though is the 4 million, if a third of that went away [referring to taxes], ok, um, you're looking at still having enough cash to spend 1 million which is the minimum investment in the hedge fund, and then you can pay some other bills..."

c. On May 7, 2011, during a presentation in Toledo, Ohio, RUDOLPH COENEN stated, "I have a staff and we already do research. We already do investments. Very competent people. Neal runs our foreign debts. He's the guy I send out to look at companies to investigate their CEO's, their CFO's, their manufacturing plants, their supervisors, their production lines, and he's the kind of guy who goes out there and does an analysis and brings it to the table and we decide as a company if we're going to invest or not."

d. On or about July 5, 2011, during a conference call, BRADFORD HUEBNER stated, "CHARLIE (referring to CHARLES EMMENECKER) mentioned that RUDY (referring to RUDOLPH COENEN) and I have been in Delaware all day communicating and getting educated by our hedge fund attorneys and I must say I was very impressed with our legal team that also will provide the administrative group that will run our hedge funds and provide our inception seat investors with a monthly, quarterly and annual report for total transparency."

e. On or about September 27, 2011, during a conference call, RUDOLPH COENEN stated, "I want to let everyone know the hedge fund is now active. It's ready for revaluation. That's all we're waiting for. We've got the administrator in place. The attorneys are in place. As a matter of fact, I had a conversation with our attorney. She is very excited hoping to see this RV come through as soon as possible."

All in violation of Title 18, United States Code, Section 1349.

COUNT 2
WIRE FRAUD
(18 U.S.C. § 1343)

The Grand Jury further charges:

The General Allegations in Paragraphs 1 to 16 are incorporated by reference herein. From in or about August 2010 to the date of this indictment, in the Northern District of Ohio, Western Division and elsewhere, BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT did devise and intend to devise a scheme and artifice to defraud, to enrich themselves through the sale of the Iraqi dinar, two non-existent hedge funds and Xango health-related products by making false representations, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

It was part of the scheme that BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT sold and offered to sell Iraqi currency, known as the dinar and “seats” or “placements” on two non-existent hedge funds by making materially false and misleading statements including but not limited to the following:

- false claims made regarding U.S. Department of the Treasury dinar holdings
- false claims made regarding the U.S. Department of the Treasury’s involvement and future involvement in the dinar and dinar exchange post-“revaluation”
- false claims made regarding Executive Order 13303
- false claims made regarding RUDOLPH COENEN’s military service
- false claims made regarding RUDOLPH COENEN’s background/employment
- false claims made regarding the Overseas Investment Protection Act
- false claims made regarding Bayshore’s Wall Street office
- false claims made regarding the formation of two (2) hedge funds.

Further BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER,

and MICHAEL TEADT, for the purpose of executing the scheme and artifice described above, did transmit and cause to be transmitted by means of wire communication in interstate commerce, writings, signals and sounds, to wit: maintenance of a page on the world wide web (www.thebhgroup.org) and through weekly interstate conference calls conducted over the telephone lines and the internet, which wire communications were materially false and misleading.

All in violation of Title 18, United States Code, Section 1343.

COUNTS 3-22
MONEY LAUNDERING
(18 U.S.C. § 1957)

The Grand Jury further charges:

On or about the dates set forth below, in the Northern District of Ohio, Western Division and elsewhere, BRADFORD HUEBNER and RUDOLPH COENEN, did knowingly engage and attempt to engage in the following monetary transactions by, through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000.00, that is, withdrawals, deposits and wire transfers of funds, such property having been derived from a specified unlawful activity, that is, wire fraud, as alleged in Count 2 of this Indictment, as set forth below. Through these transactions, BRADFORD HUEBNER and RUDOLPH COENEN promoted the Iraqi dinar and made purchases of equipment, including large screen televisions, computer equipment, and other assets.

<u>Count</u>	<u>Date</u>	<u>Amount</u>	<u>Financial Institution and Acct. Number</u>	<u>Transaction Description</u>	<u>Conducted By</u>
3	April 11, 2011	\$20,000.00	Wells Fargo – 7109	Fund Transfer	COENEN
4	May 20, 2011	\$25,000.00	Wells Fargo – 7109	Withdrawal	COENEN

5	July 22, 2011	\$15,000.00	Bank of America – 4395	Deposit	COENEN
6	July 25, 2011	\$75,000.00	Bank of America – 4395	Deposit	COENEN
7	August 10, 2011	\$45,000.00	Bank of America – 4395	Withdrawal	COENEN
8	June 22, 2011	\$300,000.0	Bank of America - 6392	Wire Transfer	HUEBNER
9	June 24, 2011	\$300,000.0	Bank of America - 6392	Wire Transfer	HUEBNER
10	June 27, 2011	\$300,000.0	Bank of America - 6392	Wire Transfer	HUEBNER
11	June 28, 2011	\$300,000.0	Bank of America - 6392	Wire Transfer	HUEBNER
12	June 28, 2011	\$22,000.00	Bank of America - 6392	Wire Transfer	HUEBNER
13	June 29, 2011	\$300,000.0	Bank of America - 6392	Wire Transfer	HUEBNER
14	June 30, 2011	\$300,000.0	Bank of America - 6392	Wire Transfer	HUEBNER
15	July 1, 2011	\$300,000.0	Bank of America – 6392	Wire Transfer	HUEBNER
16	July 5, 2011	\$150,000.0	Bank of America – 6392	Wire Transfer	HUEBNER
17	July 7, 2011	\$300,000.0	Bank of America - 6392	Wire Transfer	HUEBNER
18	July 11, 2011	\$250,000.0	Bank of America - 6392	Wire Transfer	HUEBNER
19	July 13, 2011	\$33,862.39	Bank of America - 6392	Payment to Am. Express	HUEBNER
20	July 14, 2011	\$300,000.0	Bank of America - 6392	Wire Transfer	HUEBNER
21	July 19, 2011	\$250,000.0	Bank of America - 6392	Wire Transfer	HUEBNER
22	July 22, 2011	\$250,000.0	Bank of America - 6392	Wire Transfer	HUEBNER

All in violation of Title 18, United States Code, Section 1957.

COUNTS 23 - 76
STRUCTURING AND ATTEMPTING TO STRUCTURE TRANSACTIONS
TO EVADE REPORTING REQUIREMENT
(31 U.S.C. §§ 5313 and 5324(a)(3))

The Grand Jury further charges:

On or about the dates set forth below, in the Northern District of Ohio, Western Division and elsewhere, BRADFORD L. HUEBNER and MICHAEL L. TEADT, did knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313, and the regulations promulgated thereunder, structured and attempted to structure the following transactions with domestic financial institutions, to wit:

<u>Count</u>	<u>Date</u>	<u>Financial Institution</u>	<u>Account Number Ending</u>	<u>Account Owner</u>	<u>Structured Deposit Amount</u>
23	April 16, 2010	Bank of America	4286	HUEBNER	\$6,000.00
		Key Bank	5587	HUEBNER	\$6,650.00
24	May 17, 2010	Bank of America	4286	HUEBNER	\$9,995.00
		Key Bank	5587	HUEBNER	\$4,220.00
25	May 24, 2010	Bank of America	4286	HUEBNER	\$8,190.00
		Key Bank	5587	HUEBNER	\$8,850.00
26	June 14, 2010	Bank of America	4286	HUEBNER	\$6,400.00
		Key Bank	5587	HUEBNER	\$9,900.00
27	June 15, 2010	Bank of America	4286	HUEBNER	\$9,980.00
28	July 13, 2010	Bank of America	4286	HUEBNER	\$9,000.00
29	July 19, 2010	Bank of America	6447	HUEBNER	\$7,550.00
		Key Bank	5587	HUEBNER	\$2,500.00
30	July 26, 2010	Bank of America	6447	HUEBNER	\$7,510.00
		Key Bank	5587	HUEBNER	\$10,000.00
31	August 2, 2010	Bank of America	6447	HUEBNER	\$9,725.00

		Key Bank	5587	HUEBNER	\$9,974.00
		Key Bank	5587	HUEBNER	\$3,516.00
32	August 6, 2010	Bank of America	4286	HUEBNER	\$9,900.00
33	August 9, 2010	Bank of America	4286	HUEBNER	\$9,450.00
		Key Bank	5587	HUEBNER	\$1,400.00
34	August 12, 2010	Bank of America	4286	HUEBNER	\$9,900.00
35	August 17, 2010	Bank of America	4286	HUEBNER	\$9,900.00
36	August 19, 2010	Bank of America	4286	HUEBNER	\$9,900.00
37	August 23, 2010	Bank of America	4286	HUEBNER	\$9,804.00
		Bank of America	6447	HUEBNER	\$5,600.00
		Bank of America	6447	HUEBNER	\$3,000.00
38	August 30, 2010	Bank of America	4286	HUEBNER	\$3,600.00
		Bank of America	4386	HUEBNER	\$4,500.00
		Bank of America	6447	HUEBNER	\$2,350.00
		Bank of America	6447	HUEBNER	\$8,700.00
39	August 31, 2010	Bank of America	4286	HUEBNER	\$2,970.00
		Bank of America	6447	HUEBNER	\$7,220.00
		Key Bank	5587	HUEBNER	\$5,000.00
40	September 1, 2010	Bank of America	6447	HUEBNER	\$9,980.00
41	September 2, 2010	Bank of America	4286	HUEBNER	\$9,990.00
42	September 7, 2010	Bank of America	4286	HUEBNER	\$9,950.00
43	September 8, 2010	Bank of America	6447	HUEBNER	\$9,600.00
44	September 9, 2010	Bank of America	4286	HUEBNER	\$9,995.00
45	September 10,	Bank of America	4286	HUEBNER	\$9,950.00
	2010	Bank of America	6447	HUEBNER	\$8,400.00
46	September 13,	Bank of America	4286	HUEBNER	\$9,980.00

	2010	Huntington Bank	042	HUEBNER	\$1,500.00
47	September 16,	Bank of America	4286	HUEBNER	\$9,900.00
	2010	Bank of America	6447	HUEBNER	\$800.00
48	September 17,	Bank of America	4286	HUEBNER	\$9,980.00
	2010				
49	September 20,2010	Bank of America	4286	HUEBNER	\$9,995.00
		Bank of America	4286	HUEBNER	\$9,980.00
		Bank of America	6447	HUEBNER	\$6,960.00
		Bank of America	6447	HUEBNER	\$9,970.00
50	September 23,	Bank of America	4286	HUEBNER	\$5,060.00
	2010	Bank of America	6447	HUEBNER	\$8,830.00
51	September 29,	Bank of America	4286	HUEBNER	\$6,350.00
	2010	Bank of America	6447	HUEBNER	\$8,820.00
52	October 1, 2010	Bank of America	6447	HUEBNER	\$9,910.00
53	October 4, 2010	Bank of America	4286	HUEBNER	\$6,820.00
		Bank of America	6447	HUEBNER	\$9,900.00
		Huntington Bank	042	HUEBNER	\$5,300.00
54	October 5, 2010	Huntington Bank	042	HUEBNER	\$3,050.00
55	October 12, 2010	Bank of America	4286	HUEBNER	\$6,000.00
		Bank of America	6447	HUEBNER	\$6,700.00
		Bank of America	6447	HUEBNER	\$4,800.00
56	October 13, 2010	Bank of America	6447	HUEBNER	\$9,970.00
		Huntington Bank	042	HUEBNER	\$6,560.00
57	October 14, 2010	Bank of America	4286	HUEBNER	\$5,610.00
		Bank of America	6447	HUEBNER	\$9,040.00
58	October 15, 2010	Bank of America	4286	HUEBNER	\$8,100.00

		Bank of America	6447	HUEBNER	\$9,900.00
59	October 18, 2010	Bank of America	4286	HUEBNER	\$9,950.00
		Bank of America	6447	HUEBNER	\$2,000.00
		Bank of America	6447	HUEBNER	\$9,800.00
60	October 19, 2010	Bank of America	6392	HUEBNER	\$4,350.00
		Bank of America	6447	HUEBNER	\$7,850.00
61	October 20, 2010	Bank of America	6392	HUEBNER	\$9,900.00
		Bank of America	6392	J.M.	\$9,550.00
		Huntington Bank	042	HUEBNER	\$3,800.00
62	October 21, 2010	Bank of America	6392	HUEBNER	\$5,540.00
63	October 22, 2010	Huntington Bank	042	HUEBNER	\$9,700.00
64	December 2, 2010	Bank of America	6392	HUEBNER	\$2,500.00
		PNC Bank	3387	TEADT	\$9,110.00
65	December 10, 2010	Bank of America	6392	HUEBNER	\$6,360.00
		PNC Bank	3387	TEADT	\$9,530.00
66	December 13, 2010	Bank of America	6392	HUEBNER	\$5,970.00
		Bank of America	6392	HUEBNER	\$7,940.00
		PNC Bank	3387	TEADT	\$8,940.00
67	December 27, 2010	Bank of America	6392	HUEBNER	\$4,646.00
		Huntington Bank	042	HUEBNER	\$9,800.00
68	January 6, 2011	Bank of America	6392	HUEBNER	\$1,660.00
		PNC Bank	3387	TEADT	\$7,600.00
69	January 7, 2011	Bank of America	6392	HUEBNER	\$9,500.00
70	January 13, 2011	PNC Bank	3387	TEADT	\$8,440.00
71	January 14, 2011	Bank of America	6392	HUEBNER	\$5,100.00
72	February 11, 2011	Bank of America	6392	HUEBNER	\$9,950.00

73	March 10, 2011	Bank of America	6392	HUEBNER	\$11,990.00 (Attempted Violation)
74	March 31, 2011	Bank of America	6392	HUEBNER	\$9,990.00
75	May 31, 2011	Huntington Bank	042	HUEBNER	\$9,975.00
76	June 29, 2011	Huntington Bank	042	HUEBNER	\$9,850.00

All in violation of Title 31, United States Code, Sections 5313 and 5324(a)(3).

COUNTS 77-81
WILLFUL FAILURE TO FILE CURRENCY TRANSACTION REPORT
(31 U.S.C. §§ 5313 and 5322(b))

The Grand Jury further charges:

On or about the dates set forth below, in the Northern District of Ohio, Western Division, BRADFORD HUEBNER, unlawfully, knowingly, and willfully did fail to file a Currency Transaction Report (CTR) upon receipt of cash in excess of \$10,000.00 received while operating a registered Money Service Business (MSB), as required by Title 31, United States Code, Section 5313, and the regulations promulgated thereunder, and did so while violating a law of the United States, to wit: conspiracy to commit wire fraud, in violation of Title 18, United States Code, Section 1349.

Count	Transaction Date	Customer Name	Transaction Amount
77	March 30, 2011	G.C.	\$60,000.00
78	May 2, 2011	P.J.	\$59,750.00
79	May 11, 2011	D.C.	\$72,000.00
80	May 18, 2011	D.G.	\$105,420.00
81	June 9, 2011	C.P.	\$60,000.03

All in violation of Title 31, United States Code, Sections 5313 and 5322(b).

COUNT 82
FALSE STATEMENT
(18 U.S.C. § 1001(a)(2))

The Grand Jury further charges:

On or about August 1, 2011, in the Northern District of Ohio, Western Division, MICHAEL TEADT did willfully and knowingly make, in a matter within the jurisdiction of the executive branch of the government of the United States, to wit, the Internal Revenue Service – Criminal Investigation, in connection with a criminal investigation, a materially false, fictitious and fraudulent statement and representation, in that MICHAEL TEADT told an IRS-CI Special Agent that he was neither an employee of BH Group nor was he ever compensated for his services, when in fact and in truth MICHAEL TEADT was an employee of the BH Group and was regularly compensated by it.

In violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 83
FALSE STATEMENT
(18 U.S.C. § 1001(a)(2))

The Grand Jury further charges:

On or about August 1, 2011, in the Northern District of Ohio, Western Division, MICHAEL TEADT did willfully and knowingly make, in a matter within the jurisdiction of the executive branch of the government of the United States, to wit, the Internal Revenue Service – Criminal Investigation, in connection with a criminal investigation, a materially false, fictitious and fraudulent statement and representation, in that MICHAEL TEADT told an IRS-CI Special Agent that he “did not sell dinar”, while in fact and in truth MICHAEL TEADT regularly sold

dinar and specifically on May 7, 2011 sold \$980.00 worth of dinar to an IRS-CI Undercover Special Agent.

In violation of Title 18, United States Code, Section 1001(a)(2).

FORFEITURE SPECIFICATIONS

Forfeiture of Property Relating to Counts 2-22 : Wire Fraud and Money Laundering

1. The allegations contained in Counts 1 to 83 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture, pursuant to the provisions of Title 18, United States Code, Sections 981(a)(1)(A) and (C), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 1343, 1349, and 1957, as set forth in Counts 2 to 22 of this Indictment, BRADFORD HUEBNER, RUDOLPH COENEN, CHARLES EMMENECKER, and MICHAEL TEADT shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(A) and (C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes a sum of money representing the amount of proceeds obtained as a result of the offenses for which the defendants are convicted up to a value of \$24,510,900.71, including \$23,788,485.71 from dinar sales and approximately \$722,415.00 resulting from the non-existent hedge fund “seats” or “placements” through the BH Group. Of this amount, the following property has been seized by the United States and shall be forfeited upon conviction pursuant to the provisions set forth above:

a) Property of BRADFORD L. HUEBNER

1. \$24,200.00 in U.S. Currency, seized from 2936 Pembroke Road, Toledo, Ohio 43606, on July 27, 2011 (CATS No. 11-IRS-001351).

2. \$1,768,326.92 in U.S. Currency converted from Iraqi Dinar, seized from 2936 Pembroke Road, Toledo, Ohio 43606, on July 27, 2011 (CATS No. 11-IRS-001352).
3. \$2,630.00 in U.S. Currency, seized from 17 N. St. Clair Street, Toledo, Ohio 43604, on July 27, 2011 (CATS No. 11-IRS-001353).
4. \$7,304.85 in U.S. Currency converted from Vietnamese Dong, seized from 17 N. St. Clair Street, Toledo, Ohio 43604, on July 27, 2011 (CATS No. 11-IRS-001354).
5. \$241,192.38 in U.S. Currency converted from Iraqi Dinar, seized from 17 N. St. Clair Street, Toledo, Ohio, on July 27, 2011 (CATS No. 11-IRS-001355).
6. \$26,960.00 in proceeds seized from Huntington Bank Account No. XXXXXX8042, on July 27, 2011, (CATS No. 11-IRS-001356).
7. \$2,352.47 in proceeds seized from PNC Bank Account No. XXXXXX3387, on July 27, 2011 (CATS No. 11-IRS-001357).
8. \$62,930.54 in proceeds seized from Wells Fargo Bank Account No. XXXXXXXXXXX7109, on August 9, 2011 (CATS No. 11-IRS-001358).
9. \$225,804.29 in proceeds seized from Bank of America Account No. XXXXXXXXXXX6392, August 9, 2011 (CATS No. 11-IRS-001359).
10. \$99,361.00 in proceeds seized from Bank of America Account No. XXXXXXXXXXX6392, on July 27, 2011 (CATS No. 11-IRS-001360).

b) Property of RUDOLPH M. COENEN

1. \$62,930.54 in proceeds seized from Wells Fargo Bank Account No. XXXXXXXXXXX7109, on August 9, 2011 (CATS No. 11-IRS-001358).
2. iPad, A1337, (CATS No. 12-IRS-001380).
3. HP Pavilion Computer, A1310N, (CATS No. 12-IRS-001381).
4. Macbook Air Computer, (CATS No. 12-IRS-001382).
5. Approximately \$2,574.07 from converted Iraqi Dinar, (CATS No. 12-IRS-001383).
6. HP Pavilion Computer Tower, A1310N, (CATS No.12-IRS-001384).

7. iMac A1312100, all-in-one Monitor and Computer, (CATS No. 12-IRS-001385).
8. Seagate Free Agent External Drive, SST310005FDA2E1-RK, (CATS No. 12-IRS-001386).
9. Great Quality Desktop Computer 95064D73001Q42401318, (CATS No. 12-IRS-001387).
10. HP DV1217 Laptop, (CATS No. 12-IRS-001388).
11. 2004 Ford Expedition, VIN 1FMFU18L84LA75158, purchased by RUDOLPH M. COENEN and registered in the name of MARIBEL COENEN.

c) Property of MICHAEL L. TEADT

1. \$14,900.00 in United States Currency converted from Iraqi Dinar, constituting a portion of the defendant \$241,192.38 in United States Currency converted from Iraqi Dinar.
2. \$2,352.47 in proceeds from PNC Bank Account No. XXXXXX3387.

Forfeiture of Property Relating to Counts 23-76: Structuring

3. The allegations contained in Counts 1 to 83, and Forfeiture Specifications 1 to 2, of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture, pursuant to the provisions of Title 31, United States Code, Section 5317(c), and Title 28, United States Code, Section 2461(c).

4. Upon conviction of the offenses in violation of Title 31, United States Code, Sections 5313 and 5324(a)(3), set forth in Counts 23-76 of this Indictment, BRADFORD HUEBNER AND MICHAEL TEADT shall forfeit to the United States of America, pursuant to Title 31, United States Code, Section 5317(c) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, the following:

a) Property of BRADFORD L. HUEBNER

1. \$26,960.00 in proceeds from Huntington Bank Account No. XXXXXX8042,
2. \$99,361.00 in proceeds from Bank of America Account No. XXXXXXXX6392.

b) Property of MICHAEL L. TEADT

1. \$2,352.47 in proceeds from PNC Bank Account No. XXXXXX3387,

Substitute Assets

5. The allegations contained in Counts 1 to 83, and Forfeiture Specifications 1 to 4, of this Indictment are hereby realleged and incorporated by reference herein.

6. If any of the property described in Paragraphs 1 through 4 of the Forfeiture Specifications, 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 party;
- 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), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL.

Original document -- Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.