

ATTACHMENT A

Count One **(Conspiracy to Commit Securities Fraud)**

From at least as early as in or about December 2013 through in or about June 2015, in the District of New Jersey and elsewhere, defendant

NARIS CHAMROONRAT

knowingly and intentionally conspired and agreed with others to commit an offense against the United States, namely, securities fraud, in that he and others willfully and knowingly, directly and indirectly, by the use of means and instrumentalities of interstate commerce, and of the mails, and of facilities of national securities exchanges, would and did use and employ, in connection with the purchase and sale of securities, manipulative and deceptive devices and contrivances by: (a) employing devices, schemes and artifices to defraud; (b) making untrue statements of material fact and omitting to state material facts necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; and (c) engaging in acts, practices and courses of business which operated and would operate as a fraud and deceit upon persons, all contrary to Title 15, United States Code, Sections 78j(b) and 78ff, and Title 17, Code of Federal Regulations, Section 240.10b-5.

Overt Acts

In furtherance of the conspiracy and to effect its unlawful object, the following overt acts, among others, were committed in the District of New Jersey and elsewhere:

- a. On or about January 16, 2014, CHAMROONRAT sent a co-conspirator an electronic communication attaching a document entitled "TRZ GUIDELINE," which provided guidance on carrying out the securities fraud scheme described herein.
- b. On or about May 2, 2014, one of CHAMROONRAT's co-conspirators sent an email to an individual located in New Jersey containing wire instructions for submitting payment to purportedly fund a securities trading account.
- c. On or about May 13, 2014, a bank account in Belize controlled by CHAMROONRAT received a wire transfer in the amount of \$2,500 from a bank account located in New Jersey.

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

Count Two

(Wire Fraud)

On or about May 13, 2014, in the District of New Jersey and elsewhere,
defendant

NARIS CHAMROONRAT

knowingly and intentionally devised a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, specifically, a wire of approximately \$2,500 from a bank account in New Jersey to an account in Belize controlled by CHAMROONRAT.

In violation of Title 18, United States Code, Section 1343 and Section 2.