

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
	:	Criminal No. 17-
	:	
v.	:	
	:	
	:	18 U.S.C. § 371
YANIV AVNON, and	:	18 U.S.C. § 1343
RAN ARMON	:	18 U.S.C. § 2

INDICTMENT

The Grand Jury, in and for the District of New Jersey, sitting at Newark, charges:

Relevant Individuals and Entities

1. At all times relevant to this Indictment:
 - a. Nonko Trading (“Nonko”) was an online day trading firm owned and controlled by Naris Chamroonrat (“Chamroonrat”), which served as the principal entity through the which the co-conspirators referenced below executed their scheme to defraud.
 - b. Defendant YANIV AVNON (“AVNON”) was a citizen of Israel and owned and controlled G Six Trading Y.R. Ltd. (“G6 Trading”), a company that provided online securities trading training programs. AVNON used G6 Trading to solicit day traders for Nonko.
 - c. Defendant RAN ARMON (“ARMON”) was a citizen and resident of Canada. ARMON worked for AVNON in connection with G6 Trading and also solicited investors for Nonko.

d. Chamroonrat, a co-conspirator not named as a defendant herein, was a citizen of the United States and Thailand who owned Nonko and handled its daily operations.

e. Co-conspirator #1 ("CC#1"), a co-conspirator not named as a defendant herein, solicited investors for Nonko and performed marketing work for Nonko, including web design, online advertising and social media.

f. Company A was a provider of electronic trading software that maintained computer servers in or around Carteret, New Jersey. From in or about 2012 through in or about September 2014, Nonko provided its customers access to Company A's trading software.

g. Logix Software Company Limited ("Logix") was a Thailand-based provider of electronic trading software that AVNON, ARMON, and Chamroonrat launched in or around September 2014.

COUNT ONE

(Conspiracy to Commit Securities Fraud)

2. 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, defendants

**YANIV AVNON and
RAN ARMON**

knowingly and willfully conspired and agreed with each other and others to, directly and indirectly, by the use of means and instrumentalities of interstate commerce, and of the mails, and of facilities of national securities exchanges, use and employ, in connection with the purchase and sale of securities, manipulative and deceptive devices and contrivances in contravention of Title

17, Code of Federal Regulations, Section 240.10b-5, 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, as set forth in more detail below, contrary to Title 15, United States Code, Sections 78j(b) and 78ff, and Title 17, Code of Federal Regulations, Section 240.10b-5.

Goal of the Conspiracy

3. It was the goal of the conspiracy for AVNON, ARMON and their co-conspirators to profit illegally by stealing the money day traders entrusted to Nonko on the understanding that the traders would be able to use the money to buy and sell securities on the open market. Instead of depositing that money in trading accounts and setting up the traders so that they could execute market transactions, the co-conspirators simply pocketed the money and set the unwitting traders up on demo accounts.

Manner and Means of the Conspiracy

A. Nonko's Solicitation of Traders and the "TRZ Program."

4. It was part of the conspiracy that Nonko operated as a purported proprietary trading firm for investors interested in day trading securities in the United States. To attract day traders, Nonko offered terms that were not available at other registered broker-dealers, including low minimum deposits and generous leverage (or margin) ratios of 20:1 (that is, purporting to give