

OCT - 4 2006

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

**U. S. DISTRICT COURT
W. DIST. OF N. C.**

UNITED STATES OF AMERICA)
)
v.)
)
SAMUEL THOMAS CURRIN)
)
_____)

DOCKET NO. 3:06cr403-B

BILL OF INFORMATION

Violation:
18 U.S.C. § 1956(h)
26 U.S.C. § 7212(a)

THE UNITED STATES ATTORNEY CHARGES:

At the specified times and at all relevant times:

I. Relevant People and Entities

A. Sterling Entities

1. Sterling Trust Ltd. (hereafter, "Sterling Trust") was an Anguillan corporation that maintained offices in Anguilla, British West Indies and Nassau, Bahamas.
2. Sterling ACS Ltd. (hereafter, "Sterling ACS") was a Bahamian corporation in the business of incorporating off-shore entities and providing related financial services.
3. Sterling Bank Ltd. (hereafter, "Sterling Bank") was a St. Lucian corporation operating as a bank.

B. Individuals

4. Defendant SAMUEL THOMAS CURRIN was an attorney licensed to practice law in the State of North Carolina. In addition, CURRIN was a shareholder and director of Sterling Bank. CURRIN's law firm maintained client trust accounts at First Citizens Bank in Raleigh, North Carolina and Coastal Federal Bank in Wilmington, North Carolina.
5. Mr. J, a co-conspirator unindicted herein, was a client and business partner of CURRIN. In or about December 2003, Mr. J was indicted by a Virginia grand jury on charges that he unlawfully concealed his identity in order to send unsolicited bulk e-mail (a/k/a "spam") regarding, among other things, penny stocks. In or about November 2004, Mr. J was convicted of those charges in a Virginia state court.
6. Howell W. Woltz (hereafter, "H. Woltz"), a co-conspirator unindicted herein, was

the president, a director, and a shareholder of Sterling Trust. In addition, H. Woltz was the president and a director of Sterling ACS and a director of Sterling Bank.

7. Vernice Chaitan Woltz (hereafter, "V. Woltz"), a co-conspirator unindicted herein, was the wife of H. Woltz, a certified public accountant, a director of Sterling Trust, a director and chief financial officer of Sterling ACS, and a director of Sterling Bank.

8. Mr. O, a co-conspirator unindicted herein, was a resident of Kalamazoo, Michigan and the president of a securities consulting company.

9. Mr. K, a co-conspirator unindicted herein, was a resident of Montreal, Canada and a long-time stock promoter.

10. Mr. R, a co-conspirator unindicted herein, was an attorney licensed to practice law in the State of Florida and purportedly served as counsel to entities controlled by Mr. J, Mr. K, and Mr. O. Mr. R's law firm maintained a client trust account at SunTrust Bank in Tampa, Florida.

11. Mr. H, a co-conspirator unindicted herein, was a resident of Denver, NC and a consultant to Sterling Bank. Mr. H was also an officer and director of First Vietnamese American Bank.

C. Financial Institutions

12. SunTrust Bank (hereafter, "SunTrust") was a financial institution, to wit a bank the deposits of which were insured by the Federal Deposit Insurance Company (hereafter, "FDIC"), which was engaged in and the activities of which affected interstate and foreign commerce.

13. Bank of America (hereafter, "BoA") was a financial institution, to wit a bank the deposits of which were insured by the FDIC, which was engaged in and the activities of which affected interstate and foreign commerce.

14. The Branch Banking and Trust Company (hereafter, "BB&T") was a financial institution, to wit a bank the deposits of which were insured by the FDIC, which was engaged in and the activities of which affected interstate and foreign commerce.

15. First Citizens Bank (hereafter, "First Citizens") was a financial institution, to wit a bank the deposits of which were insured by the FDIC, which was engaged in and the activities of which affected interstate and foreign commerce.

16. Coastal Federal Bank (hereafter, "Coastal Bank") was a financial institution, to wit a bank the deposits of which were insured by the FDIC, which was engaged in and the activities of which affected interstate and foreign commerce.

17. First Vietnamese American Bank (hereafter, "First Vietnamese") was a financial institution, to wit a bank the deposits of which were insured by the FDIC, which was engaged in and the activities of which affected interstate and foreign commerce. First Vietnamese was headquartered in Westminster, California.

18. Comerica Inc. (hereafter, "Comerica") was a financial institution, to wit a bank the deposits of which were insured by the FDIC, which was engaged in and the activities of which affected interstate and foreign commerce.

19. World Trade Financial Corp. (hereafter, "World Trade Financial") was a broker-dealer headquartered in San Diego, California. Advantage Trading Group, Inc. (hereafter, "Advantage Trading") was World Trade Financial's clearing agent in Longwood, Florida.

20. Sunstate Equity Trading, Inc. (hereafter, "Sunstate") was a broker-dealer headquartered in Tampa, Florida.

21. Electronic Access Direct, Inc. (hereafter, "Electronic Access") was a broker-dealer headquartered in Sarasota, Florida.

22. Newbridge Securities Corp. (hereafter, "Newbridge") was a broker-dealer headquartered in Fort Lauderdale, Florida.

23. Securities & Investment Planning Company (hereafter, "SIPC") was a broker-dealer headquartered in Boca Raton, Florida.

24. First Curacao International Bank N.V. (hereafter, "First Curacao") was a licensed bank engaged in the business of banking under the rules and regulations of the Central Bank of the Netherlands Antilles.

25. The National Bank of Anguilla Ltd. (hereafter, "National Bank of Anguilla") was a financial services organization headquartered in The Valley, Anguilla.

26. Bank of Cyprus Public Company Ltd. (hereafter, "Bank of Cyprus") was a financial services organization headquartered in Nicosia, Cyprus.

D. Publicly-Traded Companies

27. BodyScan Corp. (hereafter, "BodyScan") was a publicly-traded Nevada company quoted on the Over-the-Counter Pink Sheets (hereafter, "Pink Sheets") under the stock symbol "BDYS."

28. Ornate Holdings, Inc. (hereafter, "Ornate Holdings") was a publicly-traded Nevada shell company quoted on the Pink Sheets. On or about May 14, 2004, the name of Ornate Holdings was changed to Absolute Health and Fitness, Inc. (hereafter, "Absolute Health"), and its stock

symbol was thereafter changed to "AHFI."

29. MBC Food Corporation (hereafter, "MBC Food") was a publicly-traded Nevada shell company quoted on the Pink Sheets. On or about June 10, 2004, the name of MBC Food was changed to Concorde America, Inc. (hereafter, "Concorde"), and its stock symbol was thereafter changed to "CNCD."

30. Nexar Technologies, Inc. (hereafter, "Nexar") was a publicly-traded Nevada shell company quoted on the Pink Sheets. On or about January 31, 2005, the name of Nexar was changed to Bio-Heal Laboratories, Inc. (hereafter, "Bio-Heal"), and its stock symbol was thereafter changed to "BHLL."

E. Off-Shore Entities

31. Bovee Enterprises LLC (hereafter, "Bovee") was a company incorporated in or about August 2002 under the laws of Anguilla by Sterling ACS and controlled by Mr. J.

32. Pacific Trust was a Bahamian trust formed by Sterling ACS in or about August 2002, at the request of Mr. J, and it was controlled by Mr. J. Pacific Trust held all of the shares of stock in Bovee. Pacific Testamentary Trust was also a Bahamian trust formed by Sterling ACS, at the request of Mr. J and CURRIN, and controlled by Mr. J. Pacific Testamentary Trust was the beneficiary of Pacific Trust. Mr. J was a beneficiary of Pacific Testamentary Trust. CURRIN was the "trust protector" for this trust arrangement. Mr. M, an attorney licensed to practice law in the State of California, was counsel to these trusts.

33. Jasmine Takamine Sdn Bhd (hereafter, "Jasmine") was a company incorporated in or about November 2003 under the laws of Anguilla by Sterling ACS and controlled by Mr. K.

34. St. Lawrence Trust was a Bahamian trust formed by Sterling ACS in or about November 2003. St. Lawrence Testamentary Trust was also a Bahamian trust formed by Sterling ACS and was the beneficiary of St. Lawrence Trust. St. Lawrence Trust owned the shares of Jasmine. Mr. K was a beneficiary of St. Lawrence Testamentary Trust. Mr. K controlled and was the "trust protector" for this trust arrangement

35. Barranquilla Holdings, SA (hereafter, "Barranquilla") was a company incorporated in or about November 2003 under the laws of Anguilla by Sterling ACS and controlled by Mr. J and Mr. K. The shares of Barranquilla were owned by Amazon Trust, a Bahamian trust formed by Sterling ACS and the beneficiaries of which were Bovee and Jasmine. Barranquilla maintained an account at First Curacao.

36. Chiang Ze Capital, AVV (hereafter, "Chiang Ze") was a company incorporated in or about November 2003 under the laws of Anguilla by Sterling ACS and controlled by Mr. J and Mr. K. The shares of Chiang Ze were owned by Yellow River Trust, a Bahamian trust formed by Sterling ACS and the beneficiaries of which were Bovee and Jasmine. Chiang Ze maintained an

account at First Curacao.

37. Ryzcek Investments, Gmbh (hereafter, "Ryzcek") was a company incorporated in or about November 2003 under the laws of Anguilla by Sterling ACS and controlled by Mr. J and Mr. K. The shares of Ryzcek were owned by Danube Trust, a Bahamian trust formed by Sterling ACS and the beneficiaries of which were Bovee and Jasmine. Ryzcek maintained an account at First Curacao.

38. Keel Enterprises, LLC (hereafter, "Keel") was a company incorporated in or about November 2003 under the laws of Anguilla by Sterling ACS and controlled by Mr. J and Mr. K. The shares of Keel were owned by Cape Fear Trust, a Bahamian trust formed by Sterling ACS and the beneficiaries of which were Bovee and Jasmine. Keel maintained an account at First Curacao.

39. DaSilva, SA (hereafter, "DaSilva") was a company incorporated in or about June 2004 under the laws of Anguilla by Sterling ACS and controlled by Mr. J and Mr. K. DaSilva maintained an account at First Curacao.

40. Vanderlip Holdings, NV (hereafter, "Vanderlip") was a company incorporated in or about June 2004 under the laws of Anguilla by Sterling ACS and controlled by Mr. J and Mr. K. Vanderlip maintained an account at First Curacao.

41. Jonti Warburg Ltd. (hereafter, "Jonti") was a company incorporated in or about June 2004 under the laws of Anguilla by Sterling ACS and controlled by Mr. J and Mr. K. Jonti maintained an account at First Curacao.

42. Stromberti Esse, Gmbh (hereafter, "Stromberti") was a company incorporated in or about June 2004 under the laws of Anguilla by Sterling ACS and controlled by Mr. J and Mr. K. Stromberti maintained an account at First Curacao.

43. Gibson Island Enterprises, LLC (hereafter, "Gibson") was a company incorporated in or about December 2001 under the laws of Anguilla by Sterling ACS and controlled by Mr. J and Mr. K.

44. Bela Enterprises, LLC (hereafter, "Bela") was a company incorporated in or about March 2003 under the laws of Anguilla by Sterling ACS and controlled by Mr. J and Mr. K.

II. The Securities Fraud and Money Laundering Scheme

45. Beginning in or about April 2003 and continuing through at least in or about April 2005, Mr. J, Mr. K, Mr. O, and others known and unknown to the Government conspired to fraudulently manipulate the stock prices of various publicly-traded companies, including but not limited to BodyScan, Absolute Health, Concorde, and Bio-Heal.

46. Mr. J, Mr. K, Mr. O, and others known and unknown to the Government gained

control of large blocks of shares in various publicly-traded companies through fraudulent means and otherwise, including but not limited to the use of forged corporate documents, fake attorney opinion letters, and attorney opinion letters premised on false information. In order to conceal their ownership of these shares, Mr. J, Mr. K, and Mr. O caused the shares to be issued in the names of the off-shore entities they had formed and deposited the shares in domestic and foreign brokerage accounts in the names of those entities.

47. Mr. J, Mr. K, Mr. O, and others known and unknown to the Government then orchestrated fraudulent campaigns to promote the publicly-traded companies through various means, including but not limited to Internet search engine advertising, spam e-mail, Internet websites, unsolicited mass faxes, and voice mail broadcasting. The promotional materials contained material factual misrepresentations and omissions, including but not limited to the following:

A. The promotional materials omitted the fact that the co-conspirators had obtained control of large quantities of the securities being promoted in anticipation of their intended plan to conduct a promotional campaign regarding those securities and profit on the sale of those securities once the promotional campaign caused the prices of the securities to rise;

B. The promotional materials contained earnings projections known to the co-conspirators to be unrealistic and unjustifiable; and

C. The promotional materials contained materially false factual statements regarding the operations of the companies being promoted.

48. In addition, Mr. J, Mr. K, Mr. O, and others known and unknown to the Government conspired to defraud investors by using brokers and market-makers to fraudulently manipulate the quoted prices of the stocks.

49. When the stock prices of the publicly-traded companies being promoted rose as a result of this fraudulent activity, Mr. J, Mr. K, Mr. O, and others caused the shares of stock held in the names of the off-shore entities to be sold for tens of millions of dollars in proceeds.

50. Mr. J, Mr. K, Mr. O, Mr. R, Mr. H, H. Woltz, and others known and unknown to the Government further conspired to launder the proceeds of the securities fraud scheme described above. CURRIN, at some point, joined that conspiracy. The proceeds of this fraudulent scheme were wired and otherwise transferred from the brokerage accounts to:

A. Off-shore bank accounts at First Curacao in the names of off-shore entities;
and

B. Mr. R's law firm's client trust account at SunTrust.

Proceeds of the fraudulent scheme were then further wired to and laundered through various foreign and domestic financial institutions, including accounts at Comerica, First Curacao, BoA, BB&T,

First Citizens, Coastal Bank, and National Bank of Anguilla.

A. BodyScan Corp.

51. In or about November 2003, Mr. K and others known and unknown to the Government caused a brokerage account to be opened at World Trade Financial in the name of Barranquilla. On or about January 15, 2004, Mr. K caused approximately 1.5 million unrestricted shares of BodyScan stock to be deposited into a brokerage account at World Trade Financial in the name of Barranquilla.

52. On or about January 23, 2004, H. Woltz, CURRIN, and Mr. H opened an account at BoA in Denver, NC in the name of Sterling Bank.

53. In or about February 2004, Mr. J and others caused fraudulent promotional materials regarding BodyScan to be distributed by means of mass unsolicited facsimiles.

54. In or about February 2004, when BodyScan's stock price and trading volume rose in response to the co-conspirators' fraudulent promotional campaign, Mr. K caused approximately 1.5 million shares of BodyScan stock held in the name of Barranquilla to be sold for a total of approximately \$2.6 million.

55. On or about February 26, 2004, Mr. K caused Advantage Trading to issue a check to Mr. R's law firm (f/b/o Barranquilla) in the amount of approximately \$2.6 million. That check was deposited into Mr. R's law firm's client trust account at SunTrust. Thereafter, Mr. R caused an approximately \$2.6 million wire transfer from his law firm's client trust account at SunTrust to Sterling Bank's account at BoA in Denver, NC.

B. Absolute Health and Fitness, Inc.

56. In or about April 2004, documents were created purporting to "reverse merge" a North Carolina health club company into a publicly-traded shell company provided by Mr. O. The resulting entity was ultimately known as Absolute Health.

57. In or about April 2004, approximately 23.5 million unrestricted shares of Absolute Health stock were issued to various individuals and entities based on forged corporate resolutions purporting to authorize the issuance of those shares. Thereafter, approximately 14.5 million of these shares were subsequently transferred to brokerage accounts at Sunstate, Newbridge, and Electronic Access in the names of Barranquilla, Chiang Ze, and Ryzcek.

58. In or about June 2004 and again in or about November 2004, websites known as www.winningstockpicks.net, www.hotstockfinder.com, www.pennystockpro.com, and www.uspennystocks.com, which were controlled by Mr. J, Mr. K, and others known and unknown to the Government posted false and fraudulent promotional materials regarding the Absolute Health stock. Potential investors were directed to these websites though, among other means, Internet

search engine advertising.

59. In or about June 2004, Mr. J and others known and unknown to the Government caused fraudulent promotional materials regarding Absolute Health to be distributed by means of mass unsolicited facsimiles and voice mail broadcasting.

60. When Absolute Health's stock price and trading volume rose in response to the fraudulent promotional campaign, Mr. O and others known and unknown to the Government caused the shares of Absolute Health stock held in brokerage accounts in the names of Barranquilla, Chiang Ze, and Ryzcek to be sold and the proceeds wired to Mr. R's law firm's client trust account and to First Curacao accounts in the names of Barranquilla, Chiang Ze, and Ryzcek.

C. Concorde America, Inc.

61. In or about June 2004, Mr. J, Mr. K, Mr. O, and others known and unknown to the Government caused a Florida company to engage in a "reverse merger" with a publicly-traded shell company provided by Mr. O. The resulting entity was known as Concorde.

62. In or about June 2004, Mr. O and others known and unknown to the Government caused approximately 10 million unrestricted shares of Concorde stock to be issued to Pennsylvania company that Mr. O controlled. These shares were subsequently transferred to brokerage accounts at Sunstate and Newbridge in the names of Barranquilla, Chiang Ze, DaSilva, and Vanderlip.

63. In or about July 2004, websites known as www.winningstockpicks.net and www.uspennystocks.com, which were controlled by Mr. J, Mr. K, and others known and unknown to the Government, posted false and fraudulent promotional materials regarding the Concorde stock.

64. In or about July 2004, Mr. J and others known and unknown to the Government caused fraudulent promotional materials regarding Concorde to be distributed by means of mass unsolicited facsimiles, spam e-mails, and voice mail broadcasting.

65. When Concorde's stock price and trading volume rose in response to the co-conspirators' fraudulent promotional campaign, Mr. O and others known and unknown to the Government caused the shares of Concorde stock held in brokerage accounts in the names of Barranquilla, Chiang Ze, DaSilva, and Vanderlip to be sold and the proceeds wired to Mr. R's law firm's client trust account and to Mr. R's law firm's client trust account and to First Curacao accounts in the names of Barranquilla, Chiang Ze, and Vanderlip.

D. Bio-Heal Laboratories, Inc.

66. In or about January 2005, Mr. J, Mr. K, Mr. O, and others known and unknown to the Government caused a Nevada company to engage in a "reverse merger" with a publicly-traded shell company provided by Mr. O. The resulting entity was known as Bio-Heal.

67. In or about February 2005, Mr. O introduced Mr. J and Mr. K to another individual, who caused approximately 12 million unrestricted shares of Bio-Heal stock to be issued to defunct, non-existent, and recently incorporated companies based on a fake attorney opinion letter. At least 8 million of these shares were subsequently transferred to brokerage accounts at Newbridge and SIPC in the names of Gibson and Bela.

68. In or about March 2005, a website known as www.primepennystock.com, which was controlled by Mr. J, Mr. K, and others known and unknown to the Government, posted false and fraudulent promotional materials regarding the Bio-Heal stock. Potential investors were directed to this website through, among other means, Internet search engine advertising.

69. In or about March 2005, when Bio-Heal's stock price and trading volume rose in response to the co-conspirators' fraudulent promotional campaign, Mr. J and others known and unknown to the Government caused approximately 2.3 million shares of Bio-Heal stock held in brokerage accounts in the names of Gibson and Bela to be sold and the proceeds wired to a First Curacao account in the name of Gibson.

COUNT ONE
18 U.S.C. § 1956(h)
(Money Laundering Conspiracy)

70. The Government realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 69 of the Information, and further alleges that:

71. From in or about 2003 through in or about at least 2005, in Mecklenburg and Lincoln Counties, within the Western District of North Carolina, and elsewhere, the defendant,

SAMUEL THOMAS CURRIN

did knowingly and unlawfully combine, conspire, and agree with H. Woltz, Mr. J, Mr. K, Mr. R, Mr. H, and other persons known and unknown to the Government, to commit the following offenses against the United States:

- A. Money laundering, in violation of Title 18, United States Code, Section 1956;
- and
- B. Money laundering, in violation of Title 18, United States Code, Section 1957.

Objects of the Conspiracy

72. It was a part and an object of the conspiracy that the defendant, and others known and unknown to the Government, knowing (or willfully blind to the fact) that the property involved in financial transactions represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct financial transactions involving the proceeds of specified unlawful activity with the intent to promote the carrying on of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

73. It was a part and an object of the conspiracy that the defendant, and others known and unknown to the Government, knowing (or willfully blind to the fact) that the property involved in the financial transactions described below represented the proceeds of unlawful activity, would and did conduct financial transactions involving the proceeds of specified unlawful activity knowing that the transaction was designed to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i).

74. It was a part and an object of the conspiracy that the defendants, and others known and unknown to the Government, would and did transport, transmit and transfer funds from a place in the United States to and through a place outside the United States and to a place in the United States from and through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(2)(A).

75. It was a part and an object of the conspiracy that the defendant, and others known and unknown to the Government, would and did transport, transmit and transfer funds from a place in the United States to and through a place outside the United States and to a place in the United States from and through a place outside the United States knowing (or willfully blind to the fact) that the funds involved in the transportation, transmission and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i).

76. It was a part and an object of the conspiracy that the defendant, and others known and unknown to the Government, would and did knowingly (or with willful blindness) engage and attempt to engage in monetary transactions in and affecting interstate and foreign commerce by, through, and to financial institutions, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

Overt Acts

77. In furtherance of the conspiracy, and to accomplish the objects thereof, the defendant and his co-conspirators committed the following overt acts, among others, in the Western District of North Carolina and elsewhere:

A. On or about November 11, 2003, Mr. J, Mr. K, and others known and unknown to the Government caused Sterling ACS to form Barranquilla;

B. On or about November 14, 2003, Mr. K and others known and unknown to the Government caused a brokerage account to be opened at World Trade Financial in the name of Barranquilla;

C. On or about January 13, 2004, Mr. J, Mr. K, H. Woltz, CURRIN, Mr. H, and others known and unknown to the Government took a corporate jet from Winston-Salem, North Carolina to Nassau, Bahamas to, among other things, make preparations for the operation of Sterling Bank;

D. On or about January 15, 2004, Mr. K and others known and unknown to the Government caused approximately 1.5 million shares of BodyScan stock to be deposited into a brokerage account at World Trade Financial in the name of Barranquilla;

E. On or about January 21, 2004, Mr. H sent an e-mail to CURRIN stating that “[Mr. K.] emailed that funds flow is imminent for the stock promotion activity. Vernice says accounts have already been established at Newbridge and World Advantage.”;

F. On or about January 23, 2004, CURRIN, H. Woltz, and Mr. H opened an

account at BoA in Denver, NC in the name of Sterling Bank;

G. From on or about February 2, 2004, through on or about February 20, 2004, Mr. K and others known and unknown to the Government caused approximately 1.5 million shares of BodyScan stock to be sold from the brokerage account at World Trade Financial in the name of Barranquilla for a total of approximately \$2.6 million;

H. On or about February 26, 2004, Mr. K and others known and unknown to the Government caused Advantage Trading to issue a check to Mr. R's law firm (f/b/o Barranquilla) in the amount of approximately \$2.6 million;

I. On or about February 27, 2004, Mr. R caused the check from Advantage Trading in the amount of approximately \$2.6 million to be deposited into his law firm's client trust account at SunTrust in Tampa, FL;

J. On or about March 3, 2004, Mr. R caused a \$2.6 million wire transfer from his law firm's client trust account at SunTrust in Tampa, FL to Sterling Bank's account at BoA in Denver, NC;

K. On or about March 4, 2004, Mr. H caused a \$1.9 million wire transfer from Sterling Bank's account at BoA in Denver, NC to Mr. R's law firm's client trust account at SunTrust in Tampa, FL;

L. On or about August 18, 2004, Mr. R, at Mr. J's direction, caused a \$750,000 wire transfer of funds held for Mr. J in Mr. R's law firm's client trust account at SunTrust to First Fidelity Trust's account at National Bank of Anguilla via BoA in Charlotte, North Carolina;

M. On or about November 9, 2004, Mr. J caused approximately \$689,000 to be wired from First Fidelity Trust's account at National Bank of Anguilla to CURRIN's law firm's account at First Citizens in Raleigh, North Carolina to be held for Mr. J;

i. On or about November 10, 2004, CURRIN caused a check in the amount of approximately \$95,000 to be written to Mr. J's wife from funds held for Mr. J in CURRIN's law firm's client trust account;

ii. On or about November 22, 2004, CURRIN caused a check in the amount of approximately \$175,000 to be written to Mr. J from funds held for Mr. J in CURRIN's law firm's client trust account;

iii. On or about January 3, 2005, CURRIN caused a check in the amount of approximately \$130,000 to be written to Mr. J from funds held for Mr. J in CURRIN's law firm's client trust account;

iv. On or about January 25, 2005, CURRIN caused a check in the amount of approximately \$129,114 to be written to Mr. J from funds held for Mr. J in CURRIN's law firm's client trust account;

v. On or about April 19, 2005, CURRIN caused a check in the amount of approximately \$119,744 to be written to Mr. J from funds held for Mr. J in CURRIN's law firm's client trust account;

vi. On or about April 12, 2005, CURRIN caused approximately \$4,264 to be disbursed to his law firm from funds held for Mr. J in CURRIN's law firm's client trust account; and

vii. On or about April 19, 2005, CURRIN caused approximately \$12,000 to be disbursed to his law firm from funds held for Mr. J in CURRIN's law firm's client trust account;

N. On or about March 30, 2005, 2004, Mr. J caused approximately \$174,980 to be wired from an account at First Curacao to CURRIN's law firm's client trust account in Raleigh, North Carolina to be held for Bio-Heal;

i. On or about April 26, 2005, CURRIN caused approximately \$100,000 to be wired to a stock broker in Florida from funds held for Bio-Heal in CURRIN's law firm's client trust account;

O. On or about April 12, 2005, Mr. J caused approximately \$499,980 to be wired from Bovee's account at First Curacao to CURRIN's law firm's client trust account in Raleigh, North Carolina to be held for Bovee;

i. On or about May 23, 2005, CURRIN caused approximately \$75,000 to be disbursed to his law firm from funds held for Bovee in CURRIN's law firm's client trust account;

ii. On or about May 25, 2005, CURRIN caused approximately \$90,000 to be disbursed to his law firm from funds held for Bovee in CURRIN's law firm's client trust account;

iii. On or about June 13, 2005, CURRIN caused approximately \$10,000 to be disbursed to his law firm from funds held for Bovee in CURRIN's law firm's client trust account;

iv. On or about July 13, 2005, CURRIN caused approximately \$65,000 to be disbursed to his law firm from funds held for Bovee in CURRIN's law firm's client trust account;

v. On or about September 9, 2005, CURRIN caused approximately \$4,500 to be disbursed to his law firm from funds held for Bovee in CURRIN's law firm's client trust account;

vi. On or about September 21, 2005, CURRIN caused approximately \$15,000 to be disbursed to his law firm from funds held for Bovee in CURRIN's law firm's client trust account;

vii. On or about September 30, 2005, CURRIN caused approximately \$13,500 to be disbursed to his law firm from funds held for Bovee in CURRIN's law firm's client trust account;

viii. On or about October 19, 2005, CURRIN caused approximately \$41,980 to be wired to an account at First Vietnamese controlled by Mr. H from funds held for Bovee in CURRIN's law firm's client trust account; and

ix. On or about October 25, 2005, Mr. H caused approximately \$34,956 to be wired to an account controlled by Mr. J at Bank of Cyprus from funds held in an account at First Vietnamese controlled by Mr. H; and

x. On or about October 31, 2005, Mr. J and others caused an approximately \$34,081 wire to pay for Internet search engine advertising to be sent from funds held in an account controlled by Mr. J at Bank of Cyprus.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT TWO
26 U.S.C. § 7212(a)
(Obstruction of Due Administration of IRS)

78. The Government realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 44 of the Information, and further alleges that:

79. On or about June 30, 2003, CURRIN, along with H. Woltz and V. Woltz, caused The Oxford Corp. (hereafter, "Oxford") to be incorporated by Sterling ACS in or about November 2003 under the laws of Anguilla.

80. In or about August 5, 2004, CURRIN caused an application for an ExactPay debit card account at First Curacao to be submitted in the name of Oxford. Shortly thereafter, the application was accepted and the account was opened.

81. On or about August 12, 2004, a client of CURRIN's caused approximately \$6,000 to be deposited into the Oxford ExactPay account.

82. On or about January 26, 2005, Mr. H transferred approximately \$4,061 into the Oxford ExactPay account.

83. On or about April 15, 2005, CURRIN submitted a federal individual income tax return to the Internal Revenue Service, which return failed to report as income the \$6,000 that had been deposited into the Oxford ExactPay account.

84. From on or about June 28, 2005 through on or about July 5, 2005, CURRIN withdrew several thousand dollars in cash from the Oxford ExactPay account through use of the debit card at automated teller machines in Raleigh, North Carolina.

85. From in or about June 2003 through in or about July 2005, the defendant,

SAMUEL THOMAS CURRIN

did corruptly obstruct and impede and endeavor to obstruct and impede the due administration of the Internal Revenue Code, all in violation of Title 26, United States Code, Section 7212(a).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

86. The Government realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 77 of the Information, and further alleges that:

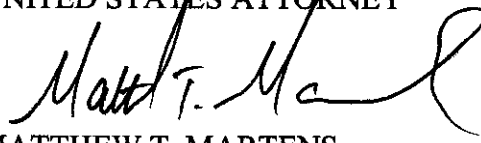
87. Notice is hereby given, pursuant to Federal Rule of Criminal Procedure 32.2(a), of the provisions of 18 U.S.C. § 982, 21 U.S.C. § 853, and 28 U.S.C. § 2461©. Under Section 2461©, criminal forfeiture is applicable to any offenses for which forfeiture is authorized by any other statute, including but not limited to 18 U.S.C. § 981, and all specified unlawful activities listed or referenced in 18 U.S.C. § 1956(c)(7), which are incorporated as to proceeds by 18 U.S.C. § 981(a)(1)(c). The defendants have or had possessory or legal interests in the following property that is subject to forfeiture in accordance with Section 982 and/or Section 2461(c):

- A. All property involved in the violations alleged in this Bill of Information, or traceable to such property;
- B. All property which is proceeds of such violations, or traceable to such property; and,
- C. In the event that any property described in (A) or (B) cannot be located or recovered or has been substantially diminished in value or has been commingled with other property which cannot be divided without difficulty, all other property of the defendants, to the extent of the value of the property described in (A) and (B).

88. The Government alleges that the following property is subject to forfeiture on one or more of the grounds stated above:

- A. The sum of approximately \$289,265, which represents fees paid by Mr. J to CURRIN's law firm;
- B. The sum of approximately \$245,000 received by CURRIN from Pacific Trust in or about December 2005;
- C. The assets of Oxford, including but not limited to the company's accounts at First Curacao and with Sterling ACS;
- D. 200,000 shares of GTX Global Corp. stock, if any, purchased by CURRIN;
- E. CURRIN's interest in Sterling Bank;
- F. Any funds paid to CURRIN upon the dissolution of Currin Law Firm, PLLC; and
- G. Two Rolex watches obtained by CURRIN from Mr. J.

GRETCHEN C.F. SHAPPERT
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "Matt T. Martens". The signature is written in a cursive style with a large, looping initial "M" and a long, sweeping tail.

MATTHEW T. MARTENS
ASSISTANT UNITED STATES ATTORNEY