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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2008 Grand Jury

UNITED STATES OF AMERICA,)	No. ED CR 09-
)	
Plaintiff,)	<u>I N D I C T M E N T</u>
)	
v.)	[18 U.S.C. § 1341: Mail Fraud;
)	18 U.S.C. § 1956(h): Conspiracy
CHRISTIANO KAWIKA HASHIMOTO)	to Commit Money Laundering; 18
JR.,)	U.S.C. § 1956(a) (1) (A) (i):
DAVID LINCOLN JOHNSON, and)	Money Laundering Promotion; 18
CATHERINE LIPSCOMB,)	U.S.C. § 2: Aiding and Abetting
)	and Causing an Act to Be Done]
Defendants.)	
)	

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At all times relevant to this indictment:

1. Financial Solutions was a company that claimed to be engaged in the business of raising money for and investing in other companies. Until approximately January 2004, Financial Solutions was located and did business at 2191 Fifth Sreet, #104, in Norco, California, in Riverside County. From approximately January 2004 to mid-August of 2004, Financial Solutions was located and did business at 8175 Limonite Avenue, Suite A, in

1 Riverside, California, in Riverside County. From approximately
2 mid-August 2004 to November 4, 2004, Financial Solutions was
3 located and did business at 4295A East Jurupa Street, Suite 116,
4 in Ontario, California, in San Bernardino County.

5 2. Defendant CHRISTIANO KAWIKA HASHIMOTO JR. ("HASHIMOTO")
6 was the founder and president of Financial Solutions.

7 3. Beginning on an unknown date in 2003, defendant
8 CATHERINE LIPSCOMB ("LIPSCOMB") was operations manager, chief
9 financial officer, and/or vice president of Financial Solutions.

10 4. Financial Solutions' primary bank account was Bank of
11 America account no. XXXXX-X7343, on which defendants HASHIMOTO
12 and LIPSCOMB were the only persons with signing authority.

13 5. Gentech Fabrication, Inc. ("Gentech") was a custom
14 manufacturer of metal products for the United States ("U.S.")
15 government, among other entities. Gentech was located at 13930
16 Magnolia Avenue in Chino, California, in San Bernardino County.

17 6. Defendant DAVID LINCOLN JOHNSON ("JOHNSON") was the
18 president of Gentech.

19 7. Gentech had three business bank accounts at Bank of
20 America: account nos. XXXXX-X9753, XXXXX-X9761, and XXXXX-X9924.

21 8. Kamp Systems, Inc. ("Kamp") was a manufacturing company
22 that designed and produced equipment for, among other entities,
23 the U.S. government.

24 9. Ohana International Inc. ("Ohana") was an investment
25 opportunity created by defendant HASHIMOTO. Ohana was an
26 international holding corporation designed to acquire companies
27 in the real estate, financial services, and entertainment
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1 industries, among others. Financial Solutions and Gentech were
2 two of these companies. Defendant HASHIMOTO sold stock in Ohana
3 to investors.

4 10. In or around October of 2002, Kamp was experiencing
5 financial and logistical difficulties and moved its operations
6 into Gentech's facility in Chino, California. At that time,
7 Gentech took over work on one of Kamp's projects for the U.S. Air
8 Force; specifically, construction of a C-5 empennage stand.

9 11. The C-5 empennage stand is a scaffolding-like structure
10 that fits around the tail of a C-5 aircraft, facilitating
11 maintenance workers' access to the back of the plane.

12 12. Gentech employees worked on construction of the C-5
13 empennage stand at Gentech's facility in Chino, California, and
14 at Lackland Air Force Base in Texas.

15 13. On or about May 26, 2004, the U.S. Air Force cancelled
16 its contract with Kamp for the C-5 empennage stand.

17 14. The Grand Jury incorporates by reference and re-alleges
18 each of these introductory allegations into each count of the
19 indictment.

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COUNTS ONE THROUGH NINETEEN

[18 U.S.C. §§ 1341, 2]

A. THE FRAUDULENT SCHEME

15. Beginning on an unknown date, and continuing through at least on or about November 4, 2004, in Riverside and San Bernardino Counties, within the Central District of California, and elsewhere, defendants CHRISTIANO KAWIKA HASHIMOTO JR. ("HASHIMOTO"), DAVID LINCOLN JOHNSON ("JOHNSON"), and CATHERINE LIPSCOMB ("LIPSCOMB"), and others known and unknown to the Grand Jury, aiding and abetting each other, knowingly and with intent to defraud, devised, participated in, and executed a scheme to defraud victim investors as to material matters, and to obtain money and property from victim investors by means of material false and fraudulent pretenses, representations, and promises, and the concealment of material facts.

16. The fraudulent scheme was carried out by defendants HASHIMOTO, JOHNSON, and LIPSCOMB, and other co-schemers, in the following manner:

a. Defendant HASHIMOTO would solicit potential investors to invest money with his company, Financial Solutions. Defendant HASHIMOTO would tell potential investors that Financial Solutions was in the business of raising money for and investing in other companies.

b. One of the investments options defendant HASHIMOTO would offer to investors was participation in a government contract lending program by lending money to Gentech Fabrication, Inc. ("Gentech"). Defendant HASHIMOTO would

1 tell investors that their money would be used to fund
2 Gentech's construction of equipment for the U.S. government,
3 and that their investments were guaranteed by a government
4 contract held by Gentech.

5 c. Defendants HASHIMOTO and JOHNSON would agree to
6 work together to promote the purported investments in
7 JOHNSON's company, Gentech, through Financial Solutions. To
8 that end, defendant JOHNSON would provide potential and
9 actual Financial Solutions investors with tours of Gentech's
10 facilities and information about Gentech, including making
11 representations to investors regarding the government
12 contract that supposedly guaranteed their investments.
13 Defendant JOHNSON would characterize the contract to
14 construct the C-5 empennage stand as being Gentech's
15 contract with the government, and would not reveal that in
16 fact it was Kamp Systems, Inc. ("Kamp") that had the
17 contract with the government or that Gentech had taken over
18 the work on that contract from Kamp.

19 d. Defendants HASHIMOTO and JOHNSON would tell
20 investors that Gentech stood to reap substantial financial
21 returns on its government contract, and as a result could
22 afford to pay substantial interest to investors for their
23 short-term loans of money Gentech needed to complete its
24 work on the government contract.

25 e. Defendant HASHIMOTO would recruit investors to
26 become Financial Solutions sales agents. The sales agents
27 would earn commissions on the investments made by the
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1 investors they recruited equal to a percentage of the
2 investments' value.

3 f. At the direction of defendant HASHIMOTO, the sales
4 agents would recruit additional investors using the
5 materials and information about the investments that had
6 been given to them by defendants HASHIMOTO and JOHNSON. In
7 addition, defendant LIPSCOMB and others at Financial
8 Solutions, acting under defendant HASHIMOTO's direction,
9 would give the agents promotional materials about Financial
10 Solutions and Gentech.

11 g. Initial investors in the Gentech contracts would
12 provide checks payable to Gentech. But after these initial
13 investments, defendant HASHIMOTO and the Financial Solutions
14 sales agents acting at his direction would instruct
15 investors to invest by making their checks payable to
16 Financial Solutions.

17 h. Defendants HASHIMOTO, JOHNSON and LIPSCOMB would
18 provide investors with promissory notes that would state the
19 dollar amount of the principal sum invested, and would state
20 that the investor would receive his or her principal plus a
21 specified amount of interest -- either 5, 10, or 20% -- on
22 the investment in thirty days. The promissory notes would
23 also state that the borrower's obligations in the promissory
24 note were secured by a security interest in a specified
25 government contract of the borrower.

26 i. Initially, the promissory notes would state that
27 Gentech promised to pay the investor the principal sum
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1 invested plus interest at the specified rate, and would be
2 signed by defendant JOHNSON and, at times, defendant
3 HASHIMOTO. Later, the promissory notes would state that
4 Financial Solutions promised to pay the investor the
5 principal sum invested plus interest at the specified rate,
6 and would be signed by only defendant HASHIMOTO or at times
7 by defendant LIPSCOMB for HASHIMOTO. Whether the promissory
8 note was from Gentech or Financial Solutions, the promissory
9 note would state that the borrower's obligations in the
10 promissory note were secured by a security interest in a
11 specified government contract of the borrower.

12 j. Defendant LIPSCOMB, acting under the direction and
13 with the assistance of defendant HASHIMOTO, would draft the
14 form promissory note that was given to investors. Using the
15 form promissory note, defendant LIPSCOMB would prepare the
16 specific promissory notes for each investment based on
17 information provided to her by Financial Solutions sales
18 agents, and then would mail the promissory notes to the
19 investors using the United States mail.

20 k. At the end of the promissory notes' thirty-day
21 periods, investors would have the option of cashing out
22 their investments or rolling them over into a new thirty-day
23 investment term.

24 l. After the U.S. Air Force cancelled its contract
25 with Kamp for the C-5 empennage stand on or about May 26,
26 2004, defendants HASHIMOTO and JOHNSON would conceal the
27 cancellation of the contract from investors, and would
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1 continue to solicit investors for the government contract
2 lending program.

3 m. Although defendants HASHIMOTO and JOHNSON, and the
4 sales agents acting under HASHIMOTO's direction, led
5 Financial Solutions investors to believe that the money they
6 invested was being used to support the construction of
7 projects Gentech had under government contract, and although
8 the promissory notes sent to investors by defendants
9 HASHIMOTO, LIPSCOMB, and JOHNSON represented that the
10 investments were secured by government contract, in fact the
11 vast majority of the money that Financial Solutions
12 investors invested in the Gentech contract would not be sent
13 to Gentech. Instead, defendant HASHIMOTO, and defendant
14 LIPSCOMB acting at HASHIMOTO's direction, would use the
15 majority of investor money to pay other investors, to pay
16 commissions for sales agents, and to pay HASHIMOTO.

17 B. THE EXECUTION OF THE FRAUDULENT SCHEME

18 17. To execute the above-described scheme, defendants
19 HASHIMOTO, JOHNSON, and LIPSCOMB, and other co-schemers,
20 knowingly participated in and aided and abetted the following
21 materially false and misleading acts, among others:

22 a. In or about 2002, defendant HASHIMOTO founded
23 Financial Solutions, initially as a company that sold life
24 insurance and annuities to businesses.

25 b. On a date unknown to the Grand Jury, defendant
26 HASHIMOTO changed Financial Solutions' business to include
27 raising money for purported investments in various
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1 companies.

2 c. In or about 2002, defendant JOHNSON took investor
3 G.G. on a tour of the Gentech facility. Defendant JOHNSON
4 told G.G. that Gentech manufactured aircraft stands for the
5 U.S. government, that the government paid Gentech \$1.5
6 million for each stand, and that each stand cost Gentech
7 \$500,000 to manufacture.

8 d. After personally investing in Gentech in or about
9 late 2002, G.G. became a sales agent for Financial
10 Solutions. Defendant HASHIMOTO gave G.G. documents to
11 assist G.G. in recruiting investors. One of these documents
12 was one page of the Gentech contract, valuing the contract
13 that Gentech held with the U.S. government at \$13.5 million.

14 e. As a sales agent, G.G. visited the Gentech
15 facility on several occasions. Defendant JOHNSON told G.G.
16 on one of his visits to Gentech that the value of the
17 government contracts held by Gentech had increased to \$110
18 million.

19 f. Contrary to defendants HASHIMOTO's and JOHNSON's
20 claims, the contracts that Gentech held with the government
21 in the fall of 2004 were cumulatively valued at less than
22 \$135,000. The contracts that Kamp held with the government
23 at that time were worth approximately \$10 million.

24 g. At a meeting of Financial Solutions' sales agents
25 in the spring of 2004, defendant HASHIMOTO announced that
26 Financial Solutions was at risk of losing Gentech as an

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1 investment opportunity because defendant JOHNSON wanted to work
2 with another company. Defendant HASHIMOTO told the sales agents
3 that, in order to continue with Gentech, the interest rate being
4 paid to investors would have to be lowered. Sales agents
5 objected to this change and defendant HASHIMOTO ultimately kept
6 or returned the interest rate to the level initially promised to
7 investors.

8 h. In or about May 2004, defendant LIPSCOMB provided
9 Financial Solutions sales agents with promotions material
10 that included a compact disk depicting the C-5 empennage
11 stand and a letter from defendant HASHIMOTO describing the
12 "government contract lending program" involving Gentech.
13 The letter explained that Financial Solutions would lend
14 Gentech capital to finance its project with the government.
15 The product allegedly cost Gentech \$500,000 to produce and
16 the government then purchased the product for \$2 million.
17 Defendant HASHIMOTO explained in the letter that Gentech
18 could thus pay investors "a substantial interest return."

19 i. At a meeting of sales agents in or about June
20 2004, a sales agent asked defendant HASHIMOTO if he planned
21 to send out Form 1099s for the sales agents to complete
22 their income tax returns. Defendant HASHIMOTO said that he
23 was not going to be sending out Form 1099s.

24 j. In or about June 2004, Gentech employees working
25 on the C-5 empennage stand at Lackland Air Force Base were
26 locked out of the base by the Air Force, and Gentech laid
27 off most of these employees.

1 k. In or about the summer of 2004, G.N., also known
2 as R.N., invested in Financial Solutions after defendant
3 HASHIMOTO indicated to G.N. that his investment was going to
4 fund the C-5 empennage stand that Gentech was working on,
5 and that the contract was a multi-million dollar deal.

6 l. In or about July or August of 2004, defendant
7 JOHNSON took a group of potential investors on a tour of
8 Gentech. During the tour, defendant JOHNSON talked about
9 the various government contracts Gentech allegedly had,
10 particularly the contract for the C-5 empennage stand.
11 Defendant JOHNSON told the investors that the contract for
12 the C-5 empennage stand was current, and indicated that
13 Gentech was manufacturing equipment under that contract.
14 Defendant JOHNSON also told investors that the potential for
15 profit on this contract was huge.

16 m. In or about summer or early fall of 2004,
17 defendant HASHIMOTO announced to Financial Solutions sales
18 agents a contest whereby the sales agent who raised the most
19 money for Gentech would win a lavish prize.

20 n. On or about October 22, 2004, Financial Solutions
21 hosted an investor recruiting event at the Ritz Carlton in
22 Marina Del Rey, California. At that event, defendant
23 HASHIMOTO told prospective investors that investors in
24 30-day notes issued by Financial Solutions received a
25 guaranteed return of 20% the first month of their investment
26 and a guaranteed return of 10% every month thereafter.
27 Defendant HASHIMOTO said that investments in the Financial
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1 Solutions notes were secured by a \$100 million government
2 bond.

3 o. Between mid-2003 and November 2004, approximately
4 723 deposits were made by defendants HASHIMOTO and LIPSCOMB,
5 and persons acting at the direction of HASHIMOTO and
6 LIPSCOMB, into Financial Solutions' Bank of America account
7 no. XXXXX-X7343, totaling approximately \$23,796,393,
8 approximately \$23 million of which came from investors.

9 p. Of the investor funds disbursed from Bank of
10 America account no. XXXXX-X7343, less than \$1 million, or
11 approximately 4% of the funds, went to Gentech. Close to \$2
12 million went directly to defendant HASHIMOTO, and
13 approximately \$14 million went to pay investors and
14 commissions for sales agents.

15 C. THE USE OF THE MAIL

16 18. On or about the dates set forth below, within the
17 Central District of California and elsewhere, defendants
18 HASHIMOTO, JOHNSON, and LIPSCOMB, for the purpose of executing
19 and attempting to execute the above-described scheme to defraud,
20 willfully caused the following items to be placed in an
21 authorized depository for mail matter to be sent and delivered by
22 the United States Postal Service, according to the directions
23 thereon:

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<u>COUNT</u>	<u>DATE</u>	<u>SENDER</u>	<u>ITEM SENT</u>	<u>ADDRESSEE</u>
25 ONE	26 6/09/ 2004	Financial Solutions Riverside, CA	Promissory Note for \$10,000 investment	M.S. and T.S. Grover Beach, CA

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<u>COUNT</u>	<u>DATE</u>	<u>SENDER</u>	<u>ITEM SENT</u>	<u>ADDRESSEE</u>
TWO	8/03/ 2004	Financial Solutions Riverside, CA	Promissory Note for \$100,000 investment	G.S. Hawthorne, CA
THREE	8/06/ 2004	Financial Solutions Ontario, CA	Promissory Note for \$10,000 investment	R.T. Oceanside, CA
FOUR	8/10/ 2004	Financial Solutions Riverside, CA	Promissory Note for \$30,000 investment	E.D.M. San Diego, CA
FIVE	8/14/ 2004	Financial Solutions Riverside, CA	Promissory Note for \$100,000 investment	I.M. Stevenson Ranch, CA
SIX	8/24/ 2004	Financial Solutions Riverside, CA	Promissory Note for \$31,350 reinvestment	G.S. Hawthorne, CA
SEVEN	8/30/ 2004	Financial Solutions Ontario, CA	Promissory Note for \$150,000 investment	V.G. New Hall, CA
EIGHT	9/14/ 2004	Financial Solutions Ontario, CA	Promissory Note for \$50,000 investment	R.T. Oceanside, CA
NINE	9/21/ 2004	Financial Solutions Ontario, CA	Promissory Note for \$10,000 investment	G.O. Santa Maria, CA
TEN	9/30/ 2004	Financial Solutions Ontario, CA	Promissory Note for \$180,000 reinvestment	V.G. New Hall, CA
ELEVEN	9/30/ 2004	Financial Solutions Ontario, CA	Promissory Note for \$50,000 investment	R.T. Oceanside, CA
TWELVE	10/04 /2004	Financial Solutions Ontario, CA	Promissory Note for \$100,000 reinvestment	G.S. Hawthorne, CA
THIRTEEN	10/09 /2004	Financial Solutions Ontario, CA	Promissory Note for \$121,000 reinvestment	I.M. Stevenson Ranch, CA
FOURTEEN	10/15 /2004	Financial Solutions Ontario, CA	Promissory Note for \$50,000 investment	G.O. Santa Maria, CA
FIFTEEN	10/21 /2004	Financial Solutions Ontario, CA	Promissory Note for \$15,000 investment	L.P. and P.P. Santa Maria, CA

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<u>COUNT</u>	<u>DATE</u>	<u>SENDER</u>	<u>ITEM SENT</u>	<u>ADDRESSEE</u>
SIXTEEN	10/22 /2004	Financial Solutions Ontario, CA	Promissory Note for \$30,000 investment	E.D.M. San Diego, CA
SEVENTEEN	10/28 /2004	Financial Solutions Ontario, CA	Promissory Note for \$198,000 reinvestment	V.G. Newhall, CA
EIGHTEEN	11/03 /2004	Financial Solutions Ontario, CA	Promissory Note for \$110,000 reinvestment	G.S. Hawthorne, CA
NINETEEN	11/04 /2004	Financial Solutions Ontario, CA	Promissory Note for \$110,000 investment	C.B. and G.B. Santa Maria, CA

COUNT TWENTY

[18 U.S.C. § 1956(h)]

A. OBJECT OF THE CONSPIRACY

19. Beginning on an unknown date, and continuing through at least on or about November 4, 2004, in Riverside and San Bernardino Counties, within the Central District of California, and elsewhere, defendants CHRISTIANO KAWIKA HASHIMOTO JR. ("HASHIMOTO"), DAVID LINCOLN JOHNSON ("JOHNSON"), and CATHERINE LIPSCOMB ("LIPSCOMB"), and others known and unknown to the Grand Jury, knowingly and willfully conspired and agreed with each other to commit offenses against the United States, namely, knowing that property involved in financial transactions represented the proceeds and profits of some form of unlawful activity, and which property was, in fact, the proceeds and profits of specified unlawful activity, that is Mail Fraud in violation of 18 U.S.C. § 1341, to conduct and attempt to conduct financial transactions with the intent to promote the carrying on of said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

20. The object of the conspiracy was to be accomplished in substance as follows:

a. The Grand Jury incorporates by reference and re-alleges paragraph 16, subparagraphs a through m, of subsection A, titled "The Fraudulent Scheme," pertaining to Counts One through Nineteen of this indictment.

1 b. Defendants HASHIMOTO and LIPSCOMB, and persons
2 acting at the direction of HASHIMOTO and LIPSCOMB, would
3 deposit the investment checks from Financial Solutions
4 investors into Financial Solutions' Bank of America account
5 no. XXXXX-X7343. But although the investors would have been
6 told that they were investing in a short-term loan to
7 Gentech Fabrication, Inc. ("Gentech"), defendants HASHIMOTO
8 and LIPSCOMB would not transfer the vast majority of the
9 investment funds to Gentech.

10 c. Defendants HASHIMOTO and LIPSCOMB would apply the
11 majority of investors' money to expenditures that promoted
12 the continuation of the fraudulent scheme, including
13 payments to other investors that purported to be returns on
14 their investments from Gentech, commission payments to sales
15 agents, and payments to venues that hosted promotional
16 events.

17 d. Although only a small percentage of invested funds
18 would be transmitted to Gentech, and although Gentech would
19 transmit back to Financial Solutions only a small fraction
20 of the funds it had received from Financial Solutions,
21 defendants HASHIMOTO and JOHNSON would continue to represent
22 to investors that their investment in Financial Solutions
23 was for a loan of funds for Gentech to use to complete the
24 work on its government contract, and that payments to
25 investors would come from Gentech.

1 C. OVERT ACTS

2 21. In furtherance of the conspiracy and to accomplish the
3 object of the conspiracy, defendants HASHIMOTO, JOHNSON, and
4 LIPSCOMB, and others known and unknown to the Grand Jury,
5 committed various overt acts within the Central District of
6 California, including but not limited to the following:

7 a. The Grand Jury incorporates by reference and re-
8 alleges paragraph 17, subparagraphs a through p, of
9 subsection B, titled "The Execution of the Fraudulent
10 Scheme," pertaining to Counts One through Nineteen of this
11 indictment.

12 b. Between mid-2003 and November 2004, approximately
13 723 deposits were made by defendants HASHIMOTO and LIPSCOMB,
14 and persons acting at the direction of HASHIMOTO and
15 LIPSCOMB, into Bank of America account no. XXXXX-X7343,
16 totaling approximately \$23,796,393; approximately \$23
17 million of this money came from investors.

18 c. Of the investor funds disbursed from Bank of
19 America account no. XXXXX-X7343 between mid-2003 and
20 November 2004, less than \$1 million, or approximately 4% of
21 the funds, went to Gentech.

22 d. Of the investor funds disbursed from Bank of
23 America account no. XXXXX-X7343 between mid-2003 and
24 November 2004, approximately \$14 million went to pay
25 investors and commissions for sales agents.

26 e. Between in or about December 2003 and October
27 2004, Financial Solutions checks and money transfers
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1 totaling approximately \$1,104,113 were paid to Financial
2 Solutions sales agent G.M. for broker fees and commissions
3 and for purported returns on investments.

4 f. In or about March 2004, Financial Solutions checks
5 totaling \$2,700 were paid to the Indian Hills Golf Club in
6 Riverside, California for meetings defendant HASHIMOTO had
7 with Financial Solutions brokers and agents.

8 g. Between in or about April 2004 and October 2004,
9 Financial Solutions checks totaling \$286,289 were paid to
10 Financial Solutions sales agent A.M. and A.M.'s company AZM
11 Investments, Inc. for broker fees and commissions.

12 h. Between in or about April 2004 and October 2004,
13 Financial Solutions checks totaling \$187,577.30 were paid to
14 Financial Solutions sales agent R.R. for broker fees and
15 commissions.

16 i. Between in or about April 2004 and November 2004,
17 Financial Solutions checks totaling \$401,860.65 were paid to
18 Financial Solutions sales agent G.G. for broker fees and
19 commissions and for purported interest returns on
20 investments.

21 j. Between in or about May 2004 and September 2004,
22 Financial Solutions checks totaling \$182,622.40 were paid to
23 Financial Solutions sales agent V.M. for broker fees and
24 commissions.

25 k. Between in or about May 2004 and September 2004,
26 Financial Solutions checks totaling \$35,100 were paid to
27 Financial Solutions sales agent H.G. for broker fees and
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1 commissions and for purported interest returns on
2 investments.

3 l. Between in or about July 2004 and October 2004,
4 Financial Solutions checks totaling \$98,789.38 were paid to
5 the Ritz-Carlton Hotel in Marina del Rey, California for
6 meetings and banquets with Financial Solutions employees and
7 investors.

8 m. Between in or about July 2004 and November 2004,
9 Financial Solutions checks totaling \$139,834.76 were paid to
10 Financial Solutions sales agent G.N., also known as R.N.,
11 for broker fees and commissions.

12 n. Between in or about August 2004 and October 2004,
13 Financial Solutions checks totaling \$42,530 were paid to
14 Financial Solutions sales agent L.P. for broker fees and
15 commissions and for purported interest returns on
16 investments.

17 o. Between in or about August 2004 and October 2004,
18 Financial Solutions checks totaling \$110,654.92 were paid to
19 Financial Solutions sales agents D.R. and M.R. for broker
20 fees and commissions.

21 p. On or about September 8, 2004, a Financial
22 Solutions check for \$10,000 was paid to Financial Solutions
23 investor I.M. for a purported interest return on investment.

24 q. Between in or about September 2004 and October
25 2004, Financial Solutions checks totaling \$520,000 were paid
26 to investor Coast to Coast Investments for purported
27 interest and principal returns on investments.

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COUNTS TWENTY-ONE THROUGH EIGHTY-FIVE

[18 U.S.C. §§ 1956(a) (1) (A) (i), 2]

22. On or about the following dates, in Riverside and San Bernardino Counties, within the Central District of California and elsewhere, defendants CHRISTIANO KAWIKA HASHIMOTO JR. ("HASHIMOTO"), DAVID LINCOLN JOHNSON ("JOHNSON"), and CATHERINE LIPSCOMB ("LIPSCOMB"), and others known and unknown to the Grand Jury, aiding and abetting each other, knowing that the property involved in each of the financial transactions described below represented the proceeds and profits of some form of unlawful activity, conducted, and willfully caused others to conduct, the following financial transactions affecting interstate commerce, which transactions each consisted of a payment by check or other money transfer from Financial Solutions' Bank of America account no. XXXXX-X7343, and which transactions in fact involved the proceeds and profits of specified unlawful activity, namely Mail Fraud in violation of 18 U.S.C. § 1341, with the intent to promote the carrying on of such specified unlawful activity:

<u>COUNT</u>	<u>DATE</u>	<u>FINANCIAL TRANSACTION</u>
TWENTY-ONE	6/06/2004	Check no. 1549 for \$30,000 payable to R.R. for broker fees
TWENTY-TWO	6/09/2004	Check no. 1782 for \$32,000 payable to G.G. for broker fees and advance
TWENTY-THREE	6/14/2004	Check no. 1817 for \$29,025.50 payable to G.M. for broker fees
TWENTY-FOUR	6/16/2004	Check no. 1595 for \$13,215 payable to G.G. for broker fees
TWENTY-FIVE	6/16/2004	Check no. 1831 for \$21,140 payable to A.M. for broker fees
TWENTY-SIX	6/21/2004	Check no. 1859 for \$29,770 payable to G.G. for broker fees

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<u>COUNT</u>	<u>DATE</u>	<u>FINANCIAL TRANSACTION</u>
TWENTY-SEVEN	6/24/2004	Check no. 1909 for \$33,742 payable to G.M. for broker fees
TWENTY-EIGHT	6/24/2004	Check no. 1918 for \$23,965 payable to V.M. for broker fees
TWENTY-NINE	6/25/2004	Check no. 1925 for \$11,520 payable to G.G. for broker fees
THIRTY	6/30/2004	Check no. 1968 for \$7,800 payable to H.G. for interest and commission
THIRTY-ONE	7/01/2004	Check no. 1976 for \$5,160 payable to G.N. for broker fees
THIRTY-TWO	7/03/2004	Check no. 1984 for \$36,000 payable to R.R. for broker fees
THIRTY-THREE	7/07/2004	Check no. 2057 for \$7,800 payable to H.G. for interest and commission
THIRTY-FOUR	7/08/2004	Check no. 2069 for \$14,420.40 payable to G.M. for broker fees
THIRTY-FIVE	7/15/2004	Check no. 2175 for \$43,311 payable to G.G. for broker fees
THIRTY-SIX	7/16/2004	Check no. 2210 for \$45,012.95 payable to G.M. for broker fees
THIRTY-SEVEN	8/03/2004	Check no. 2357 for \$24,737 payable to A.M. for broker fees
THIRTY-EIGHT	8/05/2004	Check no. 2384 for \$19,216.48 payable to D.R. for broker fees
THIRTY-NINE	8/12/2004	Check no. 2482 for \$36,087.30 payable to R.R. for broker fees
FORTY	8/20/2004	Check no. 2525 for \$15,000 payable to G.M. for broker fees
FORTY-ONE	8/20/2004	Check no. 2553 for \$18,701.60 payable to G.G. for broker fees
FORTY-TWO	8/25/2004	Check no. 2563 for \$26,941.49 payable to V.M. for broker fees
FORTY-THREE	8/27/2004	Check no. 2672 for \$63,828 payable to G.G. for broker fees
FORTY-FOUR	8/28/2004	Check no. 2675 for \$6,450 payable to L.P. for broker fees and interest
FORTY-FIVE	8/28/2004	Check no. 2681 for \$13,000 payable to G.M. for broker fees

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<u>COUNT</u>	<u>DATE</u>	<u>FINANCIAL TRANSACTION</u>
FORTY-SIX	8/30/2004	Check no. 2704 for \$26,083.42 payable to D.R. or M.R. for commissions
FORTY-SEVEN	8/31/2004	Check no. 2709 for \$42,265.24 payable to V.M. for commission
FORTY-EIGHT	8/31/2004	Check no. 2712 for \$89,990.01 payable to G.M. for commission
FORTY-NINE	8/31/2004	Check no. 2713 for \$27,335.50 payable to G.M. for commissions
FIFTY	9/03/2004	Check no. 2621 for \$35,144 payable to R.N. for broker fees
FIFTY-ONE	9/03/2004	Check no. 2622 for \$45,000 payable to R.R. for broker fees
FIFTY-TWO	9/03/2004	Check no. 2776 for \$22,455 payable to A.M. for broker fees
FIFTY-THREE	9/08/2004	Check no. 1015 for \$10,000 payable to I.M. for interest
FIFTY-FOUR	9/15/2004	Check no. 1134 for \$47,296.97 payable to G.M. for commission
FIFTY-FIVE	9/15/2004	Check no. 1137 for \$41,472 payable to G.M. for interest
FIFTY-SIX	9/15/2004	Check no. 1138 for \$44,730 payable to G.G. for commission
FIFTY-SEVEN	9/16/2004	Check no. 1071 for \$14,220 payable to A.M. for commission
FIFTY-EIGHT	9/22/2004	Check no. 1231 for \$10,000 payable to H.G. for interest
FIFTY-NINE	9/22/2004	Check no. 1258 for \$10,000 payable to G.M. for commission
SIXTY	9/24/2004	Check no. 1179 for \$28,840.65 payable to V.M. for commission
SIXTY-ONE	9/24/2004	Check no. 1289 for \$80,000 payable to Coast to Coast Investments for interest
SIXTY-TWO	9/25/2004	Check no. 1239 for \$10,000 payable to L.P. for interest
SIXTY-THREE	9/29/2004	Check no. 1325 for \$26,318 payable to A.M. for commission

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<u>COUNT</u>	<u>DATE</u>	<u>FINANCIAL TRANSACTION</u>
SIXTY-FOUR	9/30/2004	Check no. 1398 for \$49,079.82 payable to V.M. for commission
SIXTY-FIVE	10/05/2004	Check no. 1461 for \$53,000 payable to R.N. for commission
SIXTY-SIX	10/06/2004	Transfer of \$101,500 to Bank of America account no. XXXXX-X1857 held by G.M.
SIXTY-SEVEN	10/06/2004	Check no. 1485 for \$7,500 payable to L.P. for commission
SIXTY-EIGHT	10/11/2004	Check no. 1578 for \$19,270.05 payable to G.G. for interest notes
SIXTY-NINE	10/11/2004	Check no. 1582 for \$12,500 payable to G.M. for commission
SEVENTY	10/11/2004	Check no. 1584 for \$16,000 payable to G.G. for interest
SEVENTY-ONE	10/12/2004	Check no. 1603 for \$43,361 payable to A.M. for overdue commission
SEVENTY-TWO	10/12/2004	Check no. 1610 for \$9,181.11 payable to D.R. or M.R. for commission
SEVENTY-THREE	10/18/2004	Check no. 1722 for \$32,929 payable to AZM Investments, Inc. for commission
SEVENTY-FOUR	10/18/2004	Check no. 1726 for \$12,500 payable to G.M. for commission
SEVENTY-FIVE	10/20/2004	Check no. 1783 for \$76,225.64 payable to The Ritz Carlton for event 10/22/04 - dinner buffet
SEVENTY-SIX	10/20/2004	Check no. 1784 for \$3,916.66 payable to The Ritz Carlton for acct# F7962
SEVENTY-SEVEN	10/25/2004	Check no. 1833 for \$12,500 payable to G.M. for commission
SEVENTY-EIGHT	10/25/2004	Check no. 1847 for \$440,000 payable to Coast to Coast Investments for principal and interest
SEVENTY-NINE	10/26/2004	Check no. 1868 for \$10,000 payable to L.P. for interest
EIGHTY	10/26/2004	Check no. 1869 for \$8,580 payable to L.P. for commission

<u>COUNT</u>	<u>DATE</u>	<u>FINANCIAL TRANSACTION</u>
EIGHTY-ONE	10/28/2004	Check no. 1928 for \$56,173.91 payable to D.R. and M.R. for commission
EIGHTY-TWO	10/29/2004	Check no. 1971 for \$69,846 payable to AZM Investments, Inc. for commission
EIGHTY-THREE	10/29/2004	Check no. 2001 for \$12,500 payable to R.R. for commission
EIGHTY-FOUR	11/01/2004	Check no. 2014 for \$40,000 payable to G.G. for interest
EIGHTY-FIVE	11/01/2004	Check no. 2038 for \$46,530.76 payable to R.N. for commission

A TRUE BILL

Foreperson

THOMAS P. O'BRIEN
United States Attorney

CHRISTINE C. EWELL
Assistant United States Attorney
Chief, Criminal Division

ANTOINE F. RAPHAEL
Assistant United States Attorney
Deputy Chief, Riverside Office

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