

4. For example, sometime during the first half of 2007, BROMSETH solicited F.S. as a potential investor in A&O life settlement products.

5. In addition, BROMSETH told F.S. that he was a Registered Investment Advisor and gave F.S. a business card representing himself as such.

6. In truth and fact, BROMSETH was not a Registered Investment Advisor. At the time BROMSETH gave his business card to F.S., BROMSETH knew that he was not a Registered Investment Advisor.

7. BROMSETH repeatedly told F.S. that an A&O life settlement investment was risk free and a "guaranteed investment." BROMSETH told F.S. that she would receive a minimum compounded annual rate of return of between 10 and 12 percent. In truth and fact, BROMSETH knew that the A&O life settlement investments were neither risk free nor guaranteed.

8. In reliance on these assertions, F.S. invested \$600,000 in A&O through BROMSETH on or about June 19, 2007.

COUNT ONE
(Mail Fraud)

9. The allegations contained in paragraphs 1 through 8 of this Information are realleged and incorporated as though set forth in full herein.

10. From in or about July 2006, through in or about November 2007, in the Eastern District of Virginia, the Defendant, TOMME BROMSETH did knowingly execute and attempt to execute a scheme and artifice to defraud, and to obtain money and property by means of material false and fraudulent pretenses, representations, and promises.

11. For the purpose of executing the scheme and artifice to defraud, and attempting to do so, BROMSETH did knowingly: (a) place and cause to be placed in any post office and authorized depository for mail matter, any matter and thing whatever to be sent and delivered by the Postal Service; (b) deposit and cause to be deposited any matter and thing whatever to be sent and delivered by any private and interstate commercial carrier; and (c) cause to be delivered by mail and private and interstate commercial carrier any matter and thing whatever according to the direction thereon. That is a package containing a Sun Trust Bank cashier's check in the amount of \$600,000 made out to A&O Life Funds, LLC., that F.S. sought to invest in an A&O Capital Appreciation Bond, which BROMSETH deposited with Federal Express on or about June 19, 2007.

(In violation of Title 18, United States Code, Sections 1341 and 2.)

COUNT TWO
(Structuring)

12. On or about April 21, 2009 and April 23, 2009, in the Eastern District of Virginia, Defendant TOMME BROMSETH, knowingly and for the purpose of evading the reporting requirements of section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, did structure and attempt to structure transactions with two domestic financial institutions, to wit: on April 21, 2009, BROMSETH cashed an \$8,656.29 cashier's check at Bank of Virginia, a domestic financial institution, and on April 23, 2009, BROMSETH deposited \$5,469.53 in cash at Virginia Commonwealth Bank, a domestic financial institution, and obtained a cashier's check for the same amount.

(In violation of Title 31, United States Code, Section 5324(a)(3).)

FORFEITURE ALLEGATION

Pursuant to Federal Rule of Criminal Procedure 32.2, the defendant is advised that upon conviction of the offense charged in Count One of this information, he shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the violation charged in Count One. As to Count Two, defendant shall forfeit any property involved in the offense.

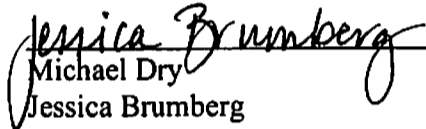
If property subject to forfeiture meets the requirements of 21 U.S.C. § 853(p), the government will seek an order forfeiting substitute assets.

(In accordance with 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) and 31 U.S.C. § 5332(b)(2)).

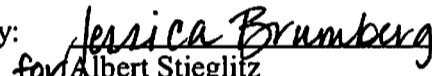
NEIL H. MACBRIDE
UNITED STATES ATTORNEY

DENIS J. MCINERNEY
CHIEF, FRAUD SECTION

By:


Michael Dry
Jessica Brumberg
Assistant United States Attorneys
Eastern District of Virginia

By:


for Albert Stieglitz
Trial Attorney, Fraud Section
Department of Justice

City: Richmond, Virginia
County/Parish _____

Related Case Information:
Criminal Information Docket No. _____
Same Defendant _____ **New Defendant**
Magistrate Judge Case No. _____
Search Warrant Case No. _____
R 20/R 40 from District of _____

Defendant Information:

This case is related to other proceedings in this Court: YES ___ NO If yes, docket No. _____

Defendant Name: **Tomme BROMSETH**

Alias Name: NONE

Counsel for Defendant: Michael HuYoung, Esq., Barnes & Diehl, P.C.

U.S. Attorney Information:

AUSA: Jessica A. Brumberg Bar #: _____

Interpreter: ___ No ___ Yes List language and/or dialect: _____

Location Status:

- Has Not Been Arrested
- ___ Already in Federal Custody
- ___ Already in State Custody ___ Defendant is available for court proceedings in this District
- ___ On Pretrial Release
- ___ Fugitive
- ___ Unknown
- ___ Bond
- Issue Summons

U.S.C. Citations

Total # of Counts: 2 ___ Petty ___ Misdemeanor Felony

Statute	Description of Offense Charged	Count(s)
In violation of Title 18 U.S.C. § 1341	Mail Fraud	<u>1</u>
In violation of Title 31 U.S.C. § 5324	Structuring	<u>2</u>

Date: 09/03/2010 Signature of AUSA Jessica A. Brumberg

District Court Case No. (to be filled in by deputy clerk): _____