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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
v.
CRISPIN TORRES, JR.,
Defendant.

Case No. **20cr2114-LAB**

I N F O R M A T I O N
18 U.S.C. 371 - Conspiracy

The United States Attorney charges, at all times material:

Count 1

18 U.S.C. § 371

CONSPIRACY

1. Beginning no later than 2012, and continuing up to and including 2019, in the Southern District of California and elsewhere, defendant CRISPIN TORRES, JR. knowingly and intentionally conspired with Co-conspirator 1 ("CC-1")(charged elsewhere) to commit securities fraud by misappropriating investor funds, in violation of Title 15, United States Code, Sections 77q and 77x.

PURPOSE OF THE CONSPIRACY

2 2. It was the purpose of the conspiracy to, among other things,
3 (a) use incoming investor funds to make principal and interest payments
4 to investors that CC-1 had recruited, and (b) embezzle investor funds
5 to support shortfalls and hide losses in CC-1's other businesses, and
6 to pay for CC-1's personal expenses.

OVERT ACTS

8 3. In furtherance of this conspiracy, and to carry out its
9 objects, the following overt acts, among others, were committed within
10 the Southern District of California and elsewhere:

11 a. On or about April 25, 2018, CC-1 sent an email
12 instructing Defendant to provide wiring information to an escrow
13 company employee in order to transfer investor funds from an escrow
14 company account to the account of one of CC-1's business entities.

15 b. On or about May 31, 2019, Defendant sent an email to a
16 bank representative attaching a fabricated statement for one of CC-1's
17 brokerage accounts in connection with a line of credit.

18 c. On or about July 2, 2019, Defendant sent an email to
19 CC-1 requesting \$200,000 of investor funds to cover expenses that were
20 related to CC-1's other businesses.

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1 d. On or about July 7, 2019, CC-1 sent an email to Defendant
2 instructing him to wire investor funds to the account of one of CC-1's
3 business entities.

4 All in violation of Title 18, United States Code, Section 371.

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6 DATED: July 22, 2020

ROBERT S. BREWER, JR.
United States Attorney

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9 AARON P. ARNZEN
10 ANDREW J. GALVIN
11 Assistant United States Attorneys
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